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ATTACHMENT B

INTERIM FINAL DECISION  
FRANKLIN POWER PRODUCTS/AMPHENOL

INTERIM FINAL DECISION/RESPONSE TO COMMENTS

FOR

FRANKLIN POWER PRODUCTS/AMPHENOL FACILITY  
FRANKLIN, INDIANA  
IND 044 587 848

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
(U.S. EPA)



INTERIM FINAL DECISION/RESPONSE TO COMMENTS  
Franklin Power Products/Amphenol Facility  
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INTRODUCTION

The Statement of Basis developed by the United States Environmental Protection Agency (U.S. EPA) for the Franklin Power Product/Amphenol (FPP/A) Facility was presented for public comment during the period of April 15 to May 30, 1997. The facility is located at the corner of Hurricane Road and Hamilton Avenue in Franklin, Indiana. The Statement of Basis discussed several viable alternative remedies for cleaning up the facility and presented the remedy proposed by U.S. EPA. This Final Decision/Response to Comments document presents the comments provided by the public, U.S. EPA's responses to the comments, and also presents the remedy selected by U.S. EPA. The remedy selected by U.S. EPA is similar to the remedy proposed in the Statement of Basis, but has been modified as a result of additional information provided in "Report of an Evaluation of the On-site Recovery System", June 1997 submitted by the FPP/A Facility, FPP/A's comment, and Indiana-American Water Company's comment, which were provided in the public comment process.

SELECTED REMEDY

The selected remedy by U.S. EPA includes the institutional controls (facility deed restriction, restriction of water well drilling permits, and advisory of confined space entry to sewer manholes) to prevent contact with contaminants; operation of an existing on-site groundwater recovery system that is to be upgraded; implementation of an air sparge/soil vapor extraction (SVE) system that focuses on the focal point of contamination; and a monitoring system to evaluate the results.

The June 1997 report submitted by the Facility concluded that the recovery system requires expansion. The report proposed that the pneumatic pumps in the recovery wells be replaced with submersible electric pumps, and that an additional recovery well be installed at a location west of the existing recovery wells. The proposed upgrade of the groundwater recovery system is incorporated into the selected remedy. The approximate location of the additional recovery well (RW-4) is shown in figure 4-1.

The electric pumps will increase the drawdown of groundwater levels at the facility and minimize the infiltration of contaminated groundwater into the storm sewer at the facility, thereby minimizing the discharge of contaminated water to



Hurricane Creek. The higher pump rates and the additional recovery well of the upgraded system will draw in a greater expanse and volume of groundwater and create more effective capture of contaminated groundwater. Upon completion of the recovery system upgrade, the system will be reevaluated.

In its comment concerning the Statement of Basis, the Facility stated that the east-west aligned sparge/SVE system near the southern facility boundary (included in U.S. EPA's proposed remedy) may not provide significant additional remediation to that of the focused (north-south aligned) sparge/SVE system addressing the highly contaminated area near the sanitary sewer. The comment also suggested that upgrades to the on-site recovery system should also be considered.

U.S. EPA evaluated the Facility's comment and concluded that the additional recovery well located to the west of the existing recovery wells can provide equivalent, if not better, control of off-site groundwater contaminant migration than a line of sparge/SVE wells. A recovery well installation will also require less development work and have fewer maintenance complications than a sparge/SVE system. Further, a sparge/SVE system achieves the most effective remediation when directed at the focal point of contamination.

Therefore, the remedy selected by U.S. EPA does not include an east-west aligned sparge/SVE system; instead it incorporates a sparge/SVE system that focuses on the highly contaminated area at the sanitary sewer line. Additionally, this sparge/SVE system is extended to address the area where concentrations of volatile organic compounds generally exceed 10,000 micrograms per kilogram in soils and 5000 micrograms per liter in groundwater (see figure 4-1).

Indiana-American's comment stated that they had reason to believe that contamination at the facility is impacting their well field that provides water to the citizens of Franklin, and that they would submit their findings on this matter in the near future. U.S. EPA has received their hydrological report on this matter and finds that the report presents a reasonable possibility of such impact. Therefore, the remedy includes the requirement that possible contaminate migration from the facility to the well field be investigated further. If such investigation presents significant evidence that the facility is impacting the well field, appropriate corrective action will be required.

The remedy selected by U.S. EPA has several advantages. The remedy can be readily implemented thereby expediting the remediation of the site. The sparge/SVE system which addresses



the focal point of contamination has the potential to achieve a high degree of remediation. The overall remedy, which includes institutional controls to prevent contaminant contact, containment of contaminated groundwater, remediation of the major source of contamination, and monitoring to assess the results, provides protection to human health and the environment. As noted in the response to comments section, public water supply systems must meet drinking water standards.

#### COMMENTS/RESPONSES

Comment - Citizen inquired as to degree and nature of contamination near the southeast corner of facility and the associated health risks.

Response - Off-site groundwater contaminant concentrations at this location exceed State drinking water standards. However, Franklin residents are served by a commercial water supply system and consumption of the water is not expected. Since the contamination in this area is not of a highly toxic nature and occurs at depths of ten feet or more, no appreciable risk is incurred.

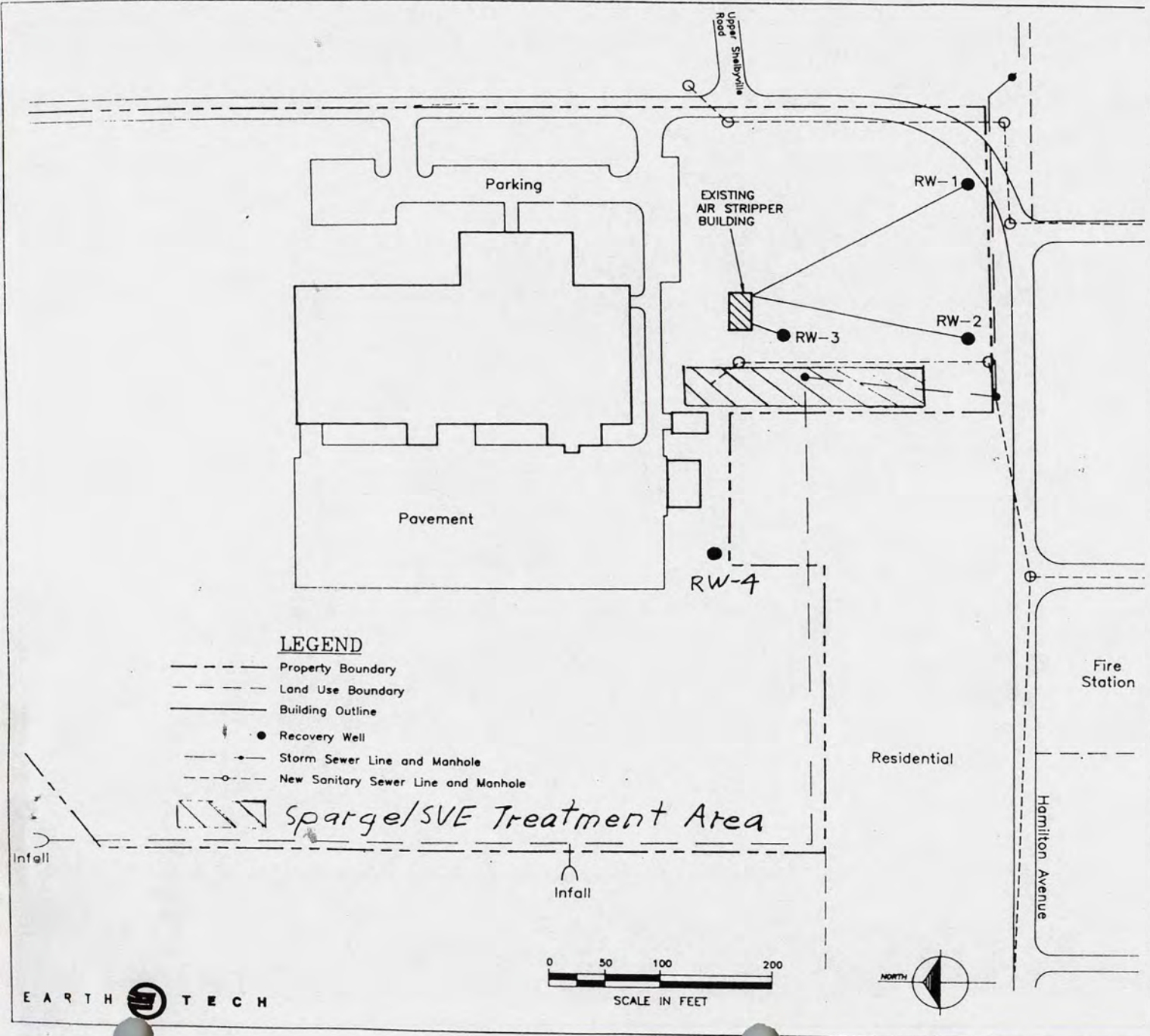
Comment - Citizen inquired as to how long the occurrence of the contamination at the facility had been known.

Response - This matter drew public attention in about 1984 when preliminary investigative activities and soil removal were performed at the facility.

Comment - Citizen inquired as to location and availability of public records so that the progress of the cleanup at the site can be followed.

Response - A Repository for the FPP/A Facility that contains the principal documents developed under the corrective action activities has been established in the Adult Reference Department, Johnson County Public Library, 401 State Street, Franklin, Indiana 46131. U.S. EPA will add critical documents to the repository as developed in the future. Interested parties should inquire at the front desk of the library for access to the repository.

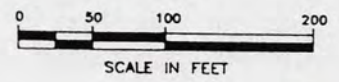
Comment - Local reporter called and stated that the Statement of Basis contained considerable jargon and asked for a general explanation of the proposed remedy. The reporter also inquired as to why such extensive time period is required to move through the corrective action process.



**LEGEND**

- Property Boundary
- Land Use Boundary
- Building Outline
- Recovery Well
- Storm Sewer Line and Manhole
- New Sanitary Sewer Line and Manhole

*Sparge/SVE Treatment Area*





Index To Administrative Record  
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Date	Author	Subject	Recipient
11/27/90		Administrative Order on Consent	
04/23/91	Kevin Pierard, USEPA	Ltr. re: USEPA review of the Quality Assurance Project Plan (QAPJP)	J. Michael Jarvis, Amphenol
05/13/91	Robert E. Aten, WW Engineering & Scien	Memo: Report of Activities for RFI/CMS, April, 1991	William Buller, USEPA
05/28/91	Robert E. Aten, WW Engineering & Scien	Memo: Revised Report of Activities for RFI/CMS, April, 1991	William Buller, USEPA
07/26/91	James H. Keith, WW Engineering & Scien	Ltr. re: Supplemental Information and Explanation for EPA QAPJP Comments	William Buller, USEPA
12/12/91	Susan Sylvester, USEPA	Ltr. re: USEPA approved, revised Quality Assurance project Plan dated 5/25/91	J. Michael Jarvis, Amphenol
07/01/92	Joseph M. Boyle, USEPA	Ltr. re: A copy of the Technical Memorandum (draft) dated 6/23/92	Michael Jarvis, Amphenol
07/06/92	James H. Keith, WW Engineering & Scien	Memo: Report of Activities for Former Amphenol RFI/CMS, June, 1992	William Buller, USEPA
09/02/92	Samuel S. Waldo, Amphenol	Ltr. re: Recent conversation with Susan Gard & Jim Keith	William Buller, USEPA
09/08/92	James H. Keith, WW Engineering & Scien	Memo: Report of Activities for Former Amphenol RFI/CMS, August 1992	William Buller, USEPA
09/09/92	Susan W. Gard, Curtis Publishing Co	Ltr. re: Former Bendix Facility, Hurricane Road Franklin, In.	William Buller, USEPA
10/16/92	Michael E. Sickels, IDEM	Ltr. re: RCRA Facility Investigation Phase II Work Plan	Susan Sylvester, USEPA
10/19/92	Joseph M. Boyle, USEPA	Ltr. re: Work Plan "Installation of Additional Monitoring Wells & Sampling, RFI	J. Michael Jarvis, Amphenol
10/26/92	James H. Keith, WW Engineering & Scien	Ltr. re: USEPA Region V written approval of Work Plan	William Buller, USEPA
11/09/92	James H. Keith, WW Engineering & Scien	Memo: Report of Activities for Former Amphenol RFI/CMS, October, 1992	William Buller, USEPA
11/23/92	James H. Keith, WW Engineering & Scien	Ltr. re: Completion of the Geoprobe study	William Buller, USEPA
12/09/92	James H. Keith, WW Engineering & Scien	Memo: Report of Activities for Former Amphenol RFI/CMS, November, 1992	William Buller, USEPA
12/16/92	James H. Keith, WW Engineering & Scien	Ltr. re: Telephone conversation, revised SOP for collecting ground water	William Buller, USEPA
12/21/92	Susan W. Gard, Franklin Power Prod	Ltr. re: Request for extension of time to submit draft RFI Report	William Buller, USEPA
12/28/92	James H. Keith, WW Engineering & Scien	Ltr. re: Telephone conversation, review of SOP for collecting ground water	William Buller, USEPA
01/06/93	James H. Keith, WW Engineering & Scien	Ltr. re: January 4, 1993 Telephone conversation	William Buller, USEPA
01/11/93	James H. Keith, WW Engineering & Scien	Memo: Report of Activities for Former Amphenol RFI/CMS, December, 1992	William Buller, USEPA
02/08/93	James H. Keith, WW Engineering & Scien	Memo: Report of Activities for Former Amphenol RFI/CMS, January, 1993	William Buller, USEPA
02/08/93	Michael E. Sickels, IDEM	Ltr. re: RCRA Facility Investigation Supplement to Phase II Work Plan	Susan Sylvester, USEPA
02/09/93	Joseph M. Boyle, USEPA	Ltr. re: USEPA receipt of 12/21/92 letter from Susan Gard requesting extension of time	J. Michael Jarvis, Amphenol
04/27/93	James H. Keith, WW Engineering & Scien	Ltr. re: Enclosed for review five copies of the draft RFI report	William Buller, USEPA
07/09/93	James H. Keith, WW Engineering & Scien	Ltr. re: Five copies of additional pages & revised pages & sheets to be inserted	William Buller, USEPA
08/20/93	Michael E. Sickels, IDEM	Ltr. re: IDEM review of Franklin Power Products' 4/27/93 RFI report	Susan Sylvester
10/06/93	James H. Keith, WW Engineering & Scien	Ltr. re: September 2, 1993 letter to Mr. Jarvis regarding the RFI Report	William Buller, USEPA
11/15/93	Joseph M. Boyle, USEPA	Ltr. re: USEPA review of RCRA Facility Investigation (RFI) report with revisions	J. Michael Jarvis, Amphenol
12/14/93	James H. Keith, WW Engineering & Scien	Ltr. re: Transmittal letter by WW Engineering & Science	Joseph M. Boyle, USEPA
01/21/94	Joseph M. Boyle, USEPA	Ltr. re: Response to 12/14/93, letter	J. Michael Jarvis, Amphenol
02/01/94	Samuel S. Waldo, Amphenol	Ltr. re: January 21, 1994 the collection of additional ground water samples	Joseph M. Boyle, USEPA
02/08/94	Bijan S. Saless, WW Engineering & Scien	Ltr. re: Summit Environmental Group, Inc.,	William Buller, USEPA



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Date	Author	Subject	Recipient
03/07/94	James H. Keith, WW Engineering & Scien	Ltr. re: Result of 3/3/94 telephone conversation	William Buller, USEPA
03/11/94	Kevin M. Pierard, USEPA	Ltr. re: Follow-up to the 2/24/94 telephone conference	Samuel S. Waldo, Amphenol
03/25/94	Samuel S. Waldo, Amphenol	Ltr. re: AOC - letter of 3/11/94	Kevin M. Rierard, USEPA
04/22/94	Kevin M. Pierard, USEPA	Ltr. re: USEPA receipt of Amphenol letter dated 3/25/94	Samuel S. Waldo, Amphenol
04/28/94	Samuel S. Waldo, Amphenol	Ltr. re: Facsimile copy of letter of 4/22/94 to Amphenol	Kevin M. Pierard, USEPA
05/17/94	James H. Keith, WW Engineering & Scien	Ltr. re: Material submitted in response to USEPA letter dated 3/11/94	William Buller, USEPA
06/14/94	James H. Keith, WW Engineering & Scien	Ltr. re: Copies of updated and revised draft RFI report	William Buller, USEPA
06/14/94	WW Engineering and Science	Supplemental Work Plan	Amphenol/USEPA
06/16/94	James H. Keith, WW Engineering & Scien	Ltr. re: Material omitted from 06/14/94 submittal for the draft RFI report	William Buller, USEPA
07/19/94	Kevin Pierard, USEPA	Ltr. re: RCRA Facility Investigation (RFI) Report	Michael J. Jarvis, Amphenol
07/22/94	William Buller, USEPA	Ltr. re: Telephone conversation with Samuel Waldo on 07/20/94	Michael J. Jarvis, Amphenol
08/02/94	Samuel S. Waldo, Amphenol	Ltr. re: USEPA letter received by fax on 07/22/94	Kevin Pierard, USEPA
08/30/94	Kevin Pierard, USEPA	Ltr. re: USEPA letter dated 07/22/94 regarding Corrective Measures Study (CMS)	Samuel S. Waldo, Amphenol
09/02/94	Samuel S. Waldo, Amphenol	Ltr. re: Corrective Measures Study (CMS) Work Plan	Kevin Pierard, USEPA
09/07/94	Samuel S. Waldo, Amphenol	Ltr. re: AOC EPA letter to Amphenol regarding letter dated 09/06/94	Kevin Pierard, USEPA
09/09/94	Michael E. Sickels, IDEM	Ltr. re: RCRA Facility Investigation Draft Corrective Measures Study Work Plan	Kevin Pierard, USEPA
11/14/94	Uylaine E. McMahan, USEPA	Ltr. re: AOC	Samuel S. Waldo, Amphenol
11/23/94	Samuel S. Waldo, Amphenol	Ltr. re: Receipt of 11/21/94 letter dated 11/14/94	Uylaine E. McMahan, USEPA
11/28/94	William Buller, USEPA	Ltr. re: USEPA review of Work Plan for a Corrective Measures Study (CMS)	Samuel S. Waldo, Amphenol
12/02/94	Samuel S. Waldo, Amphenol	Ltr. re: AOC telephone conversation of 11/30/94 & 12/02/94	William Buller, USEPA
12/07/94	Samuel S. Waldo, Amphenol	Ltr. re: AOC/ letter of 11/28/94, approving the CMS Work Plan	William Buller, USEPA
12/20/94	Uylaine McMahan, USEPA	Ltr. re: Administrative Order on Consent Amphenol Corp. response of 11/23/94	Samuel S. Waldo, Amphenol
01/05/95	James H. Keith, Amphenol	Memo: Report of CMS Activities for RFI/CMS	William Buller, USEPA
01/12/95	James H. Keith, Amphenol	Ltr. re: Amphenol RFI report, results of soil sampling & analysis	William Buller, USEPA
03/06/95	James H. Keith, Amphenol	Ltr. re: Draft Report-Corrective Measures Study	William Buller, USEPA
08/24/95	William Buller, USEPA	Ltr. re: Corrective Measures Study Draft Report	Samuel S. Waldo, Amphenol
09/22/95	Samuel S. Waldo, Amphenol	Ltr. re: Corrective Measures Study (CMS) Draft Report	William Buller, USEPA
11/14/95	Paul Little, USEPA	Ltr. re: AOC dated 11/27/90	Samuel S. Waldo, Amphenol
11/30/95	Samuel S. Waldo, Amphenol	Ltr. re: AOC dated 11/27/90	Paul Little, USEPA
12/15/95	Plinio Perez, Amphenol Counsel	Ltr. re: AOC & letter dated 9/22/95 from S. Waldo to W. Buller	Lawrence Johnson, USEPA Co
02/09/96	Samuel S. Waldo, Amphenol	Ltr. re: AOC dated 11/27/90	Paul Little, USEPA
03/12/96	Samuel S. Waldo, Amphenol	Ltr. re: AOC dated 11/27/90	William Buller, USEPA
03/26/96	Samuel S. Waldo, Amphenol	Ltr. re: AOC dated 11/27/90	Paul Little, USEPA
04/02/96	James H. Keith, Earth Tech	Memo : Report of additional CMS Activities for RFI/CMS, March 1996	William Buller, USEPA



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05/03/96	James H. Keith, Earth Tech	Memo: Report of additional CMS Activities for RFI/CMS, April 1996	William Buller, USEPA
05/28/96	Paul Little, USEPA	Ltr. re: Franklin Power Products/Amphenol	Samuel Waldo, Amphenol
06/03/96	James H. Keith, Earth Tech	Memo: Report of additional CMS Activities for RFI/CMS May 1996	William Buller, USEPA
06/14/96	Samuel S. Waldo, Amphenol	Ltr. re: AOC dated 11/27/90-report of Additional Corrective Measures Studies	Paul Little, USEPA
06/17/96	James H. Keith, Earth Tech	Ltr. re: Copies of report of Additional Corrective Measures Studies	William Buller, USEPA
09/12/96	William Buller, USEPA	Ltr. re: AOC dated 11/27/90	Samuel Waldo, Amphenol
10/15/96	James H. Keith, Earth Tech	Ltr. re: AOC dated 11/27/90-Additional Corrective Measures Studies	Paul Little, USEPA
11/01/96	William Buller, USEPA	Ltr. re: AOC dated 11/27/90	Samuel Waldo, Amphenol
11/19/96	James H. Keith, Earth Tech	Ltr. re: AOC dated 11/27/96-report of Additional Corrective Measures Studies	Paul Little, USEPA
11/25/96	James H. Keith, Earth Tech	Ltr. re: AOC dated 11/27/90-report of Shallow Ground Water Sampling	Paul Little, USEPA
11/27/96	Samuel S. Waldo, Amphenol	Ltr. re: On Site Recovery System Evaluation Work Plan	William Buller, USEPA
12/11/96	William Buller, USEPA	Ltr. re: Administrative Order on Consent (dated 11/27/90)	Samuel Waldo
01/02/97	Samuel S. Waldo, Amphenol	Ltr. re: Future Land Use Considerations-attached Response to OSWER Directive No. 9355.7-04	William Buller, USEPA
01/15/97	William Buller, USEPA	Ltr. re: Administrative Order on Consent (dated 11/27/90)	Samuel Waldo, Amphenol
01/28/97	Samuel S. Waldo, Amphenol	Ltr. re: On Site Recovery System Evaluation Work Plan	William Buller, USEPA
02/25/97	Paul Little, USEPA	Ltr. re: Administrative Order on Consent (dated 11/27/90)	Samuel S. Waldo, Amphenol
03/17/97	Samuel S. Waldo, Amphenol	Ltr. re: On Site Recovery System Evaluation Work Plan	William Buller, USEPA
04/02/97	William Buller, USEPA	Franklin Power Products/Amphenol Facility Corrective Action-Statement of Basis	Michael E. Sickels, IDEM
04/02/97	William Buller, USEPA	Ltr. re: Corrective Action-Statement of Basis Franklin Power Products/Amphenol	David C. Hudak, US Fish & Citizens
04/04/97	Dave Novak, USEPA	Ltr. re: USEPA proposing a remedy for cleanup of soil and ground-water	William Buller, USEPA
04/10/97	James H. Keith, Earth Tech	Memo: Report of Onsite Recovery System Evaluation Activities	William Buller, USEPA
04/18/97	Samuel S. Waldo, Amphenol	Ltr. re: On Site Recovery System Evaluation Work Plan -Progress Report	David Novak, USEPA
05/28/97	Samuel S. Waldo, Amphenol	Ltr. re: Corrective Action-Statement of Basis	Paul Little, USEPA
06/10/97	James H. Keith, Earth Tech	Ltr. re: Administrative Order on Consent (AOC) dated 11/27/90	William Buller, USEPA
07/07/97	James H. Keith, Earth Tech	Memo: Report of Onsite Recovery System Evaluation Activities	William Buller, USEPA
07/09/97	Eric W. Thornburg, Ind. Amer. Water	Ltr. re: Contaminated Groundwater and Soil Franklin Power Products/Amphenol Facility	William Buller, USEPA