NCDENR
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 6, 2009

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

Subject: Phase IB 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 December 3. 2008. This letter summarizes our comments on the Plan.

The Phase IB Assessment Plan must comply with the agreed upon Phase I Site Assessment Work Plan and the Response to Phase I Site Assessment Plan Comments submitted to the Inactive Hazardous Sites Branch on March 3, 2008 and May 7, 2008 respectively. A complete definition of both the horizontal and vertical extent of contamination at the site's source areas is required so that an appropriate future remedial action plan can be developed.

The suggestions for work noted in the Phase IB Assessment Plan are contrary to the agreed upon work plan as indicated on page 2 of the Response to Phase I Site Assessment Plan Comments. As stated in the Response to Phase IB Site Assessment Plan Comments, the Phase IB Assessment "will include installation of bedrock borings/monitoring wells at the site".

The Phase IB bedrock wells should be located in the same vicinities of the prior nests of wells (MW-1, MW-2, MW-3/3A, MW-4/4A, MW-5/5A, MW-6/6A) and be limited to the CTS property boundaries. The Phase IB wells should all intersect the first major fracture system located below the partially weathered rock (PWR) and competent rock interface and be located well within competent rock. All monitoring wells must be constructed according to the EPA-SW 846 Type III well construction requirements to prevent downward migration of contamination from shallower depths. A competent well driller should be contracted that has appropriate experience installing proper Type III wells.

The Phase IB investigation must be performed with the goal of gathering enough information to provide a thorough understanding of the horizontal <u>and vertical</u> geology and hydrogeology of the site. Geophysical Investigations are required for distinct fracture mapping within competent rock at the site at the time of the bedrock well installations. The investigations should include but are not limited to subsurface borehole Geophysical logging.

The Phase IB wells should be sampled no later than a week after installation. The final report summarizing the Phase I A and B activities should be submitted to the Inactive Hazardous Sites Branch no later than **March 13, 2008**.

All Phase IB groundwater samples must be analyzed as proposed for Volatile Organics using EPA Method 8260. In addition, all groundwater samples must also be analyzed for Semi-volatiles and the 14 Hazardous Substance Metals using EPA Methods 8270 and SW-846 methods, respectively. Cyanide must also be added to the analyte list for analysis. The metals samples should employ the 3030C sample prep method.

In anticipation of the Phase II work plan and investigations, continued horizontal delineation drilling activities, as proposed in the Phase IB Work Plan dated December 2, 2008, may commence prior to the official Phase II work plan submission. Any Phase II work completed prior to the Phase I report submission should be included in the Phase I report.

The Phase II Work Plan must be submitted within 30 days after the Branch's review of the Phase I Report. The Phase II work plan should also include strategies to investigate all potential sources of contamination on the currently and formerly owned CTS property(ies), including but not limited to the former diked containment area now located at the South Side Village. Identification and delineation of all soil contamination above the Branch's remediation goals at identified sources will be necessary for a complete remedial investigation.

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 B activities should be submitted to the Inactive Hazardous Sites Branch no later than **March 13, 2008**.

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

Sincerely,

Bonnie S. Ware
Hydrogeologist

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