



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
Underground Storage Tanks Program Office
75 Hawthorne Street (WST-8)
San Francisco, CA 94105

In reply, refer to: WST-8

September 28, 2011

Mr. Fred Orosco
Compliance Supervisor/ Inspector
Tohono O'odham Nation (TON)
Solid Waste Regulatory Office
P. O. Box 837
Sells, AZ 85634

Re: No Further Action at the Underground Storage Tank Site at the Pisinemo Village Church,
Pisinemo, AZ (EPA ID# TOHO-005)

Dear Mr. Orosco:

The U.S. Environmental Protection Agency (EPA) Region 9 has completed our review of the information provided by your office on June 2011, regarding the subject site. During our June 2011 quarterly conference call with your office to discuss open leaking underground storage tank (LUST) sites on the Tohono O'odham Nation (TON), you stated that you found some old UST closure reports for the Mission Church site(s). The UST Site Closure documents were dated January 4, 1999.

Site Background:

The Pisinemo Village Church underground storage tank (UST) was registered with U.S. EPA by the Franciscan Friars in 1985. The UST was located in the Pisinemo Village in the school that was run by the San Solano Mission and was used to fuel the school buses. In November 1998, Father Thomas Frost of the San Solano Mission notified the U.S. EPA of the intent to remove the UST. According to Father Frost, the UST had been out of use since the 1970's. The UST removal and site characterization were undertaken in December 1998 and the work was performed by JBL and Associates of Phoenix, Arizona. The Environmental Office of the TON provided field oversight of the removal work. The U.S. EPA did not receive the report for this UST removal.

Site Assessment

Site assessment during the December 1998 UST removal included collecting three soil samples at the north, south and center of the UST excavation. The depth of the sampling cannot be determined from the available data. However, total petroleum hydrocarbons (TPH) were detected at the three sampling locations, with the north and south locations having TPH levels at 3,900 parts per million (ppm) and 2,600 ppm, respectively. Toluene, ethylbenzene and xylenes were also detected but at levels below the 2011 EPA Regional Screening levels. Benzene was not detected in any of the soil samples.

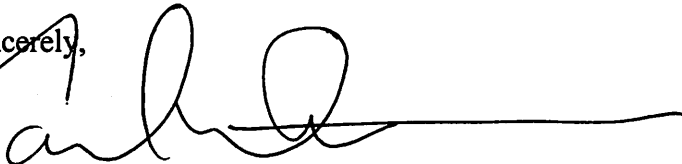
The depth to groundwater was not provided in the report. However, based on the Arizona Department of Water Resources, groundwater depth at this site is over 150 feet below land surface. Given the age of the release, the TPH contamination in soil should have degraded to levels at or below the EPA action level of 500 ppm. More importantly, the low to non-detect concentration levels of the more mobile TPH constituents (the BTEX) and the deep groundwater reduced the threat to the groundwater resource significantly.

Conclusion

My staff has discussed our findings with you and you raised questions about the TPH contamination levels detected at the site. We discussed the factors stated above, like the nature and age of release and depth to groundwater and we concurred that the contamination should have degraded over time and does not currently pose a significant threat to human health and the environment. However, if additional information becomes available in the future regarding hydrocarbon contamination in soil and/or groundwater at this site, EPA and or the TON may reopen this site and require additional site assessment and/or corrective action from the San Solano Mission Church.

If you have any questions regarding the information contained in this letter, please contact me directly at (415) 972-3355 or you can contact Tess Salire at (415) 972-3376.

Sincerely,

A handwritten signature in black ink, appearing to read 'Carl Warren', with a long horizontal line extending to the right.

Carl Warren, Project Manager
Leaking Underground Storage Tanks Program

cc: San Solano Missions Parish
Site File TOHO-005