

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX 75 Hawthorne Street San Francisco, CA 94105-3901

September 25, 2018

Richard Bowman Chapter President Mexican Springs Chapter P.O. Box 689 Tohatchi, NM 87325 EMAIL: csam@navajochapters.org

Subject: No Further Action Former Mexican Springs Trading Post Leaking Underground Storage Tank (LUST) Site Mexican Springs, NM (EPA ID# NAV215)

Dear Mr. Bowman:

The U.S. Environmental Protection Agency (EPA) has completed its review of documents pertaining to the former Mexican Springs Trading Post leaking underground storage tank (LUST) cleanup site. EPA has determined, in concert with the Navajo Nation Environmental Protection Agency (NNEPA), that no further action (NFA) is warranted for the Site based on the findings of the site assessment and remediation activity conducted in August 2018. Specifically, this NFA determination is based on the following

- Residual soil contamination that was present in 1994 was excavated in August 2018;
- One remnant UST was removed in August 2018;
- All levels of Contaminates of Concern are below applicable standards (including Navajo Nation Cleanup Standards, 2012); and
- No groundwater was encountered during the 1994 or 2018 UST removals.

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.

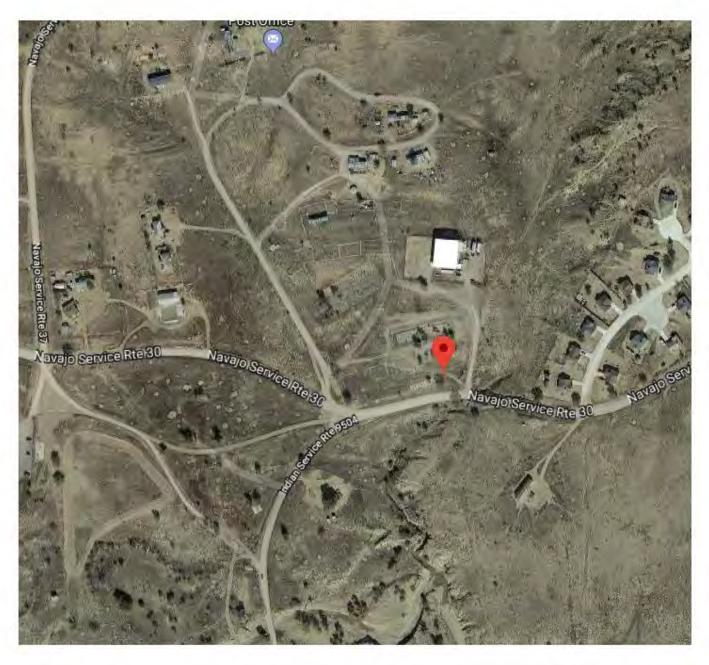
If you have any questions regarding the information contained in this letter, please contact Pam Maples of the NNEPA at 928-971-7764, Rebecca Jamison of my staff at (415) 972-3365, or you can contact me directly at (415)-972-3369.

Sincerely,

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

cc: Christine Sam, Mexican Springs Chapter Bart Stevens, BIA-Navajo Region Navajo RBDO-Shiprock Office

Enclosure I Former Mexican Springs Trading Post LAT/LONG: 35.789844, -108.825094



Enclosure II

Background

The former Mexican Springs Trading Post was opened in 1916 by Edward Vanderwagon. The site was an Exxon station prior to the 1980s. Les Philip acquired the lease for this site in 1983 and he submitted an EPA UST Notification Form in April 1986 for two 1K-gallon steel USTs; one was reported as currently used for storing gasoline and one was permanently out of use and empty. The empty UST was presumed to last have stored fuel in 1970. An updated UST registration form dated 1991 recorded only one 1,000-gallon bare steel UST. After several ownership changes, the trading post was lost to fire in the late 1980s and was demolished. The current Mexican Springs Chapter House is now built across from the former trading post.

UST Removal and Investigations

EPA reviewed the Rocky Mountain Petroleum (RMP) Tank Removal Report dated February 22, 1994 and the UST Removal Report by Norma Cady of the NNEPA dated February 28, 1994. One- 1,000 gallon UST was removed with evidence of several holes. There was no piping and the pump was removed earlier. The UST was found to have several holes and emitted a "sewage-like" odor. The samples were analyzed for Total Petroleum Hydrocarbons (TPH) which showed 6,600 ppm level from the soil sample taken at the north end of the tank and 2,200 ppm from the soil sample at the south end. The excavated soil was spread out on plastic at the site and aerated. The excavation was backfilled with clean fill. No contaminated soil was transported off-site.

In August 2010, under a contract to the Navajo Nation EPA, iiná bá investigated the site for a second abandoned UST, per the 1986 UST Notification form. The investigation was conducted with the assistance of Mr. Anslem Bitsoi, Chapter President, and found no second UST. Mr. Bitsoi stated that a "UST" was removed during the construction of the chapter House.

In August 2018, under contract to the US Army Corp of Engineers, iiná bá, while excavating contaminated soil at the Site, discovered the second UST noted above (photo to right). The UST was removed and 20 cubic yards of soil was excavated to Non-Detect (by field equipment) at twelve feet below ground surface (bgs). Soil sampling data collected in September 2018 indicated all soil was non-detect or below Navajo Nation regulatory levels for constituents of concern including benzene (iiná bá UST Removal and Site Assessment Report, September 2018)



Potential receptors and hydrocarbon exposures

The hydrocarbon concentrations in soil that were obtained from the 1994 sampling event at the site were found at approximately nine feet bgs. In 2018, iina ba excavated the remaining contaminated soil to 12'

bgs.

Groundwater was not encountered during the 1994 or 2018 UST excavation. The depth to groundwater and flow direction are unknown.

EPA believes there are no known potential exposure pathways.