UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 9

75 Hawthorne Street
San Francisco, CA 94105-3901

In reply, refer to: WST-8

February 29, 2012

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 at the Former Wildcat Springs Trading Post Underground Storage Tank (UST) Site (NAV-358) in Black Hat, New Mexico**

Dear Ms. Malone:

The United States Environmental Protection Agency (USEPA) Region 9, Underground Storage Tank Program Office (USTPO) has completed our review of the September 2011 report "***Underground Storage Tank Site Assessment Report, Former Wildcat Springs Trading Post (NAV #358) Black Hat, New Mexico***" prepared by iina'ba. The report described the activities undertaken on September 26, 2011, at the Wildcat Springs Trading Post. The work was managed by the Navajo Nation Environmental Protection Agency (NNEPA) and was funded with the NNEPA's FY 2011 LUST Grant.

Site Background

The subject site is located approximately 7.5 miles west of Yah-ta-hey, New Mexico on the northern side of Highway 264 near the intersection with County Road 1. The area is covered by windblown (eolian) deposits (sand & clay) and is vegetated with greasewood, snakeweed, pinon, Russian thistle, and other native grasses. The site was a former trading post and residence that was built in 1945 by Gib Graham and operated as a trading post until burning down in about 1951. The structure was said to be demolished in 1961 when Highway 264 was paved. According to a document obtained from the Office of Archaeological Studies from the Museum of New Mexico entitled "Investigations at Wildcat Springs Trading Post, McKinley County New Mexico" (1992), the former trading post had a shed approximately 10 feet by 10 feet in size that was used to house a gasoline-powered generator.

According the Navajo Nation Department of Water Resources, Water Management Branch (WMB), there is one water well registered in the vicinity of the site. The well is recorded as an active well owned by El Paso Natural Gas and is approximately 500 feet deep and 2,755 feet northeast of the site.

Site Assessment

On July 11, 2011 iina' ba was awarded the contract by NNEPA to conduct a site assessment at the Former Wildcat Trading Post located in Black Hat, New Mexico. During an earlier geophysical investigation performed by the NNEPA LUST Program in 2007, concerns were raised regarding the existence of an out of service UST system at the site. NNEPA determined that the UST was to be permanently closed by removal. As summarized in the report on September 26, 2011, iina' ba conducted field activities at the site which included properly removing and disposing of the 55-gallon tank, removing residual product/water from within the tank, collecting soil samples, and backfilling the excavation area.

Field observations indicated no residual liquids or sludge within the UST. Significant oxidation and failure were observed with significant holes noted at both ends of the UST. The soil screening photoionization detector (PID) measured 0.5 ppm volatile hydrocarbons in the native soil samples screened from the UST excavation. In addition, no staining or free-phase product was observed underneath the USTs and with the associated debris and piping. Confirmatory soil samples were taken from the former UST location. Results from the soil samples were non-detect for petroleum hydrocarbons and/or volatile organic compounds (ethylbenzene, total xylenes, methyl tertiary-butyl ether (MTBE)), with the exception of TPH-DRO at 38 mg/kg (well below the NNEPA Soil Cleanup Standard of 500 mg/kg). The slightly elevated lead concentrations in the soil (12.2 mg/kg) samples may allude to the fact that leaded gasoline may have dispensed or lead may be naturally occurring in the local geology. The detected lead levels are well below the NNEPA action level of 400 mg/kg for lead in soil.

Groundwater was not encountered during this investigation. The excavated soil and clean fill from the area was used to completely backfill the excavation. The UST and associated piping and debris were removed from the site and disposed at an approved facility.

Conclusion

Based on the findings presented in the report and a meeting held during the week of February 13, 2012, Henry Haven of NNEPA and EPA Region 9 agreed that no further action (NFA) was required at the site. If additional information becomes available in the future regarding hydrocarbon contamination in soil and/or groundwater at this site resulting from a release from a petroleum UST system, 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 S. Bobby Ojha of my staff at (415) 972-3374 or you can contact me directly at (415)-972-3355.

Sincerely,

Carl Warren, Supervisor
Tribal Leaking UST Program

cc: Henry Haven, NNEPA
Warren Roan, NNEPA
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