UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 9
75 Hawthorne Street
San Francisco, CA 94105-3901

February 28, 2012

Ms. Loretta Stone, Director
Environmental Protection Agency
San Carlos Apache Tribe
P.O. Box 0
San Carlos, AZ 85550

Subject: No Further Action (NFA) for the Former UST Facility at the T-11 Ranch in Cutter, AZ (EPA ID# SANC-033)

Dear Ms. Stone:

The U.S. Environmental Protection Agency (EPA) has reviewed the document entitled "T-11 Ranch (SANC 033) San Carlos Apache Nation Site Assessment, Characterization, and Remediation Report" (the "Closure Report"), dated January 2012, for the T-11 Ranch underground storage tank (UST) site (the "Site") located in Cutter, AZ. The UST closure work was conducted by Bristol Environmental Remediation Services, LLC (i.e., "Bristol") at the direction of EPA, and the Closure Report was prepared by Bristol. The Closure Report documents three phases of work by Bristol at the Site, culminating with the additional soil excavation and confirmatory sampling in August 2011 in the area of the former 1,000 gallon UST. The sections below provide historical information on the Site, discussions of the site characterization and remedial work that was conducted, and the conclusions of EPA and the San Carlos Apache Tribe's Environmental Protection Agency (SCAT EPA) regarding the current status of the Site.

Site Background and Current Use of the Site

Based on information provided by the SCAT EPA, the former 1,000 gallon UST at the Site was potentially operated from the 1960s until the 1980s for the purpose of fueling vehicles used for cattle ranching. The Site is currently used for livestock grazing and cattle roundups in the spring. The ranch house located approximately 100 feet east of the former UST area is reportedly not used. The depth to groundwater in the general area of the Site is unknown.

UST Removal, Release Confirmation and Site Characterization Work

In June 2010, Bristol removed the former UST system at the Site in order to allow soil sampling under the UST and the dispenser island. A hydrocarbon release was confirmed based on hydrocarbon vapor readings in the field with a photo-ionization detector (PID) and the analytical results for six soil samples, which showed exceedances

of EPA Region 9's Regional Screening Levels (RSLs) for residential soil for ethylbenzene, total xylenes and naphthalene. The analytical results also showed elevated concentrations for gasoline range organics (GRO) and diesel range organics (DRO). Although Bristol removed an estimated 80 cubic yards of petroleum-contaminated soil (PCS) during this initial site work, residual PCS was left in place.

In June 2011, at EPA's direction, Bristol conducted additional site assessment work in order to determine the lateral and vertical extent of PCS at the Site. During this phase of work, Bristol drilled nine soil borings, collected soil samples at 5-foot intervals for PID screening, and conducted laboratory analyses of soil samples based on the results of the PID screening. Only the analytical results for the fourth soil boring at 10 feet below ground surface (i.e., soil sample SB-4-10) showed exceedances of EPA Region 9's RSLs (for ethylbenzene and naphthalene). Elevated concentrations for GRO and DRO were also present in two soil samples from boring SB-4.

Site Remediation and Cleanup Confirmation

In August 2011, at EPA's direction, Bristol conducted additional soil excavation at the Site with the intent of removing all remaining PCS. The excavation was extended to a maximum depth of 25 feet below ground surface (to the siltstone bedrock), and approximately 388 cubic yards of PCS were excavated and properly disposed offsite at the Apache Junction Landfill in Apache Junction, AZ. The analytical results for the 19 soil samples analyzed by the mobile and fixed laboratories showed no detections for individual hydrocarbon compounds, and no detections for GRO and DRO. Groundwater was not encountered during any of the site work.

Conclusion

As noted above, the soil samples that were collected following the additional excavation work at the Site in August 2011 showed no detections for hydrocarbon compounds. On February 27, 2012, Chris Prokop, of my staff, discussed these findings with you via telephone, and you were both in agreement that the Site should be closed. For this reason, EPA and the SCAT EPA are not requiring further action for the Site at this time. However, if additional information becomes available in the future regarding hydrocarbon contamination in soil and/or groundwater at the Site, EPA or the SCAT EPA may require additional site work. If you have any questions regarding this letter, please contact Mr. Prokop at (415) 972-3363.

Sincerely,

Carl Warren, Supervisor
Leaking Underground Storage Tanks Team

cc: Chris Prokop, EPA (copy to site file)