



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

February 17, 2011

Ms. Diane Malone  
Environmental Department Manager  
Waste Regulatory and Compliance Department  
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 Salina Springs Trading Post, Salina Springs, AZ (NAV-240)

Dear Ms. Malone:

The United States Environmental Protection Agency (USEPA), Region 9 has completed our review of the file for the former Salina Springs Trading Post in Salina Springs, Arizona. Our review included the site operational history, the underground storage tank (UST) removal report, the preliminary investigation report, and the soil excavation and site treatment report. These activities were undertaken and funded by the Navajo Nation EPA. The work was performed by iina'ba of Farmington, New Mexico.

### **Background**

Three USTs were installed at the Salina Springs Trading Post between 1974 and 1978, which included an 8,000-gallon gasoline tank, a 2,000-gallon gasoline tank and a 4,000-gallon diesel tank. The facility ceased fueling operations in 1992 and was abandoned.

The site is part of the Navajo Nation Division of Economic Development's initiative in 1998 to remove out-of-service UST systems at abandoned gas stations throughout the Navajo Nation. The three USTs and associated piping were removed from the facility in September 1998. A petroleum hydrocarbon release to the soil was documented, as described in the letter report *-Removal of Underground Storage Tank System, Salina Springs Trading Post, December 1998*. During the tank removal, 40 cubic yards of petroleum-contaminated soil (PCS) was removed; however, not all of the contamination was taken out of the pit. The lateral and areal extent of contamination was not determined in 1998.

## Site Assessment

The site assessment activities were conducted in 2006 by the Navajo Nation EPA as described in the report – *Preliminary Investigation Report, Former Salina Springs Trading Post, August 2006*. Soil samples collected during the site assessment showed hydrocarbon contamination exceeding the NNEPA screening levels for soil to a depth of 25 feet below ground surface (bgs). The lateral extent of hydrocarbon contamination was not determined at this time because a daycare facility was built on top of the former tank excavation, which made it difficult to access the contaminated area.

NNEPA returned to the site in 2007 and implemented soil excavation activities to address the remaining PCS in the soil. Field screening using a photoionization detector (PID) guided the extent of the overexcavation. When the headspace readings showed less than 100 parts per million (ppm), the excavation was terminated. Approximately 200 yards of PCS was removed during this mobilization. One soil sample was collected from the bottom of the excavation and the analytical results indicated the level of gasoline range organic (GRO) hydrocarbons at 64 ppm, which was below the NNEPA's cleanup level for GRO. An elevated concentration of diesel range organic (DRO) hydrocarbons was detected in the soil sample which was not associated with the UST system, but rather with the former aboveground storage tank at the site.

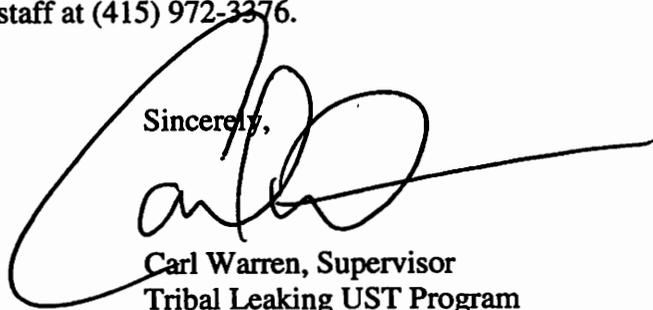
The excavation was treated in-situ with an enhanced biochemical solution to address the remaining DRO contamination and backfilled with clean soil. These activities were documented in the report- *Former Salina Springs Trading Post, Underground Storage Tank Site. Soil Excavation and Treatment, Salina Springs, Arizona, October, 2007*. Groundwater was not encountered during this investigation.

## Conclusion

During a meeting with EPA and NNEPA on December 2010, Mr. Haven recommended that this site be closed without additional action. EPA concurs with the NNEPA recommendation. However, if additional information becomes available in the future regarding hydrocarbon contamination in soil and/or groundwater at this site, EPA or the NNEPA may reopen this site and require additional site assessment and/or corrective action.

If you have any questions regarding the information contained in this letter, please contact Tess Salire of my staff at (415) 972-3376.

Sincerely,

A handwritten signature in black ink, appearing to read 'Carl Warren', is written over the word 'Sincerely,'. The signature is stylized and extends to the right.

Carl Warren, Supervisor  
Tribal Leaking UST Program

**cc: Henry Haven, NNEPA  
Warren Roan, NNEPA  
File copy NAV-240**