



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

July 16, 2009

Mr. Robert G Moss, President
Thriftway Marketing Corporation
501 Airport Drive, Suite 100
Farmington, NM 87401

Subject: No Further Action (NFA) for the former Thriftway #511, Mexican Water Trading Post in Mexican Water, AZ (NAV-124)

Dear Mr. Moss:

The United States Environmental Protection Agency (USEPA) Region 9 has completed the review of the report dated April 3, 2009, for the former Thriftway #511, Mexican Trading Post, located in Mexican Water, AZ. The report, prepared by Animas Environmental Services, LLC, (AES) describes the final remedial activities at the site during the first quarter of 2009. In addition, AES faxed the results of the latest groundwater sampling event dated May 29, 2009, to EPA Region 9, on June 29, 2009.

Site History

The Mexican Water Trading Post was originally operated by Thriftway. In 1976, four underground bare steel tanks (USTs) were installed at the Mexican Water Trading Post and were removed in 2001. Failed welds in three of the four USTs and numerous perforations in the product lines caused soil and groundwater contamination at the site.

In November 2002, Red Mesa Trading LLC took over the site from Thriftway and installed two double wall fiberglass USTs at a remote area from the original tank location but within the property limits. The facility is still actively operated by Red Mesa.

Summary of Field Activities

Field activities were initiated in February 2003, to delineate soil and groundwater contamination, caused by the release of hydrocarbon compounds from the 1976 UST system. Additional site activities were completed in October 2003, along with the installation of additional groundwater monitoring wells.

In February 2004, a Biovent system was installed at the site and routine quarterly sampling and laboratory analysis of all monitoring wells were initiated by Biotech Remediation (Biotech) and Animas Environmental Services, which took the lead in the investigation. To stimulate biodegradation of hydrocarbon contaminated groundwater, two injections of oxygen release compounds were completed in April 2004 and February 2005.

In May 2006, AES installed an SVE/AS system using an existing monitoring well as a nested extraction and injection well. The SVE/AS system operated through December 2006. With the exception of methyl tertiary-butyl ether (MTBE), analytical results for groundwater contamination of all BTEX components were below action levels. Quarterly groundwater monitoring and sampling by Biotech continued throughout 2007 and 2008. In December 2007, MW-2 through MW-6 was approved for closure by the Navajo Nation Environmental Protection Agency (NNEPA). However, MW-1 remained open for monitoring the high level of MTBE.

In September 2008, Biotech installed a mixed metal anode and cathode system in two of the existing groundwater wells to reduce the level of MTBE in MW-1. An additional cathode was installed in December 2008 in monitoring well MW-2. Based on the steady decline of the level of MTBE in MW-1 through the use of the impressed current system from 160 parts per billion (ppb) to 35 ppb, Thriftway requested that a "No Further action letter" be granted for this site.

Conclusion

Although the remaining MTBE contamination in MW-1 is above the action level of 5 ppb NNEPA draft standard, additional "active" remediation is not needed. Both the EPA and the NNEPA expect that the remaining MTBE contamination will naturally attenuate over time. During the course of the cleanup of this site, the Thriftway Marketing Corporation was aggressive with their actions.

My staff has discussed the above findings with Henry Haven, of the NNEPA LUST program and Mr. Haven concurs with these findings. Therefore, EPA and the NNEPA are not requiring further action at the present time. However, if additional information becomes available in the future regarding hydrocarbon contamination in soil and/or groundwater at this site, EPA or the NNEPA may reopen this site and require additional site assessment and/or corrective action.

If you have questions regarding the information contained in this letter, please contact Carl Warren of my staff at 415-972-3355 or the NNEPA's UST program at 928-871-7993.

Sincerely



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

Cc:

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