



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
RETURN RECEIPT REQUESTED

July 25, 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:

Thank you for preparing and submitting the *Ambient Air Investigation Work Plan Franklin Power Products, Inc./Amphenol Corporation*, dated July 25, 2018 ("Work Plan"). EPA appreciates the early submittal in response to our July 24, 2018 request for a work plan to investigate VOC conditions around the Amphenol Facility at 980 Hurricane Road in Franklin, Indiana. EPA conditionally approves the Work Plan with the following comments and conditions.

Comments:

- 1) Ensure that the remedial treatment system is operating normally during the sampling.
- 2 Page 2. *Proposed Sampling Procedures and Laboratory Analytical Methods*
 - EPA concurs with the flow regulator being set to a flow-rate of ~12.5 mL/minute rather than 200 mL/minute at the emissions pipe.
 - EPA assumes that the approach of installing a sampling port in the vent pipe described on page 2 would be the equivalent of placing the inlet of the

Summa canister inside the stack, in terms of reducing any dilution from ambient air.

3. Field SOP Item 3 (page 15), ambient air sample collection height:
 - The ambient sample collection height should be consistent with the height identified in the Work Plan (at 4-6 ft). The field SOP indicates collecting ambient air sample at 3-5 ft above ground.
4. Based on our conversation yesterday, Amphenol has obtained a one-liter Summa canister to collect a grab sample from the emissions pipe, or other application, as needed. We have discussed your concern about the potential for an issue with moisture during the 8-hour emissions collection.

Approval Conditions:

- 1) EPA's work plan request specified that sampling locations be determined based on prevailing wind direction on the date of the sampling. The proposed work plan identifies fixed sampling locations. Therefore, the work plan must be made flexible to ensure that sample locations account for wind direction.

For example, in the current plan, the eastern property boundary appears not to be adequately covered when wind is from the southwest, which is a typical summertime wind direction. EPA notes that the wind direction forecast for the next few days in Franklin predict wind direction to be from the southwest. In addition, based upon data from nearby airports, the trend is a southwest wind.


Condition One: The sampling locations must be flexible and be adjusted based upon the prevailing wind direction to ensure adequate coverage downwind of the emissions pipe.

- 2) The laboratory reporting levels for the analyte list are appropriately below the EPA screening criteria, except for TCE. The cancer risk-based screening criterion for ambient air for TCE is 0.47 ug/m³, whereas the Pace laboratory reporting limit is 0.54 ug/m³.

Condition Two: Amphenol must request that Pace meet a reporting limit of under 0.4 ug/m³, even if it must perform a SIMS method to attain this lower limit.

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
Motria Caudill, ATSDR
Conor Neal, RRB CAS2