

John Hall, Chairman
B. J. Wynne, III, Commissioner
Pam Reed, Commissioner



TEXAS WATER COMMISSION

PROTECTING TEXANS' HEALTH AND SAFETY BY PREVENTING AND REDUCING POLLUTION

November 22, 1991

CERTIFIED MAIL

Mr. Federico Pena
President
Aero Center, Inc.
900 Flightline
Laredo, Texas 78041

Re: Subsurface Release of Jet Fuel at the Laredo International
Airport Fuel Farm, 518 Flightline, Laredo (Webb County), Texas
(LPST ID No. 95021)

Dear Mr. Pena:

According to information recently provided to this Office by the City of Laredo, Aero Center, Inc. is the current operator of the underground storage tank (UST) system at the above-referenced facility. As the operator of the UST system, Aero Center, Inc. is jointly responsible with the City of Laredo for the contamination assessment and remediation activities required to address the above-referenced incident. Therefore, you are requested to coordinate with the City of Laredo to address the contamination at this site. Pursuant to Title 31, Texas Administrative Code (TAC), Section 334.78-334.81, the following actions should be pursued:

1. Initiate a quarterly groundwater sampling program which entails the performance of the following activities once every three (3) months:
 - a. Collect groundwater samples from all monitor wells which do not contain phase-separated hydrocarbons (PSH) and analyze these samples for benzene, toluene, ethylbenzene, total xylenes (BTEX), and total petroleum hydrocarbons (TPH) using only EPA-approved methods.
 - b. Measure the static groundwater level and PSH thickness in each monitor well immediately prior to collecting the above-requested samples.

Observation reports should subsequently be sent to this Office on a quarterly (three-month) basis and contain the results of the previous sampling event. These reports should include the following information:

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- a. Copies of signed laboratory reports providing the results of all sample analyses, copies of all corresponding chain-of-custody documentation, and a detailed description of sample collection and handling procedures.
 - b. A groundwater gradient map for each sampling data as well as a list of the groundwater-level measurements (corrected for product thickness, when applicable) utilized to prepare this map.
 - c. An updated isopach map of PSH thicknesses.
 - d. Updated BTEX and TPH isoconcentration maps.
 - e. An account of the volume and disposition of all recovered fluids.
2. Continue to recover all PSH which accumulate in any monitor or recovery wells. Install an automated recovery system to prevent migration of the product.
 3. You are requested to proceed with the installation of a sufficient number of additional monitor wells to fully delineate the extent of groundwater contamination. At a minimum, this should include the installation of additional monitor wells in the following general areas:
 - a. Downgradient of Monitor Well Nos. 1, 2, and 3;
 - b. Adjacent to the fuel interceptor tank (north of the fuel interceptor and south of the interceptor); and
 - c. Between the City's "beneficial-use" USTs and the "non-beneficial abandoned USTs" formerly used by the Army and Air Force.

During the drilling process, collected soil samples should be screened for the presence of hydrocarbons and selected samples should be submitted to the laboratory for analysis of benzene, toluene, ethylbenzene, total xylenes (BTEX) and total petroleum hydrocarbons (TPH) using only EPA-approved methods. Following the installation of the additional wells, representative groundwater samples should be collected from all existing monitor wells which do not contain PSH and these samples should subsequently be analyzed for BTEX and TPH. The analytical results of these groundwater samples should be used to prepare BTEX and TPH isoconcentration maps.

4. Provide an updated groundwater gradient map on a site map drawn to scale which includes: all existing monitor wells (labelled), plotted groundwater-elevation measurements, labelled equipotential contours, arrow(s) indicating predominant flow path(s), the date of measurement, a North arrow, a bar scale,

and a legend. Include a list of all groundwater-level measurements and the surveyed top-of-casing elevations.

5. On a site map drawn to scale, depict and label only the following information:
 - a. The pumping facility;
 - b. The jet fuel tanks;
 - c. The aviation gas tanks;
 - d. The fuel interceptor tank;
 - e. All piping associated with the pumping facility, the UST systems, the fuel interceptor, and the storm sewer (with the burial depths of the piping clearly labelled);
 - f. The existing monitor and recovery well locations;
 - g. The numbered vapor monitor points and the "5 ft. soil sample" location;
 - h. A north arrow;
 - i. A bar scale; and
 - j. A legend.

Please indicate which USTs are currently still in service. Also, describe the function of the interceptor tank, detail the flow process, and discuss any potential release sources associated with the interceptor tank or lines which have not yet been fully investigated.

6. Proceed with the collection of a groundwater sample for the determination of local background water quality.
7. Based upon the results of the additional assessment activities, provide a detailed remedial action plan (RAP) proposal for the completion of site remediation. The RAP should include a discussion of remedial alternatives which may be feasible for the site along with their estimated costs. For the preferred method, please provide a detailed description of system design and operation, and reasons why that method is preferred.

A written response to this letter that adequately addresses the completion of the aforementioned items should be submitted to this Office within thirty (30) days of the date of this letter. The LPST ID No. should be included on all correspondence.

Mr. Federico Pena
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Pursuant to 31 TAC Section 334.82 (b), if you determine that contamination from the release has migrated off-site, then you are required to notify the affected landowner(s).

Copies of all correspondence with this Office must be provided to our District 11 Field Office in Weslaco to the attention of Mr. Marc Haws. You are also required to notify Mr. Haws at 512/968-3165 at least forty-eight (48) hours in advance of conducting any significant on-site investigation or remediation activities.

Should you have any questions regarding this letter, please contact Ms. Anne S. Miller of my staff at 512/371-6241. Your cooperation in this matter will be appreciated.

Sincerely,



for Chet Clarke
Head, Remediation Unit I
Responsible Party Remediation Section
Petroleum Storage Tank Division

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cc: ✓ Jose Flores, City of Laredo, Texas
Rick Duarte, Corps of Engineers, Kansas City, Missouri
Marc Haws, TWC District 11 Field Office
(813 E. Pike Blvd., Weslaco, Texas 78596-4935)

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