



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 9

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

JUN 23 2016

Mr. Bob Moss
Thriftway Marketing Corp.
501 Airport Drive Suite 100
Farmington, NM 87401-2646

CERTIFIED MAIL: 7012 0470 0000 6668 6773
RETURN RECEIPT REQUESTED

Roger Burton
Western Refining
7324 4th Street NW
Albuquerque, NM 87107

CERTIFIED MAIL: 7012 0470 0000 6668 67800
RETURN RECEIPT REQUESTED

Subject: No Further Action ("NFA")
Mustang #2245 former Thriftway #245
Tes Nez Iah, Arizona
(EPA ID# NAV-121)

Dear Mssr. Moss and Mr. Burton:

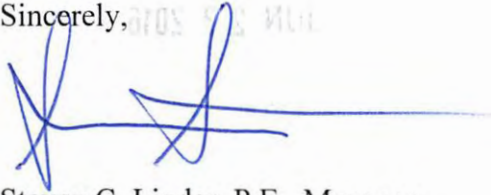
The U.S. Environmental Protection Agency ("EPA") has completed its review of documents pertaining to the removal of underground storage tanks ("USTs") and subsequent soil and groundwater remediation at the Mustang, former Thriftway 245 or 2245 in Tes Nez Iah, Arizona (EPA ID# NAV-121) ("Site"). A summary of the Site's leaking UST (LUST) information is found in Enclosure A.

EPA Region 9 discussed and reviewed the relevant documents and site conditions the Navajo Nation Environmental Protection Agency ("NNEPA"). NNEPA concurs on issuing a no further action ("NFA") letter for the Site.

If additional information becomes available in the future regarding hydrocarbon concentrations in soil and/or groundwater at the Site, or the planned use of the site, EPA may reopen the Site and require additional site assessment and/or corrective action.

Please note that this NFA letter, as well as all supporting documentation, will be available to the general public. If you have any questions regarding this letter, please contact me at (415) 972-3369, or Henry Haven, NNEPA at (928) 871-7997.

Sincerely,

A handwritten signature in blue ink, consisting of a stylized 'S' followed by a horizontal line and a loop.

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

cc: NNEPA-LUST Program
Navajo RBDO
S. Pinto, BIA-Navajo Region

Enclosure A - LUST No Further Action Summary
Former Mustang #2245/former Thriftway #245
Tes Nez Iah, Arizona
(EPA ID# NAV-121)

The U.S. EPA has completed the review of the reports and files for the Giant Industries, Inc #2245 Facility (formerly Thriftway #245). The report describes the activities conducted at the site where two consecutive releases of hydrocarbons caused widespread groundwater contamination. Funding for the site assessment and remediation was provided by the current and former owners- Giant Industries and Thriftway Marketing, respectively. The Navajo Nation EPA and U.S. EPA provided the oversight for the extended cleanup activities.

Site Background

Louie Lumkins obtained a 25- year lease in approximately 1975 for a lot in Tes Nez Iah, Arizona to build a gas station along U.S. Highway 160. Thriftway Marketing took over the site from Mr. Lumkins in 1978. Thriftway renovated the site by building a convenience store and installing two bare steel underground storage tanks (USTs) with capacities of 10k-gallons each and one steel UST with 8k-gallon capacity. Corrosion protection was installed on all tanks in 1998. A product pipe failure occurred in May 1998 causing a massive release of hydrocarbons into the environment. Subsequently, new piping was installed and Thriftway continued to operate the facility while also conducting clean-up activities at the site.

Giant Industries purchased the business and began operating the site on March 16, 2000 while Thriftway continued remediation activities. On or about April 7, 2003, one 10k-gallon UST failed a tightness test and the facility was closed down and all tanks emptied. On June 26, 2003 the tanks were re-tested; all tanks passed the subsequent tightness tests, and the facility re-opened.

UST removal and site assessment work

Westest Inc. re-tested the complete fuelling system on September 3, 2003. Two out of three tanks failed the tests. All tanks were emptied and placed in "temporary closure". Analytical results of samples collected at the site in July 2003 indicated significant increases in BTEX compounds and MTBE, an indication that a new fuel release may have occurred. All USTs were removed on April 12, 2004. The removed USTs were observed as being heavily corroded with multiple perforations in the mantles of two of the tanks.

Remedial work at the Site

Giant and Thriftway agreed to jointly fund and continue cleanup activities at the Site with Thriftway taking the lead. On November 16, 2014 EPA approved the Corrective Action Statement of Work dated November 4, 2004, which included the following corrective actions:

- Relocation of the existing domestic water well 200 feet south-west.
- Excavation of soil around the dispenser island to mitigate petroleum-contaminated soil
- Application of oxygen release compounds (ORC) in groundwater
- Installation of an air sparging/soil vapor extraction system (AS/SVE)

Approximately 188 cubic yards of PCs around the dispenser island was excavated on November 20, 2004.

An air sparge/soil vapor extraction (AS/SVE) system was installed in August 2005 and operated until May 2007; a total of 17,462 lbs of petroleum hydrocarbons (equivalent to 2,817 gallons of free product) were removed from the site. BioTech resumed operation of the AS/SVE remediation unit in select wells where by September 2008 an additional 3,926 lbs of petroleum hydrocarbons were removed from the subsurface. The remediation system was taken off-line and removed from the site on June 5, 2009. The system was successful in decreasing the overall BTEX levels in groundwater. Remnant BTEX and MTBE in groundwater was treated with enhanced bioremediation using food grade biochemicals and electroremediation using anodes during 2008 through mid-2011.

RegenOx was injected in MW1, MW2 and MW14 on December 2010 and on May/September 2012 in MW1 and MW14.

Monitoring wells abandonment and the last groundwater sampling at the Site

All on-site wells were plugged and abandoned on April 2011 except for MW-1, -12, -13, and -14. MW-1, MW-14 and the on-site drinking water well were sampled in February 2012. MW-1 showed some rebound in MTBE, MW-14 showed continued reductions, and the drinking water well continued to be non-detect for all constituents of concern.

Additional ORC applications occurred in October 2012 in MW-1 and MW-14; follow up groundwater sampling was attempted in November 2012, but MW-1 and MW-14 were found to be dry, and no samples were collected.

On March 14 and 15, 2016, upon the request of the Navajo Nation Division of Water Resources, the water well located on the site was plugged and abandoned as described in Daniel B. Stephens & Associates, Inc. April 15, 2016 report to Tim Littlewood, Western Refining Southwest, Inc.