UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105
Underground Storage Tanks Program Office
(LND-4-3)

CERTIFIED MAIL 7011 0470 0002 9198 2009
RETURN RECEIPT REQUESTED

March 24, 2017

Robert Johnson
710 E 20th Street
Farmington, NM

Subject: No Further Action
Old Yellowhorse Trading Post Underground Storage Tank Cleanup Site
Lupton, Arizona (EPA ID No. NAV351)

Dear Mr. Johnson:

The U.S. Environmental Protection Agency ("EPA") is sending this letter to inform you of our determination regarding the status of the former Yellowhorse Trading Post underground storage tank ("UST") cleanup site ("Site"), located in Lupton, Arizona, on land of the Navajo Nation. EPA has determined, in concert with the Navajo Nation Environmental Protection Office ("NNEPA"), that no further action ("NFA") is warranted for the Site, at this time, based on the findings of the site assessment activity conducted in July 2016. Specifically, this NFA determination is based on the following:

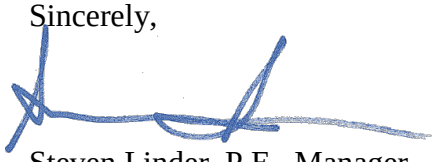
- NNEPA's contractor excavated 110 cubic yards of petroleum contaminated soil to 16 feet below ground surface ("bgs")
- Laboratory analysis reported all contaminants of concern except benzene were below the NNEPA Soil Cleanup Standards ("SCSs").
- The benzene samples slightly above NNEPA's SCSs were isolated to one area and unlikely to migrate due to the hydrological and geologic setting.
- No groundwater was encountered in the excavation.
- There are no nearby drinking water wells or surface water areas.

Conclusion

EPA recommends No Further Action 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,



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

Cc (via email, all w/enclosures):

Enclosures: A. Site Chronology and Investigation
B. Sampling Results
C. Site Layout

ENCLOSURE A

OLD YELLOWHORSE TRADING POST
UNDERGROUND STORAGE TANK CLEANUP SITE
LUPTON, ARIZONA
(EPA ID NO. NAV351)

GPS Coordinates: 35.31583, -109.093836

Site Background and Former UST Operations

The Site is located in located in the town of Lupton, Arizona, 163 miles east of Flagstaff, Arizona. The site is adjacent to Interstate-40's Frontage Road, approximately 4.25 west of the New Mexico, Arizona border. The location is rural strip of abandoned tribal themed retail businesses, with an active nearby truck stop and transmix facility.

The Site began operating in the 1920s. In the 1970s, John Yellowhorse took over operating the site including installation of three USTs for the sale of gasoline. The site burned down and was not rebuilt. A 2011 site assessment located and removed three (3) underground storage tanks ("USTs"). Minor corrosion of the USTs was observed. Groundwater was not encountered during the UST removal activity.

Site Assessment and Remediation Work from 2014 to 2016

In September 2014, Souder, Miller & Associates (SMA) collected soil samples 10-50 feet below ground surface ("bgs"). The sample results indicated soil contamination exceeding NNEPA Soil Cleanup Standards ("SCS") in five of seven borings and EPA's Regional Screening Levels for residential soil in one of the samples. The report estimated that 111 cubic yards of petroleum contaminated soil ("PCS") remained. Groundwater was estimated to be approximately 100' below ground surface.

On July 26 and 27, 2016, NNEPA oversaw the excavation of 100-110 yd^3 of petroleum contaminated soil. Seven discrete soil samples from the walls and base of the excavation and three composite soil samples were collected and analyzed. Benzene samples exceeded the NNEPA SCS action levels on the south wall, east wall, west wall and base of the excavation. Based on the clayey soil type, which does not encourage infiltration or contamination migration, and the fact that there is no impact to groundwater, EPA and NNEPA conclude that there is limited impact from the site due to the distance between the site and the nearest water well (over five miles to the southwest) and surface water body (over three miles) (See Enclosures C).

The excavation was backfilled with overburden and clean soil; the PCS was transported to a landfarm in Bloomfield. NM.

ENCLOSURE B

OLD YELLOWHORSE TRADING POST
UNDERGROUND STORAGE TANK CLEANUP SITE
LUPTON, ARIZONA
SAMPLING RESULTS

Table 2. Analytical Results
Old Yellowhorse Trading Post (NAV #351)
July 26, 2016

Sample ID	Date	Time	Sample Location	Sample Depth (feet bgs)	GRO Method 8015 (mg/kg)	DRO Method 8015 (mg/kg)	MRO Method 8015 (mg/kg)	Benzene Method 8260 (mg/kg)	Toluene Method 8260 (mg/kg)	Ethylbenzene Method 8260 (mg/kg)	Total Xylenes Method 8260 (mg/kg)	MTBE Method 8260 (mg/kg)	1,2-Dichloroethane (EDC) Method 8260 (mg/kg)	1,2-Dibromoethane (EDB) Method 8260 (mg/kg)	Total Naphthalene Method 8260 (mg/kg)	Total Lead Method 6010 (mg/kg)
NNEPA SCS (mg/kg)					500	500	500	0.002	0.6	0.7	7	0.0006	0.001	0	0.02	54
U.S. EPA RSLs: Residential Soil (mg/kg)					NE	NE	NE	1.2	490	5.8	58	47	0.46	0.036	3.8	400
S-4	7/26/2016	15:00	Base (SE corner)	16	72	<9.5	<47	0.044	<0.048	0.079	<0.096	<0.048	<0.048	<0.048	<0.019	7.0
S-5	7/26/2016	15:05	South Wall	16	<4.7	<9.2	<46	0.050	<0.047	<0.047	<0.094	<0.047	<0.047	<0.047	<0.019	6.4
S-6	7/26/2016	15:10	Base (center)	16	<4.8	<9.2	<46	0.027	<0.048	<0.048	<0.096	<0.048	<0.048	<0.048	<0.019	7.1
S-7	7/26/2016	15:15	West Wall	16	<4.6	<9.7	<48	0.097	<0.046	<0.046	<0.092	<0.046	<0.046	<0.046	<0.018	5.1
S-8	7/26/2016	15:20	Base (center)	18	<5.0	<9.2	<46	<0.025	<0.050	<0.050	<0.099	<0.050	<0.050	<0.050	<0.020	7.5
S-9	7/26/2016	15:25	East Wall	18	<4.8	<9.3	<47	0.029	<0.048	<0.048	<0.096	<0.048	<0.048	<0.048	<0.019	9.3
S-10	7/26/2016	15:30	North Wall	18	<4.8	<9.5	<48	<0.024	<0.048	<0.048	<0.095	<0.048	<0.048	<0.048	<0.019	7.8
SC-1	7/26/2016	14:52	PCS Stockpile	13 - 18	8.5	12	<48	<0.024	<0.048	<0.048	<0.096	<0.048	<0.048	<0.048	<0.019	6.4
SC-2	7/26/2016	15:50	PCS Stockpile	13 - 18	12	20	<50	<0.025	<0.050	0.10	<0.099	<0.050	<0.050	<0.050	0.45	5.7
SC-3	7/26/2016	15:55	PCS Stockpile	13 - 18	11	13	<49	<0.025	<0.050	<0.050	<0.10	<0.050	<0.050	<0.050	<0.20	5.0

NNEPA SCS: Navajo Nation Environmental Protection Agency Soil Cleanup Standards
U.S. EPA RSLs: U.S. Environmental Protection Agency Regional Screening Levels for residential soil.
NE: Not Established
Red: Above one or more action levels.

ENCLOSURE C

OLD YELLOWHORSE TRADING POST
UNDERGROUND STORAGE TANK CLEANUP SITE
LUPTON, ARIZONA
(EPA ID NO. NAV351)

THE NAVAJO NATION

RUSSELL BEGAYE PRESIDENT
JONATHAN NEZ VICE PRESIDENT

ENVIRONMENTAL PROTECTION AGENCY
WASTE REGULATORY COMPLIANCE DEPARTMENT
P.O. BOX 3089, WINDOW ROCK, NAVAJO NATION, AZ 86515
TEL (928) 871-7993 ~ FAX: (928)871-7783

March 20, 2017

Ms. Rebecca Jamison
Tribal Program Supervisor
United States EPA Region IX
75 Hawthorne Street, 10th floor
San Francisco, CA 94105

Ref: Concurrence, NFA Former Yellowhorse Trading Post, Lupton, Az; NAV351

Dear Rebecca,

The former Yellowhorse Trading Post began operations in the 1920's. In the 1970's. Mr. John Yellowhorse took over operations of the trading post, which included installation of three USTs for the sale of gasoline. The site burned down while under Mr. Yellowhorse's operation and was not re-built. During the 2011 site assessment, three USTs were removed: two 1,000-gallon capacity tanks (USTs No. 01 and 03), and one 3,000-gallon capacity tank (UST No. 02). USTs Minor oxidation and surface corrosion was observed on all USTs, with significant holes noted at the northern end of UST No. 02. Soil samples at the bottom of the removal excavation supported the conclusion that contamination existed in the northern vicinity of UST No. 02.

In September 2014, Souder, Miller & Associates conducted a site assessment of the Yellowhorse Trading Post, which included collecting subsurface soil samples from soil borings to determine the aerial and lateral extent of contamination. Seven soil borings were drilled, ranging from 10 feet to 50 feet bgs. Laboratory results indicated contamination concentrations exceeded NNEPA Soil Cleanup Standards in five of the seven soil borings and the recommendation was to remove approximately 111 cubic yards of contaminated soil.

On Tuesday, July 26, 2016 Tiis Ya Toh, Inc. excavated an area 31.5 feet by 17.5 feet and removed 110 cubic yards of petroleum contaminated soil to 16 feet bgs. The soil was hauled to a special waste landfill and replaced with certified clean fill. Confirmatory samples were taken at the bottom and in each side of the four walls of the excavation.

Laboratory analysis reported all contaminants of concern in all samples were below NNEPA Cleanup Standards with the exception of benzene. Benzene ranged from <0.024 ppm to 0.097 ppm at 16 feet bgs. The NNEPA Cleanup Standard for benzene is 0.002 with an estimated accurate laboratory detection limit of 0.5.

No groundwater was encountered in either the excavation for tank removal or any of the 2014 soil borings, the deepest of which went to 45 feet bgs and was non-detect for every of the

samples of the five-foot sampling interval. NNEPA concurs with the issuance by USEPA of a No Further Action letter for NAV351; The Former Yellowhorse Trading Post in Lupton, Az.

Thank you very much. If you have any questions, please call Pam Maples at 928-871-7764.

Sincerely,

Diane Malone, Environmental Department Manager,
Navajo Nation Environmental Protection Agency

C: Pam Maples, Environmental Specialist, NNEPA, LST Program
Warren Roan, Environmental Specialist, NNEPA, ST Program
Steven Linder, P.E., Manager, Region IX UST Program
NNEPA Files