



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 9

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

In reply, refer to: WST-8

December 12, 2008

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

Subject: No further action required for the Underground Storage Tank (UST) site at the Ganado Trading Post (NAV-344) in Ganado, Arizona

Dear Mr. Etsitty:

The United States Environmental Protection Agency (USEPA) Region 9, Underground Storage Tank Program Office (USTPO) has completed our review of the report – *Site Assessment Report*, for the Ganado Trading Post in Ganado, Arizona, dated November 2008. The report described the site closure activities undertaken in August 2008 which included the removal of the former underground storage tank (UST) system and site characterization activities. The work was funded by the Federal LUST Trust Fund and overseen by EPA Region 9 USTPO. The EPA retained Bristol Environmental Remediation Services, LLC to perform the site assessment and corrective action activities.

The facility opened in 1959, and was in operation until the trading post burned down in 1981. It was not known when the facility stopped selling gasoline but the UST system was abandoned in-place after the store burned down in 1981. To reduce future threats to the environment from this abandoned UST facility, a site assessment was implemented to remove the UST and the associated piping from the site in August 2008. One 500-gallon UST and attached piping was removed from the site. A petroleum hydrocarbon release to the soil around the fill port was discovered and documented. To address this release, 20 cubic yards of petroleum contaminated soil (PCS) were excavated beneath the UST system. The PCS was stockpiled near the excavation and disposed off-site.

Eight confirmation soil samples were taken from underneath the UST and associated piping after the PCS was removed. Analytical results from the sampling event did not detect any petroleum hydrocarbons or volatile organic compounds at the bottom of the pit above the Navajo

Nation Environmental Protection Agency (NNEPA) regulatory limits. Groundwater was not encountered during this investigation.

Based on the findings presented in the report, EPA Region 9 recommends that this site be closed without additional action. In addition, we completed our review of the potential responsible parties' ability to pay for site assessment activities and have determined that the RP is unable to pay. As a result, the EPA will not be seeking a cost recovery action against the RP for these activities.

My staff has reviewed the findings in the report with Henry Haven of the NNEPA UST program and Mr. Haven concurs with this recommendation. 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,
Program Manager
Underground Storage Tanks Program Office

Cc: Henry Haven, NNEPA
Scott Ruth, Bristol Environmental
Mimi Newton, USEPA ORC
EPA Site File NAV-344

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