



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

April 10, 2008

Mr. Stephen B. Etsitty, Director  
Executive Office  
Navajo Nation Environmental Protection Agency  
P.O. Box 339  
Window Rock, AZ 86515

Subject: Recommendation for No Further Action for the Former Underground Storage Tank Site at the Dilkon Trading Post, Dilkon, AZ (NAV-153)

Dear Mr. Etsitty:

The United States Environmental Protection Agency (USEPA), Region 9 has completed our review of the report - *Soil Excavation and Removal, Dilkon Trading Post, dated October 1, 2007*. The report describes the activities undertaken to remove and treat the petroleum contaminated soil (PCS) at the Dilkon Trading Post. These activities were undertaken and funded by the Navajo Nation EPA. The work was performed by Ironhorse Environmental Services, Inc. of Window Rock, Arizona.

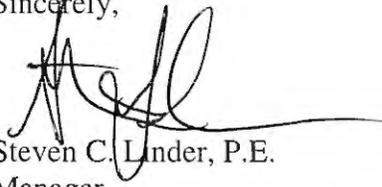
Two former USTs and associated piping were removed from the site in 1994 and a petroleum hydrocarbon release to the soil was documented. During the tank removal, PCS was also removed, however not all of the contamination was taken out of the pit. Site assessment activities conducted in 2006 by the Navajo Nation as described in the report - *Preliminary Investigation Report, Dilkon Trading Post, dated August 2006*, detected hydrocarbon contamination exceeding the NNEPA screening levels for soil. The majority of the soil contamination was noted at a depth of 25 to 27 feet below ground surface (bgs).

The activities implemented in 2007 were designed to remove the remaining PCS in the noted zone above. Approximately, 229 yards of PCS was removed during this mobilization. Soil samples were taken at the bottom of the excavated pits and the excavation was then treated with an in-situ treatment using an enhanced bio-chemical solution. Soil sampling result from one of the pits indicated the level of gasoline range organic (GRO) hydrocarbons at 100 mg/kg, which is at the target NNEPA cleanup level for GRO. Sampling results for BTEX were below both NNEPA and US EPA screening levels for soil. Groundwater was no encountered during this investigation.

Based on the findings presented in the subject report, EPA Region 9 recommends that this site be closed without additional action. There are no remains of the former facility at the site and the surface area is clear of all debris at the site. The Navajo Nation EPA was not able to locate a viable responsible party to recover the costs incurred in implementing the activities conducted at this site.

My staff has reviewed the findings in the report with Mr. Henry Haven of the NNEPA UST program and Mr. Haven concurs with these findings. If you have any questions regarding the information contained in this letter, please contact Carl Warren of my staff at (415) 972-3355.

Sincerely,



Steven C. Linder, P.E.

Manager

Underground Storage Tanks Program Office

U.S. Environmental Protection Agency – Region IX

cc: Henry Haven, NNEPA  
Warren Roan, NNEPA  
Carl Warren, UST Program Office, US EPA Region IX  
Mimi Newton, Office of Regional Counsel, US EPA Region IX

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