

Harding Lawson Associates



July 30, 1993

Client No. 20368
Project No. 23813-1

California Regional Water Quality Control Board
Los Angeles Region
101 Centre Plaza Drive
Monterey Park, California 91754

Attention: Mr. Samuel Yu

Gentlemen:

**Addendum
Phase II Site Assessment and
Supplemental Soil-Gas Survey Workplan
Utility Trailer Manufacturing Company
City of Industry, California**

Harding Lawson Associates (HLA) is pleased to present, on behalf of Utility Trailer Manufacturing Company, this addendum to the HLA's workplan entitled, "*Phase II Site Assessment and Supplemental Soil-Gas Survey, 17300 East Chestnut Street, City of Industry, California,*" dated January 14, 1993 and addendum dated April 15, 1993. This addendum has been prepared in response to the Regional Water Quality Control Board - Los Angeles Region's (RWQCB) letter dated July 13, 1993.

Aerial Photographs

It was our understanding that we would provide RWQCB staff with a list of the aerial photographs that were reviewed during preliminary site assessment activities. A list of negative numbers and the repositories where the photographs were reviewed was provided to Mr. Samuel Yu of the RWQCB on April 14, 1993.

Soil-Gas Investigation

Plate 1 presents the soil-gas sampling locations for the proposed supplemental soil-gas investigation. In summary, a total of 9 locations have been added to the 30 proposed in the addendum dated April 15, 1993 (29 locations were erroneously identified in the text of the addendum).

Soil-Matrix Sampling Locations

As requested in your letter, we have moved the location of the proposed boring at the paint booth in the northern portion of the building closer to the former soil -gas probe. In addition, we are proposing 6 additional soil-matrix sampling locations. The rationale for these additional proposed locations are as follows:

- Of the two proposed locations at the northwestern end of the Somitex property, one will further delineate and quantify the elevated VOCs detected in the soil gas in that area and the second

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will provide background information.

- The two locations proposed in the area surrounding MW-2 will further quantify data collected from borings drilled during the initial assessment work in that area.
- The two locations in the southeastern boundary of the site will further delineate and quantify the elevated VOCs detected in the soil-gas in that area.

All borings will be drilled with a truck or track-mounted auger drill rig equipped with 8 or 10-inch-outer diameter hollow-stem augers. Soil samples will be collected at 5-foot intervals with a Sprague and Henwood 2.4-inch-diameter sampler lined with brass tubes. Samples will be handled as described in the January 14, 1993 workplan. Plate 1 presents the proposed locations for the additional soil borings.

Modification of Groundwater Monitoring Requirements

Groundwater samples were collected from the 5 onsite wells on February 5, 1993. We are scheduled to sample the wells again during the first week in August. This satisfies the requirements of the semiannually sampling period granted by the RWQCB and does not make us delinquent as indicated in your July 13, 1993 letter.

Somitex will be contacted to coordinate future sampling schedules.

Project Implementation Schedule

Field work can start within approximately one week following final approval of the RWQCB. Because more than 90 days had elapsed from when the original addendum was submitted, our subcontractors will need to submit revised bids which will take approximately 1 week. Soil-gas and soil-matrix sample location clearance is expected to take approximately 3 days. Concrete coring and the supplemental soil-gas survey is expected to take approximately 14 days. The soil-matrix sampling is expected to take approximately 5 days and will follow the soil-gas survey. Vapor extraction test well installation and vapor extraction testing are expected to take approximately 6 days. Data analysis and report preparation are expected to take approximately 6 weeks. Plate 2 presents the anticipated schedule. We request that the report submittal deadline be changed to October 15, 1993.

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CLOSURE

If you have any comments or questions regarding this addendum, please call the undersigned.

Very truly yours,

HARDING LAWSON ASSOCIATES



Bradford C.D. Eismen
Project Geologist



Ted A. Koelsch, Ph.D., R.G.
Principal Hydrogeologist

Attachment: Plate 1
Plate 2

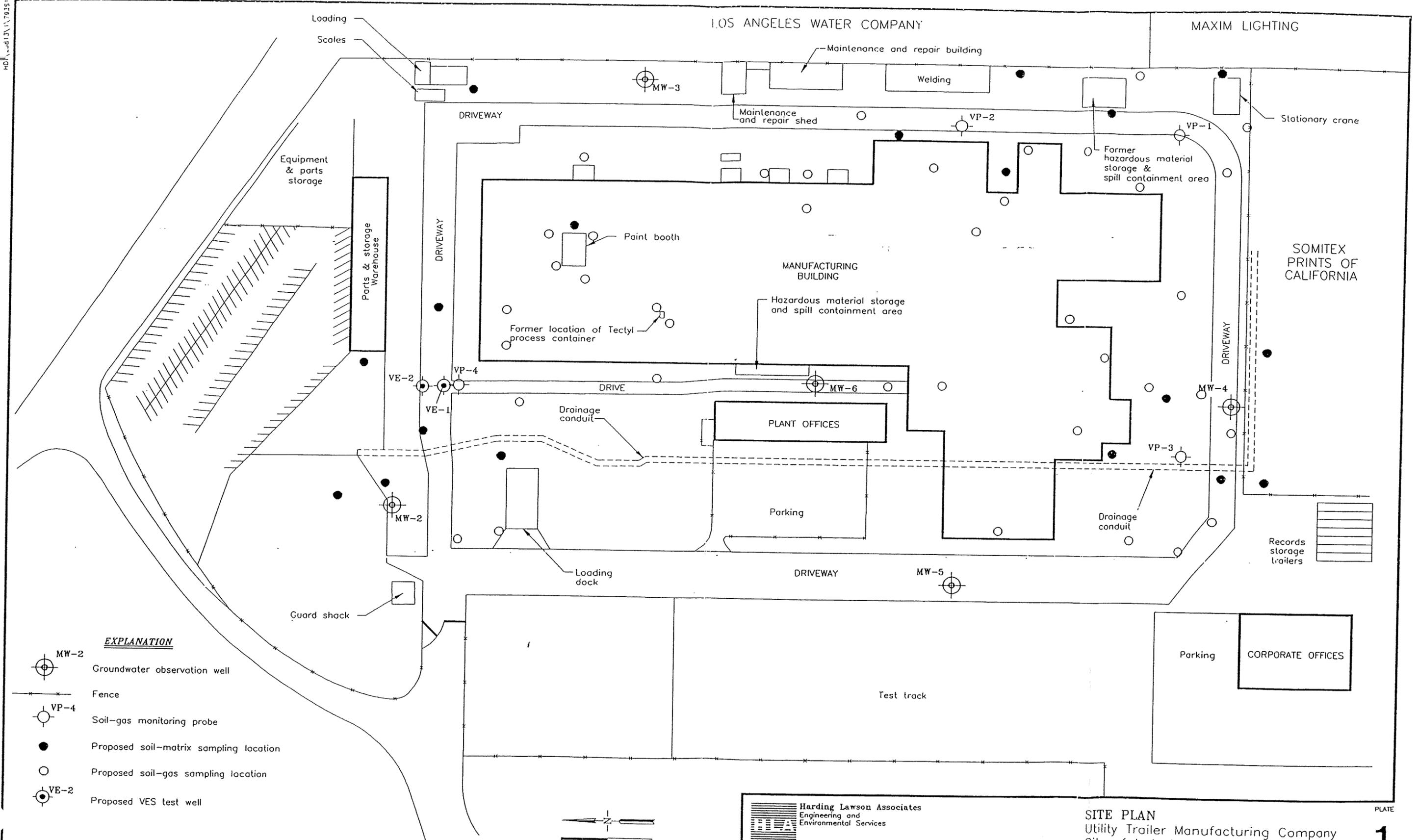
cc: Mr. Bob Griffis - Utility Trailer Manufacturing Company

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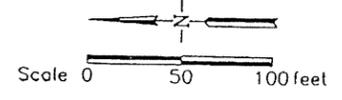
LOS ANGELES WATER COMPANY

MAXIM LIGHTING



EXPLANATION

-  MW-2 Groundwater observation well
-  Fence
-  VP-4 Soil-gas monitoring probe
-  Proposed soil-matrix sampling location
-  Proposed soil-gas sampling location
-  VE-2 Proposed VES test well



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SITE PLAN
Utility Trailer Manufacturing Company
City of Industry, California

PLATE

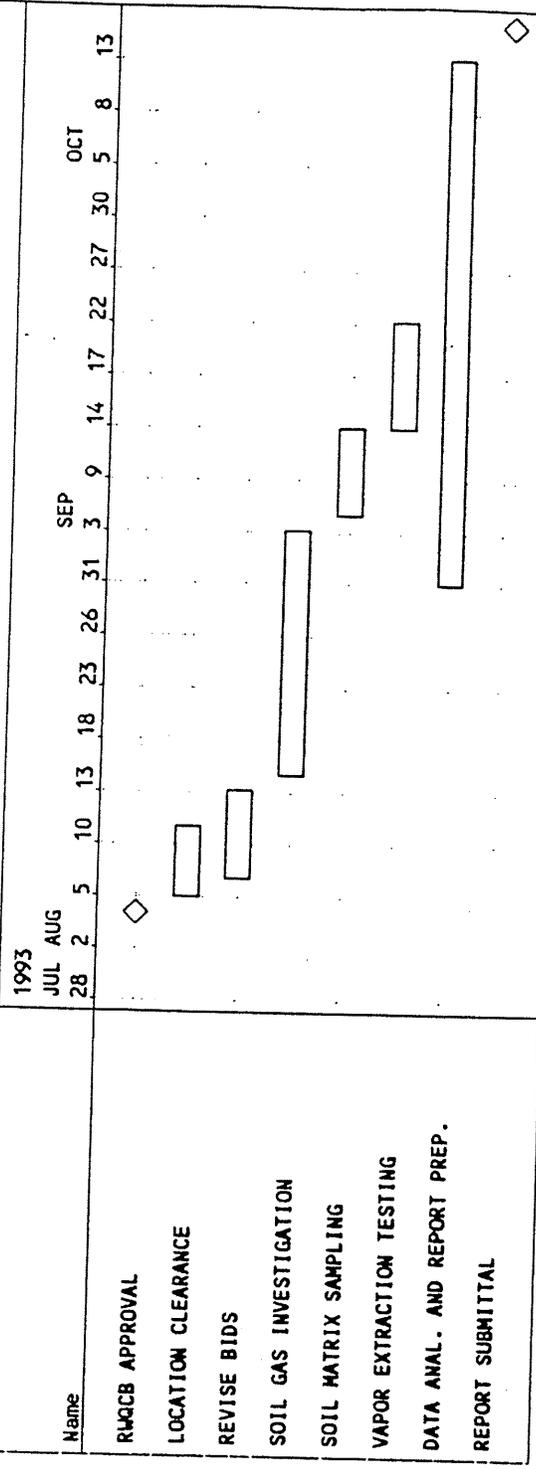
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PROJECT: UTM PHASE II
 CURRENT DATE: 07/29/93
 AS OF DATE: 05/13/93

UTM PHASE II SITE ASSESSMENT



UTM 003207



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PROJECT IMPLEMENTATION SCHEDULE
 Utility Trailer Manufacturing Company
 City of Industry, California

PLATE

2

BCDE

PROJECT-TASK NUMBER
 23813-1

APPROVED
[Signature]

DATE
 7/93

REVISED

DATE

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD—
LOS ANGELES REGION101 CENTRE PLAZA DRIVE
MONTEREY PARK, CA 91754-2156
(213) 266-7500RECEIVED
UTILITY COMP DIVISION

AUG 16 1993

ACTION

August 11, 1993

Mr. Robert Griffis
Utility Trailer Manufacturing Co.
17300 E. Chestnut Street, P.O. Box 1299
Industry, CA 91749-1299REVIEW OF REVISED ADDENDUM TO PHASE II SITE ASSESSMENT WORK PLAN
(FILE NO. 105.0296)

A revised addendum to Phase II site assessment work plan prepared by Harding Lawson Associates was received by this Regional Board under a cover letter signed by yourself. Upon review by staff, the following comments pertain:

1. Further site characterization is required at your site so that remedial action(s) can be planned and designed accordingly. Staff disagree with your statement in the cover letter that "further study ... is necessary for characterization since previous studies have not established a link between detected soil hydrocarbons at the site and those detected in shallow groundwater." Such statement is of limited value when it is without sufficient support from, or even contradicts, existing technical data. For example, four soil test borings drilled and sampled at your site revealed continuous tracks of volatile organic compounds from near surface to the capillary fringe.
2. The issue of submitting aerial photographs may have resulted from mis-communication among your company, your consultant and Board staff. Submitting reprints of the photographs may not be necessary at this time, pending development of site characterization. However, the burden of proof is still on your company if you want to use those photographs to support historical land use or other site information.
3. The revised addendum did not respond to the following:
 - i) Recommended use of soil vapor sampling probe with minimal dead volume.
 - ii) Two former paint booths west of the former TCA

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Mr. Robert Griffis

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still are still not adequately covered by the proposed additional soil vapor sampling probes.

- iii) The proposed soil gas contractor was not identified.
- 4. As for the two borings proposed to be drilled at your neighboring facility, you should contact them and may be offer a joint investigation, such as splitting soil samples. Board staff may intervene only if your effort fails.
- 5. Staff have no objection to the proposed groundwater monitoring schedule.

The work plan as amended by the two addenda is now conditionally approved provided a short letter responding to Item 3 above is provided to this office before commencement of the additional soil gas investigation. Three copies of a report are due to this Regional Board by October 15, 1993.

Please contact Samuel Yu of our staff at (213)266-7541 if you have any questions, and address all correspondence to his attention.

Philip B. Chandler

PHILIP B. CHANDLER
Senior Engineering Geologist

cc: Phillip Ramsey, USEPA, Region 9
Dennis Dickerson, Cal-EPA, DTSC, Region 3
Don Howard, Howard Engineers, Puente Basin Watermaster
John Maulding, San Gabriel Valley Watermaster
Bradford C.D. Eismen and Ted A. Koelsch, Harding Lawson
Associates, Santa Ana

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