



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

LU-16J

Via E-mail and Certified Mail 7009 1680 0000 7621 2255
RETURN RECEIPT REQUESTED

July 23, 2018

Mr. Joseph M. Bianchi
Group EHS Manager
Amphenol Corporation
40-60 Delaware Avenue
Sidney, NY 13838

Subject: Franklin Power Products, Inc./Amphenol Corporation
Request for Ambient Air Investigation
Administrative Order on Consent, Docket # R8H-5-99-002
EPA ID# IND 044 587 848

Dear Mr. Bianchi:

Under Section VIII, Paragraph N (Additional Work) of the RCRA 3008(h) Administrative Order on Consent dated November 24, 1998 (Order), EPA has determined that Respondents Amphenol Corporation and Franklin Power Products, Inc., must perform Additional Work at the facility at 980 Hurricane Road in Franklin, Indiana (Facility). The Additional Work described in this letter is necessary to meet the purposes of the Order, including but not limited to, assuring the selected corrective measures address the actual and potential threats to human health and the environment presented by the actual and potential releases of hazardous wastes or hazardous constituents at or from the Facility.

Summary of Requested Work

By July 27, 2018, EPA requests that Respondents submit a work plan to delineate air quality conditions at the Facility related to VOC emissions from the groundwater recovery/air stripping remedial system. Respondents must determine whether on-Site VOC ambient air conditions exceed EPA risk-screening levels for Site-related VOCs. The analytical data at the property boundary should be compared with the following

EPA screening criteria for residential exposure (<https://semspub.epa.gov/work/HQ/197245.pdf>) and composite worker exposure (<https://semspub.epa.gov/work/HQ/197249.pdf>), respectively.

Purpose of Sampling Event

The primary objectives of the requested investigation are to:

- 1) Investigate whether ambient air at the Site is impacted by VOCs above risk-based screening levels,
- 2) Determine whether emissions from the groundwater remedial system venting pipe is a source of VOC contamination to ambient air, and
- 3) Determine the extent of VOC migration up to the property boundary in a downwind direction.

The sampling plan will help ensure that Respondents react quickly and make appropriate changes to control VOC emissions, as needed.

VOC Sampling Locations

While the remedial treatment system is operating:

- 1) One 8-hour time-integrated sample from within the vent pipe of the groundwater recovery and air stripping system, using a Summa canister (6L) with a flow rate adjusted to 200 milliliters (mL) per minute.
- 2) Sample on-Site ambient air using Summa canisters (6L)
- 3) VOC air measurements will be taken around the Site perimeter at downwind evenly-spaced locations at or near the property boundaries. Summa canisters will be placed at breathing height (4-6 feet above ground surface). The canisters should collect ambient air for an 8-hour period.
- 4) One duplicate sample should be located at one of the downwind Site perimeter locations.
- 5) Wind speed and direction will be recorded during the sampling event.

Analyte List

Samples will be analyzed for these Site-related constituents: vinyl chloride (VC), trans-1,2-dichloroethylene (trans-1,2-DCE), 1,1-dichloroethane (1,1-DCA), cis-1,2-dichloroethylene (cis-1,2-DCE), 1,2-dichloroethane (1,2-DCA), methylene chloride,

1,1,1- trichloroethane (1,1,1 TCA), trichloroethylene (TCE), and tetrachloroethylene (PCE).

Third-party Validation

Analytical results must be validated by a third-party.

Contingency Plan

Respondents shall prepare a contingency plan to mitigate emissions if VOC risk-screening levels for residential populations are exceeded at the downwind Site perimeter and if data establish that the VOC source is emissions from the groundwater recovery system.

As we have discussed, Amphenol and EPA will coordinate closely during plan development with the objective of Amphenol executing the Work Plan as quickly as possible, potentially this week and no later than August 3, 2018, weather permitting.

If you have any questions, please contact me at (312) 886-3020. Also, please feel free to contact Dr. Bhooma Sundar, EPA risk assessor, at (312) 886-1660 to assist you in the work plan development.

Sincerely,



Carolyn Bury
Project Manager
Corrective Action Section 2
Remediation and Re-use Branch

ecc: Brad Gentry, IWM Consulting Group, LLC.
Bhooma Sundar, RRB CAS2