



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 9**

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

September 14, 2009

Mr. Terry Jones
General Manager
San Carlos Apache Tribe
P.O. Box 0
San Carlos, AZ 85550

Subject: No Further Action (NFA) for the Former Texaco Underground Storage Tank Facility in Peridot, AZ (EPA ID# SANC-002)

Dear Mr. Jones:

The U.S. Environmental Protection Agency (EPA) has reviewed the report entitled "Underground Storage Tank Closure Report, Former Texaco Station" (closure report) that was prepared by Blaes Environmental Management, Inc. (BEM) for the former Texaco underground storage tank (UST) facility (site) on Highway 70 in Peridot, AZ. The closure report documents UST closure work conducted by Cochise Contractors and BEM at the former Texaco site on May 19, 2009.

Summary of field activities on May 19, 2009 at the former Texaco UST site

The closure report documents that on May 19, 2009, Cochise Contractors properly removed two 12,000 gallon USTs at the former Texaco site. Both USTs were reported to be in good condition, with no obvious holes or cracks. During the field work, BEM collected six soil samples from beneath the two USTs and analyzed these samples for volatile organic compounds (VOCs) by EPA Method 8260B; gasoline-range organics (GRO) by EPA Method 8015D; diesel and oil-range organics (DRO/ORO) by Arizona Method 8015 AZR1; and lead by EPA Method 6010B. All soil samples for VOC and GRO analyses were preserved with methanol in the field. BEM also conducted field screening of soil samples for VOCs with a photo-ionization detector (PID). In addition, one composite soil sample was collected from the excavated soil that had been stockpiled onsite on plastic sheeting. Groundwater was not encountered during the UST removals.

Analytical data for soil samples collected at the former Texaco facility

The analytical data for soil samples contained in the closure report show no detections for VOCs, GRO, DRO and ORO. The two low-level detections for lead (6.0 and 5.2 mg/kg) were well below EPA's 400 mg/kg Preliminary Remedial Goal for lead in residential settings, and also below the reported background concentration for lead in regional soil (30 mg/kg). A "strong hydrocarbon-like odor" was detected in the soil

sample from two feet below the east end of Tank 1 (the maximum PID reading was 50 ppm), and this can probably be attributed to a previous piping release. Cochise Contractors further excavated this hydrocarbon-impacted area to a depth of 18 feet bgs, and the soil sample from this deeper interval showed no PID detections.

Site Background

Based on the records in EPA's files, the former Texaco facility was operated from 1990 until at least June 2002, when EPA inspected the operational UST system. In late 2002 or early 2003, the convenience store associated with the former Texaco facility burned down. Following the fire, the facility and UST system remained non-operational until the UST removals on May 19, 2009.

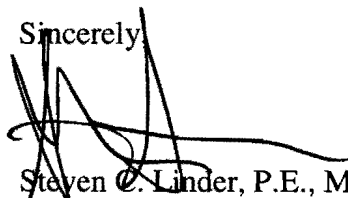
Conclusion

As noted above, all soil samples collected on May 19, 2009 from below the two USTs at the former Texaco site showed no hydrocarbon detections. In addition, the two USTs that were removed were reported to be in good condition, with no visible damage. Furthermore, the closure report contains a Certificate of Disposal for the two USTs (recycled by EMCO Recycling), and documentation that approximately 234 tons of soil were transported to the Allied Waste Landfill in Apache Junction (no excavated soil was used to backfill the excavation). The closure report also notes that Cochise Contractors used clean, imported fill to backfill the UST excavation.

Based on the documentation described above, EPA is not requiring further action at this time. However, if additional information becomes available in the future regarding hydrocarbon concentrations in soil and/or groundwater at the former Texaco UST site, EPA may require additional site assessment and/or corrective action.

Lastly, EPA is aware that two new USTs were installed in close proximity to the former Texaco USTs. Please note that the Tribe (or Peridot District) must submit a UST notification form to EPA within 30 days of dispensing fuel (the same EPA ID# should be used for these new USTs). If you have any questions regarding this letter, please contact Chris Prokop of my staff at (415) 972-3363.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven C. Linder", is written over the typed name.

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

cc: Loretta Stone, Director, San Carlos Apache Tribe EPA
Chris Prokop, U.S. EPA