



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

December 8, 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 Underground Storage Tank Site
at the McGee Trading Post, Pinon, AZ (NAV-242)

Dear Mr. Etsitty:

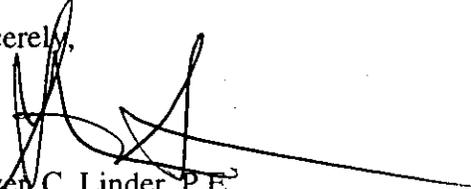
The United States Environmental Protection Agency (USEPA), Region 9 has completed our review of the report - *Removal of Underground Storage Tanks and Above Ground Storage Tanks, McGee Trading Post*, dated November 2008. The report describes the site closure activities which included the removal of the underground storage tank (UST) system and site characterization. These activities were undertaken in August 2008 and were funded by the Navajo Nation EPA (NNEPA) FY2008 LUST grant. The work was performed by iina'ba, Inc. of Farmington, New Mexico.

Prior to the UST removal, the station had been abandoned for 20 years and was gutted by fire in May 2008. To reduce future threats to the environment from this abandoned facility, a site assessment was implemented to remove three USTs, their associated piping, and the dispensers from the site in August 2008. During these activities, a petroleum hydrocarbon release to the soil was discovered and documented. To address this release, soil excavation activities were implemented to remove petroleum contaminated soil (PCS) beneath the UST system. Approximately 150 cubic yards of PCS were excavated and stockpiled near the excavation.

Soil samples were taken at the bottom and ends of the excavation and the results detected total petroleum hydrocarbon (TPH) contamination exceeding the NNEPA soil screening level of 100 mg/kg. The exceedances ranged from 270 mg/kg to 500 mg/kg for diesel range organics and 100 mg/kg to 370 mg/kg for gasoline range organics. The excavation pit was treated with an in-situ treatment using an enhanced bio-chemical solution to address the remaining contamination in the pit, before backfilling with the treated stockpiled soil. This in-situ treatment had been used and found to be effective in treating residual petroleum contamination at these levels in other LUST sites on the Navajo Nation, with similar site conditions.

Based on the findings presented in the report, EPA Region 9 recommends that this site be closed without additional action. 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.
Program Manager
Underground Storage Tanks Program Office
U.S. Environmental Protection Agency – Region IX

cc: Henry Haven, NNEPA
Warren Roan, NNEPA
Mimi Newton, Office of Regional Counsel, US EPA Region IX
File copy NAV-242