**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**
**REGION 9**
**75 Hawthorne Street**
**San Francisco, CA 94105-3901**

JUN 12 2014

The Honorable Diane Enos
President of the Salt River Pima-Maricopa Indian Community
10005 East Osborn Road
Scottsdale, AZ 85256

Subject: No Further Action for the LUST Site at the Former Taylor Farms Maintenance Facility on East Highland Road in Scottsdale, AZ
(EPA ID# SALT-042)

Dear President Enos:

The U.S. Environmental Protection Agency ("EPA") has recently been in contact with staff of the Community Development Department's ("CDD") Environmental Protection and Natural Resources ("EPNR") Office regarding backlogged leaking underground storage tank ("LUST") sites. Specifically, EPA had incomplete documentation of the UST removal work and associated activities at the former Taylor Farms Maintenance Facility ("Site") on East Highland Road. CDD-EPNR staff arranged for EPA's receipt of the full documentation of the UST removals that occurred in 2001, which supported EPA's No Further Action ("NFA") determination for the Site.

EPA reviewed the document entitled "Revised Report for Underground Storage Tank Closure Former Taylor Maintenance Facility Scottsdale, Arizona" ("Report"), dated April 18, 2002, which was prepared by Terrane Engineering Corporation ("TEC"). The Report documented the removal of three underground storage tanks ("USTs") and follow-up work at the Site in June 2001. Based on the findings of the Report, residual petroleum contaminated soil ("PCS") at concentrations above EPA's Regional Screening Levels ("RSLs") for residential areas remains in the subsurface at the Site. However, EPA has determined that no further work is required for the Site, at this time, based on the low current probability for human exposures to the residual PCS. Enclosure A provides background on the Site and documentation supporting the NFA determination.

If information becomes available in the future regarding hydrocarbon concentrations in soil and/or groundwater at the Site, or the planned use of the Site changes, EPA may reopen the Site and require additional site assessment and/or corrective action.

Please note that this NFA letter, as well as all supporting documentation, will be available to the general public. If you have any questions regarding this letter, please contact me at (415) 972-3369.

Sincerely,

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

Enclosure

cc (all w/enclosure):
Christopher Horan, CDD-EPNR Manager
John Krause, BIA Western Regional Office

# Enclosure A

LUST No Further Action Summary
Former Taylor Farms Maintenance Facility UST Cleanup Site in Scottsdale, AZ
(EPA ID# SALT-042)

**Previous UST operations at the Site**

Based on documentation contained in the "Revised Report for Underground Storage Tank Closure Former Taylor Maintenance Facility Scottsdale, Arizona" ("Report"), three USTs were installed in the 1970s or 1980s at the former Taylor Farms Maintenance Facility ("Site") to provide fuel for farm vehicles. One 7,500 gallon UST and one 4,000 gallon UST stored diesel, and a second 7,500 gallon UST stored gasoline. The Report indicates that the Site was approximately 2 acres in size and included the USTs, a dispenser island, an auto shop, a concrete slab and a canopy. There is no documentation in EPA's file for the Site indicating when the USTs were last used, but this is believed to have been in the 1990s.

The inferred location of the Site is based on the "Vicinity Map" in the Report and EPA's telephone communication on May 20, 2014 with Morris Paukgana, a former employee of SRP-MIC's Cultural & Environmental Services ("CES") Office. Mr. Paukgana indicated that the Site was in the general area of the parking lot on East Highland Road at the following approximate Global Positioning System ("GPS") coordinates: 33.506351,
-111.835456.

**UST removal, petroleum release confirmation and over-excavation**

In June 2001, TEC and its subcontractors removed the three USTs at the Site and transported them to Busby Metal Inc. for recycling. The visual inspections of the USTs showed no corrosion-related holes, pitted areas or broken seams. However, hydrocarbon odors and soil staining were documented in the UST system excavation. On June 25-26, 2001, soil samples were collected beneath each end of the three USTs and below the western side of the dispenser island, and analyzed for benzene, toluene, ethylbenzene and total xylenes ("BTEX") by EPA Method 8021B, and total petroleum hydrocarbons ("TPH") by Method 8015AZR.1. In addition, total lead analyses were obtained by means of x-ray fluorescence ("XRF").

Based on the initial laboratory results showing PCS, the UST excavation was expanded laterally and vertically. This additional excavation extended to a depth of 16 feet below ground surface ("bgs"), except for one deeper location beneath the western end of Tank 2, which was sampled at 24 feet bgs. Following this over-excavation work, confirmatory soil samples were collected and analyzed for BTEX, TPH and lead.

Of the 18 total soil samples collected from the UST excavation, five samples had benzene concentrations above EPA's current 1.2 mg/kg residential RSL (the maximum benzene concentration was 3.9 mg/kg). In addition, five soil samples had ethylbenzene concentrations above EPA's current 5.8 mg/kg residential RSL (the maximum ethylbenzene concentration was 120 mg/kg). One soil sample had a concentration of 1,000 mg/kg for total xylenes, which was above EPA's current 580 mg/kg residential

RSL for this constituent. All of the maximum concentrations noted above were from soil samples collected at 14 feet bgs, although some soil samples from 12 ft bgs also had hydrocarbon concentrations above EPA's residential RSLs.

The first 17 soil samples were collected from 12 to 16 feet bgs, while the 18th sample was collected from 24 feet bgs. The TPH concentrations ranged from non-detect (at a 130 mg/kg detection level) to 12,000 mg/kg. The four soil samples that were analyzed for lead with XRF showed concentrations of 21 to 39 mg/kg, which are consistent with background soil conditions for the area and deemed to be non-threatening to human health.

**Additional sampling and excavation of three areas of oil-stained soil**

In addition to the UST system, TEC identified three areas of oil-stained soil that were associated with the former aboveground storage tank, drum storage area and concrete pad at the Site. These three areas, identified as A, B and C, were subsequently sampled and excavated. The stained soil in areas A, B and C was excavated to depths of approximately 2, 3 and 1.5 feet, respectively. Following this excavation work, confirmatory soil samples were collected and analyzed for BTEX and TPH (a subset of samples was analyzed). Eight soil samples were collected from Area A (A1-A8), four samples from Area B (B1-B4) and three samples from Area C (C1-C3). The laboratory analyses for these samples showed no detections for BTEX or TPH. It should be noted that the laboratory performing the analyses (i.e., Transwest Geochem, Inc.) used a different sample numbering convention than that used in the tables of the Report.

**Offsite disposal of PCS**

In addition to properly disposing the UST system components and the liquid contents, TEC disposed of approximately 800 tons of PCS from the UST system excavation, and 375 tons of PCS from stained soil areas A, B and C, at the Salt River Landfill. TEC properly profiled and manifested the PCS prior to transporting it to the landfill. The excavations at the Site were subsequently backfilled with clean soil from the excavation and with clean, imported fill material.

**Current and future use of the Site**

The Site is currently used as a parking lot on the north side of East Highland Road, and the area appears to be mainly paved. A more recently constructed football field/track, associated with the Salt River High School, is located approximately 50 feet north of the Site. The western and eastern extensions of the parking lot bracket the Site, and a high school administration building is located approximately 700 feet east of the Site. A residence or farming structure is located approximately 300 feet southwest of the Site. Another residence or farming structure is located approximately 500 feet southeast of the Site. The agricultural land south of the Site is reportedly used for cotton and corn production. During a telephone communication on May 29, 2014, CDD-EPNR staff indicated that they were unaware of any plans by the SRP-MIC to change the current use of the Site as a parking lot.

**Potential residual hydrocarbon contamination in soil and receptor evaluation**

Residual PCS exceeding EPA's residential RSLs for benzene and ethylbenzene was present at depths of 12 to 24 feet bgs at the Site in June 2001. However, as noted above, the former UST and stained soil excavations at the Site were backfilled with clean soil. In addition, the Site is currently used as a parking lot. Based on the Report and Mr. Horan's email on June 4, 2014, groundwater in the area of the Site is believed to be approximately 120-150 feet bgs, and the nearest drinking water well is located approximately 2 miles west of the Site. Almost 13 years have elapsed since the collection of the soil samples at the Site, and hydrocarbon compounds are known to biodegrade fairly rapidly in soil once the source areas have been removed.