

Utility Trailer Manufacturing Company

September 4, 1992

Mr. Bahman Hajialiakbar
Los Angeles County Department of Public Works
Waste Management Division
Underground Tank Section
900 South Fremont Avenue
Alhambra, California 91803-1331

Dear Mr. Hajialiakbar:

Our company is preparing to make some process line changes at our plant in the City of Industry, which manufactures flatbed and van truck trailers. One of these changes involves the removal of an open-top processing structure, used as a dip tank, that extends both above and below the ground. This structure is located in the production line and we dip a steel trailer part into it to apply a thick, viscous Tectyl coating for corrosion protection. We are in the process of changing the current procedure and have decided to remove this structure.

It has recently been brought to our attention that this dip tank could conceivably be considered an underground storage tank, if it was used for storage rather than processing. Neither our company nor the various agencies that have inspected our plant have considered this structure to be an underground storage tank since it is an exempt flow-through process tank under EPA regulations. However, we wanted to contact you to make sure that your agency has no objections to our removal of this structure.

The dip tank has a steel primary containment and in addition is surrounded by a concrete secondary containment approximately 6 inches thick. It has no associated underground piping, and is regularly filled with the Tectyl coating from the open top. The Tectyl coating is a thick, viscous liquid that contains aluminum, petroleum-based solvent and petroleum distillates.

We are now in the process of making changes to our production line and want to avoid any unnecessary delays, therefore please let us know as soon as possible if you have any questions or comments about the removal of this structure. We plan to remove the dip tank on approximately September 18th and would appreciate your comments prior to that date.

Sincerely,

Tony Esnault
Industrial Relations Manager

PO. Box 1299, City of Industry, California 91749-1299 • Telephone: (818) 965-1541 • Telex: 67-0442

UTM 002628

Advanced Chemical Technology
1100 South Azusa Avenue
City of Industry

Rod's Foods Products
17380 Railroad Street
City of Industry

Air Products and Chemicals Inc
17801 Arenth Avenue
City of Industry

Ryco Manufacturing
17421 East Gale Street
City of Industry

AJAX Industrial Hardware Division
825 South Ajax Avenue
City of Industry

Spectrol Electronics Corporation
17070 Gale Avenue
City of Industry

The Aro Corporation
17101 East Gale Avenue
City of Industry

Stop 'n Go Markets
18039 Valley Boulevard
City of Industry

BDP Company
855 Anaheim-Puente Road
City of Industry

Teledyne Analytical Instruments
16830 Chestnut Street
City of Industry

Bircher Construction
17760 East Roland Street

Teleservice Corporation
16960 Gale Avenue
City of Industry

Cal-Mold Inc
17438 East Railroad Avenue
City of Industry

Weber Marking Systems
17421 East Gale Street
City of Industry

Circle K Thrifty Station No. 306
447 South Azusa Avenue
City of Industry

Whitecomb Plating Inc
655 South Alhambra Avenue
City of Industry

Environmental Lighting for Architecture
17891 Arenth Avenue
City of Industry

United States No. 5621
945 South Azusa Avenue
City of Industry

HH Robertson Company
825 South Ajax Avenue
City of Industry

Reuland Electric
17769 Railroad
City of Industry

LA Water Treatment Corporation
17400 East Chestnut Street
City of Industry

Besteel
1747 S. Alhambra Road
City of Industry

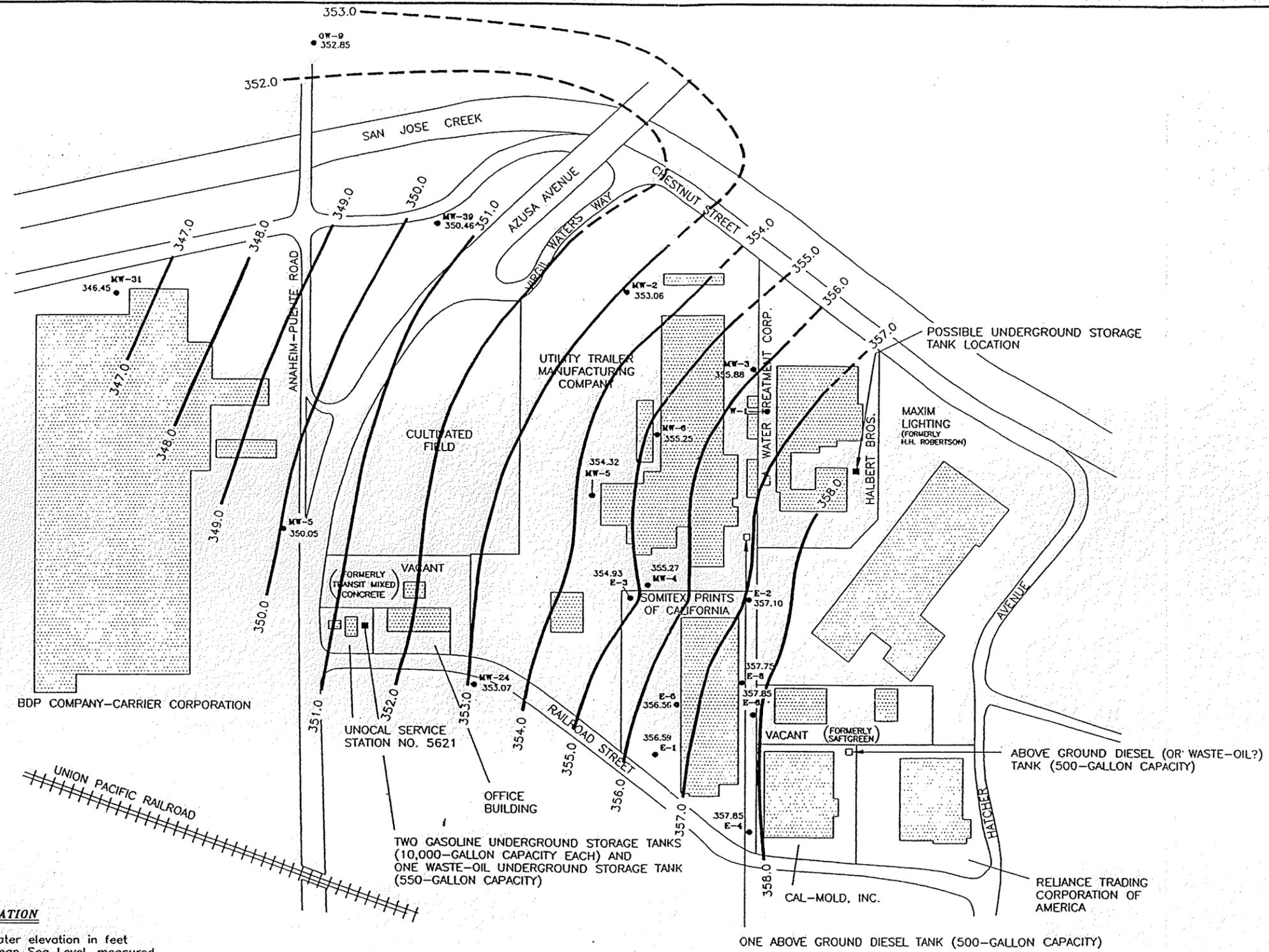
Monterey Carpets
1816 John Reed Court
City of Industry

Columbia Pacific Aluminum Corp
18111 Railroad
City of Industry

Pacific Grating Incorporated
16961 East Gale Avenue
City of Industry

From Peter M. ... 5/9/92

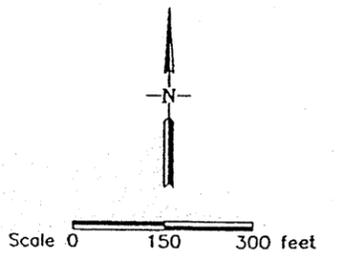
HDL 400513



EXPLANATION

• 346.45 Groundwater elevation in feet above Mean Sea Level, measured 5/6/91 to 5/15/91

355.0 — Groundwater contour line, in feet above Mean Sea Level



UTM 002630

Harding Lawson Associates
Engineering and Environmental Services

REGIONAL GROUNDWATER CONTOUR MAP
Utility Trailer
City of Industry, California

DRAWN LJH	PROJECT-TASK NUMBER 11964-001	APPROVED	DATE 9/92	REVISED	DATE
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PLATE

310 492-9646
THOMAS B. BECK & ASSOC., INC.
dba HARBOR TESTING LABORATORY
24 HOUR PHONE ~~(201) 525-2222~~

MARINE CHEMIST CERTIFICATE

SERIAL NO. S 5185

Survey Requested by <u>HARDING LAWSON ASSOC.</u>	Utility <u>UTILITY</u>	Date <u>22 SEPT 92</u>
Vessel <u>SEE BELOW</u>	Type of Vessel <u>DIP TANK</u>	Specific Location of Vessel <u>17300 E CHESTNUT</u>
Last Cargo <u>TECTYL 127 B</u>	Test Method <u>LEL O₂ VIGOR</u>	Time Survey Completed <u>1120</u>

DIP TANK MARKED
WITH YELLOW SPRAY
PAINT

5185

TESTED 0% LEL
20.8% OXYGEN

NOT SAFE FOR HOT WORK
SAFE TO COLD CUT TANK
USING HYDRAULIC OR
PNEUMATIC SHEARS.

In the event of any physical or atmospheric changes adversely affecting the STANDARD SAFETY DESIGNATIONS assigned to any of the above spaces or if in any doubt immediately stop all work and contact the undersigned Marine Chemist

QUALIFICATIONS: Transfer of ballast or manipulation of valves or closure equipment tending to alter conditions in pipe lines, tanks or compartments subject to gas accumulation, unless specifically approved in this Certificate, requires inspection and endorsement or release of Certificate for the spaces so affected. All lines, vents, heating coils, valves, and similarly enclosed apparatuses shall be considered "not safe" unless otherwise specifically designated.

STANDARD SAFETY DESIGNATIONS (partial list, paraphrased from NFPA 308-1980, Subsections 1-6.1 through 1-6.4, and Subsection 5-3.2).

SAFE FOR WORKERS: Means that in the compartment or space so designated: (a) the oxygen content of the atmosphere is at least 19.5 percent by volume; and that, (b) toxic materials in the atmosphere are within permissible concentrations; and that, (c) the residue are not capable of producing toxic materials under existing atmospheric conditions while maintained as directed on the Marine Chemist's Certificate.

NOT SAFE FOR WORKERS: Means that in the compartment or space so designated, the requirements of Safe for Workers has not been met.

SAFE FOR HOT WORK: Means that in the compartment so designated: (a) oxygen content of the atmosphere is at least 19.5 percent by volume, with the exception of inerted spaces or where external hot work is to be performed; and that, (b) the concentration of flammable materials in the atmosphere is below 10 percent of the lower flammable limit; and that, (c) the residue are not capable of producing a higher concentration than permitted by (b) above under existing atmospheric conditions in the presence of fire, and while maintained as directed on the Marine Chemist's Certificate; and further, that, (d) all adjacent spaces containing or having contained flammable or combustible materials have been cleaned sufficiently to prevent the spread of fire, or are satisfactorily inerted, or, in the case of fuel tanks or lube oil tanks or engine room or fire room bilges, have been treated in accordance with the Marine Chemist's requirements.

NOT SAFE FOR HOT WORK: Means that in the compartment so designated, the requirements of Safe for Hot Work have not been met.

CHEMIST'S ENDORSEMENT. This is to certify that I have personally determined that all spaces in the foregoing list are in accordance with NFPA 308-1980 Control of Gas Hazards on Vessels and have found the condition of each to be in accordance with its assigned designation.

The undersigned acknowledges receipt of this Certificate under Section 2-3 of NFPA 308-1980 and understands conditions and limitations under which it was issued.

This Certificate is based on conditions existing at the time the inspection herein set forth was completed and is issued subject to compliance with all qualifications and instructions.

Signed Bob Ayle UTILITY TRAILER INC 9/22/92 Date
 Signed Thomas B. Beck 594 Certificate No.