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June 2, 1992

VIA MESSENGER

Mr. Roy Sakaida
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. Sakaida and Yu:

Enclosed please find a copy of a Phase I Preliminary Site Assessment and a work plan for a supplemental soil-gas survey prepared by Harding Lawson Associates ("HLA") regarding the manufacturing facility of our client, Utility Trailer Manufacturing Company ("Utility Trailer"). These documents are being submitted on behalf of Utility Trailer in response to your letter dated March 23, 1992 and the extension you granted to Mr. Stanley Popelar of HLA as reflected in Mr. Popelar's letter dated May 14, 1992 and your telephone conversation with him on May 29, 1992.

I would also like to take this opportunity to respond to your comments in the letter dated March 23, 1992 regarding HLA's Soil-Gas Survey Report dated September 5, 1991, HLA's Quarterly Groundwater Monitoring Reports dated July 8, 1991 and September 27, 1991, and HLA's Quarterly Groundwater Monitoring Report and Annual Summary dated January 9, 1992. Utility Trailer appreciates the Regional Board's prompt review of these documents.

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Response to Your Comment Regarding Perceived Trends in
Groundwater Concentrations

Utility Trailer disagrees with your comment that the groundwater monitoring results "revealed consistent trends of increase in concentration from up- to down-gradient monitoring wells" and your interpretation that these purported trends are "clear evidence of site-originated contamination."

Monitoring well MW-2, which is located near the end of the drainage conduit that originates in the facility currently operated by Somitex Prints of California ("Somitex"), typically exhibits the highest concentrations of halogenated volatile organic compounds ("VOCs") of the five wells. However, your comment ignores the fact that higher or comparable halogenated VOC concentrations typically occur in wells MW-3 and MW-4, which are located directly down-gradient of the LA Water Treatment Corporation and Somitex facilities, respectively, as compared to VOC concentrations in wells MW-5 and MW-6, which are located down-gradient of Utility Trailer's manufacturing facility. For example, concentrations of tetrachloroethene ("PCE"), trichloroethene ("TCE"), cis-1,2-dichloroethene ("cis-1,2-DCE") and total halogenated VOCs detected in wells MW-3 and MW-4 in 1991 were typically higher than or comparable to concentrations of those compounds in wells MW-5 and MW-6. Thus, there appears to be no "consistent trend" in total halogenated VOC concentrations with groundwater gradient among these four wells.

Your comment also ignores the drainage conduit from the Somitex facility. Documented releases of dye-containing liquids from Somitex have occurred since the early 1970s, often at night, despite the objections and complaints of Utility Trailer. As recently as 1989, occasional analyses of these periodic discharges from Somitex confirmed the presence of detectable halogenated VOCs, and occasional releases from Somitex continue to occur. Utility Trailer has obviously not been able to sample every instance, or even most instances, where ponded liquids appeared in the drainage conduit, particularly during precipitation. Since 1987, however, analyses of samples of Somitex discharges in the drainage channel collected by Utility Trailer have detected every halogenated VOC found in groundwater in well MW-2.

Thus, Utility Trailer believes that your interpretation of trends in concentrations of halogenated VOCs ignores important information and monitoring data. Utility Trailer also believes that the presence of certain compounds in wells MW-3 and MW-4 and

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in discharges from the Somitex facility suggests an off-site origin for these compounds.

Response to Your Comment Regarding Possible Degradation of Certain Halogenated VOCs

At this point, it appears difficult to determine the extent to which natural degradation of compounds such as PCE, TCE or 1,1,1-trichloroethane ("1,1,1-TCA") is occurring in subsurface soils or groundwater. However, your comment suggests that increased (although still minute) concentrations of 1,1-dichloroethene ("1,1-DCE") in wells MW-5 and MW-6 could be attributable to the degradation of PCE from an off-site, up-gradient source, since PCE was detected in higher concentrations in wells MW-3 and MW-4, which are immediately adjacent the LA Water Treatment and Somitex facilities.

Response to Your Comment Regarding Possible Contamination Sources and Isoconcentration Lines

Your comment contending that "existing subsurface information indicates possible multiple contamination sources on site" appears to be based primarily upon the results of the Soil-Gas Survey Report. In addition to the limitations of soil gas analyses generally (such as difficulties in relating soil vapor concentrations to actual soil or groundwater concentrations), HLA identified site-specific problems with relying on the soil gas survey data due to the inhomogeneous nature of soils in and around Utility Trailer's manufacturing facility.

You have appropriately qualified your statement that the existence of hypothesized "multiple contamination sources on site" is possible. Utility Trailer believes that until HLA performs further investigation in response to your letter and resolves some of the site-specific uncertainties regarding soil gas survey results, it is premature to speculate about potential on-site sources of halogenated VOCs in groundwater underlying the facility.

The isoconcentration lines to which you object were originally requested by the Regional Board in its letter dated July 3, 1989 and provided by Utility Trailer's consultant in the bi-monthly groundwater monitoring reports, prepared with the understanding that the lines are estimated based on available groundwater monitoring data. There is no question that isoconcentration lines are based on available data and are, almost by definition, equivocal. Utility Trailer believes that

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such lines are a simple way of depicting the actual groundwater sampling results, recognizing the limitations of those data. However, based upon your comments, HLA will no longer include such lines in figures that appear in the quarterly groundwater monitoring reports.

Response to Your Comment Regarding Detection Limits

HLA will instruct the state-certified laboratory that analyzes future groundwater samples to split samples to the extent practicable where dilution may be required in order to allow lower detection limits for certain compounds.

Response to Your Comment Regarding the Use of Soil Gas Readings

Utility Trailer agrees that "soil gas readings do not represent actual contaminant concentrations in either soil matrix or ground water." While soil gas readings quantify contaminant vapors, Utility Trailer believes that substantial questions remain regarding where the vapor comes from, whether vapor concentrations may collect in areas of low porosity or may be trapped by surface pavement, whether representative vapor samples can be collected given the inhomogeneous site conditions identified by HLA, and how vapor readings should be interpreted.

Response to Your Comment Regarding Interpretation of Soil Gas Data

Soil gas samples collected in the three areas to which you refer contained concentrations of total halogenated VOCs in the low part-per-million range. HLA will investigate these three areas further, as described in the enclosed work plan. However, the same questions set forth immediately above apply to any interpretation of these results to characterize any conceivable on-site source of halogenated VOCs.

Response to Your Comment Regarding the Horizontal Extent of Vapor Phase Contamination

HLA will collect additional samples in these areas as described in the enclosed work plan. Once again, Utility Trailer believes that interpretation of these results remains speculative, at least until the effect of site-specific conditions on soil gas readings is determined.

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Once again, we appreciate your timely response to the 1991 monitoring and sampling reports. Please contact Mr. Bob Dixon at Utility Trailer or call me at (619) 238-2935 with any questions or comments regarding the enclosed documents or Utility Trailer's facility.

Very truly yours,

Charles F. Weiss

Charles F. Weiss
of LATHAM & WATKINS

Enclosures

cc: Mr. John Stanton
Mr. Bob Dixon
Mr. Stanley Popelar