

ATTACHMENT A

CORRECTIVE MEASURES IMPLEMENTATION PROGRAM  
SCOPE OF WORK  
FRANKLIN POWER PRODUCTS, INC./AMPHENOL

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PURPOSE

This Scope of Work (SOW) sets forth the requirements for the implementation for the design construction/installation, operation, maintenance and monitoring of the performance of the Corrective Measures selected by U.S. EPA in the RCRA Interim Final Decision (IFD) for the Marine Corporation of America/Amphenol Facility in Franklin, Indiana.

DESCRIPTION OF THE CORRECTIVE MEASURE

The major components of the corrective measure are:

- Implementation of institutional controls
- Operation of a groundwater recovery system
- Operation of a sparge/soil vapor extraction system
- Monitoring
- Investigation of possible contaminant migration to public water supply well field

Respondents shall design and implement the corrective measure to fulfill the requirements of the Consent Order and meet the performance standards set forth in an approved Final Design.

SCOPE

- TASK I Implementation of Institutional Controls  
TASK II Upgrade of Groundwater Recovery System  
TASK III Corrective Measures Final Design  
TASK IV: Investigation of Webb Well Field Contamination

TASK I: Implementation of Institutional Controls

Pursuant to Section VIII of the Consent Order, Respondents shall initiate institutional controls which include the following actions:

- A. A deed restriction shall be filed and recorded for the 15 acre property owned by Franklin Power Products, Inc. located at the intersection of Hurricane Road and Hamilton Avenue. The deed shall restrict future land use of this property to industrial/commercial use only, and restrict installation of Drinking water wells at the property.
- B. Standard confined space entry procedures shall be implemented for all sewer manholes on facility property, for storm sewer manholes at all off-site locations, and for all sanitary sewer manholes at Forsythe Street.

TASK II Upgrade of the Groundwater Recovery System.

Pursuant to Section VIII.E of the Consent Order, the Groundwater Recovery System shall be upgraded, reevaluated, and the results of the evaluation reported to U.S. EPA. Electric pumps shall be installed in the existing recovery wells, and an additional recovery well located west of MW-28 near the facility property boundary shall be installed. Upon completion of the upgrade, Respondents shall perform an evaluation of the system by measuring water levels at adjacent wells and piezometers, collecting other data as appropriate, and submit a report to U.S. EPA which presents the results of such evaluation and an as-built well design for the new recovery well.

TASK III Corrective Measure Final Design

Respondents shall collect pre-design data as needed, and perform a pilot study and other preliminary testing as needed to support a Final Design for the air sparge/soil vapor extraction (AS/SVE) system. Draft and Final Designs shall be submitted in accordance with Section VIII of the Consent Order, and at a minimum, include the following:

- A. Results of all testing and analysis of the pre-design investigations
  - 1. tables, laboratory reports, illustrations and discussion of results
- B. AS/SVE design
  - 1. location and design features
    - sparge wells

- SVE wells
- monitoring wells
- 2. schematic for vapor treatment system
- X 3. performance standards

- X C. Groundwater Recovery System
  - 1. performance standards

X Unless sufficient land use information pursuant to OSWER directive 9355.7-04 is provided which supports a future industrial/commercial land use projection, performance standards for the AS/SVE and the Groundwater recovery system shall correspond to cleanup standards based on a residential land use scenario. Secondary performance standards based on asymptotic contaminant reduction, and alternate system operation and shutdown keyed to contaminant levels, may be included.

- D. Monitoring program
  - 1. monitoring wells
    - locations
    - sampling schedule
    - list of analytes
  - 2. recovery wells, and treatment effluent
    - sampling schedule
    - list of analytes
    - water level measurements
  - 3. Storm sewer outlet
    - sampling schedule
    - list of analytes
  - 4. soil sampling
    - sampling schedule
    - list of analytes

TASK IV Investigation of possible contaminant migration from the Facility to Indiana-American Webb well field.  
Pursuant to Section VIII.I of the Consent Order, Respondents shall evaluate possible contaminant migration from the facility to the Indiana-American Webb Well Field, including the collection of additional data as needed, and submit a report presenting the results of the investigation. The report shall include all relevant data, rationale, and references to support the interpretations and conclusions.

#### QUALITY ASSURANCE/QUALITY CONTROL

All data developed under this Order shall be collected and analyzed in accordance with the Quality Assurance Project Plan (QAPP) dated May 25, 1991, or in accordance with U.S. EPA or ASTM

prescribed methods for any testing/analysis not included in the QAPP.

HEALTH AND SAFETY PLAN

All work performed under this Order shall be in accordance with the Health and Safety Plan dated October, 1988, supplemented as needed.