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# TEXAS WATER COMMISSION

*PROTECTING TEXANS' HEALTH AND SAFETY BY PREVENTING AND REDUCING POLLUTION*

October 4, 1991

CERTIFIED MAIL

Mr. Jose L. Flores
Airport Director
City of Laredo
International Airport
518 Flightline, Building No. 132
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. Flores:

We have completed our review of the investigation and remedial procedures addressing subsurface jet fuel contamination at the above-referenced facility as provided in the report submitted by your letter dated September 18, 1991. After careful review of all the information provided and pursuant to Title 31, Texas Administrative Code (TAC), Section 334.78-334.81, we conclude the following actions should be pursued in order to further address the contamination at this site:

1. Reference is made to your August 17, 1990 letter addressed to this Office. A review of our file indicates that we have no record of the fuel line test data documenting that the fuel lines tested "tight." You are requested to provide copies of the line test results and to prepare an explanation of any inconclusive results. Also, be sure to indicate the date that this information was previously submitted to this Office as promised in your August 17, 1990 letter. ("A report from Trinity will be furnished to your office as soon as I receive same.")

2. As verbally requested during your September 19, 1991 meeting with Ms. Anne S. Miller of my staff, 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 BTEX and TPH using only EPA-approved methods.





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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:

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.

3. Continue to recover all PSH which accumulate in any monitor or recovery wells. As previously requested in our October 9, 1990 letter, install an automated recovery system to prevent migration of the product.

4. As suggested in our October 9, 1990 letter and as verbally directed by Ms. Miller on September 19, 1991, 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.

5. Provide a 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.

6. 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.

7. As indicated in your September 18, 1991 letter, proceed with the collection of a groundwater sample for the determination of local background water quality.

8. 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.

9. As verbally requested by Ms. Miller on September 19, 1991, provide this Office with the name and address of the current operator of the three (3) remaining active USTs.

Please provide a written response to item Nos. 1 and 9 within fifteen (15) days of the date of this letter. A written response to this letter that adequately addresses the completion of the aforementioned item Nos. 2 through 8 should be submitted to this Office within forty-five (45) days of the date of this letter. **The LPST ID No. should be included on all correspondence.**

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. 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.

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,

Chet Clarke

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

ASM/ca
95021.rev

cc: Rick Duarte, Corps of Engineers, Kansas City, Missouri
Jeff Lewellin, TWC District 11 Field Office
(813 E. Pike Blvd., Weslaco, Texas 78596-4935)