

Utility Trailer Manufacturing Company

March 22, 1993

Mr. Philip Chandler  
Mr. Samuel Yu  
California Regional Water Quality Control Board  
Los Angeles Region  
101 Centre Plaza Drive  
Monterey Park, California 91754-2156

Re: Utility Trailer Manufacturing Company  
17300 East Chestnut Street  
City of Industry, California 91749

Dear Messrs. Chandler and Yu:

We have received and reviewed your letter dated March 3 commenting on three documents which we submitted in December and January. Frankly, we were very surprised and disappointed by your comments. Your letter does not reflect the meeting and telephone calls between Harding Lawson Associates and your staff regarding the specifics of our work plan for a Phase II Site Assessment and Supplemental Soil-Gas Survey. Your letter also appears to be primarily designed to bolster your hypothesis that Utility Trailer Manufacturing has somehow caused the presence of certain volatile organic compounds which appear in shallow groundwater that flows under our property after passing beneath many other industrial facilities. This letter responds briefly to your comments and assertions. We hope that we can meet this week to address your comments and finalize the work plan.

#### Response To Your Comments On The Site Assessment

As you know, Utility Trailer has cooperated fully with the Regional Board in its investigation of subsurface conditions beneath our property. We have spent nearly \$250,000 to investigate soil and groundwater under our property under the Regional Board's direction. In the course of this investigation, we have placed scores of borings and vapor probes on our property and installed a total of seven monitoring wells. Notwithstanding the scope of sampling and analysis requested by the Regional Board, the highest concentration of any VOC found in subsurface

soil samples collected from our property has been 2.5 parts per million of PCE at a depth of 10.5 feet, PCE concentrations in soil in the same boring below this sample decreased to 110 parts per billion. Concentrations of VOCs in soil on our property are routinely well below 1 part per million. We believe that there is not a reasonable link between Utility Trailer's activities and the presence of VOCs in underlying groundwater.

Your first comment addresses QA/QC information. HLA compiled QA/QC information to comply with the Regional Board's new policy on that subject, which was only issued in November 1992. HLA will provide this information as requested by March 29, 1993.

Your second comments purports to identify our plant as the source of VOCs "persistently found in site groundwater" based on soil concentrations of similar VOCs which are chiefly in the low part-per-billion range. It is important to recognize that many of the same compounds in groundwater underneath our property are also "persistently" found in groundwater beneath Ajax Inc., Spectrol Electronics, BDP Company at similar or higher concentrations and, I suspect at many other facilities upgradient of cross-gradient of our property. The existence of similar compounds at low concentrations in soil with no demonstrable pathway to groundwater simply does not prove causation.

You describe borings VP-1 and 2 as being located in general areas where site chemicals are or were stored. No chemicals are currently or were previously stored in the roadways areas. Moreover, our review of available facility records does not document the storage of large quantities of VOCs other than 1,1,1-TCA at the facility at any time.

You also describe boring VP-3 as being "adjacent to {our} former foam room where Freon was used." In fact, the former foam room was more than 50 feet from this boring. Conversely, the drainage conduit from Somitex Prints is located less than 10 feet from VP-3. You may recall from our repeated complaints to the Regional Board that Somitex dye discharges in this drainage channel as late as April 1988 contained Freon compounds. Even assuming that Freon compounds found in soil at boring VP-3 originated from Utility Trailer's plant, these compounds were not detected at all in the closest groundwater monitoring wells (MW-4, MW-5 and MW-6) in 1992.

Your third comment requests an explanation of the former drainage pathway along the driveway where boring VP-4 was drilled. Between 1982 and 1987 Utility Trailer extended the manufacturing building west across the driveway that passes east of the plant offices. That driveway also extended to Somitex Prints facility at Utility's southern property boundary and was also secondary drainage from Somitex north along that driveway toward VP-4, much as Somitex's drainage currently flows toward MW-2.

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Your fourth comment appears to suggest that the concentrations of PCE in water samples CPT-6 and CPT-8 demonstrate an on-site source of this compound. Since CPT-8 appears in the drainage channel, that reading is consistent with surface drainage from off-site. In addition, location CPT-6 appears to be downgradient of well MW-3, which is next to the Los Angeles Water Company property boundary. The concentration of PCE in MW-3 was substantially higher than that in CPT-6, suggesting again the possibility of migration into both well MW-3 and sample CPT-6 from an off-site source. Neither borings CPT-6 nor CPT-8 demonstrate, as you conclude, that our plant has impacted groundwater.

#### Response To Your Comments On The Work Plan

Recognizing the high costs of investigation, we sought last year to meet with Regional Board Staff before submitting final work plans, in order to avoid a lengthy process of written comments and revisions on work plans that we believed was unsatisfactory to everyone concerned. In fact, Stan Popelar of HLA communicated frequently with Mr. Samuel Yu to get his approval of the proposed work plan for the Phase II Site Assessment and Supplemental Soil-Gas Survey before it was finalized and submitted. These communications were not just conceptual; Mr. Yu reviewed and commented on both the specific number and specific location of borings and probes. He asked HLA to move some boring and probe locations and suggested deleting unnecessarily duplicative borings and probes. HLA incorporated Mr. Yu's recommendations directly into the final work plan. Your comments ignore this cooperative approach and appear to indicate that we wasted a lot of time preparing the original work plan.

Your first comment claims that the piston sampler is inappropriate. HLA has not found any reference in the Regional Board's November 1992 policy or in any EPA documents requiring a 2-inch sampling tube. In addition, the EPA has specifically approved the use of this type of piston sampler. (as shown in the attached letter). Therefore, we believe that the proposed piston sampler is adequate for the next phase of investigation.

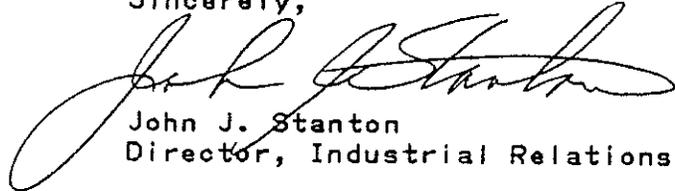
Your second comment requests an explanation of proposed soil boring locations. Stan Popelar previously addressed HLA's rationale with Samuel Yu in detail. We understood that the Regional Board approved both the number and location of borings and we see no reason to change them now..

Your third and fifth comments request an additional sweeping investigation of soil around the facility, apparently without regard to the usefulness of data or cost. Our goal for the next phase of investigation, which we believed the Regional

Board shared, remains to determine what remediation of the soil, if any, is necessary and feasible. Therefore, the work plan was specifically designed to test vapor extraction as a method to remove the low soil concentrations of VOCs. We disagree that round after round of sampling will help to determine whether soil remediation is necessary or feasible.

Please call me at (818) 965-1541 to schedule a meeting at your convenience with us and with HLA so that we can revise the work plan to satisfy the reasonable objectives of the Regional Board.

Sincerely,



John J. Stanton  
Director, Industrial Relations

cc: Mr. Philip Ramsey, USEPA Region 9  
Mr. Stanley Popelar  
Mr. Brad Eismen

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January 18, 1993

Mr. Walter Friedman  
Target Environmental Services  
5392 Bolsa Avenue, Suite 103  
Huntington Beach, California 92649

Soil Sampling Using Drive Point Sampling System  
for RCRA Facility Assessment  
MCB Camp Pendleton

Dear Mr. Friedman:

IT Corporation (IT) acknowledges the successful completion of soil sampling task by Target Environmental Services, Inc. using their Drive Point Sampling System. Approximately 600 borings were drilled and over 2,000 soil samples were recovered. This effort generated only three drums of discarded sleeves containing soil. Alternate sampling procedures using conventional hollow-stem drilling would have generated several hundred drums of soil cuttings.

The work plan for the project that proposed the use of Drive Point Sampling was reviewed by U.S. EPA Region IX; State of California Toxic Substances Control Division; State of California Regional Water Quality Control Board, San Diego Region; and U.S. Navy, Southwest Division.

In our opinion the Drive Point Sampling System offered several advantages for the project, including: cost effectiveness compared to hollow-stem drilling and sampling, high rate of production, speed, and accessibility to light areas. In view of these advantages we will consider and recommend to Jacobs this system as a viable option for future similar projects.

Sincerely,  
IT CORPORATION

A handwritten signature in black ink that reads "Jagdish N. Mathur". The signature is written in a cursive style and is positioned above a horizontal line.

Jagdish N. Mathur  
Project Manager, CTO #178

JNM:njt

IR/13-92/023/urgun.jnm

Regional Office

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