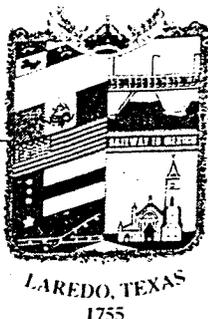


CITY OF LAREDO



November 19, 1991

Mr. Chet Clarke
Head, Remediation Unit I
Responsible Party Remediation Section
Petroleum Storage Tank Division
Texas Water Commission
P. O. Box 13087 Capitol Station
Austin, TX 78711-3087

Re: Laredo International Airport
LPST ID No. 95021

Dear Mr. Clarke:

Thank you for the assistance that you and your staff have given to our airport fuel contamination project.

We have previously corresponded and agreed to do additional site assessment work at the airport, formerly Laredo Air Force Base. However, recent discoveries of new information suggest that it would be prudent to defer the additional site assessment work until the Corps of Engineers complete the removal of the non beneficial use U.S.T.(s).

The information recently found has increased the number of reasons why the city believes the contamination to have been caused by the Army and Air Force and not the City's operators. This list of reasons has increased from 12 in September 1990 to 20 in October 1991 to 23 in November 11, 1991.

An aerial photograph dated July 7, 1954 clearly shows the surface at the six beneficial use U.S.T.(s) to be saturated with what we believe to be fuel. There are other areas as well that exhibit saturation at the surface. See attachment no. 1.

An active and large fuel farm since the early 1940's, yet the industrial waste treatment plant to process the contaminated water was not built until 1969. The question arises as to how the military disposed of the contaminated water through the years prior to 1969. The absence of the industrial waste treatment plant suggests that the government contributed to the contamination of the area until 1969.

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We have drawings produced by the government that show gravel pits used for the disposal of contaminated water. These drawings also show that gravel was added to the cavity of the six beneficial use U.S.T.(s) and pump station areas in 1969. The question arises, was the purpose for adding the gravel to remove contaminated soil and or to disperse the contaminated water away from the surface? The 1954 aerial photograph shows the ground at these areas to be saturated.

The additional site assessment work requested of the City by the Texas Water Commission will only serve to confirm what we already know from old government records of the fuel farm. Thus, we know before hand to a large degree of certainty what the additional site assessment work will reveal.

Mr. Ted Nicholson with the Corps of Engineers was in Laredo gathering information for the design phase of the project to remove the non beneficial use U.S.T.(s). Plans and specifications are scheduled for completion by December 31, 1991 after which bids will be solicited. We anticipate that the removal of the non-beneficial use tanks will commence by May 1992 or earlier. Reference the letter dated October 29, 1991 from Col. Michael H. Fellows, Chief, Environmental Restoration Division with the Corps of Engineers.

It is evident based on the information that the City has gathered that removal of U.S.T.(s) by the Corps will show contamination. The Corps will then perform site assessment work to identify the extent of the contamination. We believe that when the Corps completes the site assessment occasioned by the non beneficial use U.S.T.(s), that this assessment will confirm the City's contention that the contamination was caused by the Military and not the City's operators.

We believe that the deferral herein requested would serve to more effectively apply the airport's limited financial resources.

This request is supported by:

1. Daily removal of free product from the two recovery wells. Amount of recovery is diminishing. Daily removal will continue.
2. Commitment by the U. S. Corps of Engineers to remove non-beneficial U.S.T.(s). See letter dated October 29, 1991, from Col. Michael H. Fellows with the Corps of Engineers.

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3. New information which strongly suggests contamination by the Army and Air Force and not the City's operators. There are 23 reasons; see attachments 1 and 2.
4. Only three of the six U.S.T.(s) are active. Our goal is to cease use of the remaining three U.S.T.s as soon as possible.
5. No free product detected at the downgradient monitor wells. We will continue to monitor these wells on a daily basis.
6. We are contracting for the first quarterly report and will continue to contract for future quarterly reports regarding the monitor wells.

It is not the City's intent to remove itself from the City's rightful and legitimate obligations; however, the City is not in a financial position to assume the financial burden for something that the City did not cause.

I hope that you concur with the City's request and agree that a temporary (until the Corps completes the removal of the non beneficial use U.S.T.(s)) deferral for performing additional site assessment work by the City is the prudent and reasonable course of action to take.

Sincerely,


Peter H. Vargas
City Manager

xc: C. Villarreal
H. Domeracki
J. Aranda
A. McGettrick
D. Arredondo
J. Flores
R. Niebuhr, U S CORPS OF ENGINEERS
R. Duarte, U S CORPS OF ENGINEERS

Attachments

twc/ltr9

00654

LAREDO INTERNATIONAL AIRPORT

FUEL FARM

OCTOBER 1991

List of reasons why the City believes that the contamination was caused by the military and not the City's operators.

1. The six City beneficial use USTs tested tight
2. The supply and return fuel lines tested tight
3. Equipped with cathodic protection
4. The six beneficial use U.S.T.(s) have overfill prevention
5. Fuel interceptor tank to collect accidental spills at loading and unloading area and collect contaminated water from the filtration system
6. Fuel contamination found upgradient
7. Abandoned fuel tanks and lines at this site
8. The six beneficial use tanks were in sound condition when inspected in 1975 during conversion.
9. No reports of fuel contamination at the six beneficial use tanks from FBOs, airlines, or military, i.e., rust, excessive moisture, etc.
10. FBOs have not reported loss of fuel product
11. The fuel farm was first used extensively by the Army and later by the Air Force from 1942 to 1975
12. Gravel sumps were used by the Air Force to drain contaminated water from jet fuel filter vessels
13. Use of soil sterilants
14. Use of liquid asphalt to treat the surface
15. A flood in 1950s unearthed some USTs.
16. Contamination found close to the surface which suggest surface spills and or introduction of contaminated soil

17. Industrial waste treatment plant built in 1969 which includes a sludge bed pond. How was the contaminated water processed / disposed of from 1942 to 1969?
18. Recovery wells at beneficial use tanks indicate jet fuel, however downgradient monitor wells indicate av-gas. (Leak-Tec report)
19. Three bore holes by the Corps in early 1950s. One bore hole shows oil seepage at 3.5 feet.
20. Gravel bed 10' x 20' adjacent to the beneficial use tanks and along r.o.w. and at fill station area.
21. The interceptor tank for the 6 U.S.T.s was not yet built in 1954. How was the contaminated water disposed of?
22. The 1954 aerial photo shows a saturated ground surface at the 6 U.S.T.s, at the pump station, at the aboveground tanks, etc.
23. The 1954 photo suggests a prior development downgradient from the 6 beneficial use U.S.T.(s) and between monitor well 1 and 2. Was this a fuel tank site?



DEPARTMENT OF THE ARMY

U.S. Army Corps of Engineers
WASHINGTON, D.C. 20314-1000

29 OCT 1991

REPLY TO
ATTENTION OF:

Military Programs

Mr. Peter H. Vargas
City of Laredo
P.O. Box 579
Laredo, TX 78042-0579

Dear Mr. Vargas:

This is in response to your letter of September 12, 1991, regarding the Defense Environmental Restoration Program for Formerly Used Defense Sites (DERP-FUDS), Site No. KO6TX021301. In your letter you requested that the Corps of Engineers assign rapid response status to subject site and assist the City in the remediation of the contaminated groundwater.

The Corps of Engineers rapid response contract is restricted in its use, due to cost considerations, to situations that pose an immediate danger to human health or the environment. It is our opinion that this situation does not warrant such action, nor would the rapid response process allow us to circumvent technical or regulatory requirements.

The Corps of Engineers, Fort Worth District (the design agent for this site) has completed much of the preliminary work; the design for removal of the USTs is underway with a completion date of December 1991; and the remedial action contract will be awarded before end of March 1992. Under the current schedule the USTs will be removed in less time than it would take to initiate a rapid response contract.

After the USTs have been removed and the soil tested for contaminants, along with the soil vapor tests proposed by the City of Laredo, sufficient data should be available to determine the source of the free product. Based on these findings, a determination of eligibility and authority for further work at this site under the DERP-FUDS program will be made.

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Suggest that the above information be relayed to the Texas Water Commission as an indication of good intent and clean up progress on the site. If you have further questions on this matter, please contact Mr. Mark Simmons at (817) 334-9923; his address is: Corps of Engineers, Fort Worth District, CESWF-ED-GH, P.O. Box 17300, Fort Worth, Texas 76102-0300.

Sincerely,

For 
Michael H. Fellows
Colonel, Corps of Engineers
Chief, Environmental Restoration
Division
Directorate of Military Programs