



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
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San Francisco, CA 94105

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May 27, 2015

Mr. John McCulloch
Teec Nos Pos Trading Post
P.O. Box 940
Teec Nos Pos, AZ 86514

Subject: No Further Action: Former Underground Storage Tank Site
Teec Nos Pos Trading Post
Teec Nos Pos, Arizona
EPA ID# NAV338

Dear Mr. McCulloch:

The United States Environmental Protection Agency (US EPA), Region 9 has completed our review of the files for the former underground storage tanks (USTs) located at the Teec Nos Pos Trading Post. The two USTs were installed in 1988 and were removed on September 20, 2005. EPA reviewed the October 4, 2005 Hall Environmental Analysis laboratory report analysis of soil samples taken underneath the gasoline dispenser. The original UST removal report was not available for review.

EPA also reviewed the follow-up assessment, *Teec Nos Pos Trading Post Soil Sampling Report (January 2006)*, *Teec Nos Pos, Arizona*, by iina'ba of Farmington, New Mexico. The site assessments were funded by John McCulloch, owner/operator of the Teec Nos Pos Trading Post. Site background and the site assessments are summarized in the Attachment.

Based on the findings from the 2005 and 2006 site assessments, EPA believes that additional site investigation and/or cleanup at this site is not warranted. EPA determines that this site can be closed with no further action (NFA).

My staff reviewed the report findings with the Navajo Nation EPA (NNEPA) UST program and they concurred with this recommendation. However, if additional information becomes available in the future regarding hydrocarbon contamination in soil

and/or groundwater at this site, 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 Tess Salire of my staff at (415) 972-3376.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Linder', with a long horizontal flourish extending to the right.

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

Attachment: Site Summary

Electronic copy:

cc: Diane Malone, Departmental Manager, NNEPA
Henry Haven/Pam Maples, NNEPA
Warren Roan, NNEPA
Sharon Pinto, Director, BIA-Navajo Region
Randolph Sells, Program Manager, Shiprock RBDO

**ATTACHMENT
SITE SUMMARY
TEEC NOS POS TRADING POST
TEEC NOS POS, ARIZONA
EPA ID#: NAV338**

Site Background

The site is located north of Highway 64 and east of Highway 160 at Teec Nos Pos, Arizona. The trading post is currently owned by John McCulloch and previously owned by Russell Foutz. In 1990, Mr. Foutz submitted a tank notification to US EPA for two 8,000-gallon, gasoline USTs installed in 1988. In 1997, Mr. McCulloch submitted a tank notification to Navajo Nation Environmental Protection Agency (NNEPA) for gasoline and diesel in the two USTs. US EPA received a copy of the Notification form in July 2002. In 2006, another notification was submitted by Mr. McCulloch for permanent closure of two USTs and installation of one-22,000-gallon tank. D&H installed the double-walled, manifold fiberglass tank which was manifold to one 12,000-gallon and two 5,000 gallon compartments.

Site Assessment

D&H removed two 8,000-gallon USTs on September 20, 2005. Soil sampling was conducted below the USTs at 12' and 15' bgs and below the product lines and dispensers at 5' bgs. Petroleum contamination was detected below the gasoline dispenser at levels above the NNEPA standards for gas range organics (GRO). There was no UST removal report submitted to EPA or NNEPA to provide more details for review.

iina'ba returned to the site in January 2006 and collected two soil samples from the dispenser pit at a depth of approximately 18 feet below ground surface (bgs). Xylene was detected slightly above the NNEPA levels in one sample collected at the east end of the former dispenser. All other petroleum constituents were detected at levels below the NNEPA cleanup standard and the EPA RSL.

Groundwater, which was estimated to be at 60 feet bgs, was not encountered during these investigations. The shallow, localized soil contamination detected during the UST removal in 2005 is not expected to impact groundwater and the one drinking water well on-site.