



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 9

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San Francisco, CA 94105-3901

January 9, 2015

Certified Mail
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Ms. Diane Malone
Environmental Department Director
Waste Regulatory and Compliance Department
Navajo Nation Environmental Protection Agency
P.O. Box 339
Window Rock, Arizona 86515

Subject: No Further Action
Former Shonto Trading Post Leaking Underground Storage Tank Site
Shonto, Arizona
(EPA SITE ID: NAV316)

Dear Ms. Malone:

The U.S. Environmental Protection Agency (EPA) has completed its review of file documents pertaining to the former Shonto Trading Post leaking underground storage tank cleanup site. A summary of our review is found in Enclosure A.

EPA has determined that No Further Action (NFA) is needed for the Site at this time based on the residual contaminant concentrations at the Site, the ongoing UST operations, and no current or anticipated planned future usage of the groundwater beneath the Site. However, this no further action acknowledges that low levels of residual contamination remain at the Site. NNEPA concurred to EPA's NFA determination in their *FY2014 LUST Agreement 2nd Semi-Annual Report* to EPA dated December 2014.

If information becomes available in the future regarding hydrocarbon concentrations in soil and/or groundwater at the Site, or the planned use of the site changes, EPA may reopen the Site and require additional site assessment and/or corrective action.

If you have any questions regarding the information contained in this letter, please feel free to contact me at 415-972-3369 or at linder.steven@epa.gov.

Sincerely,



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

Attachment: Enclosure A

cc: (via email)
Henry Haven, NNEPA
Pam Maples, NNEPA
Warren Roan, NNEPA
Tincer Nez, Sr., Tuba City Chapter, Western RBDO
Sharon Pinto, BIA Navajo Region

ENCLOSURE A
SUMMARY
Former Shonto Service Station Leaking UST Cleanup Site
Shonto, Arizona
(EPA ID# NAV316)

Site Background

The Shonto Trading Post was established in 1915 on land administered by the Bureau of Indian Affairs. The self-service store and gas service station was built in 1958. Roger Drolet, former manager for the Shonto Trading Post submitted an EPA UST Notification Form in April 1986 for four bare steel USTs for gasoline storage. The USTs had capacities of 10,000; 2,000; 1,000; and 500 gallons. The three smaller USTs were installed between 1950 and 1970 and the 10K-gallon UST was installed in 1974. In August 1992, the four USTs failed the tank tightness tests and soil sampling and analysis confirmed the leakage in March 1993. In June 1993, Mr. Drolet sent another UST Notification form amending the 4th UST to be a 1K-gallon tank for diesel storage. The USTs were removed by Rocky Mountain Petroleum (RMP) of Gallup, NM in April 1995. A new 12,000-gallon UST was installed on the former UST location in May 1995 and is currently being used.

Site Characterization

1995 UST removal

EPA reviewed the report- *New Tank Installation and Tank Removal Report* dated May 1, 1995 by RMP and the *UST Removal Field Report* by Norma Cady of the NNEPA dated April 11, 1995. The four USTs that were removed were reportedly in excellent shape. However, the tank excavation for the smaller USTs was observed to be contaminated with petroleum hydrocarbons. The tank excavation for the 10,000-gallon UST did not show evidence of petroleum contamination. Groundwater was encountered in both excavations. However, there was no groundwater sampling conducted at that time.

RMP collected soil samples at the north, south and west sides of the tank excavations at two feet below the bottom. The samples were analyzed for Total Petroleum Hydrocarbons (TPH) which showed maximum level at 2,200 ppm level from the soil sample taken at the west side of the smaller tank excavation. TPH levels above 500 ppm were also found in the north and south ends of the smaller tanks excavation and at the west side of the 10K-gallon tank excavation. The excavated soil was returned to the excavation and backfilled with clean fill. Further excavation to determine the extent of hydrocarbon contamination was not done.

2011 Soil Borings and Groundwater Sampling

EPA reviewed the report- *Soil Test Boring Installation and Monitoring Well Sampling Report, Historic Shonto Trading Post*, dated September 30, 2011 by iina'ba. Six soil borings were advanced on October 18, 2011 and three borings were converted to monitoring wells which were sampled in November 2, 2011. The soil boring (SB-6) southeast of the dispenser area and the smaller tanks pit showed the highest level of TPH (@ 1,900 ppm). Benzene, toluene, ethylbenzene and xylenes (BTEX) levels at SB-6 exceeded the NNEPA action levels and the EPA regional screening level (RSL) for ethylbenzene and naphthalene. SB-2 which was located southeast of the bigger tank pit showed elevated levels of TPH, ethylbenzene and naphthalene. These soil samples were taken from 10-12 feet bgs. Soil samples taken at 25-27 feet bgs did not show any detectable levels of COCs.

The three monitoring wells were installed upgradient (MW-1), south (MW-2) and southwest (MW-3) of the tank pits. The wells were screened at 15.5 -25 feet bgs, which is below the water table (@12 feet bgs), and results showed ND's for all analytes except for TPH-diesel range organics (DRO) in MW-1 (1 ppm) and MW-2 (0.14 ppm).

Potential receptors and hydrocarbon exposures

The hydrocarbon concentrations in soil that were obtained from the 1995 and 2011 sampling events at the site were found at approximately 10-12 feet bgs, which was expected since water table was approximately at 12 feet bgs. Soil contamination did not extend beyond 25 feet bgs. Based on the depth of the residual hydrocarbon contamination, the likelihood of individuals at the Site being exposed to the residual hydrocarbon contamination through ingestion, inhalation or dermal contact is low. EPA believes these potential exposure pathways are not complete.

The Navajo Tribal Utility Authority (NTUA) indicated that the Shonto public supply wells are located more than one mile from the trading post (iina'ba, 2011). Given the distance to the Tribal water supply wells, the residual hydrocarbon contamination in soil at the Site should pose no threat to these wells.