



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX

Underground Storage Tanks Program Office

75 Hawthorne Street
San Francisco, CA 94105-3901

November 9, 2011

Mr. Ken Norton
Hoopa Land Management Department
P.O. Box 1130
Site 1 Cannery Road
Hoopa, CA 95546

Subject: No Further Action Determination at the Leaking Underground Storage Tank Site at the Former McIntosh Chevron at Lot 347 Highway 96, Hoopa, Ca 95546 (EPA ID# HOOP002).

Dear Mr. Norton:

The U.S. Environmental Protection Agency (EPA) concludes that no further action is required on this site, based on new information recently acquired from the Humboldt County Department of Health and Human Services. The new information changed the conclusions presented in the letter EPA sent you on May 10, 2010. The letter is attached here for your reference (Attachment 1).

Site Background

The underground storage tanks (USTs) at the site were installed in the early 1960's and the facility operated for over 40 years, until the site was abandoned in 2006. Prior to EPA's work in 2009, three soil samples were collected at the site in 2008. Results from the soil samples showed elevated concentrations of gasoline-range organics (GRO) and diesel-range organics (DRO) in the soil.

In June 2009, EPA removed three USTs from the site. Removal actions also included: removal of associated piping, concrete and asphalt pavement, dispensers and demolishing the canopy over the pump islands. In addition, piping and a limited amount of concrete from inside the station building was removed to address the release of material from the waste oil tank. The results of the work were summarized in the report entitled "*McIntosh Chevron (HOOP 002) Hoopa Valley Indian Reservation, Site Assessment Report, Revision 0*", (Bristol, 2009).

Changes to Conclusions to an EPA letter sent on May 10, 2010 to Hoopa:

In the earlier assessment of the 2009 investigation results, EPA recommended adding two groundwater monitoring wells to better facilitate the mapping of the groundwater gradient on the site and to determine the quality of groundwater. The request was also based on EPA's understanding of the gradient at the time – which was to the west.

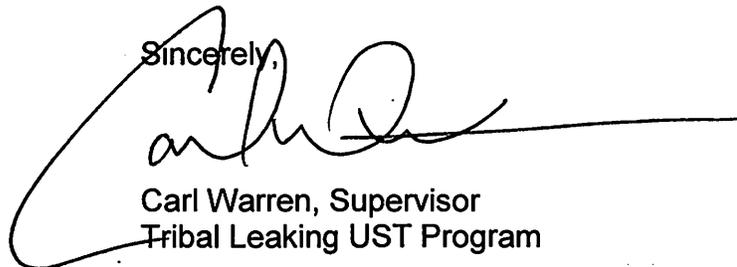
However, on November 1, 2011, EPA acquired the report from Humboldt County made on behalf of Unocal for Bulk Plant 0289 by Applied GeoSystems (AGS), which showed the groundwater gradient direction and magnitude measured in 1991 was **1 : 0.004 (H:V) to the north**. The report is entitled "*Report - Evaluation of Soil and Ground Water at Former Bulk Plant No. 0289, Highway 96, Hoopa, California*" by Applied GeoSystems prepared for Unocal Corporation on 25 May 1991 (Attachment 2). This report covers the adjacent site (former Unocal Bulk Plant 289) and the HOOP002 site.

The results of the 2009 groundwater sampling as well as the gradient map provided in the 1991 AGS report indicate that the petroleum releases to the soil appear not to have migrated into downgradient groundwater resources. This conclusion is based on the results from the groundwater sample collected from MW-3 which is downgradient of the two points for which EPA previously expressed concern (10 May 2010). A plume that might result from a release from soil to the groundwater table would be expected to have a strong lateral component of migration and would likely be intercepted by MW-3.

Therefore the question of contaminant migration in the groundwater is no longer a concern. Based on this information, EPA concludes that no new wells are needed to confirm if groundwater is impacted and that this concern is adequately addressed with the available data.

If you have any questions regarding this letter, please contact Curtis Payton of EPA's contract support staff at (916) 557-7431.

Sincerely,

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

Carl Warren, Supervisor
Tribal Leaking UST Program

CC:
Mimi Newton, ORC
Site file Hoop-002
Attachments