



North Carolina Department of Environment and Natural Resources

Dexter R. Matthews, Director

Division of Waste Management

Beverley Purdue, Governor
Dee Freeman, Secretary

March 1, 2010

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

Subject: Phase II Site Assessment 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 February 5th, 2010. This letter summarizes our comments on the Plan.

Although the Plan that was submitted to the Branch provided plans for characterizing the remaining Phase I source area investigations identified in the Branch's January 6, 2010 Phase I Site Assessment review letter, it did not provide an adequate workplan for delineating all contaminated media affected by the site as required in the Phase II remedial investigation requirements. Phase II remedial investigation requirements can be found in the Branch's "Inactive Hazardous Sites Program Guidelines for Assessment and Cleanup" at: <http://portal.ncdenr.org/web/wm/sf/ihs/ihsguide..> Attached is an additional copy of the Phase I Site Assessment letter dated January 6th, 2010 (Letter) which included reference to the requirement for horizontal and vertical delineation drilling activities to be included in the Plan. It is of utmost importance at this stage of the assessment that a conceptual model of the documented site specific conditions along with a hypothesis for proving the model be included in the Plan. Also, a strategy for the complete delineation of the Non-aqueous Phase Liquids/Dense Non-aqueous Phase Liquids (NAPL/DNAPL) needs to be included in the Plan. Due to the history of electroplating operations that occurred at the site, proposed soil samples collected for metals analyses should include results for both total chrome and chromium VI.

Please submit a revised, complete Phase II Assessment Plan that addresses these comments within 30 days of receipt of this letter. If you have any questions, please contact Bonnie S. Ware, at (336) 771-5000.

Sincerely,

Bonnie S. Ware
Hydrogeologist

CC: Susan Kelly, P.E., L.G., MacTec Engineering
Elizabeth Ahlemann, CTS Corporation
Michael Dolan, Jones Day
William Clarke, Robert & Stevens, P.A.
CAG Team Leadership
Marc Fowler, Environmental Health Director, Buncombe County
EPA Repository (CTS), Pack Memorial Library, Asheville, NC.
John Green, NCDOJ
Carolyn Callihan, EPA Region 4
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Cathy Akroyd, DWM PIO
IHSB, DWM, WSRO, NCDENR Files



North Carolina Department of Environment and Natural Resources

Dexter R. Matthews, Director

Division of Waste Management

Beverly Purdue, Governor

Dee Freeman, Secretary

January 6, 2010

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

Subject: Phase I Site Assessment, 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 Phase I Assessment (Report) as received in the Winston-Salem Regional Office (WSRO) on July 28, 2009. This letter summarizes our comments on the Plan.

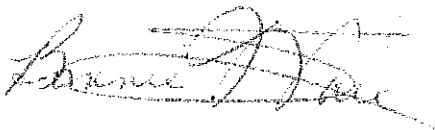
A Phase II Assessment Work Plan, in compliance with the Branch's "Guidelines for Assessment and Cleanup", which describes proposed horizontal and vertical delineation drilling activities should be completed and submitted to the Branch for review. Any additional refinements to the potential source area investigations can be included as part of the Phase II work-plan. Specifically, please include in the Phase II work plan the strategies proposed for the further investigation of the areas that include but are not limited to: 1) the former waste water gravel filter and waste water lines which connected to the municipal sewer utilities, 2) the former storm water retention pond, and 3) the former drum storage area located south of the onsite building. Soil samples should be collected in accordance with Appendix A: Sampling and Analytical Procedures for the Remedial Investigation in the Branch's Guidelines for Assessment and Cleanup.

The Phase II Assessment Work Plan should include a conceptual model of the documented site specific conditions along with a hypothesis for proving the model in the Phase II work. The Phase II Work Plan should be submitted no later than **January 29, 2010 or sooner**.

Based on the concentrations reported in prior sampling events included in the Phase I Assessment, Non-aqueous Phase Liquids/Dense Non-aqueous Phase Liquids (NAPL/DNAPL) are highly likely at the site. A more comprehensive delineation of the NAPL/DNAPL will be a necessary component of the Phase II Assessment.

Thank you for your continued cooperation in the investigation of this site. If you have any questions, please contact Bonnie S. Ware, at (336) 771-5000.

Sincerely,



Bonnie S. Ware
Hydrogeologist

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