UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 9

75 Hawthorne Street
San Francisco, CA 94105-3901

In reply, refer to: WST-8

February 28, 2012

Ms. Diane Malone
Environmental Department Manager
Waste Regulatory and Compliance Department
Navajo Nation Environmental Protection Agency
P.O. Box 3089
Building No. W008-090 Window Rock Blvd
Window Rock, AZ 86515

Subject: **No Further Action at the Former Shiprock Motors Underground Storage Tank (UST) Site (NAV-430) in Shiprock, 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 30, 2011 report "***Underground Storage Tank Site Assessment Report, Former Shiprock Motors (NAV #430) Shiprock, New Mexico***" prepared by iina'ba. The report described the activities undertaken on September 28, 2011, at the Former Shiprock Motors site. 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 0.70 miles east from the intersection with New Mexico State Highway 491 on the south side of U.S. Highway 64. The site is relatively flat, with a slight apparent slope to the north and is situated approximately 4,954 feet above mean sea level. The site is currently improved with a single-story structure that is being used as a thrift store by the Shiprock United Methodist Church.

According the Navajo Nation Department of Water Resources, Water Management Branch (WMB), there are three water wells registered in the vicinity of the site. One well is 4,950 feet west of the site while another well is 3,250 feet northwest of the site. The third well is listed as the "Shiprock Artesian Well #2" and is approximately 1,750 feet north-northwest of the site.

Site Assessment

On July 1, 2011 iina' ba was awarded the contract by NNEPA to remove the two (2) USTs described in the 2007 geophysical survey conducted at the Former Shiprock Motors site in Shiprock, New Mexico. As summarized in the report on September 30, 2011, iina' ba conducted field activities at the site which included removal of residual product/water from within the tanks, properly removing and disposing of the tanks, collecting soil samples, and backfilling the excavation area.

Field observations indicated no residual liquids or sludge within the two USTs. Oxidation and surface corrosion were observed on both USTs; with significant holes noted at the adjoining ends of each. The soil screening photoionization detector (PID) measurements was between 11 ppm and 40 ppm volatile hydrocarbons in the native soil samples screened from the UST excavation. 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)) collected beneath UST No. 01. Elevated concentrations of several petroleum-related compounds (1,200 ppm Xylenes & 430 ppm Toluene) were detected in both soil samples collected beneath UST No. 02. However, none of these reported detections exceed the current NNEPA Soil Cleanup Standards (NNEPA Proposed Storage Tank Cleanup Standards, July 2010). The slightly elevated lead concentrations in the soil (12 To 39 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 site was backfilled with 21.28 tons of crusher fines which were delivered to the site. 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