

# CITY OF LAREDO

September 18, 1991

Mr. Dan Airey  
Responsible Party Remediation Section  
Petroleum Storage Tank Division  
Texas Water Commission  
P. O. Box 13087  
Capitol Station  
Austin, Texas 78711-3087

Re: LPST ID No. 95021

Dear Mr. Airey:

I reply to your letter of August 28, 1991, to Jose L. Flores, our Airport Director, regarding ground water contamination at the Laredo International Airport. I also, reply to your letter of October 9, 1990, also to Jose L. Flores, our Airport Director, requesting nine actions to be taken in relation to the same subject.

The City has been working with the U.S. Army Corps of Engineers during the past 16 months to solve the problem of ground water contamination at the Laredo International Airport (formerly the Laredo Army Gunnery School (1942-1948) and the Laredo Air Force Base (1950-1975)).

The City appreciates the fact that the Texas Water Commission has been helpful and supportive of the City's efforts. The City strongly believes that the ground water contamination resulted from both the Army and Air Force use of the fuel systems located on the contaminated site. This belief is founded on information collected since the ground water contamination was first detected.

During a meeting on September 26, 1990, between staff of the Fort Worth office of the Corps of Engineers and staff of the City of Laredo in Fort Worth, the Corps representatives informed the City that the Corps would assume the responsibility for the removal of non-beneficial abandoned

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underground fuel storage tanks and for the remediation of the ground water contamination at the site, if the contamination resulted from the Army and or Air Force use of the premises.

There are approximately 15 abandoned USTs located up gradient from the City's six beneficial use USTs. There are also abandoned gravel sumps which were used by the U.S. government in conjunction with the filtration of the aviation fuel located up gradient from the City's beneficial use USTs. We have detail drawings of these gravel sumps dated 1956. See Exhibit A.

This indication of assumption of responsibility from the Corps came about from the City's presentation to the Corps of 12 reasons why the Army and Air Force were the parties responsible for the contamination. The Corps represented to the City that the information was overwhelming. See the enclosed Exhibit B being the report from the City of Laredo dated September 24, 1990.

Subsequent to the September 9, 1990, meeting the City received a copy of the correspondence from Colonel William D. Brown, District Engineer with the Corps of Engineers addressed to Senator Phil Gramm. This letter dated November 20, 1990 indicates that Laredo Air Force Base is eligible for a DERP-FUDS project and that the City will receive help in implementing the Texas Water Commission mandate to determine the full extent of the ground water contamination. See Exhibit C.

More recently a report dated August 17, 1991 and prepared by the Kansas City office of the Corps also suggests that the abandoned and up gradient USTs may be the responsible source of contamination. See Exhibit D.

On September 5, 1991, staff of City of Laredo met in Fort Worth, Texas, to discuss your letter dated August 28, 1991, to Mr. Flores. During that meeting the Corps requested that the City conduct additional soil vapor testing up gradient.

On September 10, 1991, the Fort Worth office Corps called to inform the City that the design work regarding the up gradient and non-beneficial use USTs will start in October 1991 and the design should be completed 30 to 45 days later. Letting of a contract by the Corps will follow soon thereafter.

The City has written to Dr. G. Edward Dickey, Acting Principal Deputy, Assistant Secretary of the Army (Civil Works), requesting that the Corps assign Rapid Response Status to DERPS-FUDS Site No. K06TX021301 so that remediation

of contaminated ground water can commence before January 1, 1992. This letter was delivered on September 16, 1991 by City of Laredo officials while in Washington D.C.

The City is again contacting our congressional delegation to urge the Corps to take immediate action in Laredo. See Exhibit E.

The goal of the City is to cease the use of, and to remove, the six USTs located on this site as soon as possible.

Furthermore, notice is hereby given to the Texas Water Commission that the City is taking out of service three of the six underground tanks that its Airport Fixed Base Operators have used. The three tanks taken out of service were previously used by Morgan Aviation Services. All fuel product remaining will be removed within the next 30 days. The Owner ID No. is 03606 and the Facility No. is 0009940 for the three USTs to be vacated. The City is negotiating with the Operator of the other three tanks to also discontinue the use of the remaining three USTs, as soon as an alternate fuel storage system can be procured.

In the interim, modifications are being made to the existing fuel system to discontinue the introduction of water and fuel to the interceptor tank from the filter vessels. Modifications will be completed by September 20, 1991 and consist of plugging the filter vessel drains. When servicing the filter vessels the water and fuel so removed will be placed on containers, thus bypassing the interceptor tank. This action will remove yet another area of concern. The only remaining use for the interceptor tank will be for emergency fuel spill containment during off loading and loading of transport vehicles.

Since detection of ground water contamination the City has spent \$27,800 for the installation of recovery and monitor wells, site assessment, and testing of the USTs and pipes. This expense does not include the labor costs of City personnel doing the recovery of free product. A proposal requested by the City to treat the contaminated ground water quoted an expense of \$3,000 per week. This quote did not include the cost of hauling or disposal of recovered product.

The cost of ground water treatment and site remediation could escalate well beyond the City's financial ability. The City is hopeful that the Corps of Engineers will participate in the cost of remediation under the federal DERPS-FUDS program.

Now, with regard to your letter of October 9, 1990, to Mr. Jose L. Flores, our Airport Director, and the nine action items you set forth in that letter, I respond as follows:

1. We concur with Leak-Tec's August 30, 1990 proposal to install automated pumping systems in RW-5 and MW-2 to remove phase-separated hydrocarbons which accumulate in these wells and to prevent migration of the product.

Response: The City of Laredo on August 31, 1991 resumed the removal of free product from RW-5 and RW-6 on a daily basis. Since resuming the removal of free product from RW-5 and RW-6 the levels of free product have dropped from 17.25 inches to 1.25 inches at RW-5 and from 18 inches to 1 inch at RW-6.

Originally, daily removal from these two recovery wells was started on April 18, 1990 and stopped on February 8, 1991 when the free product measured 3.5 inches in RW-5 and 1.0 inches in RW-6. See Exhibit F.

Testing for free product using the water colorization paste shows no free product accumulation in monitor wells 1, 3, & 4 and only nominal levels (less than 1/2 inch) in MW-2.

The City will pursue the installation of an automated pumping system and will soon solicit proposals. In the meantime, we propose to continue with our manual recovery approach, which appears to be effective.

2. Provide a more complete description of the proposed method of groundwater treatment to be tested in the future.

Response: A water treatment consultant will be consulted to recommend the preferred method of groundwater treatment.

3. Because the full extent of the groundwater contamination has not been defined by the existing monitor wells, you are requested to submit a proposal for the installation of additional wells. On a site map drawn to-scale, portray the proposed well locations. Be sure to include wells in the following areas:

- \* downgradient to Monitor Well No. 3,
- \* northwest to the tankpit, and
- \* southeast of the tankpit.

Response: Enclosed Exhibit G portrays the proposed location of two additional monitor wells and the location of eight soil vapor tests to a maximum depth of 20 feet.

Tests for free product in Monitor Wells 1, 3, and 4 show no free product and only nominal levels ( less than 1/2 inch) in MW-2.

The Fort Worth office of the Corps of Engineers has requested that the City conduct soil vapor samples for hydrocarbons up gradient from the six UST's used by the City. The soil vapor tests are more affordable and more area can be covered. The Corps is requesting the soil vapor tests to ascertain if the source of the contamination is upgradient. In the event that the source of contamination is confirmed to be up gradient, the Corps has indicated that full remediation of the entire site will be eligible under the DERP-FUDS program.

Proposals have been requested from Leak-Tec Corp. and from Target Environmental Services. We will solicit proposals but will await approval from the Texas Water Commission before authorizing the work.

4. Provide a detailed description of the 4,000 gallon interceptor in place. Include plan view and cross-sectional diagrams of the interceptor and all connected lines. Describe the final disposition of fluid collected in the sump.

Response: Enclosed please find a drawing of the interceptor tank marked Exhibit H.

The final disposition of the fluid collected in this tank has been either burned during fire department training drills or removed from site by a licensed operator.

5. On a site map drawn to-scale, depict the location of the pumping facility, the jet fuel tanks, the aviation gas tanks, the numbered vapor monitor points and all underground piping. Include the interceptor on this map also.

Response: The enclosed site map marked as Exhibit I includes all the information requested, except for the location of the vapor monitor points. The vapor monitoring location information is being added and a new Exhibit I will be furnished to the Texas Water Commission.

6. Collect a groundwater sample from Monitor Well No. 4 and have the sample analyzed for total dissolved solids (TDS) content in order to determine the local background water quality.

Response: A sample will be collected by a certified lab and a report will be provided to the Texas Water Commission within 30 days.

7. Distinguish which recovery well is shown as Well No. 1 and which is shown as Well No. 2 for the soil samples collected on April 18, 1990.

Response: Well No. 1 is RW-5 and Well No. 2 is RW-6.

8. Identify the source of the soil sample labelled "Sample No. 599-05."

Response: Soil Sample No. 599-05 was taken approximately half way along a line extended from RW-5 TO MW-1. The high level of contamination found at this location so close to the surface suggests the occurrence of a major surface spill or that contaminated soil was introduced to this area.

The water table at this location is approximately 10 feet deep or approximately 5 feet below the contaminated soil. Migration of the contaminants via the ground water is unlikely, in our view.

9. Identify the purpose of the tank shown in Photo No. 7.

Response: Photo No. 7 is not in our files. Leak-Tec Corp. is providing us with a copy at which time we will identify the purpose of the tank.

We will supplement as to items 5, 6, and 9, above, as soon as we can.

I hope that you find this response to be acceptable and that you find that the City is actively pursuing a solution to the ground water contamination.

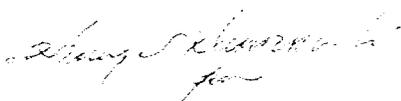
The City will continue to work with the Texas Water Commission and the Corps of Engineers to reach a satisfactory solution regarding the remediation of the contaminated ground water at the Laredo International Airport fuel farm.

The City requests that the Texas Water Commission allow it additional time to fully implement a more comprehensive remediation plan and to finalize its negotiations with the Corps of Engineers. This request is made on the basis that

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(1) recovery of free product has resumed and the levels of free product are receding, (2) new information regarding up gradient contamination caused by the U.S. government, (3) discontinuance of the interceptor tank to collect water and fuel from the filter vessels, (4) negotiations with and recent representations made by the Corps of Engineers and (5) the six USTs and pipes have tested tight in 1990.

Sincerely,



Peter H. Vargas  
City Manager

xc: Colonel William D. Brown  
District Engineer  
U.S. Corps of Engineers, Fort Worth

Mr. Paul D. Barber  
Chief, Engineering Division  
U.S. Corps of Engineers, Kansas City

✓ Jose L. Flores  
Airport Director

Anthony C. McGettrick  
City Attorney

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