



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX

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San Francisco, CA 94105

JAN 15 2015

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Ms. Diane Malone
Environmental Department Manager
Waste Regulatory and Compliance Department
Navajo Nation Environmental Protection Agency
P.O. Box 339
Window Rock, AZ 86515

Subject: No Further Action (NFA) for the Underground Storage Tank Site at the former Riverview Service Station, Montezuma Creek, UT (NAV231)

Dear Ms. Malone:

The United States Environmental Protection Agency ("USEPA"), Region 9 has completed our review of the report – *Removal of Underground Storage Tank Systems, Riverview Service Station, dated November 2007*. The report describes the site closure activities, which included the removal of the underground storage tank (UST) system and the soil sampling and analysis. These activities were undertaken in September 2007 and were funded by the Navajo Nation EPA ("NNEPA") FY2007 LUST grant. The work was performed by iina'ba, Inc. of Farmington, New Mexico.

Based on the findings presented in the Enclosure, USEPA determined that No Further Action (NFA) is needed on this site. NNEPA concurred to EPA's NFA determination in their *FY2014 LUST Agreement 2nd Semi-Annual Report* to EPA dated December 2014. If additional information becomes available in the future regarding hydrocarbon contamination in soil and/or groundwater at this site or the land use change, EPA or the NNEPA may reopen this site and require additional site assessment and/or corrective action.

If you have any questions regarding the information contained in this letter, please contact Rebecca Jamison of my staff at (415) 972-3365 or at jamison.rebecca@epa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "S. Linder".

Steven C. Linder, P.E., Manager
Underground Storage Tanks Program Office
U.S. Environmental Protection Agency – Region IX

Enclosure: Site Summary, Riverview Texaco Station (NAV231), Montezuma Creek, UT

cc: (via email)

Henry Haven, NNEPA

Warren Roan, NNEPA

Pam Maples, NNEPA

Darrell Williams, Aneth Chapter, Northern RBDO

Sharon Pinto, BIA-Navajo Region

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**ENCLOSURE
SITE SUMMARY
RIVERVIEW TEXACO STATION (NAV231)
MONTEZUMA CREEK, UT**

Site Background

The Riverview Service Station was established some time prior to 1980 and was owned by Paul and Diane Kemner. The site originally had two UST's that were installed in 1979 and were removed in September 2002. Two new tanks were installed in January 1999 and were placed about 15 feet from the location of the former tanks. These tanks were then removed in 2007.

2002 UST Removal and Site Assessment

Mr. Henry Haven of NNEPA was on-site in 2002 during the removal of the two USTs. This work was funded by the Kemners, the owner/operator and was done by Certified Technicians, Inc. of Cortes, Colorado. Mr. Haven's field notes indicated that there were holes in the two USTs and petroleum odor from the stockpiled soil. In addition, elevated photoionization detector (PID) readings from the stockpiled soil (49 and 96 parts per million (ppm)) were also documented. Mr. Haven oversaw the collection of soil samples from beneath the USTs and from the stockpiled soil. The EPA and NNEPA did not have the closure report for this UST removal.

2007 UST Removal and Site Assessment

The report for two USTs removed in September 2007 was reviewed by both EPA and NNEPA. During the 2007 removal activity, a petroleum hydrocarbon release to the soil was documented. Soil was excavated around and beneath the USTs and associated piping and dispensers. Soil samples were taken from the bottom of the tanks and at each end of the excavated pits. Hydrocarbon contamination was detected at a depth of 2 feet below ground surface (bgs) beneath the dispensers. The total petroleum hydrocarbons levels detected were below the NNEPA screening levels of 500 ppm.

Groundwater was encountered at 12 feet bgs. Approximately 3,360 gallons of water was pumped out of the excavation and removed for disposal. Four grab groundwater samples were collected from the excavation and analyzed. The analytical results showed detection of benzene at 26 ppb in one groundwater sample which is above the EPA drinking water Maximum Contaminant level (MCL) and NNEPA draft cleanup standards of 5 parts per billion (ppb).

The excavated soil was returned to the excavation and an additional 220 cubic yards of imported clean fill was used to completely backfill the excavation.

Receptors and Exposure Pathways

The NNEPA recommended that this site be closed without additional action in 2011. EPA reviewed the report findings with Mr. Henry Haven of the NNEPA LUST program and discussed the need for further action. The benzene level in one groundwater sample was above the EPA MCL and NNEPA standards

and there is one public supply well within ¼ mile of the site. A drinking water well is within 300 feet of the station that supplies drinking water to the trailer park.

USEPA and NNEPA did a site reconnaissance in June 2013 to locate the public supply well within ¼ mile of the site and the drinking water well in the trailer park. The trailer park has been removed and the well has been demolished. The site is currently a vacant lot. We located the public well north of the site, by the river, where people haul water. Upon closer examination, the well was found to be more than ½ mile from the site and labeled “Do not drink the water not for human consumption.” The well is also located upgradient of the site. Given the site’s distance and location relative to the public water supply well mentioned above, the residual hydrocarbon contamination in groundwater at the Site should pose no threat to this well.