The CTS of Asheville, Inc. Superfund Site (CTS site) is located on Mills Gap Road in Asheville, Buncombe County, North Carolina, and also includes the areal extent of contamination. It is in an area known as Skyland, which is approximately 5 miles south of Asheville. The former facility is bordered by Mills Gap Road to the north, and residences and undeveloped land to the east, south, and west. The primary contaminant associated with the CTS Site is trichloroethene (TCE).

**SPRINGS REMOVAL ACTION**

In June, EPA offered temporary relocation to residents of the three homes closest to the springs on the east side of the CTS site because the concentrations of TCE in the air inside their homes exceeded EPA Region 4’s removal management level. EPA is requiring CTS Corporation to conduct a removal action at the springs to reduce the concentrations of TCE in the air. In September, EPA approved CTS Corporation’s removal action plan and their contractor began work immediately.

The work plan includes a combination of air sparging in the water; vapor extraction with air treatment by carbon canisters; covering the springs/treatment area with a 40 mil liner; and both surface water and air sampling. EPA has a Citizen’s Guide to Soil Vapor Extraction and Air Sparging available on the internet that further describes those processes.

The construction of the system is almost complete. Air sampling near the springs is planned this week to determine whether the system is working to effectively reduce air concentrations of TCE.
**DRINKING WATER WELL SAMPLING**
The 4th quarterly drinking water sampling event of 2014 was conducted last week. All results from prior sampling events over the past few years have been below applicable health-based risk levels.

For homes with Culligan-installed whole house well water filtration systems, AMEC Environment & Infrastructure, Inc. (AMEC) personnel collected two samples, with an EPA contractor providing oversight. One sample was collected from water before it enters the filtration system in order to evaluate the quality of the unfiltered ground water. A second sample was be collected after the water flows through the filtration system to evaluate the quality of the filtered water entering the home. For homes that have not had the filtration system installed, only one sample was collected to evaluate the quality of the unfiltered ground water. Samples were not be collected from homes that have been connected to the municipal water supply or from properties where the owner requested that samples not be collected at this time.

All samples will be analyzed by Pace Analytical Services, Inc. for volatile organic compounds (VOCs) that are associated with the CTS Site. These VOCs include: 1,1-dichloroethene, cis-1,2-dichloroethene, trans-1,2-dichloroethene, tetrachloroethene, toluene, 1,1,1-trichloroethane, TCE, and vinyl chloride.

The next quarterly drinking water sampling event will be in mid-January 2015.

**UPCOMING AIR SAMPLING**
As mentioned on page 1, air samples will be collected this week near the springs to determine if the treatment system is operating to effectively reduce the concentrations of TCE in the air.

EPA has also required CTS Corporation to conduct quarterly air sampling at homes and properties that were sampled in April and June 2014. The sampling is currently scheduled for October 28-29, 2014. EPA staff will contact the property owners and tenants to schedule appointments for air sampling canisters to be set up on October 28th and then picked up 24 hours later on October 29th. Analytical data is expected within three weeks after the sample canisters are received at the laboratory. EPA staff will call the property owners and tenants to verbally provide the sample results and will follow-up by sending written letters.

After analytical results are received that show that the treatment system is effectively reducing TCE concentrations in the air, EPA will contact the property owners and tenants of the homes that were evacuated to schedule sampling inside and near those three homes.

**CONTRACT LABORATORY PROGRAM DATA FROM JUNE & NOVEMBER 2011 WELL & SPRING WATER SAMPLING**
In the August 2014 Community Update, we provided information regarding potential data quality issues for well and spring water samples collected in June 2011 and November 2011. Last week, EPA sent letters to property owners whose water was sampled during those time periods and to other agencies and contractors that might use the data for purposes such as health assessments, etc. It has come to our attention that the Agency for Toxic Substances and Disease Registry has removed the 2013 Health Consultation from their website stating that the evaluation is undergoing additional review due to the potential data quality issues. Their website also stated, “The final evaluation, including any updated data, will be posted once the review is complete.”
NAPL AREA FOCUSED FEASIBILITY STUDY WORK PLAN
On October 2, 2014, EPA submitted comments to AMEC on the Non-Aqeous Phase Liquid (NAPL) Area Focused Feasibility Study Work Plan. On October 13, 2014, AMEC submitted a response to comments letter to the EPA. EPA staff are currently reviewing the response letter and will provide more information after the review is completed.

WATER LINE CONSTRUCTION UNDERWAY
Construction of the CTS Water Line Extension is still underway. The entire project is expected to be completed by the spring of 2015. Ellum Engineering will be visiting with home owners as the project proceeds. The City will waive the normal service connection fees for homes that connect to the municipal water supply under this project. As homes are connected to the municipal water supply, Culligan will coordinate with home owners to remove the whole house well water filtration systems that they previously installed.

If you choose not to connect to the municipal water system, CTS will continue to monitor and maintain the Culligan-installed filtration systems at least until the extent of the contaminated ground water plume is determined.

WHOLE HOUSE WATER FILTRATION SYSTEM UPDATE
In 2012, CTS Corporation offered to install, monitor and maintain whole house water filtration systems for homes that are located within a one mile radius of the CTS Site that rely on well or spring water as their drinking water source at no cost to the home owners. The filtration design includes two sediment filters, a carbon filter tank, and an ultraviolet light, at a minimum.

Culligan began installing filtration systems in September 2012 and has installed systems to protect the drinking water in over 100 homes. If you have not accepted the filtration system offer yet and do not want to connect to the municipal water supply system, please contact Samantha or Angela. Our contact information is included on the last page.

The standard filtration systems will filter out some metals that are attached to sediment, remove organic chemicals, and kill bacteria that may be in your water. This is being offered as a preventative/safety measure to protect your water until the Remedial Investigation is completed and a final remedy selected or you connect to the municipal water supply, whichever occurs first.
PROPOSED FUTURE ACTIVITIES AND SCHEDULE

In July, EPA sent a list of proposed future activities and schedule to Congressmen and Senators who have constituents living near the CTS site. Due to the many unpredictable events that can happen along the way, there is considerable uncertainty in our projection of the time it will take to get various investigation and cleanup activities underway and complete those activities. Below is our best estimate at present of the projected timeline looking forward. This schedule is not fixed – it will have to be regularly updated as activities progress at the site. The schedule below has been updated to remove completed items, insert new items and revise a few of the projected dates for future activities.

<table>
<thead>
<tr>
<th>Date</th>
<th>Activity</th>
</tr>
</thead>
<tbody>
<tr>
<td>October 2014</td>
<td>Complete construction of the springs removal action treatment system.</td>
</tr>
<tr>
<td>October 13-17</td>
<td>Quarterly well water sampling.</td>
</tr>
<tr>
<td>October 20-24</td>
<td>Outdoor air sampling to determine effectiveness of springs removal action treatment system.</td>
</tr>
<tr>
<td>October 28-29</td>
<td>Quarterly air sampling at homes and properties sampled in April and June 2014.</td>
</tr>
<tr>
<td>October/November</td>
<td>Evaluate AMEC’s response to comments on the NAPL Area Focused Feasibility Study Work Plan.</td>
</tr>
<tr>
<td>November 2014</td>
<td>Receive air sampling data and notify property owners and tenants.*</td>
</tr>
<tr>
<td>Fall 2014</td>
<td>Complete review/revision/approval of the NAPL Investigation Report.</td>
</tr>
<tr>
<td>January 2015</td>
<td>Quarterly well water sampling.</td>
</tr>
<tr>
<td>January 2015</td>
<td>Quarterly air sampling.</td>
</tr>
<tr>
<td>April 2015</td>
<td>Quarterly well water sampling.</td>
</tr>
<tr>
<td>April 2015</td>
<td>Quarterly air sampling.</td>
</tr>
<tr>
<td>Spring 2015</td>
<td>Begin site-wide RI/FS for media not already addressed.</td>
</tr>
<tr>
<td>Summer 2015</td>
<td>Complete a Focused Feasibility Study (technology evaluation) for actions to remediate NAPL contamination.</td>
</tr>
<tr>
<td>Fall 2015</td>
<td>Complete public participation and issue a Record of Decision (selection of remedy) for NAPL. Issue Notice Letters to begin enforcement process.</td>
</tr>
<tr>
<td>Summer 2016</td>
<td>Complete enforcement and begin design/construction of interim action remedy for NAPL remediation.</td>
</tr>
<tr>
<td>Fall 2016</td>
<td>Complete construction of the NAPL remedy (could be sooner or later depending on the technology selected). This constructed remedy may then have to be operated for months or years before completion.</td>
</tr>
<tr>
<td>Fall 2016</td>
<td>Finalize/approve the site-wide RI/FS, complete public participation and issue Record of Decision for site-wide remedy. Issue Notice Letters to begin enforcement process.</td>
</tr>
<tr>
<td>Spring/Summer 2017</td>
<td>Complete enforcement and begin design/construction of site-wide remedy.</td>
</tr>
<tr>
<td>Spring/Summer 2018</td>
<td>Complete construction of site-wide remedy (could be sooner depending on the technology selected). This constructed remedy may then have to be operated for numerous years before cleanup can be declared “complete” based on achieving cleanup levels in ground water.</td>
</tr>
</tbody>
</table>

* Dependent upon the success of the removal action, once ambient and indoor air levels have been reduced and are within the acceptable risk range, the displaced residents will be notified that relocation is no longer necessary.
QUESTION/TOPIC OF THE MONTH

To help better educate the community on topics related to the CTS site, we created this segment in the Community Update. If you have concerns or questions that you would like more information on, please let us know.

What’s that smell? There is a strong odor and it made me dizzy and gave me a headache.

Last week, people reported a strong odor near a pipe that runs under Mills Gap Road across the street from the springs area and reported symptoms of dizziness and headaches. The Skyland Fire Department and a HAZMAT team from the Asheville Fire Department responded. Dennis Presley, Chief of Skyland Fire Department, contacted EPA. Chief Presley stated that it smelled like sewer or septic tank leakage; other people described it as a sulfur or rotten eggs odor. The Fire Department/HAZMAT Team performed tests and did not find any hazardous chemicals.

CTS Corporation’s contractors monitor the springs work area several times a day when workers are present with a photoionization detector which indicates whether or not volatile organic chemicals, such as TCE, are present in the air. They have not had any readings that would require the workers to evacuate or put on respiratory protection during the current work project. None of the workers have complained of dizziness or headaches.

TCE is the primary contaminant of concern at the CTS site. TCE has a somewhat sweet odor (not sulfur or rotten eggs). The reported odor threshold (the air concentration at which a chemical can be smelled) for TCE in air is about 540,000 micrograms per cubic meter (µg/m³). At this level, most people would likely be able to smell TCE in air. The highest concentrations of TCE that have been detected in air sampling at/near the CTS site are hundreds to thousands of times less than the odor threshold.

Some community members have stated that at times, particularly after rain events, they smell TCE in and/or near the springs. What they smell might be petroleum products or naturally decaying organic matter rather than TCE because, as stated above, the odor threshold for TCE in air is much greater than any levels measured near the springs. Previous sampling has also indicated petroleum products are associated with the CTS site and found in the springs. The odor threshold for petroleum products is much lower than the odor threshold for TCE, meaning that you can smell it at lower concentrations. Petroleum products smell similar to gasoline or diesel that you pump into your car. However, as it breaks down through years of being in the ground, the odor may change a bit. Another odor that EPA staff have detected in the springs area is that of naturally decaying organic matter, such as decaying plants and animals/insects.

With TCE, concentrations can be hazardous to you before you even smell it. However, petroleum products can be smelled at concentrations that are within acceptable health risk ranges.

But more important than exactly what people have smelled at/near the springs, the concentrations of TCE from air samples collected in April 2014 resulted in EPA offering temporary relocation to the residents of the three homes closest to the springs and EPA requiring CTS Corporation to conduct a removal action described at the beginning of this Community Update. The concentrations of TCE detected in April 2014 that triggered the temporary relocation were thousands of times less than a concentration of TCE that can be smelled.

Please stay away from the springs area on the property east of the CTS site, until after the treatment system is operating and further air testing is completed, unless you have an urgent need to be there.
Contact Information

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**Buncombe County**
Mandy Stone  
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MANDY.STONE@BUNCOMBECOUNTY.ORG

Mike Goodson  
(Managing CTS Water Line Extension Project)  
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MIKE.GOODSON@BUNCOMBECOUNTY.ORG

**Culligan**
828.251.2420  
CULLIGANWNC@BELLSOUTH.NET

**Community Groups**
**Concerned Citizens for Mills Gap Cleanup**  
Glen Horecky  
GEH4@MSN.COM

**TAG Recipient:**  
**POWER Action Group**  
Lee Ann Smith  
UPTHISHILL@BELLSOUTH.NET

Information Repository
EPA has established an information repository for the public to review some of the documents related to the Site and the Superfund program. The local repository does not include all documents related to the Site. Additional documents may be made available by EPA upon request. The local information repository is located at the:

Pack Memorial Library  
67 Haywood Street  
Asheville, North Carolina 28801-2834

EPA Website
EPA has a website specifically for the CTS of Asheville, Inc. Superfund Site. The website address is:  
http://www.epa.gov/region4/superfund/sites/npl/northcarolina/millsgapnc.html

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