



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
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ATLANTA, GEORGIA 30303-8960

OCT - 5 2016

MEMORANDUM

SUBJECT: Region 4 Response to "Progress Made, but Improvements Needed at CTS of Asheville Superfund Site in North Carolina to Advance Cleanup Pace and Reduce Potential Exposure, Report #16-P-0296"

FROM: Heather M^cTeer Toney
Regional Administrator

A handwritten signature in black ink, appearing to read "Heather M. Toney".

TO: Arthur Elkins, Jr.
Inspector General

The U.S. Environmental Protection Agency Region 4 office thanks you for the opportunity to provide a response to the Office of Inspector General's (OIG) report entitled "*Progress Made, but Improvements Needed at CTS of Asheville Superfund Site in North Carolina to Advance Cleanup Pace and Reduce Potential Exposure*". On August 31, 2016, the OIG responded to Region 4 with four unresolved recommendations. This memorandum documents Region 4's response to resolve these four previously unresolved recommendations.

OIG Recommendation #1: Develop and implement management controls to make work plans for the CTS site consistent with objectives in AOCs and other enforceable documents, and to publicly document decisions to approve work plans that deviate from or only partly address objectives.

The EPA Region 4 Proposed Resolution: Although Region 4 believes the management structure within the SF Division is effective, supervisors at the Section, Branch, and Division levels have directed the site RPM to ensure that all future work plans are consistent with objectives in AOCs and other enforceable documents. If Region 4 determines that a work plan deviates from or partly or incrementally addresses these objectives, we will acknowledge that condition in the work plan approval letter. All technical review memoranda on work plans, and subsequent approval letters will be included in the site specific Administrative Record(s), and, as such, will be publicly available and properly documented. (Planned Completion Date: September 19, 2016.)

OIG Recommendation #2: Meaningfully engage the community in the development of investigation plans, understanding the investigation results, and deciding cleanup approaches.

The EPA Region 4 Proposed Resolution: Region 4 believes that the community involvement strategy implemented at the CTS site is very robust. Region 4 is fully committed to meaningfully engage the CTS community and stakeholders and will continue to evaluate and identify better methods to do so in all future work. Region 4 will revise the Community Involvement Plan (CIP) to outline the engagement strategy employed during the development of the Interim Action Record of Decision and apply it to

development of future investigation plans and help the community understand investigation results. (Planned Completion Date: March 31, 2017.)

OIG Recommendation #3: Direct that sampling at and near the contaminated eastern springs is comprehensive enough to assess all potential exposure pathways, including vapor intrusion, and to monitor the full effects of the TCRA system on ambient air around the perimeter fence and the stream flowing under the fence.

The EPA Region 4 Proposed Resolution: Region 4 will consult with EPA's Environmental Response Team (ERT) regarding the sufficiency of the monitoring of the TCRA system at the eastern springs area. ERT is part of EPA Headquarters' Office of Superfund Remediation and Technology Innovation (OSRTI) organization and has expertise and experience in vapor intrusion assessment and monitoring. Region 4 has previously utilized ERT expertise regarding the scope and design of the vapor mitigation system. This consultation will focus on the ambient air monitoring program, potential exposure pathways (including vapor intrusion), and system operation and maintenance (O&M) monitoring and will provide recommendations for improvements (where warranted). Region 4 has already requested that CTS collect two more samples of the stream that flows under the fence, during the 2nd and 4th Quarters of 2017, to better delineate the pre-Interim Action water quality. [Note: CTS has agreed to this request]. (Planned Completion Date: March 31, 2017.)

OIG Recommendation #5: A) Develop, or require CTS to develop, a model focused on vapor exposure pathways before accepting any additional work products related to the vapor exposure pathways. This vapor-focused model should be a subset of, and consistent with, the site-wide model the Region created in February 2015. B) Review any previously approved work plans in the process of being implemented, particularly work plans related to vapor exposure pathways, in the context of the updated model, and revise those plans as needed. C) Develop and implement a plan for (1) updating the models that, together, comprise the conceptual site model, as new information on site conditions is obtained; (2) incorporating those updated models into new work and action plans; and (3) using the conceptual site model to better engage the community in the site investigation and cleanup work.

The EPA Region 4 Proposed Resolution: Regarding Recommendation 5A, Region 4 agreed to develop a vapor-focused conceptual site model (CSM) using existing characterization data by December 31, 2016. The OIG has accepted this corrective action. In response to Recommendation 5B, the vapor-focused CSM will be provided to the ERT for consultation, and Region 4 will respond to any recommendations provided on the vapor sub-model by ERT. Regarding Recommendation 5C, the CSM will be updated as new information is generated and will be incorporated into new work plans (as warranted), and the updated CSM, including the vapor sub-model, will be added to the Administrative Record. Further, Region 4 will utilize the vapor sub-model in community involvement activities. (Planned Completion Date: March 31, 2017.)