



MWH

MONTGOMERY WATSON HARZA

June 24, 2003

U.S. Environmental Protection Agency
Region IX, SFD-7-3
75 Hawthorne Street
San Francisco, California 94105

Attention: Ms. Penny McDaniel
Project Manager, Site Cleanup Branch

**Subject: Amendment 1 to Workplan for Well Relocation
Utility Trailer Manufacturing Company
City of Industry, California**

Dear Ms. McDaniel:

MWH has prepared this Amendment 1 to the Workplan for Well Relocation, Utility Trailer Manufacturing Company, dated November 21, 2002, to incorporate comments from Ms. Penny McDaniel of the United States Environmental Protection Agency (EPA) Region IX. The EPA comments were submitted to Mr. James Geocaris, Esq. in a letter dated December 31, 2003. A copy of this Amendment shall be kept with all copies of the Workplan. The EPA comments and MWH's response to comments are listed below.

WELL ABANDONMENT

Comment No. 1: Proposed well abandonment procedures are in substantial conformance with State Water Well Standards; however, there is no specific statement regarding a commitment to conform to those standards. It is recommended that the work plan specifically state that well abandonment will conform to State Water Well Standards, as presented in California Department of Water Resources (DWR) Bulletin 74-81 and supplemented by DWR Bulletin 74-90.

Response: MWH concurs. All well abandonment activities shall be conducted in accordance with California State Water Well Standards (DWR Bulletins 74-81 and 74-90 combined) and California State Monitoring Well Standards (DWR Bulletin 74-90).

Comment No. 2: If the screen slot size of the monitoring wells to be abandoned is less than 0.020 inches, it is recommended that the screen and portions of the casing surrounded with gravel pack are perforated prior to pressure grouting to ensure adequate grout invasion.

Response: MWH concurs. Any wells with slot sizes less than 0.020 inches shall be perforated prior to pressure grouting.

Comment No. 3: When adding bentonite to the grout mix, the bentonite should be mixed with the water and fully hydrated prior to mixing with cement.

Response: MWH concurs. Bentonite shall be mixed first and fully hydrated prior to adding cement to each batch of grout.

Comment No. 4: Addition of a grout accelerator, such as calcium chloride, should be avoided to minimize the potential for cracking, which could compromise the integrity of the sealant.

Response: MWH concurs. No accelerants shall be added to the grout.

Comment No. 5: During pressure grouting, the pressure needs to be maintained until the grout has had the opportunity to set up.

Response: MWH concurs. Pressure shall be maintained until the grout has an opportunity to set up.

DRILLING, SOIL SAMPLING, AND WELL CONSTRUCTION

Comment No. 1: As confirmed in the letter of March 14, 2003 from James Geocaris, Esq. To Penny McDaniel, the EPA will accept the requirement in the original Workplan for soil sampling at five-foot intervals.

Comment No. 2: A description of well development methods, and development completion thresholds should be provided.

Response: Well development will be conducted in the following manner. Each well will be developed no earlier than 48 hours following cement grout placement. A combination of bailing and surging will initially be used until sand production has essentially ceased. The well will then be pumped with a submersible pump. If groundwater recharge is very slow, the well may be bailed rather than pumped, to avoid having the well go dry. Groundwater quality parameters including pH, specific conductivity, temperature, and turbidity will be measured at regular intervals and documented on a well development log. Water level and net purge volume will additionally be monitored and recorded on the well development log. Pumping (or bailing) will continue until the groundwater turbidity has been minimized; and pH, specific conductivity, and temperature have stabilized to within 10 percent for three consecutive measurements.

INVESTIGATION-DERIVED WASTE

Comment No. 1: If emerging compounds (e.g. perchlorate, 1,4-dioxane, hexavalent chromium) have been analyzed and detected in Utility monitoring wells, then water generated during well development should be analyzed for those emergent compounds prior to disposal.

Response: MWH concurs. Purge water shall be sampled for volatile organic compounds (including 1,4-dioxane) by EPA Method 8260B, hexavalent chromium by EPA Method 7196A, and perchlorate by EPA Method 314.0.

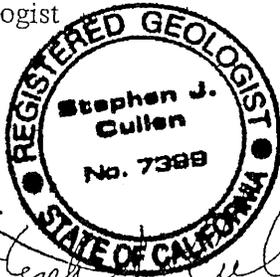
Should you have questions, please contact Frank Tam at (626) 568-6339, or Dr. Stephen Cullen at (805) 693-0613.

Sincerely,

MWH Americas, Inc.


Jennifer Wiley
Geologist


Frank Tam
Senior Engineer




Stephen J. Cullen, Ph.D., R.G.
Vice President, Principal Hydrogeologist