UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 9

75 Hawthorne Street
San Francisco, CA 94105-3901

In reply, refer to: WST-8

March 14, 2013

Gayl Honanie, Director
Hopi Environmental Protection Office
P.O. Box 123
Kykotsmovi, AZ 86039

Subject: No Further Action Required for the Former Underground Storage Tank (UST) site located at the Coach's Povatah Site (HOPI-035) in Polacca, Arizona.

Dear Ms. Honanie:

The United States Environmental Protection Agency (USEPA) Region 9, Underground Storage Tank Program Office (USTPO) has completed our review of the site file on – Polacca, Coach's Povatah *(Hopi-035)*. EPA retained Bristol Environmental Remediation Services, LLC (Bristol) to conduct site assessment and characterization activities at this abandoned UST site on June 25, 2010. The work was funded through the America Reinvestment and Recovery Act (ARRA) and overseen by the EPA Region 9 and the Hopi Environmental Protection Office (EPO).

Site Background

In December 2006, the Hopi EPO visited this site with EPA Region 9, as part of Hopi abandoned sites' reconnaissance activities. The property was abandoned and a concrete block structure remained with visible remnants of a fueling operation; a fill pipe, a vent pipe and a fuel tank fill port. According to the former Hopi EPO staff, Kendrick Lomayestewa, the tank was assessed as being empty. The owner of this property, Elbridge Poocha aka "Coach," is deceased. Hopi EPO listed this site on their 2007 environmental assessment inventory list, as a high priority site. EPA has minimal information regarding the operational history of this site.

Site Assessment

Bristol subcontracted Zonge Engineering and Research Organization, Inc. (Zonge) to perform a geophysical survey of the site on March 3, 2010 to identify subsurface features such as USTs and piping. Zonge identified an anomaly indicative of a buried UST system. On June 25, 2010, Bristol subcontracted Hopi Abandoned Mine Land Program (AML) to excavate the identified anomaly. AML uncovered one, 2,000-gallon UST and associated piping. The dispenser was located directly on top of the former tank.

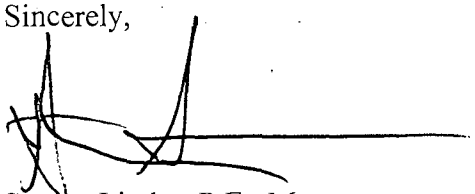
Petroleum odors and staining were noted in the UST excavation. The soil screening photoionization detector (PID) measured volatile hydrocarbons above 120 parts per million (ppm) underneath the UST. Approximately 120 cubic yards of petroleum-contaminated soil was excavated and disposed off-site. Six confirmatory soil samples were taken from the excavation at 12 feet below ground surface; beneath the piping, the dispenser and the UST. The results of the analysis of the soil samples were non-detect for petroleum hydrocarbons and/or volatile organic compounds, except for one soil sample beneath the UST. Diesel-range organics was detected at 110 ppm, which is slightly above the action level of 83 ppm. Gas-range organics (GRO) was detected at 82 ppm, benzene was non-detect and toluene, ethylbenzene and xylenes (BTEX) were detected but below the action levels.

Groundwater was not encountered during this investigation. The excavation was backfilled with clean fill and some soil left over from the tank removal. The UST and associated materials were removed from the site and disposed at an approved facility.

Conclusion

Based on the findings presented in the report, the EPA has determined that no further action is necessary to address the release from the UST at this site. The low detection of total petroleum hydrocarbons (TPHs) and more importantly, the low or non-detectable concentrations of the more mobile and toxic constituents BTEX in soil, do not present a significant risk to human health and the environment. The USTPO has discussed this site and recommendation with Hopi EPO. If you have any questions regarding the information contained in this letter, please contact Tess Salire of my staff at (415) 972-3376, or you can contact me directly at (415)-972-3369.

Sincerely,



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

cc: EPA Site File HOPI-035
Scott Ruth, Bristol
LeRoy Shingoitewa, Chairman Hopi Tribe