



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 9

75 Hawthorne Street
San Francisco, CA 94105-3901



In reply, refer to: WST-8

January 10, 2011

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 Required at Former Little Indian Trading Post
Underground Storage Tank (UST) Site (NAV-391) in Sanders, AZ**

Dear Ms. Malone:

The United States Environmental Protection Agency (USEPA) Region 9, Underground Storage Tank Program Office (USTPO) has completed our review of the November 2010 report "*Underground Storage Tank Closure Report Former Little Indian Trading Post (NAV #391) Sanders, AZ*" prepared by iina'ba. The report described the activities undertaken on September 13, 2010, at Little Indian Trading Post in Sanders, AZ. The work was managed by the Navajo Nation Environmental Protection Agency (NNEPA) and was funded with the NNEPA's FY 2010 LUST Grant.

Site Background

According to Mr. Leslie Joe, a current resident at the site, the Little Indian Trading Post was established in 1960 by Gilbert and Robert Ortega. Commercial use of the property which included store and fueling operations ran from 1969 to 1976. The Navajo Arts and Craft Enterprise (NACE) ran a curio store and fueling operation at the site from 1974 to 1976. The NACE lease expired in 1985. Around the late 1970's to early 1980's the Gilberts combined the trading post, located on the south side of Interstate 40 with the Indian City Trading Post located on the north side of Interstate 40. There has been no commercial operation in this site since 1976 and no lease since 1985.

The land is owned by the heirs of Sam Joe Francis as an allotment property. The features located at the site include a concrete slab (former trading post), an in-use house with sidewalk, UST fill ports and dispenser islands.

Based on a geophysical survey performed in July 2009, the site was believed to have two (2) side-by-side USTs, near the western corner of the old trading post foundation. During April 2009, NNEPA raised concerns regarding the potentially leaking out-of-service UST system at the site and determined that the USTs were to be permanently closed by removal and field work would be addressed under the FY10 NNEPA Corrective Action work plan.

Site Assessment

On July 1, 2010 iina' ba was awarded the contract to remove two USTs at the former *Little Indian Trading Post* in Sanders, Arizona. On September 13, 2010, iina' ba conducted field activities at the site which included removal of residual product/water from within each tank, properly removing and disposing of the two 3,000-gallon USTs, collecting soil samples, and backfilling the excavation area.

Field observations indicated minor surface corrosion and oxidation for each UST. The soil screening photoionization detector (PID) did not measure any volatile hydrocarbons above background of 0.4 parts per million (ppm). 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 a slight detection of 11.0 mg/Kg of TPH GRO/DRO beneath a soil sample from the eastern end of Tank No. 1. The slightly elevated lead concentrations in the soil samples beneath the UST system may allude to the fact that leaded gasoline may have been dispensed or lead may naturally be occurring in the local geology.

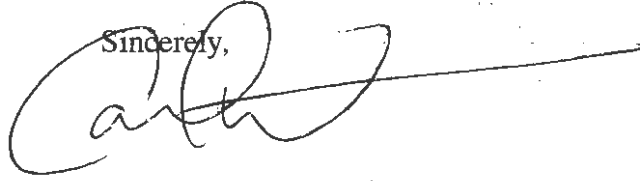
Groundwater was not encountered during this investigation. The excavated soil and clean fill from the area was used to completely backfill the excavation. The USTs and associated piping and debris were removed from the site and disposed at an approved facility.

Conclusion

Based on the findings presented in the report and a meeting held in December 2010, 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,

A handwritten signature in black ink, appearing to read 'Carl Warren', with a long horizontal line extending to the right.

Carl Warren, Supervisor
Tribal Leaking UST Program

cc: Henry Haven, NNEPA
Warren Roan, NNEPA
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