



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

SAM NUNN ATLANTA FEDERAL CENTER

61 FORSYTH STREET, S.W.

ATLANTA, GEORGIA 30303

4WD-ERRB

EMERGENCY ACTION MEMORANDUM

SUBJECT: Notification of \$50,000 Activation under (Delegation of 14-1-A)
Mills Gap Groundwater Contamination Site
Asheville, North Carolina

FROM: David Dorian, On-Scene Coordinator
Emergency Response and Removal Branch (ERRB)

TO: Site File
Site ID #: A4P5

I. INTRODUCTION

The purpose of this Emergency Removal Action Memorandum is to document approval of the proposed removal action described herein for offsite contamination related to the Mills Gap Groundwater Time Critical Removal. The Site poses a threat to public health and the environment that meets the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) section 300.415(b) criteria for removal actions. The action involves direct intervention to prevent further exposure to a CERCLA hazardous substance. The OSC has taken this action because immediate action was essential and has used the authority provided under Delegation 14-1-A for removal actions not to exceed \$50,000.

II. SITE CONDITIONS AND BACKGROUND

II.A.1. Background

Mills Gap Groundwater Contamination Site is an ongoing Time Critical Removal conducted under an Administrative Order on Consent (January 2004) between EPA, CTS Corporation and Mills Gap Associates. Elevated levels of trichloroethylene, 1, 1,1, trichloroethane, and petroleum products are in surface water and groundwater are associated with the site. From November 27, 2007 to December 7, 2007. NC DENR tested residential wells within one as part of expanded assessment of the Mills Gap Groundwater Contamination Time-Critical Removal, one residential well tested significantly above the Maximum Contaminant Level (MCLs) for trichloroethylene (TCE). Historically, TCE above EPA emergency action levels have been found in residential wells near the former CTS Corporation plant.

On August 16, 1999, NC DENR Superfund Section submitted an Immediate Removal Evaluation Request to EPA Region 4 Emergency Response and Removal Branch. The request followed DENR sampling of contaminated springs in close proximity to the former CTS site. On August 20, 1999, EPA Emergency Response and Removal Branch evaluated the site and on August 23, 1999 an EPA On-Scene Coordinator provided bottled water to the affected residence and to arrange connection to the Asheville Public Water Authority.

Following the emergency response, EPA's entered into negotiations with parties that were potentially responsible for the contamination. These negotiations culminated at the end of 2003 in the AOC between EPA, Mills Gap Associates, and CTS. The AOC required the Respondents to mitigate the source in the vadose (soil above groundwater) zone, to assess wells within a one-mile radius of the site, and to evaluate the feasibility of capturing water discharging from the contaminated springs. In accordance with the AOC, the Respondents evaluated potential impacts to residential wells within a one mile radius of the site. The current well was not included in that study.

II.A.2. Site Description

The CERCLIS ID# for the Site is NCSFN0406988

The residence potentially impacted by contamination at the site is approximately three fourths of a mile northeast of the Mills Gap Groundwater Contamination Site. The immediate vicinity area is residential, and well water is the source of drinking water.

The Mills Gap Groundwater Contamination Site is located off Mills Gap Road, approximately 1 mile east of Skyland, Buncombe County, North Carolina and consists of approximately nine fenced acres containing a large single-story building. The area is mixed industrial and residential. Residences have been built within 100 yards of the former industrial complex.

In 1952, IRC, Inc. (IRC) bought the land for the Site and constructed the building which it then used for its electroplating operations. In 1959, IRC sold the Site to CTS, Inc. From 1959 until 1986, CTS operated an electroplating facility at the Site. The chemical compound trichloroethylene (a.k.a. trichloroethene or "TCE") was employed by IRC and CTS to clean and/or degrease metal objects prior to electroplating. In 1987, Mills Gap Road Associates (MGRA) purchased the Site and is the current owner.

II.B. Removal Site Evaluation

From November 27, 2007 to December 7, 2008, North Carolina Department of Environment and Natural Resources (NCDENR), Division of Waste Management, through a cooperative agreement with U.S. Environmental Protection Agency, sampled 66 residential wells within a one-mile radius of the former CTS Corporation plant on Mills Gap Road (a map of

sampling locations can be found in the documents section). Some of the wells served multiple households. The site, currently owned by Mills Gap Road Associates, is an EPA Time Critical Removal.

Of the 66 wells sampled, one active well showed the presence of Trichloroethylene (TCE) in excess of EPA Maximum Contaminant Limits (MCLs). The well located approximately $\frac{3}{4}$ of a mile northeast of the site, and TCE was measured at 57 micrograms/liter (parts per billion). The MCL is 5 micrograms/liter for TCE. The sampling also detected trace quantities (10.2 micrograms/liter) of cis 1,2-Dichloroethylene, a breakdown product of TCE. Confirmatory sampling agreed with the original result.

One well on Concord Road taken out of service in 1999 was re-sampled as a basis for comparison to historical data. Testing re-confirmed the presence of TCE in that well.

NCDENR identified all active residential wells in the immediate area of the contaminated well. On January 8, 2008, NCDENR tested eight wells which had not been tested in the November-December sampling event. Of these six additional wells tested, one well, located immediately east of the contaminated well, also contained TCE, though in a quantity below the MCL. No contaminants were detected in the other seven wells.

II.C. Release or Threat of Release into the Environment of a Hazardous Substance, or Pollutant or Contaminant

Laboratory analyses revealed the presence of contaminated drinking water in excess of 10 times the Federal Maximum Contaminant Level (MCL) for TCE for one resident. Releases of TCE from the Mills Gap Groundwater Contamination Site have been documented in previous Action Memoranda. At this time, the Mills Gap Groundwater Contamination Site is the only known source of TCE in groundwater in the area.

EPA provided bottled water as an emergency measure to the affected resident and re-sampled the well in question.

III. THREATS TO THE PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

III.A. Threats to the Public Health or Welfare

Removal actions may be initiated to mitigate any release or threat of release that meets one or more of the criteria specified under §300.415(b)(2). Conditions at the Site meet the following of those criteria:

§300.415(b)(2)(i) - Actual or potential exposure to nearby populations, animals, or the food chain from hazardous substances.

Previous investigations for the Mills Gap Groundwater Contamination Site have indicated elevated levels of TCE (up to 19.7 ppm) in surface water. At this time the former CTS Plant is the only known source of TCE contamination in the area.

300.415 (b)(2)(ii) Actual or potential contamination of drinking water supplies or sensitive ecosystems.

The drinking water supply for a residence is 10 times in excess of the MCL for TCE.

§300.415(b)(2)(vii) - The availability of other appropriate federal or state response mechanisms to respond to the release.

NCDENR has indicated that they do not have program to provide the resident with water or arrange a connection to public water. At this time, EPA is the only agency prepared to provide an alternate water supply and/or treat the contaminated water.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substance from this site, if not addressed by implementing the response action selected in the Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

With the \$50,000 emergency funding, the OSC proposes to:

- A. Provide bottled water to the impacted resident
- B. Evaluate the feasibility of installing an in home filtration system to treat the groundwater to federal drinking water standards. Other alternate water supply may also be considered.
- C. Conduct additional sampling to ascertain the vertical profile of contamination within the well.
- D. Take soil samples as necessary

VI. EXPECTED CHANGE IN THE SITUATION AND SITE CONDITIONS IF THE ACTION IS DELAYED OR NOT TAKEN

The situation at the site will worsen if a removal action is delayed or not taken. An individual will continue to consume water containing TCE in excess of the MCL .

IX. APPROVAL OF REMOVAL ACTION

The OSC has determined that a release or threat of release or threat of release of hazardous substances exists. The OSC authorized \$50,000 to initiate Pursuant to the authority delegated under Delegation 14-1-A for emergency removal actions not to exceed \$50,000,. I hereby approve the emergency removal action described within this Action Memorandum.

_____ DATE: _____

David Dorian
On-Scene Coordinator
Emergency Response and Removal Branch

