Harding Lawson Associates

December 6, 1994

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Mr. Eric Nupen
California Regional Water Quality Control Board
Los Angeles Region
101 Centre Plaza Drive
Monterey Park, California 91754-2156

Transmittal of Interim Remedial Operations Plan Outline/Schedule and Summary of Topics Discussed During November 16, 1994, Meeting
Utility Trailer Manufacturing Company
City of Industry, California

Dear Mr. Nupen:

On behalf of Utility Trailer Manufacturing Company (UTM), Harding Lawson Associates (HLA) would like to thank you and Ms. Rueen Fang-Wang for taking the time to meet with Mr. Bob Griffis of UTM and Messrs. Mark Rickertson and Kurt Wiebe of HLA on Wednesday, November 16, 1994, to discuss plans for the interim remediation of soils in the north area of the above-referenced site. The purpose of this letter is to document the main points made during that meeting and to respond to requests made by the California Regional Water Quality Control Board - Los Angeles Region (RWQCB).

SUMMARY OF NOVEMBER 16, 1994, MEETING TOPICS

The primary purpose of the meeting was to: 1) present to the RWQCB design drawings for interim soil remediation in the north area; 2) to discuss system construction and startup work that is expected during December 1994 and January 1995; and 3) to bring to the RWQCB's attention aspects of the current plans that differ from what was laid out in the July 21, 1994, Interim Remedial Action Plan (IRAP), such as the exact locations of proposed soil-vapor extraction trenches.

The RWQCB requested that an updated schedule for the proposed work be prepared and submitted. HLA suggested that a general outline of the proposed remedial operation plan also be prepared and submitted with the schedule for RWQCB approval. These actions were agreed upon; an updated schedule is presented as Attachment 1, of this letter and an outline of planned operations is presented as Attachment 2. The RWQCB also requested that it be notified 2 to 3 days prior to the beginning of trench construction. RWQCB will also be notified prior to system startup.

The RWQCB asked whether it was probable that water might collect in the vapor extraction trenches, and if it did, whether it would affect operations. Given the depth to groundwater, and the presence of paving above the remediation area, it is not expected that a significant amount of water would collect in the trenches. However, if water does begin to collect in the trenches, it would be easily removed by the flow of air and would be collected in water drop-out equipment.

The RWQCB asked if drawings were available yet for proposed treatment equipment at the Southeast and Southwest Areas. Part of the strategy of the present interim remediation effort at the North Area (as stated in the IRAP) is to test whether the proposed cleanup strategies are successful and cost effective. It is not UTM's intention to formalize plans for the remediation of the upper clay unit at

the Southeast and Southwest Areas until the results of the present efforts are known. Interim remediation, however, of the uppermost sand zone in the South Areas is planned as discussed below.

The RWQCB asked whether additional soil-matrix sampling is planned as part of the interim remedial effort. Additional soil samples will be collected as needed from the target zones for system performance evaluation and closure criteria comparison purposes.

The RWQCB stated that it would like to receive a startup and remedial progress report after 1 month of operations, and that quarterly progress reports would be acceptable thereafter. These reports will be brief summaries of system operations information, including hours in operation, soil zones being treated, flow rates, mass and concentrations of chlorinated volatile organic compounds (CVOCs) removed, and will include graphical representations of principal trends in the data and a description of work expected in the next reporting period.

The RWQCB asked about the status of the various permits that were required to build and operate the interim remediation system. The building and construction permits are expected shortly. The refrigeration/condensation equipment that will be used in the early stages of the remedial activities operates under an existing 90-day various locations permit from the South Coast Air Quality Management District (SCAQMD), and an SCAQMD application is in preparation for the longer term granular activated carbon-based vapor extraction operation.

The RWQCB asked how rainfall runoff from the covered treatment pile is to be handled. HLA said that UTM's Storm Water Pollution Prevention Plan and Monitoring and Reporting Program documents would be reviewed and the handling of this water would be addressed. That review has been performed. Storm water running off the top of the plastic sheeting and flowing away from the pile outside the berm will be sampled as part of, and in accordance with UTM's current storm water pollution prevention plan and monitoring and reporting program. This runoff will not contact soil being treated beneath the plastic cover and should not contribute CVOC's to the sheet flow off the site. Any storm water trapped behind the asphalt berm will be sampled and analyzed for EPA 8010 as a precaution after the first significant rain. If the trapped water is found to contain CVOC concentrations in excess of California State MCL's, the water will be removed and properly disposed of. If no concentrations above MCL's are detected, the rainwater will be released to surface runoff, and no future trapped water sampling will be performed.

RWQCB suggested that a single, large sheet of plastic sheeting be used to cover the aboveground soil treatment pile. When HLA and UTM explained how multiple sheets could be welded together and weighted to facilitate pile construction and to reduce compaction, RWQCB agreed that using multiple welded sheet would be acceptable.

UTM asked about the status of the RWQCB cost recovery program. Based on prior discussions between UTM and Ms. Fang-Wang (RWQCB), UTM had delayed signing the previously sent agreement until certain administrative cost issues had been resolved. Mr. Nupen (RWQCB) stated that the policy has changed and that administrative costs are not charged to small remediation

projects which can be completed in a one-year period. The deposits required has also been reduced to $1,000. RWQCB staff agreed to send a new cost recovery package to UTM reflecting these changes.

At RWQCB's previous request, UTM has not undertaken proposed efforts to remediate soils in the South Areas pending receipt and review by RWQCB of data from adjacent sites. RWQCB said that based on its preliminary data review, UTM may now begin work in the South Areas. UTM indicated that it would extract and treat vapors from the South Area uppermost sand wells, if feasible, as part of the upcoming program at the North Area. RWQCB gave its approval but suggested that additional sampling in the south areas may possibly be needed for closure.

RWQCB has indicated in the past that a mobile laboratory would be required for soil-vapor sample analyses during remedial operations. HLA proposed that a mobile lab be used on the first day of full North Area remedial operations; Tedlar bag samples analyzed using EPA Method 8010 and a flame ionization detector (FID) will serve as comparative references. The Tedlar 8010 and FID readings would then be used as indicators of CVOC concentrations for the remainder of the operation to optimize project resources. The mobile lab would also be used for one day once the graphs of extracted CVOC concentration versus time (for the segments/wells with the highest concentrations) approach asymptotic levels. The mobile lab would be used once again when the conditions for discontinuing vapor extraction operations, as set out in the IRAP, are met.

CLOSURE

Utility Trailer Manufacturing Company and Harding Lawson Associates trust that this letter summarizes the topics discussed and agreed upon during our November 16, 1994, meeting. Please call either of the undersigned at (714) 556-7992, or Mr. Bob Griffis at (818) 854-7324, if you have any questions or comments.

Yours very truly,

HARDING LAWSON ASSOCIATES

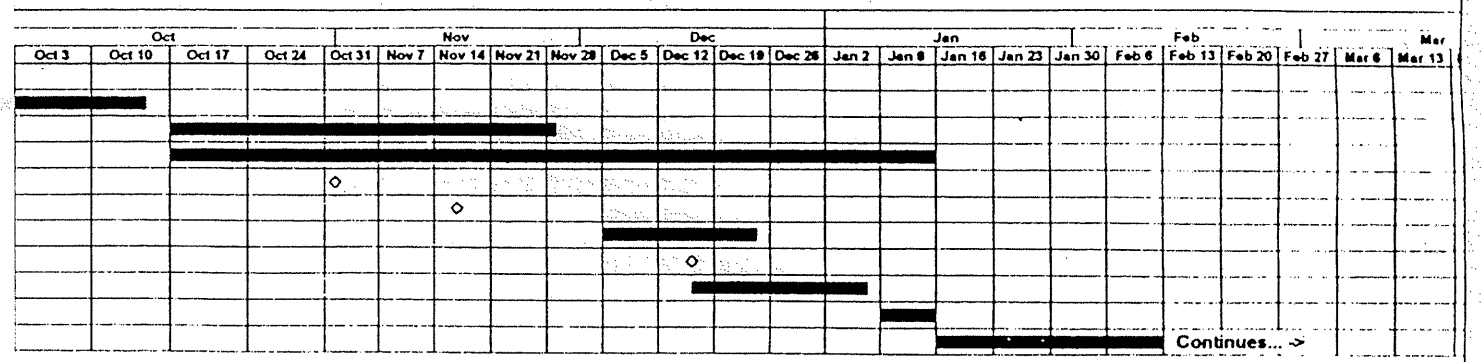
for:

Mark A. Rickertson, C.E.G.
Senior Hydrogeologist

Kurt H. Wiebe
Senior Engineer

KHW/MAR/kw/spb
94UTM085.ltr

Attachments: 1 - Updated Schedule
2 - Remedial Operations Outline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November 30, 1994
Utility Trailer Manufacturing Co.

North Area Remedial Operations Outline

Milestone	Approximate No. of Days Since Startup*	Treatment Technology	Action
Startup	0	Refrigeration / Condensation	Remove vapors at near maximum flow rate from each trench segment and sand zone well in the North Area for approximately 20 minutes each. At end of each 20 minute purge, collect mobile lab sample for 8010, Tedlar bag (8010) sample for submission to fixed lab, and FID reading. Purge and collect a vapor sample for mobile lab analysis from each of the South Area Wells (VE-5 through VE-10).
	1		Based on mobile lab and FID results, extract vapors from the trench segments and wells with the highest CVOC concentrations. Take FID readings from each operational well, and operational parameters (flow rate, temperature, removed water volumes. etc) daily. Continue to extract from wells with highest concentrations.
	7		Collect 8010 sample for submission to fixed lab from combined system influent in addition to regular data collection, repeat weekly.
Combined influent concentration drops below 400 ppmv**	14	R/C and GAC	Switch to GAC at North Area. Use refrig/condens. unit to extract vapors from Wells VE-5 through VE-10 in South Areas until influent concentrations also drop below 400 ppmv.
Combined influent concentration approaches asymptote			Use mobile lab to resample and analyze VE wells and trenches for 8010
	30	GAC	Continue daily FID monitoring and weekly 8010 fixed lab sampling in North Area. Begin equilibration shutdown/restarts after 1 month on GAC.
Conditions for shutdown as set out in the IRAP are met	90		Shut down North Area system. Evaluate use of same technology in South Areas clay unit.

Notes:
* Days shown here represent preliminary estimates only.
** Represents the approximate limit of refrigeration/condensation cost effectiveness.