



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
Underground Storage Tanks Program Office  
75 Hawthorne Street (WST-8)  
San Francisco, CA 94105**

January 8, 2015

Certified Mail 7011 0470 0002 9198 1972

Loretta Stone, Director  
Environmental Protection Agency  
San Carlos Apache Tribe  
P.O Drawer 0  
San Carlos, AZ 85550

**Subject: No Further Action Determination from the Results of the 2014 Abandoned Tank Assessment at Several Sites in the San Carlos Apache Tribe Reservation, AZ**

Dear Loretta,

The U.S. Environmental Protection Agency (EPA) has completed the review of the report entitled "*Summary Report, Assessment of Abandoned USTs in Tribal Lands*" dated November 10, 2014, by Enviro Compliance Solutions, Inc. (ECS) of Tustin, CA. The report described the activities conducted in August 2014 to verify the content and condition of the abandoned underground storage tank (UST) systems and determine if there is petroleum release to the soil below the tank system at the following sites:

- 1) Former Tiffany Store, San Carlos, AZ (SANC039)
- 2) Former San Carlos Railroad Depot, San Carlos, AZ (SANC040)
- 3) Former Osborne Gas Station, San Carlos, AZ (SANC041)
- 4) Former George Stevens Gas Station, San Carlos, AZ (SANC042)
- 5) Former Greyhound Bus Depot, Peridot, AZ (SANC043)
- 6) Former Calva Gas Station, Bylas, AZ (SANC045)
- 7) Former Hadley Gas Station, Bylas, AZ (SANC048)

Included in the report are findings from the sites, analytical results of soil samples, and photographs. A summary is provided in the attached enclosure. Both EPA Region 9 and the San Carlos Apache Tribal (SCAT) EPA were provided draft of these report for their review and comments prior to finalizing the report.

EPA Region 9 has discussed and reviewed the results of the tank assessment and soil sampling analysis with the SCAT EPA. At this time, EPA has made a determination of no further action with respect to leaking UST site assessment and cleanup at all seven sites.

However, the presence of a UST at the Former George Stevens Gas Station (SANC042), while not

posing a threat to environmental health and safety, will warrant a proper UST closure in accordance with 40 CFR 280 Subpart G 280.71-73. We recommend that SCAT EPA work with the property owner and former operator and the EPA Region 9 UST Enforcement Section to properly close this UST.

If additional information becomes available in the future regarding hydrocarbon contamination in soil and/or groundwater at these sites that may pose a threat to the environment, U.S. EPA or the SCAT EPA may reopen these sites and require additional site assessment and/or corrective action.

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

We appreciate the time and efforts of the SCAT Environmental Protection Agency and the current property owners in helping us complete work at these sites.

Sincerely,



Steven E. Linder P.E., Manager  
Underground Storage Tanks Program Office

Enclosure: Summary, Assessment of Abandoned USTs, SCAT

cc:

Terry Rambler, SCAT Tribal Chairman

Vern Grant, SCAT TIPO

Terry Jones, SCAT General Manager

Property owners

Dhananjay Rawal, ECS

Glen Mitchell, USACE

Doug McDaniel, R9 Enforcement Section

**SUMMARY**  
**Assessment of Abandoned USTs**  
**San Carlos Apache Tribal Reservation**  
**August 2014**

**Tank Assessment Results**

The work was performed by ECS on the week of August 4, 2014. Staff from EPA Region 9 and the SCAT EPA provided oversight of the field work. After excavating the anomalies detected at these sites from the 2012 Geophysical Survey, we uncovered one intact UST at one site – at the former George Stevens Gas Station in San Carlos (SANC042). In the other six sites, excavating the electromagnetic anomalies yielded disintegrated portions of USTs, pipelines, and metallic debris/objects not related to UST systems. For a more detailed discussion of these findings, the final report can be made available to you at your request.

**Soil Sampling Analysis**

ECS collected soil samples beneath the UST and UST-related buried objects at the following sites:

- 1) Former Tiffany Store, San Carlos, AZ (SANC039)
- 2) Former George Stevens Gas Station, San Carlos, AZ (SANC042)
- 3) Former Greyhound Bus Depot, Peridot, AZ (SANC043)

The analytical results showed detection of benzene and toluene for all three sites but at levels below the EPA Region 9 Regional Screening Levels (RSLs)\* for unrestricted use. TPH oil and diesel was detected at low levels at the former Greyhound Bus Depot (SANC043) at levels below the EPA Region 9 RSLs for unrestricted use.

\*United States Environmental Protection Agency Regions 3, 6, and 9. May 2014. Regional Screening Levels for Chemical Contaminants at Superfund Sites. [http://www.epa.gov/reg3hwmd/risk/human/rb-concentration\\_table/index.htm](http://www.epa.gov/reg3hwmd/risk/human/rb-concentration_table/index.htm)