



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 9

75 Hawthorne Street
San Francisco, CA 94105-3901

In reply, refer to: WST-8

October 22, 2011

Shasta Moore
Compliance Coordinator
PREFERRED SANDS
One Radnor corporate Center
100 Matsonford Road, Suite 101
Radnor, PA 19087

Subject: **No Further Action Required at the Preferred Sands of Arizona Plant (Cheto Mines) Underground Storage Tank (UST) Site (NAV-301) in Sanders, AZ**

Dear Ms. Moore:

The United States Environmental Protection Agency (USEPA) Region 9, Underground Storage Tank Program Office (USTPO) has completed our review of the October 2011 "*Underground Storage Tank Closure Report Preferred Sands of Arizona Plant (NAV#301) Sanders, AZ*" prepared by iina'ba. The report described the activities undertaken on August 21, 2011, at the Preferred Sands of Arizona Plant in Sanders.

Site Background

The subject site is an existing mine (Cheto) capable of producing approximately 550,000 tons per year of frac sand and propan. The out-of-service UST was installed in 1996 and was used to store unleaded gasoline for Site use. The UST was originally installed, operated, and maintained by *BASF Corporation* until the sale of the "UST System" to *Preferred Sands* on January 25, 2011. Since that time, the UST has remained empty and out-of-service.

The Site is located approximately 6.5 miles southeast of the intersection of Interstate 40 and Clay Mine Road near Sanders, Arizona at an approximate topographic elevation of 6,025 feet above mean sea level (MSL). The property consists of an active mine with associated office and processing buildings and equipment. The out-of-service UST is situated north (behind) the scale house for the mine beneath a small sand hill vegetated with local species of desert plants. A single, raised concrete pump island is positioned at the bottom of the hill, with a single, gas station type, suction dispenser mounted in the middle. The UST is buried beneath the ground immediately north of the dispenser, with a vent pipe exiting the subsurface due north along a barbed-wire fence.

Site Assessment

On August 30, 2011 iina' ba was awarded the contract to remove the USTs at the Preferred Sands of Arizona Plant located in Sanders, Arizona. As summarized in the report on October 7, 2011, iina' ba conducted field activities at the site which included removal of residual product/water from within each tank, properly removing and disposing of the tank, collecting soil samples, and backfilling the excavation area.

Field observations indicated that there was no pitting and holes on the UST. Low level PID readings in ppm were recorded in the soil samples screened from the sidewalls of the UST excavation. In addition, no staining or free-phase product was observed underneath the UST and with the associated debris and piping. Confirmatory soil samples were taken from the former UST location. Results from the soil samples were non-detect for petroleum hydrocarbons and/or volatile organic compounds (ethylbenzene, total xylenes, methyl tertiary-butyl ether (MTBE)). A very low concentration for TPH, slightly above the reporting limit of 23 mg/Kg, was detected beneath the suction dispenser at 26 mg/Kg. However, this detection is considerably lower than the *Navajo Nation EPA Soil Cleanup Standards* (NNEPA Proposed Storage Tank Cleanup Standards, July 21, 2010) of 400 mg/Kg.

Groundwater was not encountered during this investigation. The excavated soil and clean fill from the area was used to completely backfill the excavation. The UST and associated piping and debris were removed from the site and disposed at an approved facility.

Conclusion

Based on the findings presented in the report, NNEPA and EPA Region 9 agreed that no further action (NFA) was required at the site. If additional information becomes available in the future regarding hydrocarbon contamination in soil and/or groundwater at this site resulting from a release from a petroleum UST system, 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 S. Bobby Ojha of my staff at (415) 972-3374 or you can contact me directly at (415)-972-3355.

Sincerely,

Carl Warren, Supervisor
Tribal Leaking UST Program

cc: Henry Haven, NNEPA
Warren Roan, NNEPA
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