

# CITY OF LAREDO

June 12, 1992

Mr. Chet Clarke  
Unit Leader, Remediation Unit III  
Responsible Party Remediation Section  
Petroleum Storage Tank Division  
Texas Water Commission  
P. O. Box 13087  
1700 North Congress Avenue  
Austin, TX 78711-3087

Re: Laredo International Airport Fuel Farm,  
LPST ID No. 95021

Dear Mr. Clarke:

This letter will serve as the City of Laredo response to your letter dated April 24, 1992.

Thank you for meeting with us on June 2, 1992 to discuss the Laredo Airport Project.

The following enumerated responses correspond to the enumerated action items of your April 24, 1992 letter and the agreed to action dates herein noted.

1. Therefore, without further delay, you are requested to proceed with the installation of a sufficient number of monitor wells in appropriate locations to fully delineate the contaminant plume (as previously requested).

Action Date: Summer 1992

The City of Laredo is soliciting interest statements from environmental consultants. See Exhibit A.

The selected environmental consultant will guide the City in developing more monitor wells to help delineate the plume of contamination and better define the source of contamination.

The consultant will be selected by July 1, 1992, and monitor wells will be installed by the end of August 1992.

2. 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.

Action Date: Summer 1992

The consultant will prepare an updated ground gradient map by August 15, 1992.

3. Prepare a cumulative table of groundwater-level measurements which includes: a) the measurement date, b) the monitor well designations, c) the surveyed top-of-casing elevations, d) depth to phase-separated product, if applicable, e) the static groundwater level measurements, f) the apparent phase-separated product thicknesses, if applicable, g) the corrected phase-separated product thicknesses, if applicable, h) the calculated groundwater elevations, and i) a footnote indicating the correction factor used to adjust apparent product thicknesses, if applicable. As subsequent measurements are collected, all newly-acquired data should be incorporated into the existing table to provide a complete historical summary of the fluctuations in groundwater levels and phase-separated product thicknesses.

Action Date: Summer 1992

The City's consultant will provide this information by August 15, 1992.

4. Submit copies of the signed laboratory reports displaying the results of all sample analyses and copies of all corresponding chain-of-custody documentation. Also, provide a detailed description of the sampling methodology and handling procedures employed.

Action Date: Summer 1992

The City's consultant will provide this information by August 15, 1992.

5. Submit copies of the signed State of Texas Well Reports (Form No. WWD-012) for all newly-installed monitor wells.

Action Date: Summer 1992

The City's consultant will provide this information by August 15, 1992.

6. As previously requested in our October 4, 1991, letter on a site map drawn to scale, depict and label only the following information. 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.

Action Date: Now

Enclosed please find a copy of the site map marked Exhibit B drawn to scale depicting the information you requested.

The City on Saturday, June 6, 1992, with permission from the Texas Water Commission unearthed the piping system associated with the six beneficial use tanks. The fuel lines were found clean and not leaking. The interceptor tank lines were found clean.

However, on June 10, 1992, one jet fuel line developed a pinhole leak between the receiving manifold and pump station. This was reported to the TWC and the line taken out of service until repairs are done.

Old contamination was encountered close to the surface, at two areas. At the Aviation gasoline unloading manifold area and at the west side adjacent to the beneficial use tanks. This contamination is very shallow.

The function of the interceptor tank is to collect contaminated fuel released from the fuel filter vessels and to collect fuel spills at the loading and unloading area. The interceptor tanks has two compartments, the first compartment separates the fuel from the water and retains the fuel, the second compartment releases the water into the City's storm sewer system. The flow to the interceptor tank is by gravity flow. Visual inspection by City and Mr. Greg Goode, Texas Water Commission representative, showed no indication that the interceptor lines are leaking.

Regarding other lines not fully investigated, these too upon visual inspection do not show evidence of leaks, but this will be more fully analyzed by the consultant to be hired by the City.

7. As proposed by the JBL Group, continue to recover all PSH until product no longer accumulates in any of the monitor or recovery wells. Indicate the final disposition of all recovered fluid.

Action Date: Continuous

The City has continuously recovered any free product at the fuel farm. We are pleased to report that Recovery Well #5 since December 2, 1991 has on only five days produced minimal levels of free product. The free product recovered appears to be old product and does not exhibit characteristics of recent fuel.

8. Continue to conduct groundwater sampling events on a quarterly basis as outlined in our October 4, 1991, letter.

Action Date: Continuous

The next quarterly sample and analysis will be performed no later than July 15, 1992. The analysis herein requested by the TWC will be performed.

9. Provide an explanation of the reasons that groundwater samples were not collected from Monitor Well No. 4 during the December 11, 1991, sampling event.

Action Date: Now

Monitor Well #4 was sampled and analyzed for TDS during the December 11, 1991 sampling event. By correspondence dated October 9, 1992, Mr. Dan Airey with the Responsible Party Remediation Section of the Texas Water Commission requested that a TDS analysis be performed on Monitor Well #4. The most recent sample of Monitor Well #4 was analyzed on June 2, 1992 and the analytical results showed no hydrocarbon contamination. See Exhibit C for Lab results.

10. Submit a copy of the chain-of-custody documentation, for the groundwater samples collected on December 11, 1991. (The chain-of-custody form provided by the JBL Group references a soil sample collected on December 18, 1991.)

Action Date: Now

The chain of custody documentation for the December 11, 1991 samples event is marked Exhibit D.

11. As proposed, conduct a twenty-four (24) aquifer pump test to determine the capacity of the well, the hydraulic characteristics of the aquifer and the radius of influence. Recovery measurements should be made in the observation wells after the pump has been shut off to assist in calculating the aquifer coefficients. Submit all test results and calculations used in making these determinations. Apply this information to the design of a remediation system.

Action Date: Year

The City's environmental consultant will perform the pump test within the time parameters established by the Texas Water Commission.

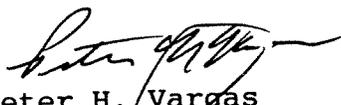
12. Based upon the above-referenced pump test, develop a more detailed RAP proposal.

Action Date: Year

The City's consultant will be asked to develop a more detailed RAP proposal as requested by the Texas Water Commission.

I hope that this response meets with your approval and that hence forth we initiate a firm action plan to mitigate these environmental concerns at the Laredo International Airport.

Sincerely,

  
Peter H. Vargas  
City Manager

- xc. Carlos Villarreal  
Joe Aranda  
Jose L. Flores  
Amador Escudero  
Jerry Cain  
Victor Oliveros  
Luis Perez-Garcia