



September 8, 1998

Mr. E. G. Solomon  
California Regional Water Quality Control Board  
Los Angeles Region  
101 Centre Plaza Drive  
Monterey Park, CA 91754-2156

Dear Mr. Solomon:

Based on our telephone conversation of August 17, 1998, I further researched my notes and Utility Trailer Manufacturing Company's ("UTM") material usage records, and would like to clarify the positions regarding material usage stated in UTM's letter to Dr. Heath, dated August 11, 1998. My understanding during the call was that Regional Water Quality Control Board ("RWQCB") staff did not disagree with any conclusions in that letter, except those dealing with material usage.

After reviewing UTM's letter, RWQCB staff noted that the assertion that methylene chloride had not been used at the facility was contradicted by a Chemical Storage and Use Questionnaire dated June 12, 1987, and brought this to my attention during the August 17, 1998, telephone call. After a detailed review of UTM's files I agree that this portion of the statement was in error. Methylene chloride was used as part of the trailer foaming process which was discontinued in 1988.

After receipt of the RWQCB's "no further requirements" ("NFR") letter on August 10, 1998, I spoke with Dr. Heath about a mis-characterization of certain wells as downgradient. Dr. Heath stated that RWQCB staff would review the NFR letter and make corrections as necessary, but noted that Mr. Lara's cases had not yet been reassigned. Upon a more detailed reading of the letter, I realized other inconsistencies existed. Rather than calling Dr. Heath, I decided to draft a letter detailing the inconsistencies to aid in the staff's review. We drafted the letter quickly in an attempt to provide RWQCB staff with timely, specific comments on the NFR letter. Unfortunately, on the material usage issue, I quickly reviewed some of my notes on material usage in coatings, and concluded that methylene chloride had not been used on the site. The drafted letter included this as fact, and I apologize for any misunderstanding this may have caused. UTM would like to clarify the material usage issue.

Page 2 of the RWQCB's NFR letter, in the section titled "Previous Assessment", states "*The subject site has been occupied by a utility trailer manufacturer and 1,1,1-TCA, methylene chloride, and other chlorinated solvents were used during operations.*" We continue to disagree with the chemical use history as stated. UTM has consistently denied the use of any chlorinated solvents, particularly tetrachloroethene ("PCE") and trichloroethene ("TCE"), and has admitted to the use of 1,1,1-TCA and methylene chloride. In the Chemical Storage and Use Questionnaire dated June 12, 1987, UTM included the historical use of certain solvents that the RWQCB has used as the basis for the conclusion that "*...other chlorinated solvents were used during operations.*" Based on the August 17, 1998, telephone call, my understanding is the particular solvent is listed as: "Chlorinated/Hydrocarbon Blend - Rho-Clene." I have attached a copy of the MSDS for this solvent. In summary, Rho-Clene contained 95% of 1,1,1-Trichloroethane and 5% of paraffins and naphthenes. Trace constituents listed are 1,4-Dioxane at 2.3%, and 1,2-Dichloroethane ("1,2-DCA") at 200 parts per million ("ppm"). No other trace constituents are listed.

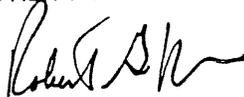
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My review of the Chemical Storage and Use Questionnaire suggested that we should clarify the composition of two additional materials, namely, "Acryld Reducer R7K6212 Solvent Blend", and "Swifts Foam Bond". MSDS sheets for these materials are also attached. The R7K6212 contains aromatic VOCs only. The Swifts Foam Bond was an adhesive containing methylene chloride.

To the best of our knowledge, and based upon careful and exhaustive reviews of all records, including MSDSs, AQMD air emissions reports, and hazardous waste manifests, we have concluded that chemical use at this facility has been restricted to coatings (paints), adhesives and solvents containing aromatic VOCs (e.g., mineral spirits, xylene, toluene), 1,1,1-TCA, and methylene chloride. Additionally, water-based coatings have been used. Except for trace amounts of 1,2-DCA contained in the Rho-Clene product, no history exists to confirm the use any other chlorinated compounds, specifically PCE and TCE.

We appreciate your bringing the error in our August 11, 1998 letter to our attention, and we look forward to continuing to work cooperatively with RWQCB staff.

Sincerely,  
UTILITY TRAILER MANUFACTURING COMPANY



Robert Griffis  
Corporate Environmental Manager

attachments

cc with attachments:

Loren E. Henning, USEPA, Region IX, San Francisco, California

cc without attachments:

Carol Williams, San Gabriel Valley Watermaster  
Ed Stewart, Harding Lawson Associates

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