



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105
Underground Storage Tanks Program Office
(LND-4-3)

APR 18 2017

CERTIFIED MAIL
700818306279833
RETURN RECEIPT REQUESTED

Mr. Craig Calloway
Red Rock Retailers, LLC
501 Airport Drive, Suite 100
Farmington, NM 87401

Subject: No Further Action
Red Horse Trading Post Underground Storage Tank Cleanup Site
Red Valley, Arizona (EPA ID No. NAV031)

Dear Mr. Calloway:

The U.S. Environmental Protection Agency ("EPA") is sending this letter to inform you of our determination regarding the status of the former Red Horse Trading Post underground storage tank ("UST") cleanup site ("Site"), located in Red Valley, Arizona, on land of the Navajo Nation. EPA has determined, in concert with the Navajo Nation Environmental Protection Agency ("NNEPA"), that no further action ("NFA") is warranted for the Site, at this time, based on the findings of the site assessment activity conducted in 2016-2017. Specifically, this NFA determination is based on the following:

- Laboratory analysis reported all contaminants of concern were below the Navajo Nation Soil and Groundwater Cleanup Standards (revised) in 2012 for the past three quarters.
- There are no nearby drinking water wells or surface water areas.

Conclusion

EPA recommends No Further Action at this time. However, if additional information becomes available in the future regarding hydrocarbon contamination in soil and/or groundwater at the Site, EPA may determine that additional site assessment and/or corrective action is warranted.

If you have any questions regarding the information contained in this letter, please contact Pam Maples

of the NNEPA at 928-871-7764, Rebecca Jamison of my staff at (415) 972-3365, or you can contact me directly at (415)-972-3369.

Sincerely,



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

Cc (via email, all w/enclosures):
D. Malone/P. Maples, NNEPA
S. Pinto, BIA-Navajo Region
Navajo RBDO

Enclosures: A. Site Chronology and Investigation
B. Site Layout

ENCLOSURE A
RED ROCK TRADING POST
UNDERGROUND STORAGE TANK CLEANUP SITE
RED VALLEY, ARIZONA
(EPA ID No. NAV31)
GPS Coordinates: 36.603901, -109.060747

Site Background and Former UST Operations

The Site is located approximately 0.5 miles south of Navajo Route 63 in the village of Red Valley, Arizona. It remains an active convenience store operated by Red Mesa, LLC. An underground storage tank ("UST") system consisting of a 1,000 gallon, 3,000 gallons and 4,000-gallon gasoline USTs were removed in February 1992 by Envirotech, Inc. Soil samples from the UST removal indicated petroleum impacts to soil and groundwater. Shallow groundwater is approximately 23 feet below ground surface ("bgs").

Site Assessment and Work from 2016-2017

EPA contracted through U.S. Army Corp of Engineers for iina' ba', Inc. to assess current groundwater impacts from the 1992 UST removal. Previously gathered information indicated that the generally understood groundwater flow is toward the east/north east in the direction of the Red Rock Wash. Three soil borings were converted into groundwater monitoring wells at the site in June 2016. Water depth was found to be at 20' to 24' bgs.

The initial soil boring results from June 8, 2016 found no detections of BTEX, MTBE, naphthalene, 1,2,Or- or 1,3,5-trimethylbenzene. Only a single detected of lead was reported, well below the NNEPA soil cleanup level; and no detections of tetraethyl lead (TEL) were reported in any of the soil samples. No petroleum odor or sheen was detected during the well installation.

Groundwater samples were collected on June 15, 2016; the sample results found no detections of benzene, toluene, ethylbenzene or xylene ("BTEX"), Methyl tert-butyl-ether ("MTBE"), naphthalene, 1,2, or- or 1,3,5-trimethylbenzene. A very low concentration of total petroleum hydrocarbons-diesel range organics ("TPH-DRO") at 0.16 mg/L and oil range organics ("ORO") at 0.29 mg/L was detected in MW-2. Total lead was detected in all groundwater samples with concentration ranging from 23 ug/L to 21 ug/L which is above the Navajo Nation Cleanup Standard of 15 ug/L. No detection of organic lead species of tetraethyl lead was noted. Background lead levels in Arizona soil are in the median range of 20 mg/kg.¹

iina' ba' collected groundwater samples from the three groundwater monitoring wells on June 15, 2016, December 13 2016, and March 2017. The lack of detectable petroleum hydrocarbons in groundwater over the past nine (9) months, (with the exception of a single trace of TPH-DRO) indicates that the former tank basin is no longer a source of petroleum hydrocarbons; and, there appears to be no threat to human health or the environment from the former UST system. All BTEX and MTBE contaminants of concern remain below Navajo Nation's 2012 Groundwater cleanup standards.

¹ <https://www.epa.gov/superfund/usgs-background-soil-lead-survey-state-data#AZ>

ENCLOSURE B
RED ROCK TRADING POST
RED VALLEY, ARIZONA
(EPA ID No. NAV031)



Figure 1: Red Rock Trading Post Location



Figure 2: Groundwater monitoring well Locations