



Utility Trailer Manufacturing Company

April 15, 1993

Via Personal Delivery

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 April 6. As is specified in the enclosed Addendum to the workplan, Harding Lawson Associates is adding the soil gas probe locations and providing three of the four items you requested at our meeting on April 1, and in your April 6 letter. We do not have prints or copies of any of the aerial photographs reviewed by Harding Lawson for the site assessment. These photographs were reviewed at commercial locations which are accessible to the Regional Board, including the Fairchild Collection at Whittier College and Aerial Map Industries in Irvine. Harding Lawson has provided the Regional Board with a list of the specific photographs reviewed for the assessment in the event that you wish to inspect them.

We would like to thank you for meeting with us on April 1 to discuss our workplan and the items raised in your March 3 letter. We appreciate your recognition and consideration of our request to marshal our resources for any soil remediation found to be feasible and necessary, as opposed to repetitive and costly site investigations, particularly when our California manufacturing plant continues to lose money.

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However, we disagree with your implication that our property has not been substantially investigated already, and your statement that Utility Trailer is "blaming everything on the neighboring (facility) while ignoring (our) own operation." We have installed a large number of soil gas probes, soil borings and monitoring wells in response to Regional Board directives, and we have submitted comprehensive documentation regarding our operations in response to EPA and Regional Board demands. We suspect that Utility Trailer has done far more site investigation and been more cooperative with the Regional Board and EPA than virtually all other businesses in the area, and we disagree with any implication that Utility Trailer is avoiding reasonable site investigation.

You also suggest that the possibility of future vapor extraction remediation supports a perceived need for additional soil gas probes and recommend that we delay vapor extraction testing until further site assessment occurs. As we discussed at our meeting, we believe that the site has already been investigated in great detail and at substantial cost. Until we assess whether vapor extraction is a feasible remediation approach, we believe that additional soil gas probes are unnecessary, although we are installing the probes you requested. We see no reason to spend limited resources on phase after phase of investigation unless we know what soil remediation, if any, is feasible.

At the meeting, we expressed our concern over what appears to be the Regional Board's past focus on Utility Trailer to the exclusion of the many up-gradient businesses and properties in the City of Industry. Your letter purports once again to identify Utility Trailer as a source of volatile organic compounds found in groundwater, while we continue to believe strongly that the substantial body of existing data we have gathered do not justify this conclusion. For example, your comparison of VOC concentrations in milligrams per kilogram in soil to micrograms per liter in underlying groundwater is not technically appropriate.

Your letter also refers to a hypothesized "waste discharge" or "spilled liquid chemical" from Utility Trailer to imply that our manufacturing operations caused the finding of VOC's in soil near drainage channels. We believe that a review of your files and Utility Trailer's detailed submission to the EPA would show that the only documented releases into drainage channels on our property have come from Somitex Prints, and that no spills or discharges from any Freon or other tank at Utility Trailer's plant have been identified.

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Since 1987, Utility Trailer has alerted the Regional Board to Somitex's discharges of dye-colored liquids. Drainage across Utility Trailer's property has occurred along current or former roadway areas from south to north following the surface gradient. Thus, rainwater drainage and surface discharges from Somitex have traveled north along the current drainage channel and the former driveway that existed there since the early 1970s. Similarly, rainwater flowed from the south along the driveway east of the plant offices until 1987, when the manufacturing building was extended across that driveway.

While we could go through a detailed response to every point made in your letter, we believe that a debate over issues such as the usefulness of Hydropunch samples or soil gas probes or the validity of conclusions based on such data is neither necessary nor productive at this time. We remain committed to cooperation with the Regional Board and Harding Lawson is prepared to implement the revised workplan reflecting your comments rapidly. Please contact John Stanton, our Director of Industrial Relations, at (818) 965-1541 with any questions or comments on this letter or Harding Lawson's Addendum to the workplan or any further communications on this matter.

Sincerely,



Bob Dixon

BD:ml

cc: Mr. Phillip Ramsey
Mr. Dennis Dickerson
Mr. Brad Eismen

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