SITE SURVEY SUMMARY SHEET FOR DERP-FUDS SITE NO. KO6TX021301 LAREDO INTERNATIONAL AIRPORT, TX NOVEMBER 1990

SITE NAME: Laredo International Airport, formerly Laredo Air Force Base.

LOCATION: Laredo, Texas. See attached site maps.

SITE HISTORY: On 7 May 1942, the U.S. Government acquired 2,085.43 acres (1,891.87 acres fee, 184.31 acres easement, and 9.25 leased acres). The Army constructed runways and numerous facilities from 1942-1974. The site was initially reported excess on 17 June 1947, however, the base was reactivated during the Korean conflict. The former base was again reported excess on 29 March 1974. Approximately 309 acres were either deeded or sold to other federal, state, and county agencies, or private firms. The rest of the site was deeded to the city of Laredo. Currently, the site is owned by private firms, federal, state, county agencies, and the city of Laredo. Most of the site is currently used as the Laredo International Airport.

SITE VISIT: A site visit was conducted on 25 April 1990. Randy Niebuhr, CESWF-ED-GH, visited the site. He spoke with the Airport Manager, Mr. Jose Flores, and several other Airport employees familiar with the activities at the former AFB.

CATEGORY OF HAZARD: The categories of potential hazards are CON/HTW, BD/DR, HTW, and PRP/HTW.

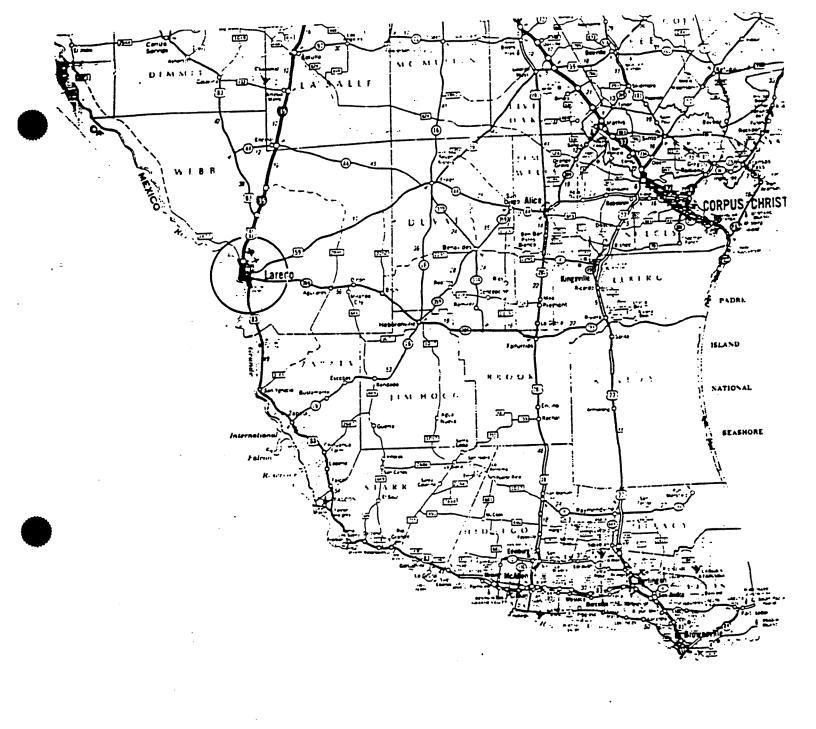
PROJECT DESCRIPTION: There are four potential projects at this site.

- a. CON/HTW. There are at least 16 underground storage tanks (USTs) with associated pipelines. At two locations the existence of more USTs are indicated on a map, but there is no surface evidence of the tanks. An electromagnetic survey will have to be conducted to locate the suspected USTs.
- b. BD/DR. Demolition of two asbestos sided wood-framed buildings and concrete slabs. A radar building foundation near an active runway is an obstruction and safety hazard, and is recommended for removal. Removal of a concrete vault near the radar foundation structure is also recommended.
- c. HTW. There is an industrial waste disposal unit, airplane cleansing area, a suspected waste disposal site, possible radiation burial site, and a creek adjacent to the paint shop catch basin with possible contamination containing toxic materials. The project will require investigation beyond the scope of this PA.
- d. PRP/HTW. Ground-water contamination has been discovered at the former base. Free floating petroleum product has been found floating on top of the

ground water at the former fuel farm. The city has beneficially used six USTs at the fuel farm, however, the tanks were inspected by the city in 1975 and pronounced sound. The six USTs and associated fuel lines were tightness tested in August 1990 and determined to be tight. The city has conducted a preliminary sampling program and found evidence of petroleum product in the preliminary sampling program and found evidence of petroleum product in the soil upgradient of the fuel farm. The Texas Water Commission (TWC) has soil upgradient of the fuel farm. The Texas Water Commission (TWC) has soil upgradient of the provide plans for further monitoring wells and a more directed the city to provide plans for further monitoring wells and a more complete description of the proposed method of ground-water treatment. There is reason to believe most, if not all of the petroleum contamination dates back to the time the site was an active military installation.

AVAILABLE STUDIES AND REPORTS: Attachment 1 - 24 September 1990 - City of Laredo Report; Attachment 2 - 18 April 1990 - Texas Water Commission Correspondence; Attachment 3 - 9 October 1990 - Texas Water Commission Correspondence; Attachment 4 - Tank and Fuel Line Tightness Testing Results; Correspondence; Attachment 4 - Tank and Fuel Line Tightness Testing Results; Attachment 5 Monthly Monitoring Well Report (March 1990); and Attachment 6 - UST Summary.

FORT WORTH DISTRICT POC: Randy Niebuhr, 817/334-3223.







DEFENSE ENVIRONMENTAL RESTORATION PROGRAM FORMERLY USED DEFENSE SITES PROGRAM PINDINGS AND DETERMINATION OF ELIGIBILITY LAREDO INTERNATIONAL AIRPORT, TX SITE NO. K06TX023101

FINDINGS OF FACT

- 1. On 7 May 1942, the U.S. Government acquired 2,085.43 acres (1,891.87 acre fee, 841.31 acres easement, and 9.25 leased acres) 1 mile northeast of Laredo, Texas, for an Army Air Corps gunnery school. The site was developed and named the Laredo Army Airfield, later renamed Laredo Air Force Base.
- 2. The Army constructed a complete air training facility at the site, including housing and support facilities for servicemen and their families. The former base was used by the Army and later the Air Force, initially as a flexible gunnery school, and later as a pilot training facility.
- 3. The site was initially reported excess on 17 June 1947, however, the base was reactivated in 1952 during the Korean conflict. The former base, 2,085.43 acres, was again reported excess on 29 March 1974. The acreage and facilities were disposed of to the Department of Interior, U.S. Postal Service, Texas National Guard, Texas State Department of Highways and Public Transportation, Webb County, City of Laredo, Catholic Church, Flynn Investment Company, and Laredo Municipal Housing Corporation who are current owners. The real estate records on file did not reveal any restrictions or restoration clauses, however, they did contain recapture clauses in case of a national emergency.

DETERMINATION

Based on the foregoing findings of fact, the site has been determined to be formerly used by DOD. It is, therefore, eligible for the Defense Environmental Restoration Program - Formerly Used Defense Sites established under 10 USC 2701 et seq.

DATE	STANLEY G. GENEGA
DEIL	Brigadier General, USA
	Commanding

PROJECT SUMMARY SHEET FOR

DERP-FUDS BD/DR PROJECT NO. K06TX021302 LAREDO INTERNATIONAL AIRPORT SITE NO. K06TX023101 NOVEMBER 1990

project description: The Army constructed over 500 facility support buildings including maintenance shops, warehouses, barracks, officer's housing, hangars, runways and taxiways, utilities, fuel farm, and other miscellaneous facilities. Currently, the vast majority of the buildings constructed by the Army are being beneficially used. The former officer's club, Army are being beneficially used. The former officer's club, officer's quarters building, a radar building foundation, and a concrete vault have not been used since the base was abandoned and the airport authorities requested the demolition of those structures. That part of the airport where the two buildings in question are located is surrounded by private residences and apartments. The two abandoned buildings pose structural safety hazards and are easily accessible by nearby neighborhoods. The radar building foundation and concrete vault are adjacent to an active runway and are obstructions and safety hazards.

PROJECT ELIGIBILITY: Records indicate that the remaining buildings were constructed by the Army and used by both the Army and Air Force during the time the site was an active installation.

POLICY CONSIDERATIONS: The buildings which are in beneficial use are not proposed for this project.

PROPOSED PROJECT: The former officer's club, officer's quarters, radar building foundation, and concrete vault meet eligibility criteria and policy considerations and are proposed for removal.

DD FORM 1391: Attached.

FORT WORTH DISTRICT POC: Randy Niebuhr, 817/334-3223.

PROJECT SUMMARY SHEET FOR

DERP-FUDS CON/HTW PROJECT K06TX021303 LAREDO INTERNATIONAL AIRPORT SITE NO. K06TX021301 NOVEMBER 1990

PROJECT DESCRIPTION: There are 16 underground storage tanks (USTs) with associated pipelines and pumping stations, and 7 suspected USTs at Laredo International Airport. Nine USTs have either been used in the past or are currently used beneficially. The old fuel farm is still active and soil and ground-water contamination have been discovered (see the PRP HTW project summary sheet). The fuel pumps at the former fuel farm are still in use.

PROJECT ELIGIBILITY: Records and maps indicate as many as 23 USTs were installed and used by the Army, and later the Air Force.

POLICY CONSIDERATIONS: The six USTs in beneficial use and three USTs not currently in use, but have been used by Airport personnel in the past, are not proposed for this project.

PROPOSED PROJECT: Fourteen USTs meet eligibility criteria and policy considerations and are proposed for removal.

COST ESTIMATES: A DD Form 1391 is attached for the proposed removal project of the 14 USTs, and a DD Form 1391 is also attached for the 9 USTs which are eligible but not proposed.

FORT WORTH DISTRICT POC: Randy Niebuhr, 817/334-3223.

Agr.

PROJECT SUMMARY SHEET FOR

DERP-FUDS HTW PROJECT NO. K06TX021304 LAREDO INTERNATIONAL AIRPORT SITE NO. K06TX021301 NOVEMBER 1990

PROJECT DESCRIPTION: There are five potential hazardous/toxic waste sites at the former base. There is an area where airplanes were washed down, a creek adjacent to paint shop catch basin, a former waste disposal site, industrial waste receptical, and an area where low level radiation possibly has been buried.

During the period of time the base was in operation, the aircraft were routinely washed to remove grime from the exterior of the fuselage. The airplanes were wheeled to a designated grassy field (see site map at Encl 1) and washed down. There is a possibility that soil at the wash down area has been contaminated from the solvents used in the cleaning of the planes.

Old or bad paint and paint stripper and other solvents were deposited into an underground holding tank outside of the paint shop. If the tank was overfilled, the excess drained into a catch basin consisting of a small pit filled with sand. A small creek exists a few feet to the west of the basin and anything that entered the basin eventually percolated to the nearby creek. There may be contaminated sediments in the creek and the soil around the catch basin and holding tank may be contaminated. The Airport, operated by the city of Laredo, still uses the paint shop and facilities.

Building 1339 was the site of industrial waste disposal. The waste was placed into a sump in the building. The sump emptied into an open air vat behind the building. It is not known what happened to the material once it was in the vat.

The Airport has received several anonymous telephone calls concerning the possible burial of low level radiation material at the former base. The telephone calls indicated that radiation has possibly been buried in an open field near the existing water tower (see map at Encl 1). The calls have not indicated when the suspected disposal occurred or the type of radiation.

The Airport personnel have indicated that an area just north and west of the runways was used as a disposal area (see map at Encl 1). At this time the type of material disposed of at the site is not known. The Airport Director, Mr. Flores, has requested the Corps include this site in the future Remedial Investigation/Feasibility Study (RI/FS).

PROJECT ELIGIBILITY: Records and maps indicate that the aircraft wash area, paint shop catch basin, industrial waste facility, possible radiation disposal site, and a possible sanitary

landfill were built and utilized by the Army, and later used by the Air Force. The possible landfill was apparently closed prior to the closure of the base.

POLICY CONSIDERATIONS: There is no policy applicable to this project. The sites are eligible for DERP-FUDS if they pose a hazard.

EPA FORM 2070-12: Attached.

PROPOSED ACTIVITIES: A RI/FS is recommended for the five potential HTW project sites to determine the extent of possible contamination at the sites. A determination of further action should be made by Missouri River Division.

FORT WORTH DISTRICT POC: Randy Niebuhr, 817/334-3223.

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LAKEDU INTERNATIUMAL AIRPURI

PROJECT NO. KO6TX021304

POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT

PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS (EPA FOR 2070-12)

ı.	HAZARDOUS CONDITIONS AND INCIDENTS OI MA. GROUNDWATER CONTAMINATION Unknown	02 DOBSERVED (DATE March 9D 04 NARRATIVE DESCRIPTION	POTENTIAL	ALLEGED
	O3 POPULATION POTENTIALLY AFFECTED Free floating petroleum product has port. The extent and source of the		farm area of definitely as	the air- certained
	TO THE PROPERTY OF THE PROPERT	02 DOBSERVED (DATE) 04 NARRATIVE DESCRIPTION	POTENTIAL	ALLEGED
	01 V B. SURFACE WATER CONTAINED Unknown 03 POPULATION POTENTIALLY AFFECTED Unknown There is a potential for contamination a waste paint underground storage to	on of water in a free flowi	ng creek adja •	cent to
	OI C. CONTAMINATION OF AIR O3 POPULATION POTENTIALLY AFFECTED	02 OBSERVED (DATE) 04 MARRATIVE DESCRIPTION	POTENTIAL	MALLEGED
	None			
	O1 D. FIRE/EXPLOSIVE CONDITIONS O3 POPULATION POTENTIALLY AFFECTED	02 DBSERVED (DATE) 04 MARRATIVE DESCRIPTION	POTENTIAL	DALLEGED
	None		5	□ ALLEGED
	OI . DIRECT CONTACT O3 POPULATION POTENTIALLY AFFECTED	02 DESERVED (DATE) 04 MARRATIVE DESCRIPTION	□ POTENTIAL	
	None		_	
	01 F. CONTAMINATION OF SOIL 03 POPULATION POTENTIALLY AFFECTED UNKNOWN	02 DOBSERVED (DATE March 90 04 MARRATIVE DESCRIPTION	POTENTIAL	☐ ALLESED
	Soil has been contaminated by petro and source of the contamination has	leum product at the airport not been definitely ascerta	fuel farm. Tined.	The extent
	OI S. DRINKING WATER CONTAMINATION OS POPULATION POTENTIALLY AFFECTED	O2 OBSERVED (DATE) O4 NARRATIVE DESCRIPTION	☐ POTENTIAL	□A_LESEC
	None			
	C: H. MORKER EXPOSURE/INJURY CS POPULATION POTENTIALLY AFFECTED	C2 OBSERVED (DATE) O4 NARRATIVE DESCRIPTION	POTENTIAL	□ ALLEGE?
	Lone			•
	01 1. POPULATION EXPOSURE/INJUNY 03 POPULATION POTENTIALLY AFFECTED	02 OBSERVED (DATE) 04 NARPATIVE DESCRIPTION	POTENTIAL	□ ALLEGED

Rone

LAREDO INTERNATIONAL AIRPORT

PROJECT NO. KO6TX021304

POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT

PART 3 - DESCRIPTION OF MAZARDOUS CONDITIONS AND INCIDENTS (EPA Form 2070-12)

11.	HAZARDOUS CONDITIONS AND INCIDENTS (continued) 01 J. DAMAGE TO FLORA 04 NARRATIVE DESCRIPTION	O2 OBSERVED (DATE)	POTENTIAL	MALLEGED
	None			
	OI . DAMAGE TO FAUNA O4 NARRATIVE DESCRIPTION	O2 DBSERVED (DATE)	POTENTIAL	MALLEGED
	None			
•	01 L. CONTAMINATION OF FOOD CHAIN 04 NARRATIVE DESCRIPTION	C2 DBSERVED (DATE)	POTENTIAL	☐ ALLEGED
	None	÷		
	01 M. UNSTABLE CONTAINMENT OF WASTES 03 POPULATION POTENTIALLY AFFECTED	02 OBSERVED (DATE) 04 PARRATIVE DESCRIPTION	POTENTIAL	ALLEGED
	None			•
	O1 N. DAMAGE TO OFFSITE PROPERTY O4 NARRATIVE DESCRIPTION	O2 OBSERVED (DATE)	POTENTIAL	MALLEGED
	None			
	01 0. CONTAM. OF SEVERS, STORM DRAINS, WVTF'S	O2 DBSERVED (DATE)	POTENTIAL	DALLEGED
	None	•		
	OI P. ILLEGAL/UNAUTHORIZED DUMFING OA NARRATIVE DESCRIPTION	C2 OBSERVED (DATE)	POTENTIAL	□#Treess
	None			
	OS DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR	ALLEGED HAZARDS		
	None			
	TOTAL POPULATION POTENTIALLY AFFECTED: Unkno	own		
٧.	SOURCES OF INFORMATION			

Luredo International Airport authorities.

PROJECT SUMMARY SHEET

FOR

DERP-FUDS PRP/HTW PROJECT K06TX021305 LAREDO INTERNATIONAL AIRPORT SITE NO. KO6TX021301 NOVEMBER 1990

PROJECT DESCRIPTION: Ground-water contamination has been discovered at the former base. Free floating petroleum product has been found on top of the ground water at the former fuel The city of Laredo has beneficially used six underground storage tanks (USTs) at the fuel farm, however, the tanks were inspected by the city in 1975 and pronounced sound and the six USTs and associated fuel lines were tightness tested in August 1990 and determined to be tight. The city has conducted a cursory soil sampling program at the fuel farm and found evidence of petroleum product in the soil upgradient of the fuel farm. A former base employee has testified at a City Council meeting that he knew of several large fuel spills which had occurred at the active Air Force base. Also, there is a gravel sump at the fuel farm which may have been used to dispose of waste fuels while the base was still active.

The Texas Water Commission (TWC) has directed the city of Laredo to provide plans for more monitoring wells in order to determine the extent of the contamination and provide a more complete description of the proposed method of ground-water treatment. Even though TWC has not identified the Department of Defense (DOD) as a PRP, DOD placed and used the USTs for approxiately 30 years and may be responsible for an undertermined number of fuel spills.

PROJECT ELIGIBILITY: The USTs at the Laredo International Airport were constructed by the Army and used by both the Army and Air Force.

POLICY CONSIDERATIONS: There is no policy applicable to this project.

EPA FORM 2070-12: Attached.

PROPOSED ACTIVITIES: This potential project should be referred to CEMRD for negotiations with regulatory agencies and other PRPs.

FORT WORTH DISTRICT POC: Randy Neibuhr, 817/334-3223.

POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT

PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS (EPA FORM 2070-12)

11.

None

HAZARDOUS CONDITIONS AND INCIDENTS		POTENTIAL	ALLEGED
CI A. GROUNDWATER CONTAMINATION Unknown	02 DOBSERVED (DATE March 9D 04 NARRATIVE DESCRIPTION		
Free floating petroleum product has port. The extent and source of the	been discovered at the fuel contamination has not been d	farm area of lefinitely as	the air- certained.
	Consequen (DATE	POTENTIAL	ALLEGED
01 B. SURFACE WATER CONTAMINATION 03 POPULATION POTENTIALLY AFFECTED Unknown There is a potential for contaminati a waste paint underground storage ta		ng creek adja	cent to
01 C. CONTAMINATION OF AIR 03 POPULATION POTENTIALLY AFFECTED	02 OBSERVED (DATE) . 04 MARRATIVE DESCRIPTION	POTENTIAL	MALLEGED
None	•	5	☐ ALLEGED
O1 D. FIRE/EXPLOSIVE CONDITIONS O3 POPULATION POTENTIALLY AFFECTED	02 OBSERVED (DATE) 04 MARRATIVE DESCRIPTION	POTENTIAL	
None			□ ALLEGED
O1 DE. DIRECT CONTACT O3 POPULATION POTENTIALLY AFFECTED	02 DBSERVED (DATE) 04 HARRATIVE DESCRIPTION	□ POTENTIAL	٦٨٢٢٥٥٥
None			
01 F. CONTAMINATION OF SOIL 03 POPULATION POTENTIALLY AFFECTED Unknown	02 DOBSERVED (DATE March 90 04 HARRATIVE DESCRIPTION	POTENTIAL	MALLEGED
Soil has been contaminated by petrol and source of the contamination has	and broduct at the althoris	fuel farm. Tined.	The extent
OI G. DRINKING WATER CONTAMINATION O3 POPULATION POTENTIALLY AFFECTED	02 DBSERVED (DATE) 04 NARRATIVE DESCRIPTION	POTENTIAL	□ ALLEGES
None			
C1 H. WORKER EXPOSURE/INJURY OS POPULATION POTENTIALLY AFFECTED	02 OBSERVED (DATE) 04 HARRATIVE DESCRIPTION	POTENTIAL	ALLEGEE
None			
C1 1. POPULATION EXPOSURE/INJURY C3 POPULATION POTENTIALLY AFFECTED	02 OBSERVED (DATE) 04 NARRATIVE DESCRIPTION	POTENTIAL	☐ ALLEGED

POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT

PART 3 - DESCRIPTION OF MAZARDOUS CONDITIONS AND INCIDENTS (EPA FORM 2070-12)

	PART 3 - DESCRIPTION			
11.	HAZARDOUS CONDITIONS AND INCIDENTS (continued)	O2 OBSERVED (DATE)	POTENTIAL	MALLEGED
	01 J. DAMAGE TO FLORA 04 HARRATIVE DESCRIPTION	•		
	None	O2 DBSERVED (DATE)	POTENTIAL	MALLEGED
	O1 □K. DAMAGE TO FAUNA O4 NARRATIVE DESCRIPTION	V. 2000		
	None	C2 OBSERVED (DATE)	POTENTIAL	☐ ALLEGED
	01 L. CONTAMINATION OF FOOD CHAIN 04 MARRATIVE DESCRIPTION	C3 10925KA50 (2012		
	None	02 OBSERVED (DATE)	POTENTIAL	MALLEGED
	01 M. UNSTABLE CONTAINMENT OF WASTES 03 POPULATION POTENTIALLY AFFECTED	04 PARRATIVE DESCRIPTION		
	None	O2 OBSERVED (DATE)	POTENTIAL	DALLEGED
	OI N. DAMAGE TO OFFSITE PROPERTY O4 MARRATIVE DESCRIPTION			
	None		☐ POTENTIAL	☐ ALLEGED
	DI□O. CONTAM. OF SEWERS, STORM DRAINS, WATF'S O4 MARRATIVE DESCRIPTION	O2 OBSERVED (DATE)		
	None .		POTENTIAL	- ALLEGED
•	O1 P. ILLEGAL/UNAUTHORIZED DUMPING O4 NARRATIVE DESCRIPTION	C2 OBSERVED (DATE)	٠,٠٠٠	_
	None			
	OS DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, O	R ALLEGED HAZARDS		
	None			
. !	11. TOTAL POPULATION POTENTIALLY AFFECTED: Unks	nown		
,	Y. SOURCES OF INFORMATION	íties.		

Laredo International Airport authorities.

ATTACHMENT 1

CITY OF LAREDO REPORT SEPTEMBER 24, 1990

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 (high property described herein is located.... without 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 lamenths 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

2.

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, 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 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:

- Department of Defense through the U. S. Corps of Engineers commission a comprehensive environmental impact study of the former Laredo Air Force Base.
- 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.
- Department of Defense to reimburse the City for expenses incurred by the City in testing the fuel tanks and lines and site assessment report.

ATTACHMENT 2

TEXAS WATER COMMISSION CORRESPONDENCE APRIL 18, 1990

TEXAS WATER COMMISSION

B. J. Wynne, III, Chairman John E. Birdwell, Commissioner Cliff Johnson, Commissioner



John J. Vay, General Counsel Michael E. Field, Chief Hearings Examiner Brenda W. Foster, Chief Clerk

Allen Beinke, Executive Director

April 18, 1990

CERTIFIED MAIL

Mr. Jose L. Flores Laredo International Airport 518 Flightline, Building 132 Laredo, Texas 78041

Re: Subsurface Release of Jet A Fuel or Aviation Gasoline at the Laredo International Airport, 518 Flightline, Building No. 132, Laredo (Webb County), Texas (LUST ID No. 95021)

Dear Mr. Flores:

This Office has been made aware of the above-referenced incident through information you provided to Mr. Jeff Lewellin of cur District 11 Field Office in Weslaco on March 12, 1990. The Texas Water Commission (TWC) is responsible for protecting state waters as well as public health and safety from impacts that may result when a well as public health and safety from impacts that may result when a release occurs from an underground storage tank system. Title 31, Texas Administrative Code (TAC), Section 334.71-334.85 requires the owner or operator of an underground storage tank system to immediately abate any releases of a regulated substance and remove the resulting contamination.

In order to determine the degree of remediation necessary to address this incident, you are requested to perform a contamination assessment study and provide your findings in a detailed report to this office. This report must include the following information:

- A description of the release including the cause, the volume lost, and all measures taken to abate and contain it.
- A determination of the vertical and horizontal extent of subsurface contamination and an account of the procedures utilized to support this determination. The term "subsurface contamination" includes not only the presence of free product, but also any dissolved-product contamination of groundwater and residual contamination of soils.

RECEIVED APR 2 0 1990

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F. O. B. - 1306 - Capital Station • 1700 North Congress Ave. • Austin, Texas 78711-3067 • Area Circle 120

- A site characterization which provides a description of the local soil, geology, and groundwater conditions. If any groundwater is threatened or has already been impacted, you must also provide background water quality information, a water-table gradient map, and a water well inventory. This inventory must locate, on a current U.S.G.S. topographic map, all water wells within a one-half mile radius of the site and provide all available information pertaining to each well. It is also necessary that you provide copies of all State of Texas Water Well Reports (Form No. WWD-012) for any installed monitor wells as is required under the Texas Water Well Drillers Act.
- 4) A site map drawn to scale indicating the location of the entire underground storage tank system and all nearby buried utilities, structures, and roads. This map should also provide the location of any excavated areas and the collection points for all soil and water samples.
- 5) Laboratory reports providing the results of all sample analyses and a description of sample collection and analytical procedures. Only EPA-approved methods will be accepted for the collection and analysis of samples utilized to determine waste classifications and final cleanup levels.
- An account of the disposition of contaminated scils and water, recovered product, or any associated wastes. If wastes are transported off-site for disposal or recycling, copies of signed receipts from the receiving facility as well as any requested uniform hazardous waste manifests must be included.
- 7) A city or county map depicting the facility's location and photographs documenting observable impacts, excavations, stockpiled soils, and any on-site treatment activities.
- Finally, based upon the results of the assessment, a proposal for the completion of site remediation.

If any evidence exists indicating the presence of free product accumulation in any monitor wells, the tankhold, piping trenches. etc., immediate removal measures must be implemented. Paily observations should be made and appropriate action pursued to wished that all free product is continuously removed.

Also be advised that TWC approval must be granted before you may initiate any on-site treatment to reduce contaminant levels of affected soils and/or water. Additionally, all vapor emissions that might be associated with this release or your response activities must be controlled and monitored to protect human health and safety.

Mr. Jose L. Hiores Page 3

Please note that you are required to notify Mr. Lewellin at 512/968-3165 at least forty-eight (48) hours in advance of conducting any significant on-site investigation or remedial activities including the installation of soil borings and/or monitor wells and excavation work.

We request that the completed site assessment study and remediation proposal be provided to this Office no later than forty-five (45) days from the date of this letter. A copy of your response or any other correspondence with this Office must be provided to Mr. Lewellin.

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

sincerely,

no Dan Airey

Responsible Party Remediation Section Petroleum Storage Tank Division

ASM/cma 95021.cad

cc: Jeff Lewellin, TWC District 11 Field Office (813 E. Pike Blvd., Weslaco, Texas 78596-4935)

ATTACHMENT 3

TEXAS WATER COMMISSION CORRESPONDENCE OCTOBER 9, 1990

TEXAS WATER COMMISSION

B. J. Wynne, III, Chairman John E. Birdwell, Commissioner Cliff Johnson, Commissioner



John J. Vay, General Counsel Michael E. Field, Chief Hearings Examiner Brenda W. Foster, Chief Clerk

Allen Beinke, Executive Director

October 9, 1990

CERTIFIED MAIL

Mr. Jose L. Flores Airport Director Laredo International Airport 518 Flightline, Bldg. #132 Laredo, Texas 78041

Subsurface Release of Jet Fuel at the Laredo International Airport, 518 Flightline, Bldg. #132, Laredo (Webb County), Texas (LPST ID No. 95021)

Dear Mr. Flores:

We have completed our review of the August 6, 1990 contamination assessment report as well as the August 30, 1990 addendum prepared by assessment report as well as the August 30, 1990 addendum prepared by your consultant, Leak-Tec Corporation. After careful review of all the information provided and pursuant to Title 31, Texas Administrative information provided and pursuant to Title 31, Texas Administrative Code (TAC), Section 334.73-334.75, we conclude the following actions should be pursued in order to further address the contamination at this site.

- 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 ı. prevent migration of the product.
- Provide a more complete description of the proposed method of groundwater treatment to be tested in the future. 2.
- 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 of Monitor Well No. 3,
 - northwest of the tankpit, and
 - southeast of the tankpit.
- Provide a detailed description of the 4,000 gallon interceptor in place. Include plan view and cross-sectional diagrams of the i. interceptor and all connected lines. Describe the final di position of fluid collected in the sump.
- 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. 5. Include the interceptor on this map also.

- Collect a groundwater sample from Monitor Well No. 4 and have the sample analyzed for total dissolved solids (TDS) content in order 6. to determine the local background water quality.
- 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 7. 18, 1990.
- Identify the source of the soil sample labelled "Sample No. 599-8. 05."
- Identify the purpose of the tank shown in Photo No. 7.

Please observe the following guidelines for future assessment activities.

- Soil samples collected from beneath the saturated zone should not be submitted for laboratory analysis.
- A maximum detection limit of one (1) part per million should be employed for total petroleum hydrocarbon (TPH) analyses of 2. groundwater samples.

A written response to this letter that adequately addresses the completion of the aforementioned items should be submitted to this Office within forty-five (45) days from the date of this letter.

Copies of all correspondence with this Office must be provided to our District 11 Field Office in Weslaco to the attention of Mr. Jeff Lewellin. You are also required to notify Mr. Lewellin at 512/968-3165 at least forty-eight (48) hours in advance of conducting any significant on-site investigation or remediation activities including excavation and/or the installation of soil borings/monitor wells. Also, Mr. Lewellin and Mr. Charles Webster, the District representative of the Hazardous and Solid Waste program, should be notified prior to the performance of any activities concerning the interceptor system.

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,

You Dan Airey

Responsible Party Remediation Saction Petroleum Storage Tank Division

ASM/cma

95021.rev

Army Corps of Engineers, Fort Worth District, Attn: Randy Niebuhr Jeff Lewellin, TWC District 11 Field Office (813 E. Pike Blvd., Weslaco, Texas 78596-4935) ATTACHMENT 4

TANK AND FUEL LINE TIGHTNESS TESTING RESULTS

July 31, 1990

Amador Escudero, P.E. City Engineer City of Laredo 4001 N. Bartlett Avenue Laredo, TX 78041

Re: Laredo International Airport Fuel Farm Tank Leak Testing Results

Dear Mr. Escudero:

Attached please find our report on tank leak testing performed at the Laredo International Airport July 12 through July 15. If you have any questions please feel free to call me at the number below or Mr. William Guarniere at (713) 493-3471.

Very truly yours,

MALCOLM PIRNIE, INC.

John P. Sparks, P.E. Senior Project Engineer

mr

c: Mr. Jose L. Flores, Airport Director

1633-01-1

RECEIVED AUG 3 1990

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HOWER TOWNS OF COMMITTEE WAY SOME BOY.

1995 St. 2000



Geotechnical, Environmental and Construction Materials Consultants

July 25, 1990

Mr. John Sparks
Malcolm Pirnie, Inc.
10947 Town & Country Way
Suite 600
Houston, TX 77024

Re: Test No. 900713 Performed July 12 thru July 15, 1990 Loredo International Airport 518 Flight Line Loredo, TX

Dear John;

The underground storage tanks containing Jet-A and Avgas tested on January 12 thru July 15, 1990 tested tight as defined by regulations USEPA 40 CFR Part 280 and NFPA 329-87. The results of the tests are presented below:

Product	Volume		High Level Leak Rate (GPH)	Low Level Leak Rate (GPH)	Full System	Tank Only
AVGAS	25.000		-C.01 @ 10"	N/A	Tight to 10"	PASS
• • • • • • • • • • • • • • • • • • • •	25,000		0.00 @ 12"		Tight to 12"	Pass
JET A-A			-C.03 @ 10°	N/A	Tight to 10"	PASS
JET A-B	25,000		0.00 @ 10"	N/A	Tight to 10"	PASS
	25,000	• • • •	0.00 € 10	N/A	Tight to 12"	PASS
JET A-D	25,000	0.00			Tight to 12"	PASS
AVGAS	25,000	0.00	-0.02 € 12*	n/a	right to re	

The high level tests of the tank systems at this location are considered sufficient for certification purposes since the water level in the backfill area is below the point of hydrostatic equilibrium.

As we discussed, the pressure line tests performed on the 4° product lines yielded inconclusive results. We believe the reason for the inconclusive results is that the ballcock valves at the end of the lines are leaking product back into the tank. To properly test these lines it will be necessary to disconnect the lines from the tanks at the valves and cap them. This is the only method we can recommend to properly test these lines.

Attached are copies of the strip charts indicating the test results for each tank tested. These tests meet all of the requirements set forth by NFPA 329-87 and USEPA 40 CFR part 280.

Please maintain these documents as part of the files on your fuel system. These documents indicate that you have met the tank tightness part of the new regulations. As discussed, you must also maintain records reflecting that you are performing monthly inventory control.

We sincerely appreciate the opportunity to serve you. If we can be of further service in any way, please contact us.

Sincerely,

William H. Guarniere

Phone (713) 947-10⁵⁵

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LIKES CHART FOR DATA RECORD: SUUTIBST. RIO OF 25000 GALLON AVGASIOOL TANK & LARADO INTL AIROPT 518 FLICHTLING LAFACO
TEST OF LEATUR: E.GUARNIERL
LEAK RATE AVG OF 20 CYCLES / LINE FEED: 6 JPH / TOTAL TEST TIME: 104.7 MIN / DENSITY: .69 / TANK TEMP & STAFT: 86 F / COC: .CCC

73.5 73.5 73.7 73.7 738.8 739.8 740.9 741.9 741.9 745.1 746.2 748.3 749.3	555 677 8 6 9 9 0 0 1 2 2 3 3 4 4 5 6 6 7 7 8 6 9 9 0 0 0 1 1 1 2 2 2 3 3 4 5 5 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7	TIME
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SIRIP CHART FOR DATA RECORD: 90071338.R12 UF 25000 CALLOW JET A TANK & CAPADO INTL AIRPORT, 518 FLIGHTLINE, LAFAC

::

LEAL RATE AVG OF 20 CYCLES / LINE FEED: 6 1PH / TOTAL TEST TIME: 185.6 MIN / DENSITY: .77 / TANK TEMP @ STAFT: 90 F / COC: .0005

\$\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\		3.4720 3.4681 3.4682 3.4600 3.4557 3.4518 3.4437 3.4378 3.4356 3.4356 3.4356 3.4236 3.4236 3.4153 3.4153	GALLONS "
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END OF STRIP CHART 90071459.RTG - DATA COLLECTED ON LEAK COMPLITER SZW 8511195

STEED CHAFT FOR DATA FLOOND: GOLFTAGE, PER OF 25000 GALLON JET A TANK & LAREDO INTL APPOPE, 518 FLICHTLINE, LARED
TEST DELEATOR: BLOWARNIERE
LEAR RATE AVG OF ZO CYCLES / LINE FEED: 6 IPH / TOTAL TEST TIME: 80.4 MIN / DENSITY: .76 / TANK TEMP & START: 86 F / COE: .000

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STRIP CHART FOR DATA RECORD: 90071562.F12 CF 25000 DALLOW JET A TANK & LAREDO INTO ATRPOUT,518 FLIGHTLINE,LARED
TEST OPERATOR: B.GUARNIERE
LEAK RATE-AVG OF 20 CYCLES / LINE FEED: 6 IPM / 1014; 7EST TIME: 291.1 MIN / DENSITY: .79 / TANK TEMP @ STAPT: 84 F / COE: LOCCY

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STEED CHART FOR DATA REC.40: 90071563.817 OF 25000 GALLON ANGASTOOLL TANK & LAREDO INTERTEPORT, STEEDELINE, LARED

TEST OFERATOR: 8.GUARNIERE

LEAL RATE AVG OF 20 CYCLES / LINE FEED: 6 IPH / TOTAL TEST TIME: 207.8 MIN / DENSITY: .68 / TANK TEMP & STAFT: 86 F / COL: .C...

3.4851 3.4752 3.4757 3.4662 3.4633 3.4263 3.4274 3.4286 3.4380 3.4286 3.4381 3.4286 3.4382 3.43831 4.4382 4.4383 4
3:3/2/2 a t v v c:02

END OF STATE CHART PUCTISCS.RIZ DATA COLLECTED ON LEAK COMPUTER S/M 88121905

NOTE:

The attached Strip Itert example is from an actual test. The only change made was the Ideation name. The test was run for a total of 137 minutes, but proceed data are usually confined to the last 70-75 minutes of the test with each line showing a calculated leak rate based on an average of 250 readings of temperature and volume change during a period of accroximately one minute.

DATA RECORD: This The identifies an individual test with a number representing the data (YYMMDD) followed by a two-dight serial number, the alphabetic charrel designation and a number representing the height of fluid in the riser in inches. The Tank Volume and Product in the tank and test location are also shown on this line.

OPERATOR NAME: Operator name is shown on the second line.

LEAK RATE AVERAGE (LEA): The number of cycles (minutes) of data used to calculate average leak rate and standard deviation is shown. This number is selected based on the variability of data values, and can be as high as 60 cycles. I hour of data).

LINE FEED (LFD): This is the travel in inches/hour of the strip chart (e.g. 6.0 vertical innes = 1 hour on the chart).

TOTAL TEST TIME: The number of minutes that data were collected for this test.

DATA CONSTANTS: Coefficient of expansion for the product tested and its measured density are shown on the third line.

AMBIENT TANK TEMPERATURE (a): The initial value is shown in degrees Fahrenheit in the hearing. Subsequent values are recorded on the strip chart according to the scale given in the hearing. This variable is plotted for information purposes only, and is not used to calculation of look rate. Ambient tank temperature increases toward the right.

TYERAGE TANK TEMPERATURE (1): These symbols record the charge of average liquid temperature. Each chart division represents 0.01 degrees F, and positive change is toward the right.

IICUID VOLUME (V): It is is the volume of liquid in the measuring cylinder. The amount at the end of each cycle is given under the claim titled SAL and a plotted on the style chart with each division line representing a crange of 0.01 gallons. Movement to the left reads liquid added to the underground tank in order to maintain a constant level (i.e. orderground liquid volume is decreasing).

the state of the second the average value of leak mate for the state of the state o

Zero for the pictical value of leak rate is the center of the strip chart. Each division line represents 0.2, 2 or 20 gal/hr, depending upon the calculated value of average leak rate. A positive leak rate value is a leak out of the tank and will plot toward the right of the center, line. A negative leak rate value is an "in-leak" (e.g. drain-back from a pipe or the effect of a vapor pocket) and will plot toward the left of the center line.

NOTE: The starting point for plotting of each variable except leak rate is arbitrary, and has no significance regarding absolute value since only change is being plotted.

THREE TIMES STANDARD DEVIATION. THE STANDARD DEVIATION (a statistical measure) of leak rate for the number of cycles used to calculate the average leak rate (usually 30) is calculated once per cycle and multiplied by 3. The smaller this number becomes, the less random variation there is in the sampled data and the greater confidence that the leak rate has stabilized and is accurate. For example, a leak rate of .20 with a THREE TIMES STANDARD DEVIATION of .04 means we are 95% sure that the true value of leak rate will lie in the range .20 ±.04 or between .24 and .16 gal/hr. Conversely, there is only a 1% chance it will fall outside that range, and the MOST LIKELY VALUE is the calculated leak rate of .20 gal/hr.

CALLBERT FOR THIS RECORDS VOICESSELLEDS OF STOOL CASSESS FROM THE DIALITY DEEP RECE FREEDOMS, LAS

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END OF STRIP CHART PODDIESALEDS DATA COLLECTED ON LEAK COMPUTER S/N 89061305



1.005 GARCIA ST.

LAREDO, TEXAS 78041

(512) 727 3702

August 21, 1990

Laredo International Airport 518 Flightline Laredo, Texas 78041

Attention: Mr. Jose Flores
Airport Director

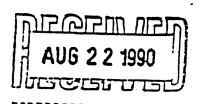
Dear Mr. Flores:

Matt and Ed completed their work out at the airport fuel farm pressure testing the lines. There was not any indication of line leakage problems according to what they noticed or what the test results indicated. Enclosed are the copies of the test results. Please let us know if there is more we can do to help you with the fuel farm problem.

Very truly yours,

TRINITY TESTING LABORATORIES, INC.

William J Rich



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ATTACHMENT 5

MONTHLY MONITORING WELL REPORT (MARCH 1990)

LEAR-ILE L M.

"MOST" MORTHLY MONITORING REPORT FOR UNDERSO, MI LIDRAGE TARK GRETERS

USI Facility 15 #: 494 LAREDO INTERNATIONAL AIRPORT

Date inspected: 00/00/90 lime: 04:50:00

518 FLIGHTLINE TX 78041 LAREDO

inspected by: R. GRADEN

Route number:

Report to:

LAREDO INTERNATONAL AIRFORT

518 FLIGHTLINE

518 FLIGHTLINE

LAREDO

TX 78041

(512) 722-9826

JUE FLORES (AIRPORT PIRECTOR)

Number of points: 11 Wells:

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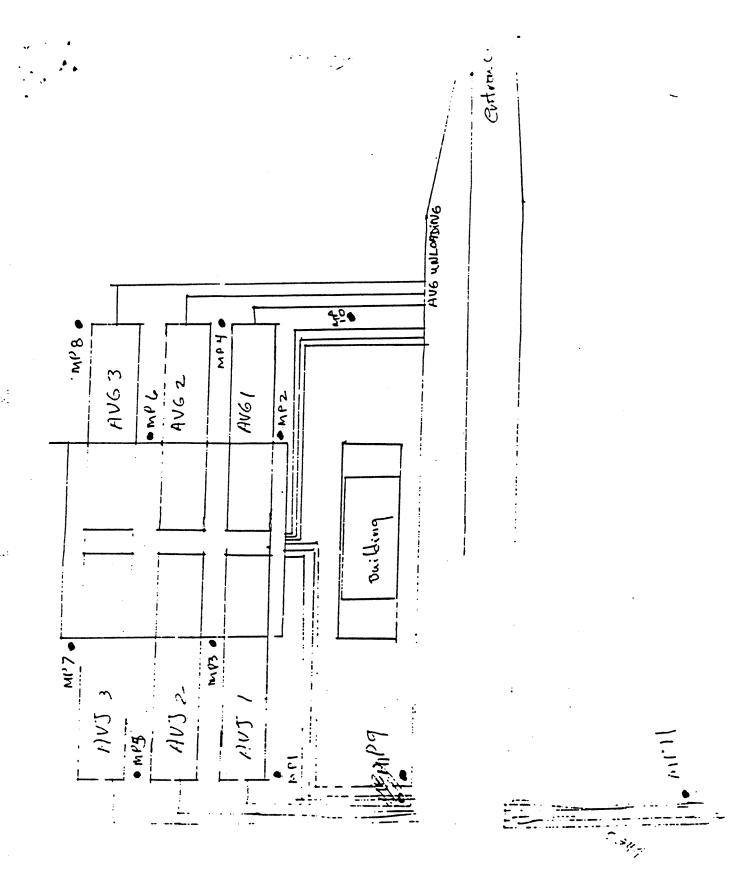
- I kefer to the month column that corresponds to the monitoring date on the top of this form.
- I Head down this column for the latest readings on the monitoring points. A lower number represents a lower level of soil contamination.
- . Refer to the facility map for positioning of monitoring points.

Total Hetrojene Hydroparbona reported in parts per billion.

Lorente Liberta

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ATTACHMENT 6
UNDERGROUND STORAGE TANK SUMMARY

UNDERGROUND STORAGE TANK SUMMARY

NUMBER OF USTS	VOLUME	CONTENTS	LOCATION	USED
3	25,000 ea	Jet Fuel	Near Bldg. 1367	Yes
3	25,000 ea	Jet Fuel	Near Bldg. 1367	Yes
1	20,000	Unknown	E. of Bldg. 1367	No
1	5,000	Unknown	E. of Bldg. 1367	No
3 (Suspected)	Unknown	Unknown	E. of Bldg. 1367	No
4 (Suspected)	Unknown	Unknown	N. of Bldg. 1367	No
1	Unknown	Unknown	Plane Work Area	No
1	Unknown	Unknown	E. of Bldg. 160	No
•	Unknown	Unknown	W. of Bldg. 160	Yes
1	Unknown	Waste Oil Tank	Adjacent to Bldg. 142	No
2	5,000 ea	Unknown	Adjacent to Bldg.	Yes
1	Unknown	Unknown	Next to Bldg. 2098	No
1	600	Unknown	Next to Bldg. 1050	No