



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

27 August, 2021

MEMORANDUM

TO: File

SUBJECT: No Further Action (NFA) Determination for Release at NAV228 (Goulding's Lodge)
Leaking Underground Storage Tank Site

The purpose of this memorandum is to document for the record the U.S. Environmental Protection Agency's (EPA's) review of the confirmed release at the NAV228 Leaking Underground Storage Tank (LUST) site. The site was operated by Goulding's Lodge with the address of 421 San Juan County Road, Monument Valley, Utah 84536. The release was confirmed during the UST system removal on April 6, 2021. The system consisted of three (3) USTs, piping, and a dispenser island: one (1) 10,000-gallon fiberglass reinforced plastic (FRP) "regular" gasoline tank installed in 1991, one (1) 6,000-gallon steel "super" gasoline tank installed in/around 1985, and one (1) 6,000-gallon steel diesel tank installed in/around 1985, along with FRP piping.

During the UST system removal, 13 soil (termed "closure") samples were collected (SS-1 through SS-6 at 15-13 feet below ground surface (bgs) around the former UST basin; and SS-8 through SS-13 at three (3) feet bgs along the former lines and dispensers) (see Figure 1). All samples were analyzed for benzene, toluene, ethylbenzene, total xylenes, naphthalene, total petroleum hydrocarbons (TPH-DRO and -GRO), and methyl-tert-butyl ether (MTBE). Although none of the samples analyzed in the lab exceeded the Navajo Nation Environmental Protection Agency's (NNEPA's) 2012 Soil Cleanup Standards, sample SS-6 was close to the threshold for TPH-DRO at 476 mg/kg (where the standard is 500 mg/kg). This indicates that the release appears to have occurred toward the southeast corner of the 10,000-gallon gasoline UST (see Figure 1). The responsible party (RP) and NNEPA therefore agreed to excavate an area approximately 18 feet by 15 feet in area around SS-6 to a depth of 22 feet bgs to remove petroleum contaminated soil (PCS). During the excavation which occurred on April 12, 2021, staining and odor were observed at the interval of approximately 16 to 21 bgs. Photoionization detector (PID) readings in the most impacted areas ranged from 1,100 to 3,780 ppm. The closure report did not mention any groundwater encounter.

After the removal of the PCS, five (5) confirmation soil samples were collected on the same day. Four (4) of the confirmation samples were collected in each of the sidewalls of the excavation pit (at 18 feet bgs) and one (1) sample was collected in the center of the pit floor (at 22 feet bgs). No contaminants were found above detection limits in all five (5) confirmation samples.

The NNEPA coordinated with the Utah Division of Environmental Response and Remediation (DERR) in their efforts to have the RP complete cleanup activities at this site as well as confirmation sampling and have closed this site without requiring any further action. Based on the information cited above, I have also determined that No Further Action is necessary 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.

Sincerely,

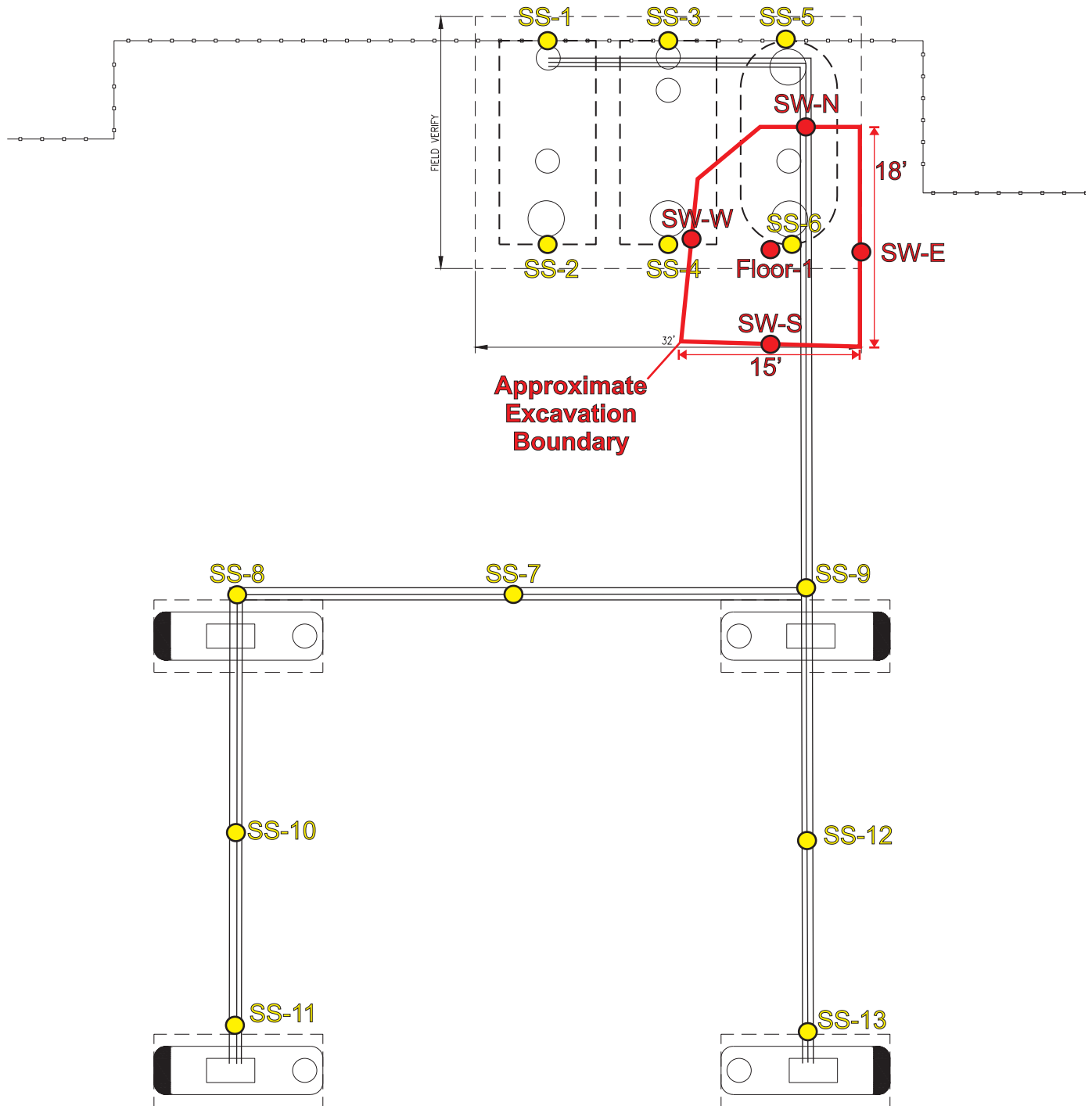
Simona Platukyte
Tribal LUST Project Manager, Underground
Storage Tanks Section

Enclosures

Figure 1 from Revised Closure Notice and Sampling Report for NAV228, Dated June 17, 2021

cc:

Alison Fong, EPA R9, Underground Storage Tanks Section, Manager



Groundwater >30'



- Closure Soil Sample Location
- Confirmation Soil Sample Location

Excavation and Soil Sample Location Map

Figure 1