

From: Miller, Angela
Sent: Thursday, December 21, 2017 12:04 PM
Cc: Miller, Angela <Miller.Angela@epa.gov>
Subject: CTS of Asheville Inc., community update 12-21-17

Good afternoon!

In response to questions and concerns raised at the EPA public meeting on November 30, 2017, particularly about potential air impacts on the surrounding community, CTS and its contractor (TRS) have added additional safeguards. The attached fact sheet further describes the controls and safeguards for the installation and operation of the Electrical Resistance Heating (ERH) treatment system at the CTS of Asheville, Inc. Superfund Site. It also provides details about the contractor selected and their safety record; information about health, safety and emergency response planning; and community notification.

The ERH construction is underway, and thus far 15 electrodes and 11 temperature monitoring points have been installed. CTS is planning to post weekly updates on their website at: www.ctsofasheville.com/news.

If you know of someone who would like to be added to our email distribution list, please have them contact me, and if you wish to be taken off the mailing list, please let me know that as well.

More information regarding the CTS Superfund Site can be found at: <https://www.epa.gov/superfund/cts-millsgap>.

As always, please feel free to contact me (678) 575-8132 or Craig Zeller (404) 273-7072, at any time.

Merry Christmas and Happy New Year to you and yours!



All the best,
Angela R. Miller
US EPA, Community Involvement Coordinator
Enforcement and Community Engagement Branch
Investigations/Community Engagement Section
61 Forsyth Street, SW
Atlanta, GA 30303
Office: (404) 562-8561
Cell: (678) 575-8132
Email: miller.angela@epa.gov

U.S. Environmental Protection Agency CTS of Asheville, Inc. Superfund Site

Asheville, N.C.



Fact Sheet

December 2017

Introduction

In response to questions and concerns raised at the EPA public meeting on November 30, 2017, particularly about potential air impacts on the surrounding community, CTS and its contractor (TRS) have added additional safeguards. This fact sheet further describes the controls and safeguards for the installation and operation of the Electrical Resistance Heating (ERH) treatment system at the CTS of Asheville, Inc. Superfund Site. It also provides details about the contractor selected and their safety record; information about health, safety and emergency response planning; and community notification.

Drilling safeguards

- ❖ During drilling for installation of the system, contaminated soil is being placed in roll-off bins prior to being transported off-site for disposal. The roll-off bins are lined with plastic and capped with a cover to prevent releases (see photo).
- ❖ The bins will be transported on trucks by A&D Environmental Services to approved landfills out of state. An estimated 400 tons of hazardous waste will be disposed at the US Ecology landfill in Belleville, Michigan. An estimated 100 tons of non-hazardous waste will be disposed at the Republic Services landfill in Enoree, South Carolina.
- ❖ Hand-held vapor meters will be used to screen the air for volatile organic compounds (VOCs) around the drill rigs and the soil roll-off bins, as well as around an outer perimeter of the work zone, during installation of the system.
- ❖ If these vapor meters detect elevated concentrations of contaminants, actions will be taken to identify and control the source.



Above: Hand-held vapor meter.

Example lined and capped roll-off bin.



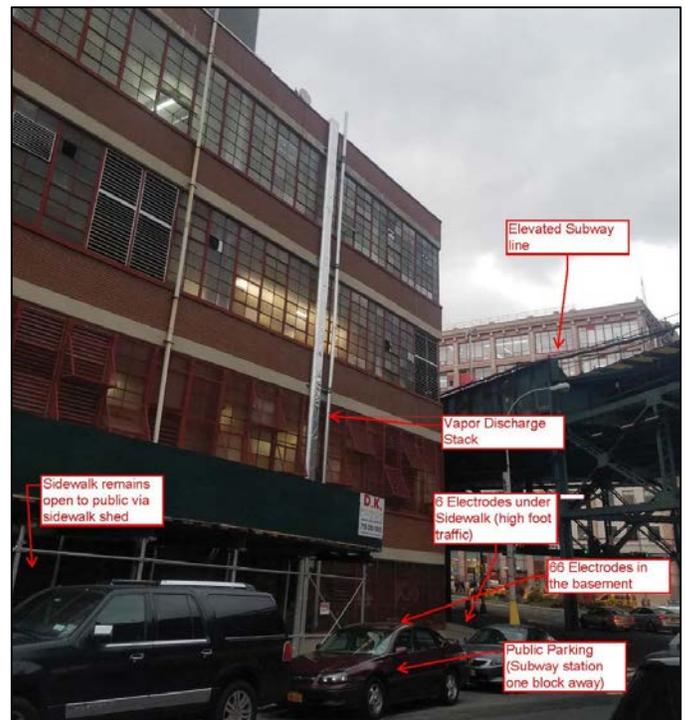
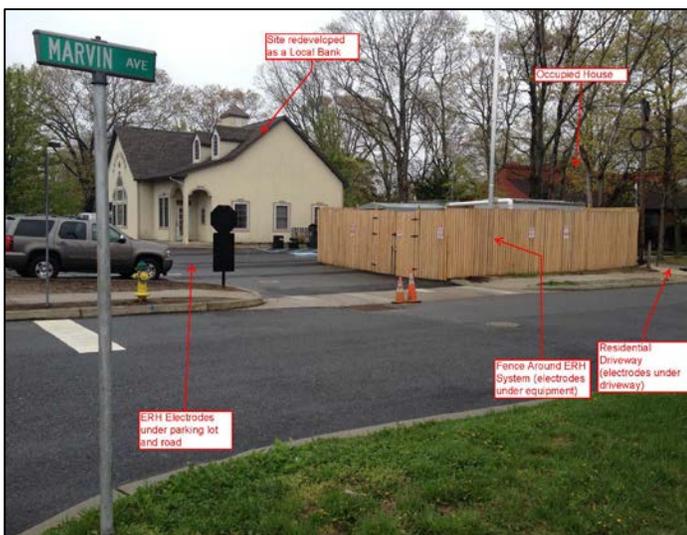
Treatment system safeguards

- ❖ The system is under a vacuum, so if a pipe fails, air will be pulled into the system rather than released to the environment.
- ❖ Vacuum sensors in the piping network are designed to detect pipe failure or malfunction. If the strength of the vacuum drops below a minimum set point, the electrodes will be immediately de-energized and the generation of vapor will stop.
- ❖ In the event of malfunction or alarm from any piece of equipment, the system is designed to default to safe mode and bring the electrodes offline.
- ❖ Four continuous air monitoring stations will be established around the perimeter of the site to provide real time data (24 hours a day, 7 days a week) during heating operations. If these air monitoring stations detect elevated concentrations of contaminants—above Western North Carolina’s regulatory limit of 59 micrograms per cubic meter (ug/m3)—actions will be taken to identify and control the source.
- ❖ If a leak does occur, the contaminated vapor will dissipate in the surrounding outdoor air and the concentrations would not be expected to be above protective action levels.
- ❖ During operation of the system, hand-held vapor meters will be used throughout the site as a backup safeguard to detect leaks and ensure that protective action levels are not exceeded.

Treatment system contractor and safety record

ERH treatment technology was developed in the mid-1990s to clean up contaminated groundwater, and approximately 250 projects have been completed by the contractors who do this work. TRS, the contractor selected for the CTS of Asheville project, was started in 2000 and has completed approximately 130 ERH projects. TRS is currently working in the United States, China, Brazil, Belgium, Germany, and France on projects with varying site requirements and conditions. All TRS’s projects have been completed without any contaminated vapors discharged above protective action levels.

ERH systems such as the one proposed for the site have been installed and operated in numerous populated areas without releases of contaminated air to the surrounding communities. The following photos provide examples of projects immediately adjacent to, underneath, or inside occupied buildings and homes. Electrodes with vapor recovery wells were installed beneath the occupied buildings at angles, or from the basement.



Photos of ERH systems installed in occupied residential and dense urban settings.

Health, Safety and Emergency Response

Site activities will be performed in accordance with required Health and Safety Plan and Emergency Response Plan. During system startup, the Skyland Fire Department will be asked to visit the site to review the system and the operations that will take place. By becoming familiar with the ERH system, the Skyland Fire Department will be prepared to respond quickly and appropriately in the event of an emergency.

Community Notification

As operator of the treatment system, TRS personnel will be immediately notified of any leaks, malfunctions or alarms. CTS and EPA are committed to keeping the community informed during construction and operation of the ERH treatment system. CTS will post weekly updates to its website (www.CTSofAsheville.com). These weekly updates will include summaries of any leaks, malfunctions or alarms, and the steps taken to resolve them. EPA will continue to send regular email community updates to the CTS site distribution list.

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[www.epa.gov/superfund/
cts-millsgap](http://www.epa.gov/superfund/cts-millsgap)

FOR MORE INFORMATION

EPA Remedial Project Manager

Craig Zeller (404) 273-7072
zeller.craig@epa.gov

EPA Community Involvement Coordinator

Angela Miller (678) 575-8132
miller.angela@epa.gov

NC Department of Environmental Quality

Beth Hartzell (919) 707-8335
beth.hartzell@ncdenr.gov

NC Department of Health and Human Services

(919) 707-5900
nchace@dhhs.nc.gov