

Inactive Hazardous Site Branch  
CTS of Asheville Summary  
(NCD003149556/Former APS# 20358)  
Mills Gap Road, Buncombe County

This is the February 2009 update of the NCDENR-directed activities that CTS is performing at the Mills Gap Road site.

IHSB-CTS Site, Order of Documents:

NCDENR to CTS Phase IB Work Plan Response Ltr 1-6-09

CTS Modified Phase I B Site Assessment Work Plan 1-23-09

NCDENR to CTS Modified Phase I B Work Plan Response Ltr 1-30-09

**February 2009 Update:**

- The IHSB continues to negotiate an Administrative Agreement for site cleanup with CTS.
- NCDENR reviewed the CTS Phase IA data and proposed Phase IB Site Assessment Workplan and provided a comment letter back to CTS on 1-6-09, redirecting some of the proposed additional assessment activities back to the original workplan strategy.
- NCDENR and CTS used a conference call on January 16, 2009 to discuss site assessment strategies related to the proposed Phase I B work plan and NCDENR's January 6, 2009 letter response. CTS clarified that it would prefer to finish the defining of the horizontal delineation down to the top of bedrock contamination, including off-site locations, before coming back to perform the vertical delineation of contamination in the bedrock. This is an accepted investigation strategy when assessing chlorinated solvent contamination. It was agreed that CTS will continue into off-site assessment down to the top of bedrock interval and limit vertical bedrock well installations until a more complete delineation of the shallower groundwater contamination is defined. CTS will move ahead with two on-site bedrock monitoring wells while off-site shallow investigations are being performed. To minimize confusion, this proposal to continue off-site assessment of contamination down to the top of bedrock will be known as the Phase 1 Addendum (an extension of Phase 1A), not Phase I B. The two deep monitoring wells being installed onsite during the Phase I A addendum are an early part of the vertical delineation strategy that will be performed in the true Phase I B. Additional bedrock monitoring wells will be installed during the Phase I B phases of investigation. If CTS has difficulty obtaining access agreements to install monitoring wells on offsite properties during the Phase I A addendum, NCDENR has agreed to assist in efforts to convince residents of the necessity of the monitoring wells.

- CTS submitted what they titled a “modified Phase 1 B work plan” on January 23, 2009, to reflect the conference call discussions with DENR. However, as noted below, it was ultimately decided that the plan should be referred to as Phase 1 A Addendum”.
- NCDENR wrote a letter to CTS on January 30, 2009, further qualifying key points in the modified Phase 1 B work plan and redirecting CTS to call it a Phase 1 A addendum rather than a modified 1 B, since the proposed plan is largely oriented toward furthering the horizontal delineation of contamination down to the top of bedrock. A report deadline of April 10, 2009 was set for the activities defined in the work plan.
- CTS began drilling the two proposed on-site bedrock wells on February 5, 2009.