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August 25, 2017

Mr. Alvin Thompson
PO Box 85
Church Rock, NM 87311

Ref: Review of NNEPA files and reports submitted for NAV302, in Thompson's Market, Leaking Storage Tank Site in Church Rock, NM.

Dear Mr. Thompson,

The Navajo Nation Environmental Protection Agency (NNEPA) has completed the review of NNEPA files and reports from 1998 to 2017 submitted for NAV302, Thompson's Market in Church Rock, NM.

Site Background:

November 1999 Site Assessment

At the request of USEPA Region IX a minimum site assessment was conducted. Groundwater was encountered at 35 feet below ground surface. Five soil borings were advanced with three completed as groundwater monitoring wells. All three wells were well above the NN Cleanup Standards (Cleanup Standards) for benzene. The initial soil borings that were sampled were all exceedingly high in every contaminate of concern (COC).

2007 Groundwater investigation

Monitoring well 1 (later called MW-B) had elevated levels of benzene, toluene, ethylbenzene, total xylenes (BTEX), MTBE, and total lead. Monitoring well 2 (later called MW-C) was below the Cleanup Standards for all COC's. Monitoring well 3 (later called MW-A) was above the Cleanup Standards for benzene and total lead.

October 2011 Underground Storage Tank Removal

On October 3, 2011, two 8,000-gallon capacity USTs were removed and transported off-site for destruction. Soil samples were collected following Navajo Nation protocol for lab analysis from the excavated tank pit and were analyzed for diesel range organics, (DRO) and gasoline range organics, (GRO). All soil samples were below the NNEPA clean-up standards for soils, 500 mg/kg. The samples were also below the cleanup standard for total lead in soils, 54 mg/kg. However, benzene remained above the Cleanup Standards.

September 2016 Soil and Groundwater Assessment

Two additional test borings were advanced down gradient of the existing wells in 2016 to assess the condition of the soil and groundwater at the site and to ensure that the contamination had not moved off site. Groundwater was encountered at 38 to 40 feet below ground surface. All five (5) wells at the site were sampled.

The following summarizes the results from the two new monitoring wells soil test boring analytical data collected between August 25 and 26, 2016. The new wells are MW -D and MW – E:

- The presence of BTEX compounds were not reported in any of the soil test boring samples
- The presence of TPH-GRO, DRO, or ORO were not reported in any of the soil samples
- The presence of PAH compounds was not reported in any of the soil test boring samples

The following summarizes the results of the groundwater analytical sample data collected from all five wells on September 7, 2016:

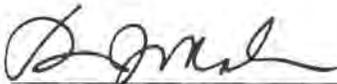
- No measurable NAPL was detected in any of the five (5) groundwater monitoring wells.
- The presence of a sheen was noticeable in monitoring well MW-B.
- No BTEX, MTBE, or naphthalene were detected in any of the five (5) groundwater samples.
- A trace amount of anthracene was detected in the groundwater sample from MW-A.
- 1,2,4- and 1,3,5-trimethylbenzene were detected in the groundwater sample from MW-B at levels of 92 and 77 ppb respectively. (Maximum Contaminate Level is not established by NNEPA but the sample results were well below the 330 ppb that is the acceptable level of many states.)
- TPH-GRO was detected in the groundwater samples from MW-A and MW-B at levels of 4.7 and 0.26 ppb respectively. (Maximum Contaminate Level not established by NNEPA);
- TPH-DRO was detected in the groundwater samples from MW-A and MW-B at levels of 1.8 and 5.7 respectively. (Maximum Contaminate Level not established by NNEPA);
- TPH-ORO was detected in the groundwater sample from MW-B at a level of 0.26 ppb. (Maximum Contaminate Level not established by NNEPA);
- Acenaphthylene was detected in the groundwater sample from MW-D at a level of 1.0 ppb. (Maximum Contaminate Level not established by NNEPA but the sample results were well below the 420 ppb that is the acceptable level of many states.)

Recommendations:

It is recommended that this site be closed without additional action. USEPA concurs with the Navajo EPA recommendation. However, if additional information becomes available in the future regarding hydrocarbon contamination in soil and/or groundwater at this site from past operations, USEPA or NNEPA may reopen this site and require site assessment and/or corrective action.

If you have questions regarding the information contained in this letter, please contact me or my staff at 928-871-7993

Sincerely,



Diane Malone, Department Manager
NNEPA Waste Regulatory Compliance Department
Leaking Storage Program

C: Pam Maples, Environmental Specialist, NNEPA
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LST Files