



North Carolina Department of Environment and Natural Resources

Dexter Matthews, Director

Division of Waste Management

Beverly Eaves Perdue, Governor
Dee Freeman, Secretary

September 28, 2010

Ms. Carolyn Callihan, RPM
US EPA Region IV Waste Division
Atlanta Federal Building
61 Forsyth St., 11th Floor
Atlanta, GA 30303-3104

Subject: Pre-CERCLIS Screening Assessment
Arden Electroplating Inc.
235 Mills Gap Road
Skyland, Buncombe County, NC, 28776

Dear Ms. Callihan:

This site was pre-screened for potential listing on CERCLA. It was identified during a search for other potential sources for groundwater contamination near the CTS of Asheville site (NCD 003 149 556) in the Mills Gap Road area of Asheville, NC. Based on findings of this Screening Assessment, it is recommended that this site **not** be listed on CERCLIS for further study.

On March 15, 2010, I talked with Mr. Thomas Israel concerning his property at 54 Pinner's Cove Road. During this conversation, Mr. Israel stated that he was one of the three principal owners of Arden Electroplating (Arden). Mr. Thomas Parker (location unknown) was the President, Mr. Norman Lewis (deceased) was the Vice President, and Mr. Israel was the Secretary. According to Mr. Israel, Arden operated in the CTS facility for just over a year, during whichion, all of their waste (plating sludge) was shipped off-site and handled by GSX Services. After one year, they tried to find another location to operate from but did not and ceased operations. No equipment was ever relocated from the Arden operations (Ref. 1).

A file review of the North Carolina Hazardous Waste Section fileroom indicates that Arden Electroplating was incorporated on 11/22/1985, suspended on 3/17/1989 and listed Administrative Dissolution on 12/8/1993.

Ms. Carolyn Callihan

9/28/2010

Page 2 of 2

Mr. Israel responded to an EPA Request for Information Pursuant to Section 104(e) of CERCLA, concerning operation of Arden Electroplating and possible operations that occurred on 54 Pinner's Cove Road in July, 2010. In this response, Mr. Israel reiterated that Arden Electroplating only operated in the CTS facilities for 1 year and ceased operations after that. In the 104(e) response, Mr. Israel listed the principals of Arden Electroplating as Mr. Rick Parker, President; Mr. Thomas Israel, Vice President; and Mr. Norman Lewis, Secretary (Ref. 2)

Since Arden Electroplating operated solely in the CTS facilities, the coordinates of the site are those of the CTS of Asheville site, 35.4931° north latitude and 82.5103° west longitude. The site reference point is the northeast corner of the main building on the CTS site (Ref. 3).

We have concluded that Arden Electroplating does not need to be added to CERCLIS since the company operated solely in the CTS facilities at 235 Mills Gap Road and this location is already on CERCLIS as the CTS of Asheville site. Arden Electroplating might be considered an additional potentially responsible party for the CTS of Asheville site.

Sincerely,



Harry Zinn, Environmental Engineer
Site Evaluation and Removal Branch
NC Superfund Section



Jim Bateson, Head
Site Evaluation & Removal Branch
NC Superfund Section

cc. File through Jim Bateson

Reference 1 Memo to File RE; Telephone Conversations with Mr. Israel

Reference 2 Request for Information Pursuant to Section 104(e) of CERCLA for Arden Electroplating

Reference 3 Latitude and Longitude Calculations for CTS of Asheville

PRE-CERCLIS SCREENING ASSESSMENT CHECKLIST/DECISION FORM

This checklist can assist the site investigator during the Pre-CERCLIS screening. It will be used to determine whether further steps in the site investigation process are required under CERCLA. Use additional sheets, if necessary.

Checklist Preparer: Harry Zinn 09/25/2010
 (Name/Title) (Date)
401 Oberlin Road, Raleigh, North Carolina 919-508-8488
 (Address) (Phone)
harry.zinn@ncdenr.gov
 (E-Mail Address)

Site Name: Arden Electroplating

Previous Names (if any):

Site Location: 235 Mills Gap Road
 (Street)
Asheville North Carolina 28803
 (City) (ST) (Zip)

Latitude: 35.4931° **Longitude:** 82.5103°

Complete the following checklist. If Ayes is marked, please explain below.		YES	NO
1.	Does the site already appear in CERCLIS?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2.	Is the release from products that are part of the structure of, and result in exposure within, residential buildings or businesses or community structures?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3.	Does the site consist of a release of a naturally occurring substance in its unaltered form, or altered solely through naturally occurring processes or phenomena, from a location where it is naturally found?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4.	Is the release into a public or private drinking water supply due to deterioration of the system through ordinary use?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5.	Is some other program actively involved with the site (i.e., another Federal, State, or Tribal program)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6.	Are the hazardous substances potentially released at the site regulated under a statutory exclusion (i.e., petroleum, natural gas, natural gas liquids, synthetic gas usable for fuel, normal application of fertilizer, release located in a workplace, naturally occurring, or regulated by the NRC, UMTRCA, or OSHA)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7.	Are the hazardous substances potentially released at the site excluded by policy considerations (e.g., deferral to RCRA Corrective Action)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8.	Is there sufficient documentation that clearly demonstrates that there is no potential for a release that could cause adverse environmental or human health impacts (e.g., comprehensive remedial investigation equivalent data showing no release above ARARs, completed removal action, documentation showing that no hazardous substance releases have occurred, EPA approved risk assessment completed)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Please explain all Ayes answer(s), attach additional sheets if necessary:

Site Determination:

- Enter the site into CERCLIS. Further assessment is recommended (explain below).
- The site is not recommended for placement into CERCLIS (explain below).

DECISION/DISCUSSION/RATIONALE:

Arden Electroplating was identified during a search for alternate sources of groundwater contamination in the vicinity of the CTS of Asheville site in Asheville, NC. Initially, it was not known if Arden Electroplating operated in any other location other than the CTS facilities.

Mr. Israel was one of the three principal owners of Arden Electroplating (Arden). Mr. Thomas Parker (location unknown) was the President, Mr. Norman Lewis (deceased) was the Vice President, and Mr. Israel was the Secretary. A file review of the North Carolina Hazardous Waste Section fileroom indicates that Arden Electroplating was incorporated on 11/22/1985, suspended on 3/17/1989 and listed Administrative Dissolution on 12/8/1993.

According to Mr. Israel, Arden operated in the CTS facility for just over a year. During their time of operation, all of their waste (plating sludge) was shipped off-site and handled by GSX Services. After one year, they tried to find another location to operate from but did not and ceased operations. No equipment was ever relocated from the Arden operations. No operations took place on the property at 54 Pinner's Cove Road.

In a response to a 104(e) request by EPA, Mr. Israel reiterated the above information, except, he listed Mr. Lewis as Secretary and himself as Vice President.

We have indicated that Arden Electroplating is already on CERCLIS since it operated solely in the CTS facilities at 235 Mills Gap Road and this location is already on CERCLIS as Mills Gap Road Groundwater Contamination aka. CTS of Asheville. Arden Electroplating might be considered an additional potentially responsible party for the CTS of Asheville site.

Regional EPA Reviewer: _____

Print Name/Signature

Date

State Agency/Tribe: HARRY ZIMM


Print Name/Signature

9/28/2010

Date

REFERENCE 1

MEMO

DATE: March 16, 2010

TO: File

FROM: Harry Zinn, Environmental Engineer
North Carolina DENR, Superfund Section

RE: Telephone Conversations with Mr. Israel
Arden Electroplating
Skyland / Buncombe County, North Carolina

On March 10, 2010 I spoke with Mr. Thomas Israel concerning the ownership and history of 54 Pinnars Cove Road. Mr. Israel stated that he purchased this property in 1986 for his son. Mr. Israel also confirmed that he was one of three principals that operated Arden Electroplating. Arden Electroplating was operated on the CTS facility and no equipment was relocated for reused at any other facility.

On March 15, 2010 in a subsequent conversation, Mr. Israel stated that the long building identified on the 60 Pinnars Cove Road parcel was an old chicken coop that was converted into a garage. Mr. Israel also expanded on the previous information he gave concerning Arden Electroplating. Mr. Israel stated that Arden Electroplating consisted of Thomas Parker (President), Norman Lewis (Vice President), and himself as Secretary. Arden Electroplating operated for about 1 year in the CTS facility. Arden Electroplating tried to find a suitable place to relocate to but were unable to, and shut down operations in 1987 when CTS closed their building. During operations, waste was shipped off-site by GSX Services.

REFERENCE 2



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
SAM NUNN
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA GEORGIA 30303-8960

JUN 25 2010

INFORMATION REQUEST LETTER
URGENT LEGAL MATTER - PROMPT REPLY REQUESTED
CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Terric Israel and Thomas D. Israel
Arden Electroplating
54 Pinner's Cove Road
Asheville, NC 28803

RE: Request for Information Pursuant to Section 104(e) of CERCLA
Mills Gap Road Groundwater Contamination Superfund Site (the Mills Gap Site)
EPA ID # NCSFN0406988
CTS of Asheville, Inc. Site (the CTS Site)
EPA ID # NCD003149556
Asheville, Buncombe County, North Carolina

Dear Messrs Israel:

The purpose of this letter is to request that you respond to the enclosed Information Request. The United States Environmental Protection Agency (EPA) is currently investigating the release or threatened release of hazardous substances, pollutants or contaminants, or hazardous wastes on or about the above-referenced Sites. This investigation requires inquiry into the identification, nature, and quantity of materials generated, treated, stored, or disposed of at, or transported to, the Sites and the nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant at, from or in the areas surrounding the Sites. EPA also is seeking information relating to the ability of persons to pay for or to perform response actions at the Sites.

The two Sites that are the subject of this letter are interrelated. The CTS Site is located off Mills Gap Road, approximately one mile east of Skyland, in Buncombe County, North Carolina, and consists of approximately nine acres of maintained grounds containing a large, single-story building. In 1952, International Resistance Company, Inc. (IRC) bought the land and constructed

the building which was used for its electroplating operations. In 1959, IRC sold the property to CTS, Inc (CTS). From 1959 to 1986, CTS operated an electroplating facility at the Site. In 1987, Mills Gap Road Associates (MGRA) purchased the Site and is the current owner.

Environmental sampling indicates the subsurface beneath the former plant is contaminated with the chemical compound trichloroethylene (a.k.a. trichloroethene or TCE), as well as petroleum products. In 1999, TCE was discovered in nearby springs and one residential drinking water well. The Mills Gap Site was listed in the Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) at this point and encompasses contamination of springs and private wells in the area that may be attributable to the CTS Site. In December 2007, EPA and the North Carolina Department of Environment and Natural Resources (NCDENR) commenced more extensive sampling that included expanded residential well sampling and vapor intrusion sampling at homes in close proximity to the CTS and the Mills Gap Sites. This letter is being sent to you as part of an investigation to find companies and individuals who may have information that could assist in EPA's research in the area surrounding the Sites.

Pursuant to the authority of Section 104 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. § 9604, as amended, and Section 3007 of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6927, you are hereby requested to respond to the Information Request set forth in Enclosures hereto.

Compliance with the Information Request is mandatory. Failure to respond fully and truthfully to the Information Request within thirty (30) days of receipt of this letter, or to adequately justify such failure to respond, can result in an enforcement action by EPA pursuant to Section 104(e) of CERCLA, as amended, and/or Section 3008 of RCRA. Each of these statutes permits EPA to seek the imposition of penalties of up to thirty-seven thousand five hundred dollars (\$37,500) for each day of continued non-compliance. Please be further advised that provision of false, fictitious, or fraudulent statements or representations to the Information Request may subject you to criminal penalties under 18 U.S.C. § 1001 or Section 3008(d) of RCRA, 42 U.S.C. § 6928(d).

This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501, et seq.

Your response to this Information Request should be mailed to:

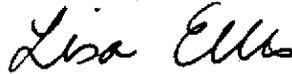
Lisa Ellis
Office of Environmental Accountability – 13th floor
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303

Due to the seriousness of the issues at the Sites and the legal ramifications of failing to respond properly, EPA strongly encourages you to give this matter immediate attention and to

respond to this Information Request within the time specified above. If you have any legal or technical questions relating to this Information Request, you may consult with EPA prior to the time specified above. Please direct legal questions to Lisa Ellis, Attorney-Advisor, at (404) 562-9541. Technical questions should be directed to Carolyn Callihan, Remedial Project Manager, at (404) 562-8913.

Thank you for your cooperation in this matter.

Sincerely,

A handwritten signature in cursive script that reads "Lisa Ellis".

Lisa Ellis
Attorney-Advisor

Enclosures

- A. Instructions
- B. Definitions
- C. Questions

INSTRUCTIONS

1. Please provide a separate narrative response to each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the number of the Question to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, you must supplement your response to EPA. Moreover, should you find, at any time after the submission of your response that any portion of the submitted information is false or misrepresents the truth, you must notify EPA of this fact as soon as possible and provide EPA with a corrected response.
4. For each document produced in response to this Information Request indicate on the document, or in some other reasonable manner, the number of the Question to which it responds.
5. The information requested herein must be provided even though the Respondent may contend that it includes possibly confidential information or trade secrets. You may, if you desire, assert a confidentiality claim covering part or all of the information requested, pursuant to Sections 104(e)(7)(E) and (F) of CERCLA, 42 U.S.C. Sections 9604(e)(7)(E) and (F), Section 3007(b) of RCRA, 42 U.S.C. Section 6927(b), and 40 C.F.R. Section 2.203(b), by attaching to such information at the time it is submitted, a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade secret," or "proprietary," or "company confidential." Information covered by such a claim will be disclosed by EPA only to the extent, and only by means, of the procedures set forth in statutes and regulations set forth above. If no such claim accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice to you. You should read the above cited regulations carefully before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim.

DEFINITIONS

The following definitions shall apply to the following words as they appear in this Information Request:

1. The term "you" or "Respondent" shall mean Arden Electroplating, the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors, assigns, and agents.
2. The term "person" shall have the same definition as in Section 101(21) of CERCLA: an individual, firm, corporation, association, partnership, consortium, joint venture, commercial entity, United States Government, State, municipality, commission, political subdivision of a State, or any interstate body.
3. The terms the "Site" or the "facility" shall mean and include the property on or about the Mills Gap Site and the CTS Site property in Asheville, Buncombe County, North Carolina unless described as the Respondent's facility or site in which case the terms shall mean Arden Electroplating's operations.
4. The term "hazardous substance" shall have the same definition as that contained in Section 101(14) of CERCLA and includes any mixtures of such pollutants and contaminants with any other substances. Petroleum products mixed with pollutants and contaminants are also included in this definition.
5. The term "hazardous waste" shall have the same definition as that contained in Section 1004(5) of RCRA.
6. The term "solid waste" shall have the same definition as that contained in Section 1004(27) of RCRA.
7. The term "materials" shall mean all substances that have been generated, treated, stored, or disposed of or otherwise handled at or transported to the Site, including but not limited to, all hazardous substances, pollutants and contaminants, hazardous wastes and solid wastes.
8. The term "hazardous material" shall mean all hazardous substances, pollutants or contaminants, and hazardous wastes, as defined above.
9. The term "non-hazardous material" shall mean all material as defined above, excluding hazardous substances, pollutants and contaminants, and hazardous waste.
10. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business address and business telephone number, present or last known home address and home telephone number, and present or last known job title, position or business.

11. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including a sole proprietorship), to set forth its full name, address, legal form (e.g., corporation, partnership, etc.), organization, if any, and a brief description of its business.
12. The term "identify" means, with respect to a document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), the identity of the author, addressor, addressee and/or recipient, and the substance or the subject matter.
13. The term "release" has the same definition as that contained in Section 101(22) of CERCLA, 42 U.S.C. Section 9601(22), and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
14. The terms "document" and "documents" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreement and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, report, notice, message, analysis, comparison, graph, chart, interoffice or intraoffice communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc or disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document, and (e) every document referred to in any other document.
15. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
16. The term "arrangement" means every separate contract or other agreement between two or more persons.
17. The terms "transaction" or "transact" mean any sale, transfer, giving, delivery, change in ownership, or change in possession.

18. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions.
19. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 C.F.R. Part 300, or 40 C.F.R. Parts 260-280, in which case the statutory or regulatory definitions shall apply.

QUESTIONS

1. Identify the person(s) answering these Questions on behalf of Respondent.
2. For each and every Question contained herein, identify all persons consulted in the preparation of the answer.
3. For each and every Question herein, identify all documents consulted, examined, or referred to in the preparation of the answer and/or all documents that contain information responsive to the Question and provide true and accurate copies of all such documents.
4. Describe the nature of the activities or business (including duration of operations) at the Arden Electroplating facility.
5. Describe any Arden Electroplating operations that occurred on the CTS Site.
6. Describe any of Arden Electroplating's business relations or relations of employees with the CTS Site or the Mills Gap Site.
7. Describe any positions held at CTS by any Arden Electroplating employees prior to, or contemporaneous with, their employment at Arden Electroplating.
8. Did Arden Electroplating ever use, purchase, generate, store, treat, dispose of, or otherwise handle at its facility at 54 Pinners Cove Road or at the CTS Site any hazardous substances? If the answer to the preceding question is anything other than an unqualified "no", identify:
 - a. In general terms the nature and quantity of the hazardous substances that were used, purchased, generated, stored, treated, disposed, or otherwise handled.
 - b. The chemical composition, characteristics, physical state (e.g., solid, liquid) of each hazardous substance so used, purchased, generated, stored, treated, disposed, or otherwise handled.
 - c. The persons who supplied Arden Electroplating with each such hazardous substance.
 - d. When and how each such hazardous substance was used, purchased, generated, stored, treated, disposed, or otherwise handled.
9. Describe the chemical processes that have been used at Arden Electroplating's facility at 54 Pinners Cove Road, or at the CTS Site, during the period of time when the Respondent owned, leased, and/or operated the facility. Specify which processes involved the use of trichloroethylene (TCE), perchloroethylene (PCE), toluene, or

any other solvent or petroleum product.

10. State whether PCE or TCE, toluene or any material containing PCE, TCE, or toluene was ever sold, stored, disposed of, used or otherwise handled at Respondent's facility at 54 Pinnars Cove Road or the CTS Site during the period of time when the Respondent owned, leased and/or operated its facility. If so, provide the following information:
 - a. identify the chemical name and composition, trade name and FIFRA registration number, if any;
 - b. the time period(s) during which each material was used;
 - c. identify all persons who used each material at the facility during each period;
 - d. describe briefly the purpose for which each material was used at the facility. If there was more than one use, describe each and when each was used;
 - e. the total volume (in gallons) of each such material used during the time period, and if more than one time period is involved also provide the volume for each time period;
 - f. identify the supplier(s) and provide copies of all contracts, service orders, shipping manifests, invoices, receipts, canceled checks and other documents pertaining to the supplying of each material;
 - g. describe how and where each material was stored at Respondent's facility, including but not limited to, the kind and size of containers or tank(s), the storage area, pad or enclosure, the approximate average volume stored at the facility, and if the storage practice changed during the period, state how and when;
 - h. state how frequently each material was delivered to the facility and in what volume on the average (estimate if exact frequency and volumes are not known);
 - i. state whether each material was delivered to the facility in bulk or in closed containers and describe how each material was transferred to the storage containers or tank(s) including any equipment used and by whom;
 - j. specify the locations at which each material was used;
 - k. describe how each material was transported from the on-site storage to the point where it was applied, in what amounts, and whether this was done using containers, hoses, piping or other equipment;

ENCLOSURE C

- l. describe the procedures for cleaning any equipment used and where this was done;
 - m. describe how, where, when, and by whom the material containers were cleaned out, and removed from the facility or disposed of;
 - n. if any of the practices described in response to the above questions changed during that time period, describe the change and when it occurred.
11. Describe in detail and provide all documentation regarding drum (or other containers or straight dumping of waste) disposal/burial on Respondent's facility or the CTS Site or the Mills Gap Site.
12. Describe in detail and provide all documentation regarding the removal of any and all waste that was disposed/buried/dumped at Respondent's facility or the CTS Site or the Mills Gap Site. Please be specific as to, but do not limit your responses to, when, where, how much, and what confirmation samples were taken of soil/groundwater – including depth and constituents included in the analyses.
13. Provide a list of all contents of any and all drums, containers, and/or waste products that were buried or disposed of on Respondent's facility.
14. Provide all information on drums, containers, and/or waste products that were buried or disposed of on the CTS Site or the Mills Gap Site.
15. Provide all documentation of previous air, soil, sediment, or groundwater samples taken on Respondent's facility or any studies done with or without State direction. For groundwater samples, include the depth of all samples collected.
16. Provide all documentation of any Phase I or Phase II assessments performed on Respondent's facility – specify if conducted for land transaction purposes.
17. List all other Arden Electroplating or other facilities, buildings, or divisions with different addresses that you accepted waste from, handled waste from, or brokered waste from. Include any and all Arden Electroplating or other subsidiaries, partners, parent corporations, or other companies that you have contracted with to do the previously mentioned activities.
18. Describe all occurrences associated with violations, citations, deficiencies, and/or accidents concerning Respondent's facility during your ownership or operation. Provide copies of all documents associated with such an occurrence.
19. Describe all occurrences associated with violations, citations, deficiencies, and/or accidents concerning the CTS Site or the Mills Gap Site.
20. Provide a list of all local, state, and federal environmental permits granted for your

ENCLOSURE C

facility or any part thereof (e.g., RCRA Permits, NPDES Permits, etc.)

21. Provide all documentation of hazardous waste generator, treatment, or storage activity, regardless of whether you notified anyone under RCRA of such activities.
22. Provide all documentation of any RCRA notifications of RCRA waste generator activity, application for permits, and/or manifests of shipments of hazardous waste.
23. Describe the acts or omissions of any persons, other than your employees, agents or those persons with whom you had a contractual relationship that may have caused a release or threat of release of hazardous materials at Respondent's facility or at the CTS Site or at the Mills Gap Site. In addition:
 - a. Describe all precautions that you took against foreseeable acts or omissions of any such third parties, including but not limited to, Pechiney Plastic Packaging, Incorporated and the consequences that could foreseeably result from such acts or omissions.
 - b. Describe the care you exercised with respect to the hazardous materials at Respondent's facility. In other words, describe any affirmative acts you have taken to address the hazardous materials on your property, including any actions to mitigate continuing releases into the environment and to limit the threat posed to human health and the environment.
24. To the extent you have knowledge, for each and every past or current owner, operator, lessor, or lessee of any portion of Respondent's facility or the CTS Site or the Mills Gap Site, other than you:
 - a. Identify such person and the nature of their operation at Respondent's facility or the CTS Site or the Mills Gap Site or other facility;
 - b. Describe the portion of Respondent's facility or the CTS Site or the Mills Gap Site owned, operated, or leased by each such person and state the dates during which each portion was owned, operated or leased;
 - c. Provide copies of all documents evidencing or relating to such ownership, operation or lease, including but not limited to, purchase and sale agreements, deeds, leases, etc;
 - d. Provide all evidence that hazardous materials were released or were threatened to be released at Respondent's facility or the CTS Site or the Mills Gap Site during the period that they owned the facility.
25. Are you or your consultants planning to perform (or have you performed) any investigations of the soil, water (ground or surface), geology, hydrogeology, or air quality on or about the Respondent's facility? If so:

ENCLOSURE C

- a. Describe the nature and scope of these investigations;
 - b. Identify the persons who are undertaking or who will undertake these investigations;
 - c. Describe the purpose of the investigations;
 - d. State the dates of such investigations;
 - e. Describe as precisely as possible the locations at Respondent's facility where such investigations are taking or will take place.
26. Describe the nature/organizational structure of your business, including State incorporations, subsidiaries, parent companies, and number of employees.
27. Identify the officers, managers, and majority shareholders of Arden Electroplating and the nature of their management duties, and amount of shares held, respectively.
28. Identify all persons who may be responsible for the liabilities of Respondent or the CTS Site or the Mills Gap Site arising from or relating to the release or threatened release of hazardous substances at Respondent's facility, or the CTS Site or the Mills Gap Site including but not limited to successors, officers, and individuals.
29. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any question contained herein or who may be able to provide additional responsive documents, identify such persons (including contact information) and the additional information or documents that they may have.
30. For each and every question contained herein, if information or documents responsive to this Information Request are not in your possession, custody or control, then identify the persons from whom such information or documents may be obtained.

Lisa Ellis

Office of Environmental Accountability

US Environmental Protection Agency, Region 4

61 Forsyth Street, SW

Atlanta, Georgia 30303

Lisa,

The property at 54 Pinnors Cove Rd has never had anything to do with Arden Electroplating, Inc or CTS Corporation in any way. This property had two Mobil homes on it and my wife and I purchased this property from our then daughter-in-law's parents for rental income for us. I don't understand why this is in this at all. I wanted to clarify this. We still own this property and any other correspondence you need from me you can contact me at this address - Thomas Israel

81 Blackberry Ln

Mills River, NC. 28759

Question #1 - Thomas Israel

#2 - No one

#3 - No documents used

#4 - Arden Electroplating, Inc was in business for app. 1 yr from late 1985 to mid 1986. We did Zinc, Tin and Nickel plating.

#5 - All of Arden Electroplating, Inc. operations that are listed in #4 was performed on the CTS site.

#6 - Arden Electroplating, Inc did plating for the CTS at Asheville facility at the CTS site on Mills Gap Rd

Question #6 One of the three owners of Arden Electroplating, Inc was a former employee of CTS (myself - Thomas Israel) one was still employed at CTS (Norman Lewis) the other owner (Rick Parker) had no relation with CTS

Question #7 - Thomas Israel was General Foreman over the Machine Division of the CTS of Asheville Plant.

Norman Lewis was the QC Manager

Question #8 - Arden Electroplating, Inc did not have a facility at 54 Pinners Cove Rd. Arden Electroplating, Inc did purchase, generate, treat, and store at the CTS site,

8a - 111 Trichloroethane, purchased in 55 gal drums, used to clean parts, Muratic Acid purchased in 15 gal drums, used in plating line process, Sulfuric Acid purchased in 15 gal drums used in plating process, Nickel Sulfate and Nickel Chloride purchased in 55 gal drums used in plating process, Zinc Chloride purchased in 15 gal drums used in plating process, Stannate Tin purchased in 50 # bags used in plating process, Zinc Chromates purchased in 50 # drums used in plating process, Electro Cleaners and Soak Cleaners purchased in 55 gal drums used in plating process.

8b 111 Trichloroethane - liquid
Muratic Acid - liquid
Nickel Sulfate & Nickel Chloride - liquid
Zinc Chloride - liquid
Stannate Tin - Powder
Zinc Chromates - Powder
Electro and Soak Cleaners - Powder

Question #8c 1,1,1 Trichloroethane and Acids purchased from Tigar Chemicals
All other chemicals purchased from WA Reynolds Company
And Fred Gunn Chemical Company.

8d. All of these were used in cleaning of parts or in the
plating process. They were purchased when needed mostly
once a month. They were stored in fenced in area
on outside of building in back of plant.

Question #9 Arden Electroplating, Inc had no facility at 54 Pinners
Cove Road.

The chemical processes used at the CTS site consisted of

A Watts Nickel plating line

A dull tin (stannate Tin) line

A zinc chloride line

None of these processes used trichloroethylene (TCE)

perchloroethylene (PCE), or toluene. The only solvent used by

Arden Electroplating was the 1,1,1 Trichloroethane nor did Arden
Electroplating ever purchase any products containing TCE, PCE
or toluene.

Question #10 None of these were ever used at the CTS site or taken
to the property owned by me at 54 Pinners Cove Road.

Question #11 No dumping of waste or burial of waste was ever
done by Arden Electroplating Inc. or by its employees
anywhere.

Question #12 None was ever disposed, buried, or dumped at any site

Question #13 None

Question #14 None

Question #15 None

Question #16 None

- Question # 17 None
- Question # 18 None
- Question # 19 None
- Question # 20 local and state RCRA Permit
- Question # 21 I don't have any documentation
- Question # 22 I don't have any documentation
- Question # 23 None
- 23a None
- 23b All waste was treated by us to comply with all regulations and did not violate any of them
- Question # 24 I have no knowledge of this other than ETS and IRC
- 24a Do not know
- 24b Do not know
- 24c Do not know
- 24d Do not know
- Question # 25 No
- Question # 26 I have no business
- Question # 27 Ardau Electroplating Inc was dissolved in 1986 they were three officers - Rick Parker - President, Thomas Israel - Vice President and Norman Lewis - Secretary -
- Question # 28 Do not know
- Question # 29 Do not know
- Question # 30 Do not know

REFERENCE 3

LATITUDE AND LONGITUDE CALCULATION WORKSHEET #2

LI USING ENGINEER'S SCALE (1/60)

SITE NAME: CTS of Asheville, Inc. CERCLIS #: NCD 003 149 556

AKA: Mills Gap Road Contaminated Groundwater S SSID: n.a.

ADDRESS: Mills Gap Road

CITY: Asheville STATE: NC ZIP CODE: 28803

SITE REFERENCE POINT: NE corner of main Building

USGS QUAD MAP NAME: Skyland TOWNSHIP: - N/S RANGE: - E/W

SCALE: 1 : 24,000 MAP DATE: 1965 SECTION: - 1/4 - 1/4 - 1/4

MAP DATUM 1927 1983 (CIRCLE ONE) MERIDIAN: -

COORDINATES FROM LOWER RIGHT (SOUTHEAST) CORNER OF 7.5' MAP (attach photocopy)

LONGITUDE: 82 ° 30 ' 0.00 " LATITUDE: 35 ° 22 ' 30.00 "

COORDINATES FROM LOWER RIGHT (SOUTHEAST) CORNER OF 2.5' GRID CELL:

LONGITUDE: 82 ° 30 ' 0.00 " LATITUDE: 35 ° 27 ' 30.00 "

CALCULATIONS: LATITUDE (7.5' QUADRANGLE MAP)

A) NUMBER OF RULER GRADUATIONS FROM LATITUDE GRID LINE TO SITE REF POINT: 378

B) MULTIPLY (A) BY 0.3304 TO CONVERT TO SECONDS:

A X 0.3304 = 124.89 "

C) EXPRESS IN MINUTES AND SECONDS (1' = 60") : 2 ' 4.89 "

D) ADD TO STARTING LATITUDE: 35 ° 27 ' 30.00 " + 2 ' 4.89 "

SITE LATITUDE: 35 ° 29 ' 34.89 "
35.4930 °

CALCULATIONS: LONGITUDE (7.5' QUADRANGLE MAP)

A) NUMBER OF RULER GRADUATIONS FROM RIGHT LONGITUDE LINE TO SITE REF POINT: 112

B) MULTIPLY (A) BY 0.3304 TO CONVERT TO SECONDS:

A X 0.3304 = 37.00 "

C) EXPRESS IN MINUTES AND SECONDS (1' = 60") : 0 ' 37.00 "

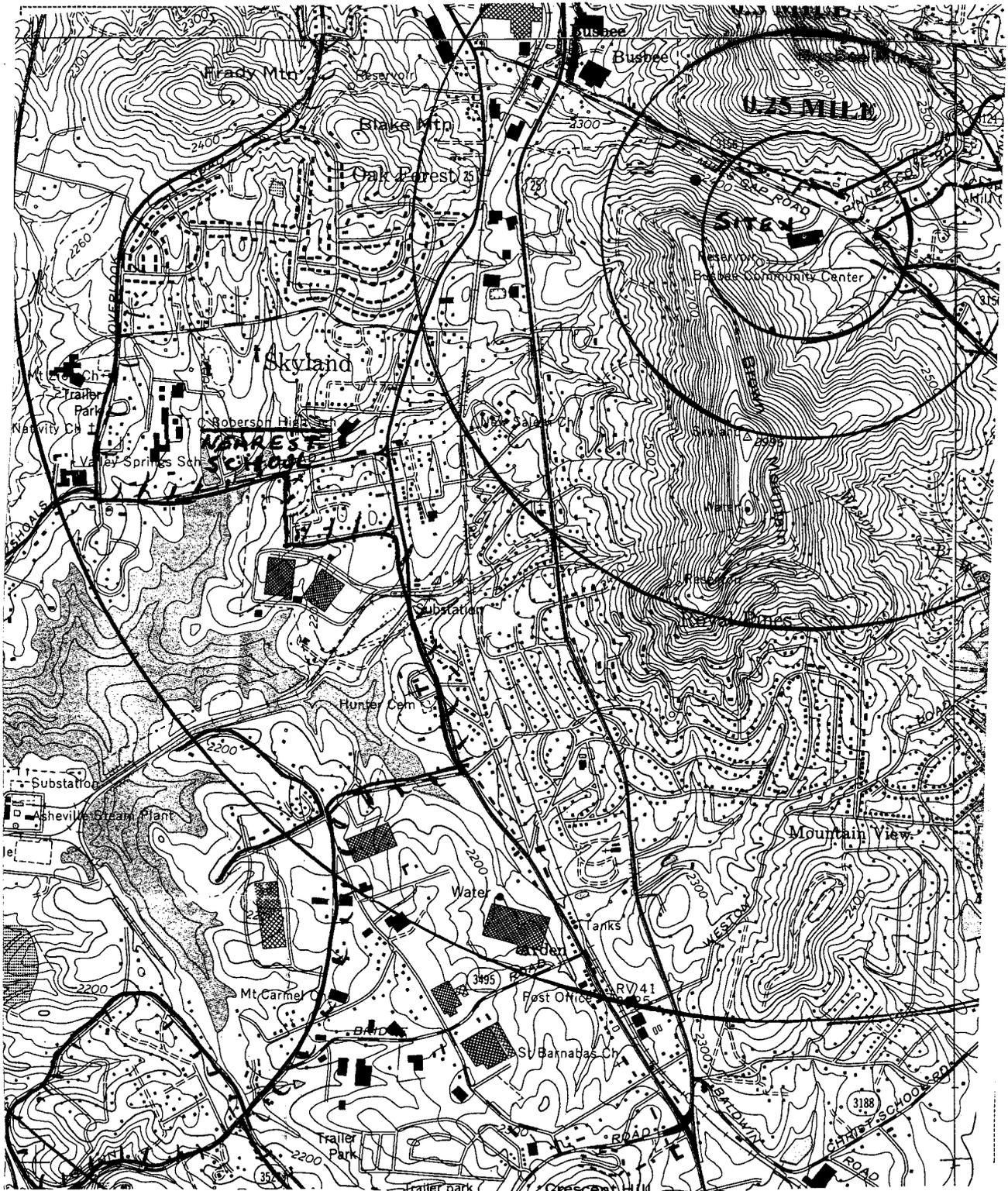
D) ADD TO STARTING LONGITUDE: 82 ° 30 ' 0.00 " + 0 ' 37.00 "

SITE LONGITUDE: 82 ° 30 ' 37.00 "
82.5103 °

INVESTIGATOR: Harry Zinn DATE: 6/22/2006

SITE NAME: CTS of Asheville, Inc.

NUMBER: NCD 003 149 556



TOPOGRAPHIC MAP QUADRANGLE NAME: Skyland SCALE: 1 : 24,000

COORDINATES FROM LOWER RIGHT (SOUTHEAST) CORNER OF 2.5' GRID CELL:

LATITUDE: 35 ° 27 ' 30.00 " LONGITUDE: 82 ° 30 ' 0.00 "
35.4583 ° 82.5000 °