

John Hall, Chairman
Pam Reed, Commissioner
Peggy Garner, Commissioner



TEXAS WATER COMMISSION

PROTECTING TEXANS' HEALTH AND SAFETY BY PREVENTING AND REDUCING POLLUTION

November 9, 1992

CERTIFIED MAIL

Mr. Mark Simmons
Fort Worth District
U.S. Army Corps. of Engineers
P.O. Box 17300
Fort Worth, Texas 76102-0300

Re: Subsurface Hydrocarbon Contamination at the Non-Beneficial
Use Tankhold at the Laredo International Airport, 518
Flightline, Building 132, Laredo (Webb County), Texas
(LPST ID No. 104866)

Dear Mr. Simmons:

Our District 11 Field Office in Weslaco became aware of contamination at the above-referenced facility through a field inspection conducted on June 25, 1992. Subsequently, this Office became aware of the presence of groundwater contamination through information contained in the August 27, 1992 Status and Quarterly Monitoring Report prepared by Raba-Kistner Consultants, Inc. and received in this Office on August 31, 1992. The Texas Water Commission (TWC) Central Office will be responsible for regulatory coordination in association with this facility unless you are advised otherwise in writing by the TWC.

The TWC is responsible for protecting waters in the state as well as public health and safety from contamination that may result when a release occurs from a storage tank system. Title 31, Texas Administrative Code (TAC), Section 334.71-334.85 requires the owner or operator of a storage tank system to immediately abate any release of a regulated substance and remove the resulting contamination.

Therefore, you are requested to conduct a contamination assessment to determine the vertical and horizontal extent of soil and groundwater contamination. Your findings must be submitted to this Office in a detailed report. The report must include the following information:

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1. A complete description of the storage tank system, the cause of the release, the volume of product lost, and all measures taken to abate and contain the release. Also provide a description of past usage of the site.
2. A site characterization which provides a description of both the regional and the site-specific soil types, geology, and groundwater conditions.
3. A determination of the extent of contamination and an account of the procedures utilized to support this determination. Because groundwater has been contaminated, you are requested to investigate the degree and extent of groundwater contamination by installing three to five monitor wells. Soil samples should be collected during the drilling process. The term "groundwater contamination" includes not only the presence of a product layer, but also any dissolved contaminants (dissolved-phase contamination). Please be sure to provide the following information:
 - a. Copies of the signed State of Texas Well Reports (Form No. WWD-012) for all installed soil borings and monitor wells as required by the Texas Water Well Drillers Act.
 - b. A groundwater gradient map (corrected for the floating product-thickness, when applicable) which is based upon groundwater-level measurements collected from the installed monitor wells. The groundwater gradient map should be presented on a site map drawn to scale. Please submit all supporting field measurements.
 - c. The background total dissolved solids (TDS) content of the contaminated groundwater zone. The sample should be collected from a nearby upgradient monitor well which is not contaminated.
 - d. An inventory of all water wells located within a one-half mile radius of the site. The location of each inventoried well must be depicted on a current U.S.G.S. topographic map and all available information pertaining to each well should be provided.
4. A site map drawn to scale indicating the location of the entire storage tank system (tanks, lines, dispensers), all nearby buried utilities, major structures, and adjacent roads. This map should also provide the location of any excavated areas and the collection points for all soil and water samples.

5. A city or county map indicating the specific location of the facility and photographs which document observable impacts, excavations, stockpiled soils, and any treatment activities conducted at the site.
6. A discussion of potential receptors (water wells, residences, schools, utilities, etc.)
7. Copies of the signed laboratory reports indicating 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.
8. The volume and disposition of contaminated soils 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 required uniform hazardous waste manifests must be submitted. All wastes must be handled in strict accordance with all applicable federal, state, and local laws and regulations.
9. A remedial action plan (RAP) for the completion of site remediation or a summary of additional activities planned to complete the assessment. The RAP should include a discussion of the technical alternatives for site remediation which are 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.

If monitor wells are installed, a groundwater monitoring and sampling program should be conducted on a quarterly (3-month) basis and Quarterly Observation Reports should subsequently be submitted to this Office which contain:

- 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.
- A groundwater gradient map for each sampling date as well as a list of the groundwater-level measurements (corrected for product thickness, when applicable) utilized to prepare this map.
- An account of the volume and disposition of all recovered fluids.

Please be advised of the following:

- If any of the released product accumulates in any monitor wells, the tankhold, piping trenches, etc., immediate removal measures must be implemented to be in compliance with 31 TAC 334.79. Please provide a description of the method of product recovery and make observations to ensure that all product is continuously removed.
- In order to comply with 31 TAC 334.85 and 334.482 regarding the proper management of wastes, on-site storage of wastes such as drill cuttings or groundwater removed during well development or purging activities at this site is authorized by this letter as long as the wastes are properly stored to prevent any release of contaminants. The wastes should be removed from the site for proper disposal or treatment as soon as reasonably possible. 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.
- Our records indicate that the tanks at this facility have not been registered with this agency. As of September 1, 1987, a person who owns or operates an underground storage tank used to store a regulated substance must register the tank with the Texas Water Commission in accordance with 31 TAC, Section 334.7. Please provide this Office with a copy of your facility's registration form or submit the necessary information on the attached blank form and indicate why previous registration was not made.
- If you determine that contaminants released from your storage tank system have migrated off of your property, then 31 TAC 334.82(b) requires that you notify the affected landowner(s) of that fact. Please provide documentation that the affected landowner(s) have been notified.
- You are required to notify Mr. William Morris of our District 11 Field Office in Weslaco at 512/968-3165 at least forty-eight (48) hours in advance of conducting any significant on-site investigation or remedial activities including the initiation of excavation work or the installation of soil borings and/or monitor wells. Also, if locking caps are used on any monitor wells, then keys to the wells should be kept on-site during normal business hours so that periodic facility inspections can be conducted by representatives from this Office.

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The contamination assessment report is due forty-five (45) days from the date of this letter and must be formatted as outlined in the May 1991 TWC publication *Standardization of Report Format* including a cover page, a report summary, and a chronology of events. An extension to the established time frame may only be granted by verbal request to the coordinator assigned to this case. You should be prepared to provide a justification for the extension, a schedule for implementing the remaining activities, and a summary of all activities completed to date. Written documentation of this information and the new due date for the report must subsequently be provided to this Office.


To address this matter, it is recommended that you take a well-planned phased approach. Therefore, you are encouraged to secure the services of a qualified environmental consultant knowledgeable in hydrogeology to assist you in conducting the contamination assessment.

To aid you in addressing this matter, the following documents have been included with this letter:

- 1) *Guidance Manual for LPST Cleanups in Texas*
- 2) *Standardization of Report Format*
- 3) List of informational pamphlets available from the TWC.

A copy of your response or any other correspondence with this Office must also be provided to Mr. Morris. The LPST ID Number should be included on all correspondence with this Office. If you have any questions or require guidance regarding this matter, please contact Ms. Anne Miller of my staff at 512/908-2227. Your cooperation will be appreciated.

Sincerely,



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

ASM/cma
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Enclosures

cc: Jose Flores, City of Laredo, International Airport
(518 Flightline, Building No. 132, Laredo, Texas 78041)
William Morris, TWC District 11 Field Office
(813 E. Pike Blvd., Weslaco, Texas 78596-4935)

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PETROLEUM STORAGE TANK DIVISION PAMPHLETS

The following pamphlets are available from the Texas Water Commission:

_____	PST 91-01	<i>Am I Regulated, Am I Compliant?</i>
_____	PST 91-02	<i>Leaking Storage Tanks - What Do I Do?</i>
_____	PST 91-03	<i>Six Phases of a Storage Tank Release Cleanup</i>
_____	PST 91-04	<i>Selecting an Environmental Consultant</i>
_____	PST 91-05	<i>Soil Boring and Monitor Well Installation</i>
_____	PST 91-06	<i>Soil and Groundwater Sampling and Analysis</i>
_____	PST 91-07	<i>Petroleum Storage Tank Remediation Fund</i>
_____	PST 91-08	<i>Revised Application Procedures for Reimbursement</i>
_____	PST 92-03	<i>Real Estate Considerations for LPST Cleanups</i>
_____	PST 92-05	<i>How to Remove Your Underground Storage Tank</i>

These publications are available at no charge from the Texas Water Commission Publications Office at P.O. Box 13087, Austin, Texas 78711-3087 or phone 512/463-7829.

After reviewing the pamphlet you are interested in, you may contact the Petroleum Storage Tank Division at 512/908-2200 for additional information.