



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 9

75 Hawthorne Street
San Francisco, CA 94105-3901

MAY 2 2014

Todd Flores
Pic-N-Run
P.O. Box 2817
Flagstaff, AZ 86003

Subject: No Further Action for the UST facility at Nelson Pic-N-Run UST Cleanup Site in Leupp, Arizona (EPA ID# NAV-244)

Dear Mr. Flores:

The U.S. Environmental Protection Agency ("EPA") and the Navajo Nation EPA ("NNEPA") have reviewed the documents submitted regarding the removal of three USTs and disposal of contaminated soil stockpiled on the above noted site. The sections below provide background on the Site and documentation supporting the no further action (NFA) determination.

Previous and current UST operations at the Site

Three underground storage tanks ("USTs") have historically operated at the site. Three USTs were installed in 1987 and removed in 2009. The current USTs were installed in 2009 and have been inspected by EPA or NNEPA in 2011 and 2013.

Spill - Diesel- July 2009

The facility reported on July 7, 2009 approximately 200 gallons of diesel were released under the dispenser.

UST removal and Site Assessment work

Three USTs originally installed in August 1987 were removed in October 2009 by Cochise Contractors of Tempe Arizona. Tank 001 was a 10,000 unleaded gasoline tank; Tank 002 was a 6,000 diesel tank and 003 was an 8,000 premium gasoline tank. The USTs did not show any visible holes or leakage. An organic vapor analyzer (OVA) was used on-site to screen soil excavated from the UST pit. Low level readings directed the contractor to over excavate 5,000 yards of soil from the UST pit.

Due to the July 2009 spill, during the UST removal, the dispensers were removed and the area excavated to 11 feet below ground surface (bgs). OVA readings taken of the dispenser excavation pit were less than 500 ppm and in most cases less than 50 ppm.

The excavated soil from the UST pit and dispenser area was stockpiled on-site. The Navajo Nation in a letter dated July 10, 2009, disallowed storage of the contaminated soil on-site. The stockpiled soil was removed from the site in July 2010.

Testing and Disposal

Invoices submitted to EPA and NNEPA prepared by Waste Management of Phoenix note that the eighteen (18) cubic yards of petroleum contaminated soil excavated was classified as non-hazardous and disposed of at the Pen-Rob Landfill.

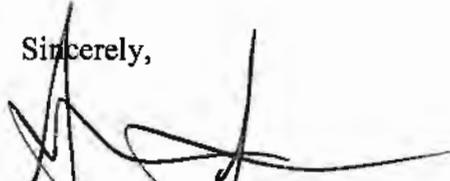
Planned current and future use of the Site

The Site continues to be used as a retail gasoline facility.

Conclusion

Based on the documentation described above, EPA and NNEPA believe that no further action is needed for the Site at this time. However, if additional information becomes available in the future regarding hydrocarbon concentrations in soil and/or groundwater at the Site, EPA, or the NNEPA, may reopen the site and require additional site assessment and/or corrective action. If you have any questions regarding this letter, please contact me at (415) 972-3369.

Sincerely,



Steven C. Binder, P.E., Manager
Underground Storage Tanks Program Office

cc: Diane Malone/Henry Haven, NNEPA
Navajo RBDO
Navajo BIA