

# City of Laredo

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September 24, 1990

Mr. Melvin Green  
Department of the Army  
U. S. Army Engineer District, Fort Worth  
Attn: CESWF-ED-G  
819 Taylor  
Lantheim Federal Building, Room 7A28  
P. O. Box 17300  
Fort Worth, TX 76102

Dear Mr. Green:

Since Mr. Randy Niebuhr's visit to Laredo on April 25, 1990, additional information has become available regarding the Airport's Fuel Farm. The additional information is in regards to aviation fuel contamination at the Airport's Fuel Farm. The enclosed report details this information.

Recently, the City became aware of certain environmental hazards that through no fault of the City, may result in a considerable drain of City financial resources. The concerns include ground water contamination at the Fuel Farm, asbestos on aging buildings classified as temporary structures by the Air Force, waste disposal facilities and possibly a landfill.

It is my understanding that your agency administers a Department of Defense Environmental Restoration Program. Participation by this Environmental Restoration Program in correcting environmental hazards at the former Laredo Air Force Base is urged.

I believe that the City of Laredo and the U. S. Army Corps of Engineers can work together to resolve any environmental hazard at Laredo International Airport, formerly Laredo Air Force Base.

This letter and the enclosed report will be delivered personally by Mr. Henry Domeracki, Assistant City Manager, Mr. Joe Aranda, Transportation Director, and Mr. Jose L. Flores, Airport Director. Messrs. Domeracki, Aranda and Flores will be prepared to answer any questions regarding the contents of the report.

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Mr. Melvin Green  
Department of the Army  
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Thank you for your assistance and consideration to the City  
of Laredo request for Department of Defense Environmental  
Restoration Program participation at Laredo.

Sincerely,



Peter H. Vargas  
City Manager

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LAREDO INTERNATIONAL AIRPORT

REPORT TO

U. S. CORPS OF ENGINEERS

SEPTEMBER 24, 1990

Background:

Laredo International Airport, formerly Laredo Air Force Base, was originally established during World War II as an Army Air Gunnery School. After World War II, it was deactivated until the Korean Conflict in 1952, at which time, it re-opened as a training facility for pilots. On April 17, 1973, all pilot training at Laredo Air Force Base was terminated.

On February 21, 1975, the City of Laredo acquired the Laredo Air Force Base by an indenture agreement with the Federal Government. Since that time, Laredo Air Force Base has been renamed Laredo International Airport and is operated by the City of Laredo.

Said indenture agreement quitclaimed to the City certain property subject to certain reservations, restrictions and conditions. Two reservations in the indenture agreement pertain to future use and recapture of property by the Grantor. Section 7, paragraph F reads: "That the Grantee (City) will make available all facilities of the Airport at which the property described herein is located.... without charge, for use by aircraft of any agency of the United States...." Section 7, paragraph G, reads: "That during any national emergency declared by the President of the United States of America.... the Government shall have the right to make exclusive or non-exclusive use.... without charge, of the Airport..."

Since take over by the City in 1975, the Air Force, Navy, Border Patrol, U. S. Customs and other federal agencies have utilized the Airport without charge. The Air Force and Navy regularly conduct training operations at Laredo.

The property conveyed to the City by the 1975 indenture agreement consisted of property of known and unknown condition, classified as temporary or permanent construction by the Air Force, constructed between 1943 and 1973 and inventoried and not inventoried in the conveyance documents.

Fuel Farm:

The Fuel Farm has been in active use since the early 1940s. The storage capacity at one time exceeded 1.7 million gallons of aviation fuel. Presently, the City is only utilizing six 25,000 gallon underground fuel storage tanks. Approximately ten underground fuel tanks were abandoned in place by the Air Force at this site and approximately six other underground storage tanks elsewhere.

Prior to the City utilizing these six tanks, the City's contractor and fuel suppliers inspected the tanks and found the tanks in sound condition. These six tanks were installed in 1951 and are equipped with (1) electrically induced cathodic protection, (2) overfill prevention, and (3) interceptor tank.

As a result of the tanks being over 25 years old, the City contracted for the installation of leak detection vapor monitoring wells. Free product (fuel) was detected in the vapor monitor wells. Two recovery wells were subsequently installed in the immediate tank cavity area to initiate free product recovery.

Because free product was encountered, the Texas Water Commission ordered that the six tanks and lines be tested for tightness and that a site assessment study be undertaken.

Testing of the six tanks was performed on July 12, 1990 and the results showed the tanks to be tight, not leaking. The supply and return lines were tested on August 13, 1990 and they too were found to be tight.

A site assessment report prepared by Environmental Associates, Inc., Leak-Tec Corporation, was submitted to the Texas Water Commission on August 6, 1990.

An exploratory hole for construction purposes was drilled approximately 240 feet upgradient from the six tanks and contaminated soil was encountered.

The City of Laredo has incurred the approximate \$28,000 in expenses associated with the installation of leak detection wells, recovery wells, testing the fuel tanks and lines and site assessment report. This expense does not include daily personnel cost of recovering the free product. At minimum an additional \$70,000 expense can be anticipated during the next 12 months to recover free product, treat the ground water and dispose of contaminants.

The City's position regarding the Fuel Farm is that the City may not have contributed to the fuel contamination. This position is supported by the following factors: (1) the six tanks tested tight, (2) the supply and return fuel lines

tested tight, (3) the fuel system is equipped with cathodic protection, (4) the fuel system has overfill prevention, (5) the fuel system has an interceptor tank, (6) fuel contamination was also found upgradient, (7) the existence of abandoned Air Force fuel tanks and lines at this site, (8) the fuel tanks were in sound condition when inspected in 1975, (9) the City has no reports of contaminated fuel at this six tanks by the City's Fixed Base Operators, fuel suppliers, or the military, (10) our Fixed Base Operators have not reported loss of fuel product, (11) the fuel farm was first used extensively by the Army Air Gunnery School and lastly by the Air Force, and (12) past Army Air and Air Force operating practices do not meet present environmental standards, i.e., gravel sump pits.

Asbestos:

The City of Laredo is concerned regarding certain buildings having asbestos. Demolition of two buildings has been delayed until an asbestos investigation is performed.

Waste Disposal Facilities:

Certain waste treatment facilities abandoned by the Air Force still remain in place, though not utilized by the City.

Landfill

The City is not aware to what extent the Air Force operated a landfill at the former Laredo Air Force Base and what future implications if any this may have on the City.

Action Proposed:

1. Department of Defense through the U. S. Corps of Engineers commission a comprehensive environmental impact study of the former Laredo Air Force Base.
2. Department of Defense through the U. S. Corps of Engineers take corrective action regarding deficiencies that may be noted in the comprehensive environmental impact study.
3. Department of Defense to reimburse the City for expenses incurred by the City in testing the fuel tanks and lines and site assessment report.

LAREDO INTERNATIONAL AIRPORT REPORT TO U.S. CORPS OF ENGINEERS

Appendix

1. Map - Laredo Air Force Base
2. Existing building schedule dated March 1973.
3. Map - Fuel Farm
4. Fuel Tank Tightness Test Report
5. Fuel Lines Tightness Test Report
6. Site Assessment Report
7. Daily free product recovery log
8. General location of exploratory well