



North Carolina Department of Environment and Natural Resources

Dexter R. Matthews, Director

Division of Waste Management

Michael F. Easley, Governor

William G. Ross Jr., Secretary

January 30, 2009

Mr. Marvin Gobles
CTS Corporation
905 West Boulevard North
Elkhart, Indiana 46514

Subject: Modified Phase IB Site Assessment Work Plan, CTS, Mills Gap Road Site, Mills Gap Road, Asheville, Buncombe County, North Carolina

Dear Mr. Gobles:

The Inactive Hazardous Sites Branch (Branch) has reviewed the above referenced Assessment Plan (Plan) as received in the Winston-Salem Regional Office (WSRO) on January 26, 2009. The January 26, 2009 modified Plan reflects changes made to the previous December 2, 2009 Phase IB workplan in response to the Branch's January 6, 2009 comment letter on the plan, and a conference call held between the Branch and CTS on January 16, 2009. This letter summarizes our comments on the modified Plan.

As discussed in our January 16, 2009 conference call, the current Phase of work would be more appropriately known as "Addendum to Phase I A" and should bear no reference to a "Phase I B". The nomenclature for the current phase of work must be changed in all future reporting to reflect this status. The current Addendum to Phase I A will involve continued horizontal delineation of the contaminant plume down to the bedrock surface at both onsite and offsite locations. If access agreements cannot be obtained by MacTec within 2 weeks, the Branch will assist in obtaining those agreements. The off-site work should progress unimpeded by the lack of an agreement from all off-site land owners. As access agreements are obtained the off-site work should immediately commence on those properties expediting the installation of the off-site monitoring wells. If access has not been granted to any specific off-site properties within a reasonable period as to be included in the final report, then that property will be included in future phases of work.

The recommendation for installation of two bedrock wells in association with the existing MW-1 and MW-4 well locations is acceptable to begin vertical delineation of the contaminant plume. The actual Phase I B investigation will require completing the vertical delineation of the contaminant plume after the horizontal delineation efforts are closer to completion. Abandoning a bedrock boring because contamination is suspected will be generally unacceptable unless there are significant concerns that even a properly constructed monitoring well will create a vertical pathway for contaminants to enter into the fractured bedrock. EPA's "DNAPL Site Characterization" publication, dated September 1994, provides guidance on constructing monitoring wells to minimize the possibilities of spreading groundwater contamination through monitoring well installation. A copy of the guidance can be found at:

http://epa.gov/superfund/health/conmedia/gwdocs/non_aqu.htm

Please also refer to the EPA Region 4: Field Branches Quality System and Technical Procedures guidance, "Design and Installation of Monitoring Wells, February 18, 2008" found at: <http://www.epa.gov/region4/sesd/fbgstp/index.html>

Since you will already be performing some downhole geophysical evaluations of the bedrock monitoring wells after they are installed at MW-1 and MW-4, some of these tools may be useful in determining if free phase DNAPL exists in the top of bedrock monitoring wells MW-3A and MW-6A. This data would assist you in determining locations for the future installation of vertical delineation monitoring wells in the proximity of the main contaminant plume during the Phase I B investigation.

The modified Plan proposes a separate report for: 1) the two bedrock monitoring well installations, and 2) the additional shallow and top of bedrock monitoring well locations. Two reports are unnecessary as presented in the Modified Plan. A single, final report summarizing the Phase I A and Addendum to Phase I A is expected. The final report summarizing the Addendum to Phase I A activities should be submitted to the Inactive Hazardous Sites Branch no later than **April 10, 2009**.

The Phase I B Work Plan must be submitted within 30 days after the Branch's review of the Phase I Report.

The investigative-derived waste handling procedures must also include the containment, collection and removal of water derived from all drilling operations. An impermeable basin must be constructed and maintained around the auger or air rig at all times during the drilling procedures. The drilling process water must be pumped into DOT-approved containers for proper short-term on-site storage and off-site transport. The containers must be labeled and sampled for characterization.

Again, please be advised that the final report summarizing the Phase I A and Addendum to Phase I A activities should be submitted to the Inactive Hazardous Sites Branch no later than **April 10, 2009**.

If you have any questions, please contact Bonnie S. Ware, at (336) 771-5000.

Sincerely,



Bonnie S. Ware
Hydrogeologist

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