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

JUN 2 3 2016

Ms. Diane Malone
Environmental Department Director
Waste Regulatory and Compliance Department
Navajo Nation Environmental Protection Agency
P.O. Box 339
Window Rock, AZ 86515

Subject: No Further Action Determination for the Underground Storage Tank Site at the Former Smith Lake Trading Post, Smith Lake, New Mexico (NAV398)

Dear Ms. Malone:

The United States Environmental Protection Agency (US EPA), Region 9 has completed our review of the report - *Underground Storage Tank Removal and Site Assessment, Former Smith Lake Trading Post, Smith Lake, McKinley County, New Mexico dated April 2016.* The report describes the activities undertaken to remove the underground storage tank (UST) system at the site and the site characterization on April 13, 2016.

US EPA LUST Trust Fund provided funding for the work through the interagency agreement with the US Army Corps of Engineers (USACE). iina'ba', Inc. of Farmington, New Mexico performed the work under contract with the USACE. Enclosure A provides site background and summarizes the results of the site assessment.

Based on the findings presented in the report, EPA Region 9 and Navajo Nation Environmental Protection Agency (NNEPA) determined that this site can be closed without additional action. NNEPA concurs on issuing a no further action (NFA) on letter for the site.

If additional information becomes available in the future regarding hydrocarbon contamination in soil and/or groundwater at this site that may pose a threat to the environment, the U.S. EPA may reopen this site and require additional site assessment and/or corrective action.

If you have any questions regarding the information contained in this letter, please contact Rebecca Jamison of my staff at (415) 972-3365.

Sincerely,

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

Enclosure A. Site Information and Summary of Site Assessment

cc: Sharon Pinto, Director, BIA Navajo Region
Albert Lee, Program Manager, Eastern RBDO
Mary Perry-Henio, President, Smith Lake Chapter
Mary Ellen Foutz, property owner

ENCLOSURE A
SITE INFORMATION AND SUMMARY OF SITE ASSESSMENT
Former Smith Lake Trading Post, Smith Lake, NM (NAV398)

Site Background:

The former Smith Lake Trading Post's operations started around 1906. Following an ownership change in the 1940's, it was closed for 20 years until the Foutz Trading Company took it over in 1962. In 1981, Keith Foutz closed this store permanently and built the current store by the highway. The original trading post was a fairly large, cut stone building with gas pumps out front. The Trading Post burned down in 1995. The stone walls were torn down and all that remains is a small amount of stone rubble showing the outline of the walls. (Berkholz, *Old Trading Post at the Four Corners, 2007*).

EPA conducted a site reconnaissance in 2004 and noted surface features resembling fill pipes on concrete pedestals. No geophysical survey was conducted to verify that underground storage tanks (USTs) are still present at the site. The 2016 site assessment was undertaken to confirm the presence of the USTs and any petroleum contamination.

UST Removal and Site Assessment:

Two USTs and associated piping were removed from the site. The two USTs, each with an estimated capacity of 1,000 gallons, were in poor condition with excessive corrosion, pitting and numerous holes in the bottom. The USTs were estimated to be over 70 years old. The top of the USTs were at two (2) feet below ground surface (bgs) and the bottom at six (6) feet bgs.

Although there were no visible or obvious signs of petroleum release in the UST pit, the slightly elevated photoionization detector (PID) readings (up to 389 parts per million (ppm) indicated petroleum release in soil immediately around the tanks. The laboratory analysis of soil samples confirmed the release. A total of eight soil samples were taken at the bottom of the excavated pit and on the side walls of the excavation at 3 feet bgs.

Results of Laboratory Analysis:

Volatile and semi-volatile organics were not detected in any of the soil samples except for 1,2,4-trimethylbenzene (TMB) at 120 ppm exceeding the EPA regional screening level (RSL) of 58 ppm on the south side wall of the excavation at three (3) feet bgs. None of the deeper soil samples had detectable TMB indicating the release may be from overfill or leak from piping joints. NNEPA has no action level for TMB.

Diesel-range organics (DRO) were detected in five (5) of the eight (8) soil samples retained from the former UST basin at concentrations ranging from 52 ppm (equivalent to mg/kg) to 190 ppm; oil-range organics (ORO) were detected in four (4) of the eight (8)

soil samples retained from the former UST basin at concentrations ranging from 90 ppm to 140 ppm. None of the soil samples exceeded the NNEPA action level of 500 ppm or the US EPA RSL of 2,500 ppm.

Total lead concentrations in soil ranged from 22 ppm to 85 ppm with four samples exceeding the NNEPA action level of 54 ppm but below the EPA RSL of 400 ppm. The organolead species of tetraethyl lead and tetramethyl lead were not detected in any of the soil samples indicating that the lead detected in soil is not related to fuel release but may be naturally occurring.

Site Restoration:

The excavation was backfilled using the non-impacted overburden soils compacted in lifts using the bucket. After all overburden materials were placed, a final lift of native soils gathered from around the site were used to restore the area to grade and achieve a positive slope for drainage. The tanks were taken to a recycling facility as scrap metals. Groundwater was not encountered during this investigation.