



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 9

75 Hawthorne Street  
San Francisco, CA 94105-3901

In reply, refer to: WST-8

December 12, 2008

Mr. Stephen B. Etsitty, Director  
Executive Office  
Navajo Nation Environmental Protection Agency  
P.O. Box 339  
Window Rock, AZ 86515

Subject: No further action required for the Underground Storage Tank (UST) site at the Ganado Lake Trading Post (NAV-466) in Ganado, Arizona

Dear Mr. Etsitty:

The United States Environmental Protection Agency (USEPA) Region 9, Underground Storage Tank Program Office (USTPO) has completed our review of the report – *Site Assessment Report*, for the Ganado Lake Trading Post in Ganado, Arizona, dated November 2008. The report described the site closure activities undertaken in August 2008 which included the removal of the former underground storage tank (UST) system and site characterization. The work was funded by the Federal LUST Trust Fund and overseen by EPA Region 9 USTPO. The EPA retained Bristol Environmental Remediation Services, LLC to perform the site assessment and corrective action activities.

The former UST system consisting of two USTs, with capacities of 4,000 and 10,000 gallons tanks, were installed in 1976. It was not known how long the facility was open for operations but in 1995, the NNEPA staff visited the site and verified that the tanks were not in service. Due to the sparse records for this site, we do not know how well the tanks were maintained while in service. This uncertainty, combined with the fact that the tanks were abandoned in the ground for more than 10 years, made this site a high priority for the Navajo Nation.

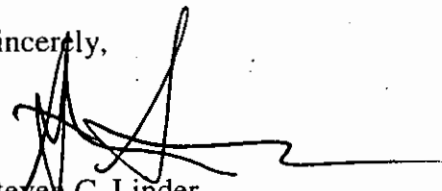
The USTs and attached piping were removed from the site in August 2008 and a petroleum hydrocarbon release to the soil beneath the tanks was discovered and documented. To address this release, approximately 22 cubic yards of petroleum contaminated soil (PCS) were excavated beneath the UST system. The PCS was stockpiled near the excavation and disposed off-site.

Eight confirmation soil samples were taken from underneath the USTs after the PCS was removed. Analytical results from the sampling event did not detect any petroleum hydrocarbons or volatile organic compounds at the bottom of the pit above the Navajo Nation Environmental Protection Agency (NNEPA) regulatory limits. Groundwater was not encountered during this investigation.

Based on the findings presented in the report, EPA Region 9 recommends that this site be closed without additional action. In addition, due to a lack of lease documentation and site history information, Region 9 was unable to identify any viable responsible parties that could be held potentially liable for corrective action costs for this. As a result, the EPA will not be seeking a cost recovery action for these activities.

My staff has reviewed the findings in the report with Henry Haven of the NNEPA UST program and Mr. Haven concurs with this recommendation. If you have any questions regarding the information contained in this letter, please contact Carl Warren of my staff at (415) 972-3355.

Sincerely,



Steven C. Linder,  
Program Manager  
Underground Storage Tanks Program Office

Cc: Henry Haven, NNEPA  
Scott Ruth, Bristol Environmental  
Mimi Newton, USEPA ORC  
EPA Site File NAV-466