UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
Underground Storage Tanks Program Office
75 Hawthorne Street (LND-4-3)
San Francisco, CA 94105

JAN 3 0 2015

CERTIFIED MAIL: 7013 1090 0000 1618 9907
RETURN RECEIPT REQUESTED

Mr. Rudy Mix, Environmental Program Manager
Waste Program, Department of Environmental Quality
Gila River Indian Community
P.O. Box 97
Sacaton, Arizona 85147

Subject: No Further Action
Former USTs at Komatke Market
17197 South 51st Avenue, Laveen, Arizona (EPA ID# GILA-003)

Dear Mr. Mix:

The U.S. Environmental Protection Agency Region 9 ("EPA") has completed its review of file documentation pertaining to the Komatke Market underground storage tank ("UST") Site ("the Site"). EPA's summary of the former UST operations, site assessment work and potential receptors, as well as the conclusions regarding the Site, are contained in Enclosure A.

Based on this file review, EPA has determined that no further action ("NFA") is required for the Site at this time. However, if additional information becomes available in the future regarding hydrocarbon contamination in soil and/or groundwater at the Site related to USTs, or the planned use of the Site changes, EPA may reopen the Site and require additional site assessment and/or corrective action.

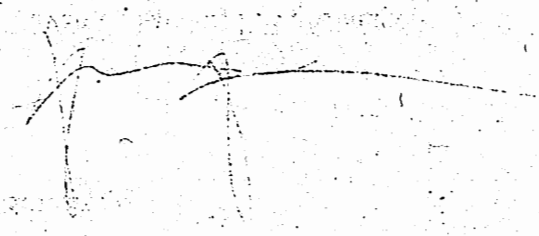
Please note that this NFA letter, as well as all supporting documentation, will be available to the general public. If you have any questions regarding this letter, please contact me at (415) 972-3369.

Sincerely,

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

Enclosure: A) Site Background and Justification for NFA

Cc (w/enclosures): Janet Bollman, GRIC DEQ



ENCLOSURE A
Site Background and Justification for NFA

UST release at Komatke Market, 17197 South 51st Avenue, Laveen, Arizona (EPA ID# GILA-003)

Site background and current use

Based on the file documentation, EPA believes that there have been three generations of USTs at the Site, including the currently operating USTs. The original EPA UST Notification Form for the Site, dated February 28, 1986, listed two 10,000 gallon, steel USTs that were installed in 1984 for storing gasoline. These original steel USTs appear to have been operated until approximately 2001 based on the subsequent UST Notification Form for the Site, which was signed by James Harriman on January 17, 2001. The 2001 UST Notification Form listed two fiberglass USTs (no installation dates were given) and these were operated until approximately August 2010 when they were removed as part of a facility renovation project. In September 2010, two double-walled fiberglass USTs were installed at the Site and these USTs are still in operation.

UST removal, hydrocarbon release confirmation and over-excavation of contamination

In August 2010, the Gila River Indian Community's ("GRIC's") contractor, Cochise Contractors ("Cochise"), removed two 10,000 gallon USTs, the associated piping and four fuel dispensers at the Site. The USTs were observed to be in good condition with no obvious holes or cracks, and no hydrocarbon staining was observed in the excavation for the UST system. However, hydrocarbon vapors were detected in the soil beneath the former northwestern fuel dispenser, and subsequent photo-ionization detector ("PID") measurements confirmed the release. Based on these observations, Cochise over-excavated the petroleum contaminated soil ("PCS") in the area of the former northwestern dispenser to an approximate depth of 14 feet below ground surface ("bgs"). In-situ soil samples were collected by Blaes Environmental Management, Inc. ("Blaes") from three locations below each of the two USTs at 14 feet bgs. In-situ soil samples were also collected from below the dispensers at 3 feet bgs. Due to the above-noted release below the northwestern dispenser, in-situ soil samples were also collected from 8 feet and 14 feet bgs during the over-excavation work in that area.

The soil samples collected by Blaes on August 19, 2010 following the UST removals were analyzed for volatile organic compounds ("VOCs") by EPA Method 8260, gasoline-range organics ("GRO") by EPA Method 8015D, diesel-range organics ("DRO") and oil-range organics ("ORO") by EPA Method 8015 AZ, and total lead by EPA Method 6020A. The laboratory analyses showed detections for benzene, toluene, ethylbenzene and total xylenes ("BTEX"), as well as 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, 4-isopropyltoluene, isopropylbenzene, naphthalene, n-butylbenzene, n-propylbenzene, sec-butylbenzene and lead. However, the concentrations for all of these chemicals were below EPA's Regional Screening Levels ("RSLs") for soil in industrial settings. It should be noted that the soil from 8 feet bgs in the area of the former northwestern dispenser, which had shown some individual hydrocarbon concentrations above the industrial RSLs, was subsequently over-excavated. The soil samples showed no detections for GRO, DRO and ORO, except for GRO (490 mg/kg) and ORO (1,100 mg/kg) at 14 feet bgs below the former northwestern dispenser.

Additional site assessment to determine the vertical extent of PCS

On September 1, 2010, Blaes began additional site assessment work to determine the vertical extent of PCS, which included drilling a soil boring in the immediate area of the former northwestern dispenser

and a second boring in the area of the former southern UST. Soil sampling was conducted in both borings at 20 feet, 25 feet and 30 feet bgs (a total of six samples). The soil samples from 20 feet and 25 feet bgs were analyzed for BTEX only by EPA Method 8021, whereas the soil samples from 30 feet bgs were analyzed for the full VOC list by EPA Method 8260 and polynuclear aromatic hydrocarbons ("PAHs") by EPA Method 8310. The analytical results for the soil samples collected on September 1, 2010 were below the industrial RSLs except for naphthalene at 30 feet bgs, where the maximum concentration was 20 mg/kg (versus the 17 mg/kg industrial RSL for naphthalene).

Groundwater investigation

During the additional site assessment described above, groundwater was encountered in both borings at approximately 33 feet bgs. Based on this occurrence of groundwater and hydrocarbon detections down to 30 feet bgs, Cochise authorized Blaes to install groundwater monitoring wells in the two soil borings. Monitoring wells MW-1 and MW-2 were both 2 inch diameter wells that were installed to a total depth of 55 feet bgs, and were screened from approximately 25 feet bgs to the full well depth. On September 7, 2010, Blaes sampled both wells and had the samples analyzed for VOCs by EPA Method 8260B and PAHs by EPA Method 8310. The depths to groundwater in MW-1 and MW-2 were 32.62 feet bgs and 32.90 feet bgs, respectively. The laboratory results for the two monitoring wells sampled on September 7, 2010 showed no concentrations above EPA's Maximum Contaminant Levels ("MCLs").

On August 28, 2012, following the installation of two additional monitoring wells northwest and southeast of the former UST basin, GRIC's contractor ("Kleinfelder") sampled all four monitoring wells and analyzed the groundwater samples for VOCs by EPA Method 8260B, semi-volatile organic compounds ("SVOCs") by EPA Method 8270C, GRO, DRO and ORO by EPA Method 8015D, and selected metals by EPA Methods 200.7, 200.8 and 245.1/7470A. The analytical results for the groundwater samples showed no concentrations above the MCLs except for 7.6 µg/l of bis(2-ethylhexyl)phthalate that was detected in the groundwater sample from MW-3, which was slightly above the 6 µg/l MCL for this compound. The laboratory table noted, however, that the 7.6 µg/l detection of bis(2-ethylhexyl)phthalate was an estimated concentration because it was detected below the minimum reporting limit ("MRL").

Potential receptors and current use of the Site

The Site is an active UST facility and it is completely paved. In its "Soil & Groundwater Investigation Report" for the Site, dated September 22, 2010, Blaes stated that there were no schools, hospitals, day-care centers, nursing homes or other sensitive receptors within 500 feet of the Site. Blaes noted that a few scattered residences were located within 500 feet of the former UST area to the west and southwest. Blaes' report also noted that the nearest surface water is the Gila River located approximately 1.5 miles west of the Site. Based on information provided by the GRIC's Department of Environmental Quality ("GRIC DEQ"), Blaes determined that two registered water wells were located within ¼ mile of the Site. However, GRIC DEQ staff subsequently indicated that both of these wells were not active. On January 27, 2015, GRIC DEQ staff indicated that the nearest active drinking water well is located at Gila Crossing, which is approximately 1.25 miles south of the Site.

Conclusion

As noted above, only the naphthalene concentration in the soil sample from 30 feet below the former northwestern dispenser exceeded EPA's RSLs for industrial settings. In addition, the analytical results from the two groundwater monitoring events at the Site showed no concentrations above EPA's MCLs,

except for the laboratory's estimated concentration below the MRL for bis(2-ethylhexyl)phthalate, which was slightly above its MCL. The groundwater beneath the Site is not currently used for drinking water and GRIC DEQ staff are not aware of any future plans to use this groundwater. In addition, GRIC DEQ staff are not aware of any future plans to change the current use of the Site as a UST facility. Based on information provided by GRIC DEQ staff, the nearest active drinking water well is located approximately 1.25 miles south of the Site, and the nearest surface water is the Gila River located approximately 1.5 miles west of the Site. Based on these findings, no further work is required for the Site at this time.