



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX

75 Hawthorne Street  
San Francisco, CA 94105

April 23, 2008

Mr. Stephen B. Etsitty, Director  
Executive Office  
Navajo Nation Environmental Protection Agency  
P.O. Box 339  
Window Rock, AZ 86515

Subject: Recommendation for No Further Action for the Underground Storage Tank Site  
at the Round Rock Trading Post, Round Rock, AZ (NAV-138)

Dear Mr. Etsitty:

The United States Environmental Protection Agency (USEPA), Region 9 has completed our review of the report - *Underground Storage Tank Removal, Round Rock Trading Post, dated October 5, 2007*. The report describes the activities undertaken to remove the underground storage tank (UST) system at the site and the site characterization that happened next. These activities were undertaken on July and August 2007 and were funded by the Navajo Nation EPA (NNEPA) special revenue fund. The work was performed by Ironhorse Environmental Services, Inc. of Window Rock, Arizona.

Two USTs, dispensers and associated piping were removed from the site and a petroleum hydrocarbon release to the soil was documented. During the tank removal, approximately, 50 cubic yards of petroleum contaminated soil (PCS) was removed, however not all of the soil contamination was taken out of the pit. A total of six soil samples were taken at the bottom of the excavated pit and an in-situ treatment using enhanced bio-chemical solution was applied to the exposed hydrocarbon impacted soil in the excavation. Some of the stockpiled soil was also treated with the enhanced bio-chemical solution and was mixed with imported clean soil prior to back filling. The excavation was top off with clean soil.

Hydrocarbon contamination exceeding the NNEPA screening levels were detected at three sampling locations below both dispensers islands for total petroleum hydrocarbons (TPH) diesel (110 parts per million (ppm)) and gasoline (140 ppm) and at one of the UST's for TPH diesel (110 ppm). The soil contamination was noted at a depth between six to nine feet below ground surface (bgs). Groundwater was not encountered during this investigation. The NNEPA screening levels for both TPH gasoline and diesel are 100 ppm.

Based on the findings presented in the report, EPA Region 9 recommends that this site be closed without additional action. The remaining contamination in the soil is slightly above the NNEPA screening levels and is below the EPA Region 9 screening levels of 500 ppm for both gasoline and diesel TPH. In addition, the remaining contamination in the excavation was treated with an enhanced bio-chemical solution.

This data has been reviewed with Mr. Henry Haven of the NNEPA UST program and Mr. Haven concurs with this conclusion. If you have any questions regarding the information contained in this letter, please contact Carl Warren of my staff at (415) 972-3355.

Sincerely,

Steven C. Linder, P.E.  
Manager  
Underground Storage Tanks Program Office  
U.S. Environmental Protection Agency – Region IX

cc: Henry Haven, NNEPA  
Warren Roan, NNEPA  
Carl Warren, UST Program Office, US EPA Region IX  
Mimi Newton, Office of Regional Counsel, US EPA Region IX

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SYMBOL	WST-8	UST-8	WST-8			
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