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

February 28, 2013

Mr. Ronnie Lupe, Chairman
White Mountain Apache Tribe
P.O. Box 1150
Whiteriver, AZ 85941

Subject: No Further Action (NFA) for the Apache Garage UST Site
Highway 260, McNary, AZ (EPA ID# WMAP-031)

Dear Chairman Lupe:

The U.S. Environmental Protection Agency (EPA) has reviewed the "Final Site Assessment and UST Removal Report - Former Apache Garage Service Station" (the "Report") for the Apache Garage underground storage tank (UST) site (the "Site"), dated November 2012, that was prepared by iina ba, Inc. for EPA. The Report documents the removal of three USTs and associated UST system components at the Site by iina ba, Inc., and subsequent soil sampling and analysis during the week of September 17, 2012. The sections below provide historical information about the Site, discussions of the soil sampling and analytical results, and the conclusions of EPA and the White Mountain Apache Tribe's (WMAT's) Environmental Protection Office (EPO) regarding the current status of the Site.

Previous UST Operations and Current Use of the Site

Based on interviews with WMAT EPO staff and residents in the McNary area, EPA believes that the Site was used as a fueling and service station from the 1940's until, potentially, the early 1980's. However, EPA obtained no specific information about the former UST operations from these interviews, and no EPA UST notification form was ever submitted. The potential existence of remaining USTs at the Site was indicated by iina ba, Inc.'s Geophysical Site Assessment that was conducted in March 2012.

In 2003, the WMAT's Housing Authority built its McNary substation on the Site. Currently, the former UST area is covered by an asphalt parking lot, and the Site is totally enclosed by a high fence with a locked entrance.

UST Removal, Soil Sampling and Hydrocarbon Releases at the Site

During the week of September 17, 2012, iina ba, Inc. removed three non-operating, steel USTs and some steel piping at the Site. Two of the USTs had calculated

volumes of 2,500 gallons, and the third UST had a capacity of 1,000 gallons. Aside from single "pinholes" in Tank 1 and Tank 3, and overall surface corrosion, the UST system was in fair to good condition considering its age.

Hydrocarbon stained soil was observed below the northern end of Tank 1 and the southern end of Tank 3. Soil samples were collected from in situ soil beneath both ends of each UST for a total of six samples. Photo-ionization detector (PID) readings were obtained from each sampling location, and the PID readings ranged from non-detect to 1,168 ppm. The six soil samples were analyzed at a fixed laboratory for volatile organic compounds (VOCs) by EPA Method 8260B, semi-volatile organic compounds (SVOCs) by EPA Method 8270C, total petroleum hydrocarbons (TPH) as gasoline, diesel and oil by EPA Method 8015, and eight RCRA metals by EPA Method 6010.

The laboratory analyses showed no detections for VOCs, except for low concentrations for 1,2,4-trimethylbenzene (0.48 mg/kg) and 1,3,5-trimethylbenzene (0.30 mg/kg). The laboratory results also showed no detections for SVOCs. The maximum TPH concentration (sum of all fuel fractions) detected in the soil samples was 129 mg/kg. A number of metals were detected in the soil samples, but these low concentrations were consistent with naturally occurring concentrations in soil. Total lead was detected in all six soil samples, but the highest concentration was only 22 mg/kg. The UST system components, rinsate and associated waste materials were properly recycled/disposed offsite, with the appropriate documentation. In addition, the UST excavation was properly backfilled and the parking lot was restored to its previous asphalted condition. Groundwater was not encountered during the UST removal activities at the Site.

Hydrocarbon releases to soil at the Site were confirmed based on visual observations, PID screening, and analytical detections at lower concentrations for two trimethylbenzene compounds, and TPH as gasoline and diesel. However, none of the concentrations for these compounds exceeded EPA Region 9's Regional Screening Levels (RSLs) for residential soil. Most of the hydrocarbon detections were associated with in-situ soil below the northern end of Tank 1 and the southern end of Tank 3.

Conclusion

As noted above, the analytical results for the soil samples that were collected at the Site following the UST removals documented the presence of hydrocarbons. However, none of the detected concentrations exceeded EPA Region 9's RSLs for residential soil. For this reason, EPA believes that no further action is required for the Site at this time. Mr. Terry Hill with the WMAT's EPO concurred with EPA's finding that the Site requires no further action at the present time in his e-mail to Chris Prokop, of my staff, dated February 19, 2013. However, if additional information becomes available in the future regarding petroleum contamination in soil and/or groundwater at the Site, EPA or the WMAT's EPO may require additional site work. If you have any questions regarding this letter, please contact Mr. Prokop at (415) 972-3363.

Sincerely,

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

cc: Brenda Begay, Director, WMAT EPO
Terry Hill, Environmental Specialist, WMAT EPO
Chris Prokop, EPA (copy to site file)