



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 9

**75 Hawthorne Street
San Francisco, CA 94105-3901**

In reply, refer to: WST-8

December 15, 2010

Ms. Loretta Stone
San Carlos Apache Tribe Environmental Protection Agency (EPA)
10 West Tonto Street
P.O. Drawer 0
San Carlos, AZ 85550

Subject: No further action required for the Underground Storage Tank (UST) site at the Point of Pines Logging Camp (SANC-032), Apache Reservation, Arizona

Dear Ms. Stone:

The United States Environmental Protection Agency (USEPA) Region 9, Underground Storage Tank Program Office (USTPO) has completed our review of the report – Point of Pines Logging Camp Site (SANC 032), Site Assessment Report, and Revision 1, dated December 2010. The report described the activities undertaken on June 23, 2010, at the Point of Pines Logging Camp location in San Carlos. The work was funded through the American Reinvestment and Recovery Act (ARRA) and overseen by the EPA Region 9 and the San Carlos Apache Tribe Environmental Protection Agency. Bristol Environmental Remediation Services (Bristol) was retained by EPA to perform this work.

Site Background

The Site was identified by San Carlos Apache Tribe EPA as an abandoned UST site based on observations of the site features and limited oral history. The site was a logging camp and at the time of the assessment was abandoned. There was no actual information in the Apache Nation's or EPA's files, regarding the history of a fueling operation at this site. The identification of the USTs on site was based on the observation of concrete pad remains and tank vent pipes and/or dispenser stick-ups. The San Carlos Apache Tribe listed this facility in their environmental inventory as a site for UST removal and site assessment.

Site Assessment

On June 23, 2010, Bristol excavated and removed the two USTs, associated piping and debris from the site. This included removal of residual petroleum product from one of the two

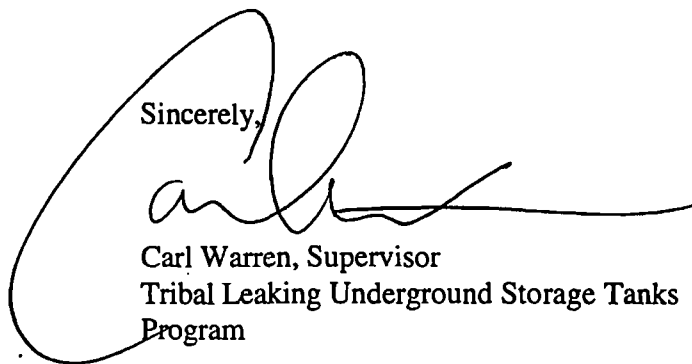
tanks. No petroleum odors, colors or staining of soil were noted underneath the location of the UST and associated piping. The soil screening photoionization detector (PID) did not measure any volatile hydrocarbons above the action level of 50 parts per million by volume (ppmV) calibrated against an isobutylene standard. Confirmatory soil samples were taken from the former UST location. Results from the soil samples were non-detect for petroleum hydrocarbons and/or BTEX. Some minor amounts of benzo(a)pyrene (b(a)p) were detected at concentrations above the residential preliminary remediation goal (PRG) for soil and also above the Soil Screening Level (SSL) for protection of groundwater established by EPA Region 9. However, the depth at which the contamination was detected makes the residential pathway incomplete. Moreover, based on regional topography and surface water elevations, the groundwater can be reasonably expected to be 15 to 20 feet below ground surface. Due to the depth to groundwater and the very limited areal extent of the b(a)p, a site specific SSL would be much higher than the Region 9 published data and would result in a SSL assessment that identifies the b(a)p concentrations to be of limited risk.

Imported clean fill and the excavated soil were used to completely backfill the excavation. The UST, piping and debris (including a buried oil drum) were removed from the site and disposed at an approved facility. Groundwater was not encountered during this investigation.

Conclusion

Based on the findings presented in the report, the EPA Region 9 USTPO recommends that this UST site be closed without additional action. The USTPO has discussed this site and recommendation with you. If you have any questions regarding the information contained in this letter, please contact Curtis Payton of my staff at (916) 557-7431 or you can contact me directly at (415)-972-3355.

Sincerely,

A handwritten signature in black ink, appearing to read 'Carl Warren', is written over the word 'Sincerely,'. The signature is fluid and cursive, with a large loop at the beginning and a long horizontal stroke at the end.

Carl Warren, Supervisor
Tribal Leaking Underground Storage Tanks
Program

Cc: EPA Site File SANC-032
Scott Ruth, Bristol



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX

Underground Storage Tanks Program Office
75 Hawthorne Street (WST-8)
San Francisco, CA 94105

October 5, 2010

Mr. Paul Buck
Supervisory Soil Conservationist
Department of Forestry
San Carlos Apache Tribe

Dear Mr. Buck:

The United States Environmental Protection Agency (EPA), Region 9, in cooperation with the San Carlos Apache EPA, conducted environmental site assessments (assessments) at five sites on the San Carlos Apache Reservation in June 2010. The U.S. EPA's contractor, Bristol Environmental Remediation Services (Bristol), directed the field portion of the assessments and is preparing reports detailing the findings of the assessments.

Summaries of findings for the five sites where the assessments were conducted are as follows:

- 1) San Carlos Old Jail, located in San Carlos – No underground storage tanks (USTs) were located at the site. No indications of contamination were found. A no further action letter will be drafted for this site.
- 2) Point of Pines Ranch, located in Point of Pines – One UST was located and removed. No indications of contamination were found. A no further action letter will be drafted for this site.
- SANC 032 3) Point of Pines Old Logging Camp, located in Point of Pines - Two USTs were located and removed. No indications of contamination were found. A no further action letter will be drafted for this site.
- 4) Anchor 7 Ranch, located near San Carlos - One UST was located and removed. No indications of contamination were found. A no further action letter will be drafted for this site.
- 5) T-11 Ranch, located in Cutter – One UST was located and removed. Field instruments indicated, and laboratory tests confirmed, the presence of petroleum-contaminated soil. Approximately 60 cubic yards of contaminated soil were excavated and removed, and the excavation was backfilled with clean fill. Soil contamination remains in the ground.

EPA proposes the following work activities at the T-11 Ranch site:

In order to define the extent of contaminated soil, and possibly contaminated groundwater, the site will need to be characterized. Characterization activities will include the following tasks:

- Using a drill rig, advance borings and collect soil samples for laboratory analysis. We will have a mobile laboratory on site to do this work as we drill.

- If groundwater is encountered during the drilling, we will collect water samples for analysis and may install groundwater monitoring wells so that the extent of groundwater contamination (if present) can be determined and monitored.
- Additional contaminated soil may also be removed from site.
- All work will be directed by an on-site Bristol geologist and will have U.S. EPA and San Carlos EPA oversight.

Prior to performing the site assessment work in June 2010, Bristol consulted the San Carlos Apache IDT and obtained clearances from the following San Carlos Apache entities:

- 1) Historic Preservation and Archeology Department
- 2) Tribal Employment Rights Office
- 3) Chairman's Office (re: Access Permits)
- 4) Planning & Economic Development (re: Business License)
- 5) San Carlos Apache EPA

Additionally, the EPA obtained the ecological clearances for the above sites.

Prior to site mobilization at the T-11 Ranch site, Bristol will contact each of the entities listed above to ensure that the exiting clearances are still applicable for the upcoming work.

EPA would like to schedule the field work for November of 2010. The characterization activities should take less than one week to complete. Please give me a call at 415-972-3355, if there is any additional information that the IDT requires regarding this project. EPA looks forward to working with the Tribe on completing the tasks associated with the T-11 Ranch site cleanup.

Sincerely yours,

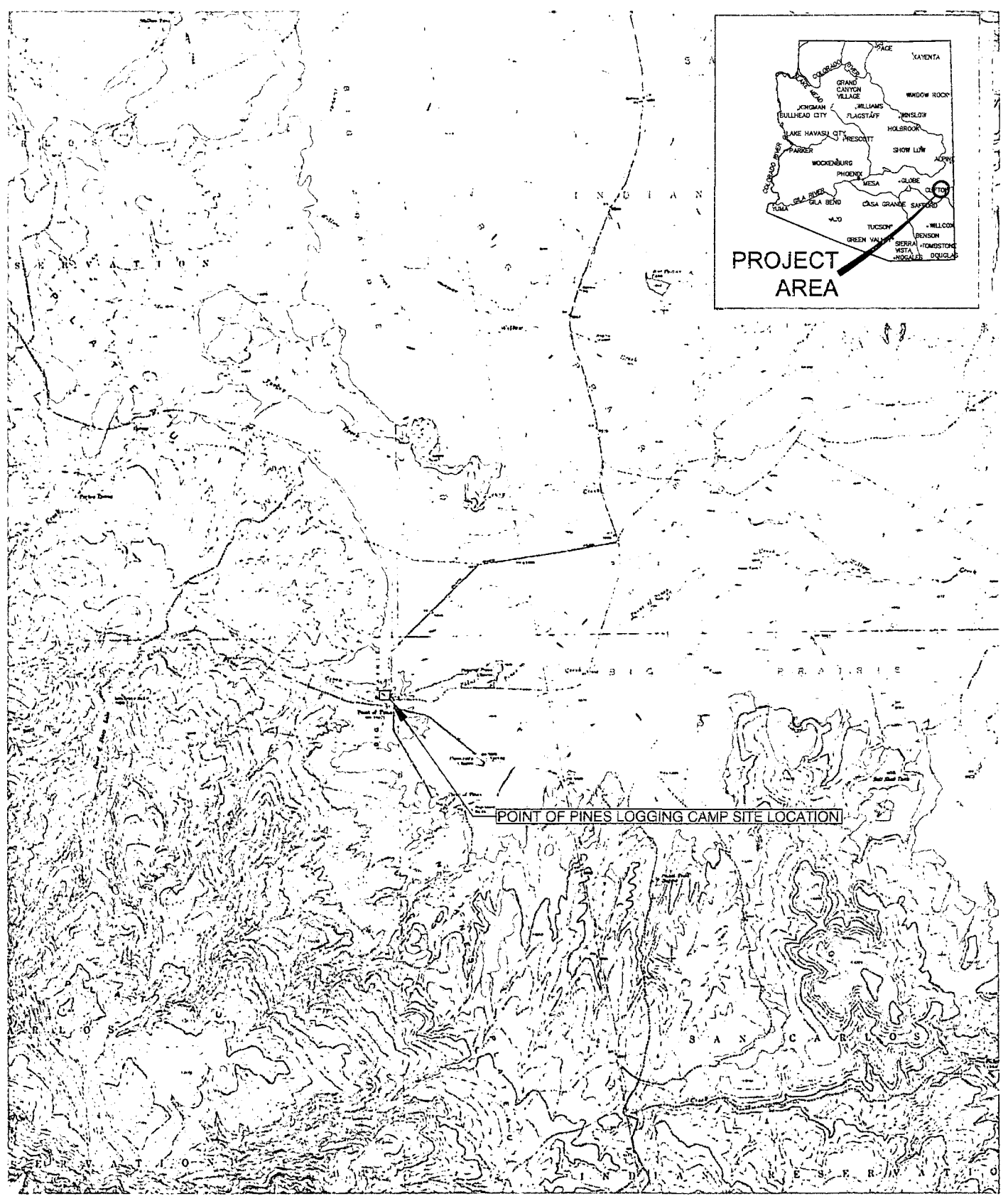
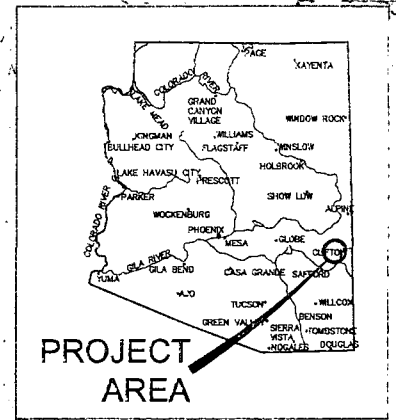


Carl Warren
Supervisor, Tribal UST Cleanup Program

CC:

Loretta Stone, San Carlos Apache Tribe
Tess Salire, Army Corp of Engineers
Curtis Payton, Army Corp of Engineers
Scott Ruth, Bristol Environmental
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Drawing: O:\005\410060 EPA LS23 PINELACAD-ENVIRO\POINT-PINES-LOGCAMP-JAN10\DWG\410060-FIG1-JAN10.DWG - Layout: 410060-FIG3-JAN10
 User: MGARCIA Mar 10, 2010 - 9:18am Xrefs: - Images: 033109C6.TIF 033109C7.TIF 033109D6.TIF 033109D7.TIF



TOPO REFERENCE
 San Carlos
 (AZ) Topo Quad
 Orig Date: 1955
 Quad series: 7.5'
 Paper source: Topographic 1:24,000

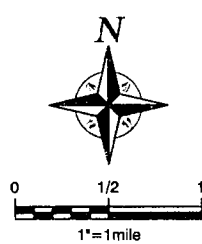



FIGURE E3 SAN CARLOS APACHE NATION (SANC 032) POINT OF PINE, ARIZONA POINTS OF PINES LOGGING CAMP SITE LOCATION		
 Bristol ENVIRONMENTAL REMEDIATION SERVICES, LLC Phone (907) 563-0013 Fax (907) 563-6713 Project No. 410060	DATUM: NA PROJECTION: NA	DATE 01/21/10 DWN. MTG SCALE SHOWN APPRVD. JSR



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
Underground Storage Tanks Program Office
75 Hawthorne Street (WST-8)
San Francisco, CA 94105

June 1, 2010

Mr. Paul Buck
Supervisory Soil Conservationist
Department of Forestry
San Carlos Apache Tribe
P.O. Box 0
San Carlos, AZ 85550

Dear Mr. Buck:

The United States Environmental Protection Agency (EPA), Region 9, in cooperation with the San Carlos Apache EPA, will be conducting environmental site assessments (assessments) at five sites on the San Carlos Apache Reservation in June 2010. The U.S. EPA's contractor, Bristol Environmental Remediation Services (Bristol), will be implementing the field portion of the assessments and will prepare reports detailing the findings of the assessments. EPA and the San Carlos Apache EPA staff will provide field oversight during the assessment work.

Listed below are the five sites where the assessments will be conducted:

- 1) San Carlos Old Jail, located in San Carlos
- 2) Point of Pines Ranch, located in Point of Pines
- 3) Point of Pines Old Logging Camp, located in Point of Pines
- 4) T-11 Ranch, located in Cutter
- 5) Anchor 7 Ranch, located near San Carlos

At each of the sites, at least one buried fuel underground storage tank (UST) is present and will be removed, as well as any associated pump islands (concrete), pumps, and dispenser lines that run from the pumps to the UST(s). If more than one UST at a site is found, then it also will be removed. After the USTs are removed, soil samples will be collected from beneath the USTs and lines to see if fuel has leaked from these locations. If it is obvious at the time that the USTs and/or lines are removed that contaminated soil is present, then up to 30 cubic yards of contaminated soil may be excavated (and taken to an approved landfill for disposal) and replaced with clean soil. If groundwater is encountered, then a sample will be collected for laboratory analysis.

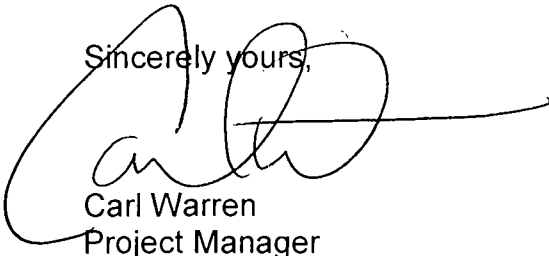
To date, Bristol has obtained the following clearances from various San Carlos Apache entities:

- 1) Historic Preservation and Archeology Department – Email sent to Bristol by Vernelda Grant (Tribal Historic Preservation Officer/THPO) on 2-25-10 stating that clearance for the site assessment activities is given and that the Tribal Archeologist shall be contacted should there be an occurrence of cultural materials during the work.
- 2) Tribal Employment Rights Office (TERO) – Email sent to Bristol by Hutch Noline on 5-6-10 stating that TERO approval has been given for the site assessment work.
- 3) Access Permits – Email sent to Bristol by Beatrice Hendricks of the Chairman's Office on 2-5-10 stated that if Bristol is affiliated with the Tribal EPA during the site assessment, then Bristol would not need an access permit.
- 4) Business License – Email sent to Bristol by Charles Russell, Acting Director of Planning & Economic Development, on 1-26-10 stating that Bristol does not need a business license to perform the site assessments.

Additionally, EPA has performed an ecological evaluation for each of the five sites. As concluded in the attached letter EPA does not anticipate that the proposed work would adversely impact the listed species in the area, and that the overall impact is expected to be beneficial. Therefore, our determination for the sites listed above is "may affect but is not likely to adversely affect."

If you have any questions, please give me a call at 415-972-3355. EPA looks forward to working with the Tribe on addressing the sites listed in this letter.

Sincerely yours,



Carl Warren
Project Manager

Attachment:

Ecological Clearance Package

CC:

Loretta Stone, San Carlos Apache Tribe
Tess Salire, Army Corp of Engineers
Curtis Payton, Army Corp of Engineers
Scott Ruth, Bristol Environmental
Copy to the file(s)

Letter sent via email