



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 9

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

In reply, refer to: WST-8

March 8, 2010

Mr. Benito Alvarez, Jr.
General Manager
Tohono O'odham Farming Authority
25310 S. Toltec Buttes Road
Eloy, AZ 85231

Re: No Further Action Determination for the Former Underground Storage Tank Site in TOFA Farms (aka San Lucy Farms), Eloy, Arizona (TOHO-036)

Dear Mr. Alvarez:

The United States Environmental Protection Agency (USEPA) Region 9, Underground Storage Tank Program Office (USTPO) has completed our evaluation of the environmental conditions of the subject site and has prepared this letter to report our findings.

Site Background:

The Tohono O'odham Nation (TON) acquired the San Lucy Farms in 1988. A representative from the EPA visited the site on August 27, 1999 and observed the facility operations. The underground storage tank (UST) was located adjacent to the main farm maintenance shed with the dispenser located directly on the southeast corner of the shed. There was a lock on the fill pipe prohibiting the dispensing of fuel because the tank was slated for removal. Fuel for the farm operations was being provided by an above ground storage tank (AST) located on the north end of the shed

In May of 2007, Carl Warren and Tess Salire of EPA performed a site reconnaissance with Fred Orosco and Lorinda Sam of the TON Environmental Program Office (EPO). In addition, we met with you and Max Banda of your staff. Mr. Banda showed us the location of the former UST, which was directly in front of the entrance to the farm main maintenance shed. There were no visible remains of the old UST system that was observed during the tour.

Site Assessment History

UST Removal (1999)

Based on existing records, the 1,000-gallon gasoline UST was removed on August 31,

1999. The only written documentation of the removal of the UST is a four-page letter from the UST removal contractor that was addressed to the TON. The letter stated that the former tank was removed in August 1999 and disposed off-site with accompanying certificate of disposal and recycling documentation. The letter also noted that the tank was intact upon excavation with no visible holes or sign of leakage however; there was a minimal amount of stained soil around the dispenser. Soil samples were taken from under the UST at 7 feet below ground surface (bgs), but the analytical results were not provided in the letter. The excavated soil was used to backfill the excavation.

Site Assessment (2001 and 2002)

In 2001, the Bureau of Indian Affairs retained Environmental Technology, Inc. (EnTech) to conduct a site assessment. EnTech advanced two soil borings at 20 feet bgs at the former location of the UST. Analytical results indicated petroleum contamination in soil with benzene at levels above the Arizona Department of Environmental Quality (ADEQ) soil remediation level (SRL).

EnTech performed additional site assessment activities in 2002. Findings from the investigation, were presented in the *UST/AST Assessment Report, 3200-acre San Lucy Ranch, Eloy, Arizona* dated May 1, 2002. The report described the activities undertaken to assess the extent of contamination from the former UST at the site and to assess and address the petroleum contamination associated with the diesel release from the AST. Our review focused on the UST site assessment activities.

EnTech advanced six soil borings in the former UST location to a maximum depth of 60 feet bgs. The extent of contamination has been defined to a depth of 50 feet bgs and to an area of 50 feet in diameter. Three soil samples had benzene levels of (0.89 ppm at 25 feet bgs, 1.6 and 2.8 ppm at 10 feet bgs), slightly above the ADEQ SRL of 0.61 ppm. However, these exceedances did not go beyond 25 feet in depth. Groundwater was not encountered in the investigation. EnTech concluded that no additional site assessment was needed at this former UST site.

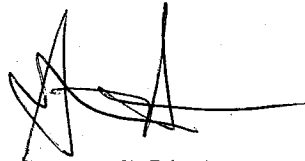
Conclusion

After reviewing the case file, EPA has determined that this site does not appear to pose an adverse threat to human health and the environment at this time. Based on the findings presented in the 2002 site assessment report, the remaining contamination from the former UST site is very limited and does not require additional assessment or action. The remaining soil contamination in the ground should degrade over time. As a result, EPA recommends that this site be closed without additional action.

The USTPO has discussed this site with the Tohono O'odham Nation and they concur with our recommendation. If additional information is presented in the future, regarding the remaining residual contamination from the UST that may pose a threat to the environment; EPA may reopen this case for additional investigations.

If you have any questions regarding the information contained in this letter, please contact Carl Warren of my staff at (415) 972-3355.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Linder', with a long horizontal stroke extending to the right.

Steven C. Linder, P.E.

Program Manager

Underground Storage Tanks Program Office

Cc: John Krause, BIA Phoenix Area Office
John Graves, BIA Phoenix Area Office
Fred Orosco, Tohono O'odham Nation Solid Waste Regulatory Office
EPA Site File TOHO-036