



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

December 13, 2018

VIA EMAIL

Dixie Cayaditto
c/o Katrena Cayaditto (kditto313@gmail.com)
Cuba, NM 87013

Subject: No Further Action
Former Kenneth Cayaditto Trading Post
Torreon, NM
(EPA ID#:NAV292)

Dear Ms. Cayaditto:

The United States Environmental Protection Agency (EPA), Region 9 has completed our review of the reports related to the former Kenneth Cayaditto Trading Post leaking underground storage tank (LUST) cleanup site (Site). EPA has determined, with concurrence from the Navajo Nation Environmental Protection Agency (NNEPA), that no further action (NFA) is necessary for the Site based on the findings from the site assessment and remediation activity conducted on September 8 and 9, 2014 and again on November 20, 2018. The work was funded by the federal LUST Trust Fund. A summary of the site assessment reports is provided in Enclosure B. The NFA determination is based on the following:

- No residual soil contamination above federal or tribal standards was identified in the November 2018 soil samples; and
- There are no groundwater wells on the Site nor was groundwater was encountered during the site investigation activities in 2014 or 2018; groundwater is estimated to be 50 bgs.

Based on the information cited above, EPA has determined that No Further Action is necessary at this time. However, if additional information becomes available in the future regarding hydrocarbon contamination in soil and/or groundwater at the Site, EPA may determine that additional site assessment and/or corrective action is warranted.

If you have any questions regarding the information contained in this letter, please contact Pam Maples of the NNEPA at 928-971-7764, Rebecca Jamison of my staff at (415) 972-3365, or you can contact me directly at (415)-972-3369.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven C. Linder".

Steven C. Linder, P.E., Manager
Underground Storage Tanks Program

Enclosures

cc:

Bart Stevens/G. Padilla, BIA-Navajo Region
Navajo RBDO
D. Malone/P. Maples, NNEPA
Dana Bahar - NMED bahar@state.nm.us

Enclosure A

**FORMER KENNETH CAYADITTO SERVICE STATION
(EPA ID # NAV292)
TORREON, NM**

The former Kenneth Cayaditto Trading Post is located on Highway 197 outside Cuba, New Mexico.
Latitude: 35.785426, Longitude: -107.240078



Background

The former Kenneth Cayaditto Trading Post (Site) is located on the southeast side of Hwy 197 in Torreon, New Mexico, 22 miles south of Cuba. It was used by the Torreon Co-Op in 1975. In 1986, Kenneth Cayaditto submitted a UST Notification to the State of New Mexico listing two USTs with sizes of 3,000 and 7,000 gallons for gasoline storage. The USTs were reported as 10 years old which put their year of installation in 1976. In 1990, Mr. Cayaditto submitted a UST notification to US EPA listing the two USTs as currently in use, with a start year of 1983. Other file information indicated that they operated as a Conoco gas station in 1987. The Co-Op closed in 1996 when Mr. Kenneth Cayaditto passed.

In 2000, EPA's UST Circuit Rider did a site reconnaissance and found evidence of the former UST system including the dispensers and concluded that the USTs may still be in the ground.

2008 Geophysical Investigation

The NNEPA contracted with iiná bá in 2008 to conduct a geophysical survey to confirm the USTs at the site. Sunbelt Geophysics of Albuquerque, NM conducted the field work on August 22, 2008. A strong electromagnetic feature indicative of two USTs placed end to end, the size of 2,500 gallons and 3,000 gallons, was detected west of the dispensers. Filler ports were found above each UST. Product lines were found running to the east towards two vent pipes on the northern side of the building. The results of the survey can be found in the report- *Geophysical Investigation, Former Kenneth Cayaditto Service Station, Torreon, New Mexico dated October 2008, iiná bá*

2014 UST Removal and Site Assessment

EPA through an interagency agreement with the U.S. Army Corp of Engineers (USACE) contracted with Souder Miller Associates (SMA) to remove the USTs at the Site and perform site closure assessment. SMA performed UST site closure on September 8 and 9, 2014. Pam Maples of NNEPA and Tess Salire of USACE were on-site to observe and oversee the work. Two USTs with sizes of 3,000 and 8,000 gallons were excavated and found to be in corroded condition with several holes. Petroleum hydrocarbon release to the soil beneath the dispensers and the USTs were documented in the field by the PID readings.

Soil samples were taken from the bottom of the tanks and underneath the dispenser island and piping and analyzed for VOCs, SVOCs and total lead. Hydrocarbon contamination was detected in all soil samples with the highest level at the sample taken below the southern dispenser (for the 8K-gallon UST). None of the constituents detected exceeded the EPA Regional Screening Levels but naphthalene exceeded the NNEPA cleanup goals level of 0.02 ppm in all soil samples. Total lead was detected at levels below the EPA RSL. However, the soil sample taken from beneath the southern dispenser had a total lead of 130 ppm which is above the NNEPA action level of 53 ppm.

The associated piping, vent pipes and dispenser island were also removed. Groundwater was not encountered in the excavation. The excavation went down to approximately 16' below ground surface (bgs). Groundwater is estimated to be 40 feet bgs.

The results of the UST site closure can be found in the report- *Underground Storage Tank Site Assessment Summary Report, Kenneth Cayaditto Service Station (NAV#292), Torreon, Navajo Nation, New Mexico, dated December 2014, Souder, Miller and Associates.*

2018 Soil Boring

USACE in 2018 hired *iiná bá* to evaluate remnant soil contamination between the USTs and the former dispenser island. Initially NNEPA and EPA planned to excavate 100 cubic yards of soil in the area and sample below the excavation, however, the site was in use as a garden by the residents. Working with the residents, it was determined that EPA and NNEPA should validate the presence or absence of grossly-impacted soil through soil test boring advancement.

Two (2) borings (SB-1 and SB-2) were taken at the subject site using a Geoprobe® track-mounted Model 7720DT direct-push rig. Soil samples were continuously collected from the soil borings at five-foot intervals. Lab samples were collected from available samples retrieved during each 5-foot interval recovered (from 3.0 to 5.0 feet at SB-1) and from 5.0 to 10.0 feet at SB-2). Due to the extremely dense soils encountered, refusal of the direct-push sampler resulted. Lab analysis of the samples found:

- The concentrations of all petroleum-related compounds analyzed for were below their respective laboratory method detection limits (MDL);
- The presence of tetraethyl lead (TEL) was not reported in any of the samples submitted at concentrations above the MDL; and,
- Total Lead concentrations in soil ranged from 8.5 milligram per kilogram (mg/Kg) to 11 mg/Kg

The total lead samples were found to be within the naturally occurring range.

Current Status

The site is currently utilized as a multi-family residential area which includes a trailer home for a senior citizen and a concrete building where a family with a four-year-old boy resides.

The depth of soil contamination precludes direct exposure and dermal contact to the current residents. The remaining contamination was delineated and re-tested in 2018. The results demonstrate that the Site does not pose a threat to groundwater. There are no private wells at the site. Water to the residents at this site is supplied by NTUA. Based on the EPA RSLs and NNEPA's 2012 Cleanup Standards, the site does not pose a risk to the current residents.