



August 11, 1998

Dr. Arthur Heath  
California Regional Water Quality Control Board  
Los Angeles Region  
101 Centre Plaza Drive  
Monterey Park, CA 91754-2156

Dear Dr. Heath:

We are in receipt of the Regional Water Quality Control Board's ("RWQCB") no further requirements letter dated August 10, 1998, and we appreciate your prompt response to our submittals.

In reviewing the letter, we have noted some inconsistencies in certain statements and interpretations. We would like to take this opportunity to clarify some of these issues.

The section of the RWQCB's August 10 letter titled "Remediation Closure Report", specifically paragraph number 2 on page 2, states "A total of twenty-one (21) soil vapor samples were collected on December 10, 1997, from nineteen (17) soil vapor probes installed to a maximum depth of 14' below ground surface (bgs) and two (2) vapor extraction wells located in the southern area of the subject site. These soil vapor samples were collected for confirmatory purposes. Laboratory analysis of these samples [in the southern area] resulted in the detection of maximum VOCs concentrations of 1.9  $\mu\text{g/L}$  of PCE and 9.9  $\mu\text{g/L}$  of 1,1,1-TCA. The highest VOC concentrations were detected in samples collected from the effluent of vapor extraction Well VE15."

The Harding Lawson Associates ("HLA") closure report (on page 4) states that "... results from all samples [in the southern area] were not detected above a method detection limit of 1  $\mu\text{g/L}$ , with the exception of one sample (SG-12-6 at 1.5  $\mu\text{g/L}$  of tetrachloroethene [PCE])." This statement is corroborated in Table 7, Table 8, and Appendix C of the HLA closure report. It appears that the statements in the RWQCB's August 10 letter were based on Tedlar bag samples reported in Table 2, rather than the results of the on-site soil-gas sampling. As presented in the IRAP and discussed in subsequent meetings between Utility Trailer ("UTM") and RWQCB staff, the basis for confirmatory sampling is in-situ soil gas testing using an on-site mobile lab. The Tedlar bag samples were to be taken solely for purposes of "calibrating" the PID which was used to develop relative concentration decline curves. Because these samples were taken during operation of the extraction system they do not represent in-situ equilibrium concentrations.

The section of the RWQCB's August 10 letter titled "Groundwater Monitoring", specifically paragraph number 1 on page 2, states "The highest VOCs concentrations were detected in samples collected from wells MW-3 and MW-4 located upgradient from the building and near-field from the southern section of the facility respectively." Additionally, paragraph number 2 of the same section states "... the average PCE concentration was greater in MW-4 than in MW-3. Furthermore, the detected PCE concentrations in MW-4 have been highest measured at the subject. These findings indicate continued impact to ground water quality from on-site VOC sources."

We disagree with the characterization of MW-4 as a near field well. Based on groundwater flow directions, illustrated on Plate 2 of the HLA Groundwater Monitoring report, it is clear that both wells MW-3 and MW-4

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are upgradient to UTM operations, and these wells have historically represented concentrations in groundwater entering the property boundaries adjacent to LA Water and Somitex Prints, respectively. Table 4 of the HLA Groundwater Monitoring report demonstrates that concentrations seen in MW-3 are not inconsistent with results reported from the Puente Valley Steering Committee's ("PVSC") well MW6-82 completed just upgradient. The results in MW-4 have consistently corroborated an increasing trend of groundwater concentrations across the Somitex Prints site, and this well is located immediately downgradient of the recently VES-remediated area within the Somitex Prints building.

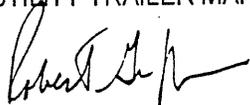
On page 2 of the RWQCB's August 10 letter, in the section titled "Previous Assessment", it states "*The subject site has been occupied by a utility trailer manufacturer and 1,1,1-TCA, methylene chloride, and other chlorinated solvents were used during operations.*" We disagree with the chemical use history as stated. In numerous submittals to the RWQCB, UTM has denied the use of any chlorinated solvents except 1,1,1-TCA. To the best of our knowledge, and based upon careful and exhaustive reviews of all records, including MSDSs and Hazardous Waste Manifests, we concluded that chemical use at this facility has been restricted to coatings containing aromatic VOCs (e.g., mineral spirits, xylene, toluene), water-based coatings, and 1,1,1-TCA-based coatings. No history exists to confirm the use of methylene chloride or any other chlorinated solvent.

The apparent basis for the RWQCB allegation that methylene chloride was used at the site is the presence of methylene chloride in the first several soil samples taken at the site, during the late 1980s. Review of later sampling, both soil matrix and soil gas, performed in the same areas as those earlier reported detections, did not substantiate those detections. It is clear in retrospect that many of the earlier sampling results would not pass the close QA/QC scrutiny that is practiced today. Labs occasionally report methylene chloride in samples, and in most cases, after review of the lab QA/QC samples, it has been determined to be a lab-introduced contaminant. We believe that the early reported detections of methylene chloride should not be used to allege the use of methylene chloride at the UTM facility, when the bulk of the data developed for the site clearly shows this conclusion to be inaccurate.

Lastly, it is our understanding that our request made via the HLA closure report is specifically granted, and we will proceed accordingly. Namely, we requested permission to completely abandon the VES system, including grouting of all piping, soil piezometers, soil-gas probes and multi-level soil vapor wells.

We have appreciated your assistance in bringing this project to a close, and we look forward to your response to the issues raised in this letter.

Sincerely,  
UTILITY TRAILER MANUFACTURING COMPANY



Robert Griffis  
Corporate Environmental Manager

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