Asheville Dyeing and Finishing/Anvil Knitwear Facility
Swannanoa, North Carolina
EPA ID # NCD 070 619 663

Revised NC HWS Comments on
Draft RCRA Facility Assessment Report (July 29, 2004)

Executive Summary

1) The text of the "Executive Summary" states that there are two AOC's listed in Table 1, but there is actually one. Figure 2 seems to show AOC 1A and AOC 1B. The HWS assumes these are the same two AOCs. At one time, Booz-Allen intended to designate a segment of Bee Tree Creek as an AOC, which adds to the confusion. (Photo #30 is labeled this way.) Booz-Allen should make these various references to the AOCs consistent.

2) Figure 1 appears to have been created by reproducing part of a USGS topographic quadrangle map. The USGS topographic map should be identified by name on Figure 1 or in the text of the report. The map should probably also be listed in the references.

3) In Table 1, Booz-Allen assigned a "release potential" to each SWMU or AOC. Booz-Allen should explain the criteria used for each of the three categories (i.e., low , medium, and high). If the process is complicated or difficult to communicate, a flow chart may be useful.

Section 3.0
Facility Description

4) The EPA ID number listed in the text is not correct. The correct EPA ID number is NCD 070 619 663.

Section 4.1
Waste Management Practices
Waste Water Treatment System (SWMU 12)

5) The fact that Anvil Knitwear discharges 1 million gallons of waste water per day brings up the subject of the source for this water. Booz-Allen should mention that Anvil Knitwear doesn't own or operate any groundwater production wells and doesn't use groundwater as either potable water or production water.

6) Booz-Allen should identify the municipality or regulatory agency that issued the facility's waste water permit (Permit S-021-01).

Section 4.2
Regulatory History

7) Each time the 1976 cleanup of Bee Tree Creek is mentioned, it's referred to as a "requested cleanup." Booz-Allen should mention the name of the agency that requested the cleanup and had oversight responsibilities.

8) While discussing SWMU 14, Booz Allen stated that the analytical results did not show high concentrations of "extractable inorganics." The HWS suggests that the analytical procedure used to analyze the samples (possibly EP toxicity, TCLP, or SPLP) be mentioned. In addition, the second clause of this same sentence (i.e., the same sentence that contains the "extractable inorganics" phrase) should probably be revised to clarify its intended meaning.

9) In this section of the RFA, Booz-Allen states that NC DENR collected soil, sediment, and leachate samples at SWMU 14, and a discussion of the analytical results follows. This information should be summarized in Section 6.14 - Old Dump Area also.

Section 5.1.2
Topography and Surface Water

10) A recreational pond is located about 1200 feet south of the Asheville D&F facility. The pond is in a municipal park behind (i.e., south of) the Owen Manufacturing Company. The Swannanoa River is immediately south of the recreational pond. Booz-Allen should include this information in Section 5.1.2 of the draft RFA report.

Section 6.0
SWMU and AOC Descriptions

11) In the description of each SWMU or AOC, Booz-Allen determines the likelihood that release pathways to various media are complete. Booz-Allen should discuss the criteria used to establish the low, medium, and high classifications. A flow chart may facilitate the communication of these concepts.

Section 6.9
SWMU 9 - Interior Floor Drains/Trench Drains

12) In the RFA, Booz-Allen recommends confirmatory sampling for SWMU 9-Interior Floor Drains/Trench Drains. During a conference call concerning the RFA (11/18/04), there was some confusion concerning the layout of the drainage system. If Anvil Knitwear has engineering drawings or plans showing the drainage system (particularly the segment(s) that are in the subsurface), they should be included in the RFA. However, the HWS is not recommending that these drawings or plans be created at this time.

Section 6.11
SWMU 11 – Sparging/SVE Remediation System

13) The newer air sparging/SVE system was installed to remediate a groundwater plume that is located beneath Anvil Knitwear's building. Because of this system, the risk of vapor intrusion into the building is assumed to be negligible. However, since the geometry of the groundwater plume and the effective radius of the remediation system are not known, this may not be an accurate assumption. The potential for a complete release pathway from contaminated groundwater to indoor air should be considered. Consequently, the HWS recommends that the possibility of a release pathway for air be raised above the 'low"

category. In addition, the HWS recommends confirmatory sampling at this unit for indoor air. These two recommendations should be discussed in the text of this section.

Section 6.14
SWMU 14 - Old Dump Area

14) Booz-Allen should define the phrase "ductile metallic material."

Attachment 1

15) The SWMU designations (i.e., the SWMU numbers) used in Attachment 1 are not consistent with the rest of the RFA report.

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