



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 9

75 Hawthorne Street
San Francisco, CA 94105-3901

October 25, 2012

Mr. Derrick McNeal
Compliance Officer (QM)
U.S. Public Health Service
Whiteriver Hospital
P.O. Box 860
Whiteriver, AZ 85941

Subject: No Further Action (NFA) for the UST Facility at the former location of the IHS Hospital in Whiteriver, AZ (EPA ID# WMAP-055)

Dear Mr. McNeal:

The U.S. Environmental Protection Agency (EPA) has reviewed the document entitled "Letter Report for the UST Removals, Investigative Sampling and Closure of Two Former Underground Storage Tanks Discovered at Removal Site Located at the Former Indian Health Services Hospital" (the "Report"), dated July 17, 2012. The Report documents the removal of two underground storage tanks (USTs) and subsequent soil sampling and analysis by Kary Environmental Services, Inc. (KES) on June 27, 2012 at the former location of the Indian Health Services (IHS) hospital in Whiteriver, AZ (the "Site"). The sections below provide historical information on the Site, discussions of the soil sampling and analytical results, and the conclusions of EPA and the White Mountain Apache Tribe's Environmental Protection Office (WMAT EPO) regarding the current status of the Site.

Background and Current Use of the Site

Based on information contained in the Report, the former IHS hospital in Whiteriver was operated until about 1977 when the current IHS hospital was opened. It is believed that the former IHS hospital operated two USTs, potentially until 1980, when the former IHS hospital was demolished. At least one of the two USTs that IHS formerly operated at the Site appears to have contained diesel fuel for vehicles. Both USTs were left in-place following demolition of the former IHS hospital.

In 1997, the Chaghache Day Care Center was constructed at the Site, and a swing set was built over the area of the two former IHS USTs. In June 2012, during relocation of the swing set by Navapache Construction Company, the former IHS USTs were discovered and strong hydrocarbon vapors in shallow soil were documented. The former USTs were only buried about three feet below ground surface, and it appears that the piping connections to the USTs had not been sealed off properly. The swing set described previously has been returned to the now backfilled area above the former IHS USTs.

UST Removal, Soil Sampling and Hydrocarbon Release Confirmation at the Site

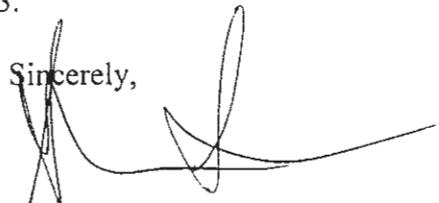
On June 27, 2012, KES removed the two former IHS USTs at the Site. The larger UST, with an estimated volume of 8,428 gallons, had some residual diesel fuel. The smaller UST, with an estimated volume of 4,084 gallons, may have stored heating oil. Following the UST removals, KES collected a total of 15 soil samples for field and laboratory analysis. These samples were collected from beneath the USTs and piping, and from the soil piles for both UST excavations. For the field analyses, KES inserted a photo-ionization detector (PID) into bagged soil samples and obtained approximate concentrations for total volatile organic compounds (VOCs). The soil samples collected for laboratory analyses were subsequently analyzed for VOCs, total petroleum hydrocarbons as gasoline, diesel and oil (GRO, DRO and ORO), polynuclear aromatic hydrocarbons (PAHs), and eight metals.

Hydrocarbon releases at the Site were confirmed based on the following: 1) strong hydrocarbon vapors from in-situ soil prior to UST removal, 2) detectable VOC concentrations with the PID for all bagged soil samples, and 3) low concentrations for four PAH compounds from the laboratory analyses for the western soil pile sample (i.e., concentrations slightly above the analytical detection levels). However, there were no detections from the laboratory analyses for VOCs, GRO, DRO and ORO. In addition, the low concentrations for the four PAH compounds noted above were all below EPA Region 9's Regional Screening Levels (RSLs) for residential soil. The laboratory concentrations for metals appear to be consistent with background concentrations.

Conclusion

As noted above, the analytical results for the soil samples that were collected at the Site following the UST removals documented petroleum contamination. However, the analytical results showed no detections for petroleum compounds above EPA Region 9's RSLs for residential soil. For this reason, EPA and the WMAT EPO are not requiring further action for the Site at this time. However, if additional information becomes available in the future regarding petroleum contamination in soil and/or groundwater at the Site, EPA or the WMAT EPO may require additional site work. If you have any questions regarding this letter, please contact Chris Prokop, of my staff, at (415) 972-3363.

Sincerely,



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

cc: Chris Prokop, EPA (copy to site file)
Brenda Begay, WMAT EPO
Terry Hill, WMAT EPO