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May 6, 2008

Ms. Bonnie Ware
North Carolina Department of Environment and Natural Resources
DWM, Superfund Section, Inactive Hazardous Sites Branch
585 Waughtown Street
Winston-Salem, North Carolina 27107

Subject: **Response to Phase I Site Assessment Plan Comments**
Mills Gap Road Site
Skyland, North Carolina
NCD Number 003149556
MACTEC Project 6686-08-1744

Dear Ms. Ware:

On behalf of CTS Corporation (CTS), MACTEC Engineering and Consulting, Inc. (MACTEC) is pleased to present this response to Phase I Site Assessment Plan (Plan) comments. The Plan, dated February 28, 2008, was submitted to the North Carolina Department of Natural Resources (NCDENR) Inactive Hazardous Sites Branch (IHSB) for the above-referenced Site. NCDENR provided comments to the Plan in a letter dated March 31, 2008 and NCDENR's comments were discussed on a teleconference call between you and representatives of MACTEC on April 28, 2008. We anticipate that the following revisions to the Plan will satisfy NCDENR's comments; therefore, this letter is intended to serve as an Addendum to the Plan and a 'revised' Plan will not be produced.

The Phase I Site Assessment will be conducted in two phases. The Phase IA assessment will include the installation of up to 12 monitoring wells at the six approximate locations shown on the attached figure. At each drilling location, an exploratory boring will be advanced to the top of competent bedrock using wash/mud rotary drilling techniques. If the apparent water table is greater than ten feet above the top of bedrock, then two monitoring wells will be installed at that drilling location: 1) a Type II monitoring well with a ten-foot screened interval across the water table, and, 2) a Type III monitoring well with a five-foot screened interval, the base of which will be situated at the contact between competent rock and the overlying unconsolidated material (partially weathered rock). If the distance between the water table and competent bedrock is less than ten feet, then one monitoring well will be installed at that drilling location. The depth, screened interval, and well construction type (i.e., Type II or III) for the monitoring well will be determined at the time of drilling.

During installation of the first monitoring well at each drilling location, a soil sample will be collected from a depth of one to two feet above the apparent water table. The soil sample will be collected using a split-spoon sampler and submitted for the following analyses:

- volatile organic compounds (VOCs) according to EPA Method 8260 (including tentatively identified compounds)
- semi-volatile organic compounds (SVOCs) according to EPA Method 8270 (including tentatively identified compounds)
- Hazardous Substance List (HSL) metals according to EPA Methods 6010 and 7471 (mercury)
- cyanide according to EPA Method 9010/9014

Ground-water samples will be collected from the shallow ground-water and partially weathered rock monitoring wells and submitted to the laboratory for analysis of VOCs, SVOCs, cyanide, and HSL metals (using 3030C preparation method).

The Phase IB assessment will be based upon our evaluation of the Phase IA results, and will include installation of bedrock borings/monitoring wells at the site, as circumstances may warrant. The objective of the Phase IB assessment will be to obtain information about bedrock geologic and water quality conditions at the Site. The locations, drilling/well construction/sampling procedures, etc., will be discussed with IHSB personnel prior to commencing field activities; however, a formal approval process is not anticipated.

Investigative-derived waste generated during the advancement of the soil borings and installation of the monitoring wells will be contained in impermeable basins and prepared for proper short-term on-site storage and off-site transport and disposal.

If you have questions regarding the information contained herein, please contact us at (828) 252-8130.

Sincerely,

MACTEC ENGINEERING AND CONSULTING, INC.

Susan E. Kelly, P.E., L.G.
Senior Engineer

Matthew E. Wallace, P.E.
Principal Engineer

Attachment: Proposed Monitoring Well Location Map (revised Figure 5)

cc: Marvin Gobles, CTS Corporation
Elizabeth Bottorff Ahlemann, CTS Corporation
Michael Dolan, Jones Day
William Clarke, Robert & Stevens, P.A.