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 7671 1777
RETURN RECEIPT REQUESTED

December 11, 2018

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

Mr. Matt Kupcak
Director, Global Environmental Programs
BorgWarner Inc.
3850 Hamlin Road
Auburn Hills, MI 48326

Subject: Franklin Power Products, Inc./Amphenol Corporation
Request for Off-Site Interim Measure Work Plan
Administrative Order on Consent, Docket # R8H-5-99-002
EPA ID# IND 044 587 848

Dear Mr. Bianchi and Mr. Kupcak:

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. (FPP/Amphenol) must perform Additional Work at the facility at 980 Hurricane Road in Franklin, Indiana ("Facility" or "Site"). 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.

Recent environmental media sampling along North Forsythe St. and portions of Hamilton Ave., Ross Court, and Glendale Dr. south of the former Amphenol Corp. facility identified significantly elevated levels of volatile organic compound (VOC) vapors in sewer bedding soil, street rights-of-way soil, sewers, and VOC contamination of groundwater. VOC concentrations are elevated above vapor intrusion risk-based screening levels; groundwater is also elevated above maximum contaminant levels.

Amphenol Corporation (Amphenol) has indicated its intent to perform an interim measure (IM) remedy to address residual off-Site contamination in the neighborhood south of the Facility, referred to as the Study Area in Corrective Action documents for this Site. Amphenol described the proposed remedy conceptually to EPA as the removal of contaminated media around the sewer system and replacement of sewers along a portion of North Forsythe St. to eliminate or mitigate risk of vapor intrusion. However, it is unclear that off-Site contaminated media needing remediation is confined to North Forsythe St. Additional sampling is needed to identify the areal extent to be covered by the remedial design plan. This letter requests that Amphenol submit a detailed remedial design work plan ("work plan") including such sampling for EPA approval. Upon approval, EPA will require that Amphenol begin work as soon as possible.

The purpose of the sampling in the neighborhood south of the Facility was to determine the condition of historically contaminated off-site environmental media in the Study Area, and whether residual VOC contaminated media exceeded risk-based residential screening values. The sampling was also performed to assess the extent of off-Site impacts. However, the investigation was not comprehensive, and the complete extent of off-Site impacts was not determined. The sample results are being used to identify buildings, primarily homes, needing indoor air vapor intrusion sampling. To date, of the subset of homes sampled, some have sub-slab and indoor air VOC levels above IDEM Risk-based Closure Levels and need sub-slab vapor depressurization systems and other remedial measures, underscoring the need for remediation of impacted media.

Summary of Requested Work

Amphenol Corp must prepare and submit a work plan to EPA that describes its proposed approach to interim measures to address off-Site contaminated environmental media. The work plan must include proposed risk-based Corrective Action objectives for incorporation into the remedial design.

The work plan must include, but not be limited to, the elements described below.

1) Design-level data Insufficient information is currently available to design the remedy. Amphenol must collect design-level information, including sampling to establish the proposed vertical, horizontal, eastern/western and southern extent of the remedial area. The work plan must propose the approach to delineating the extent of VOC-impacted media, including field and analytical methods. The impacted media to be analyzed includes sewer bedding soil, street rights-of-way

soil, and groundwater. Data collection may include sampling on residential and other private properties.

Amphenol may prepare and submit a sampling plan to collect design-level data to EPA in advance of the final proposed work plan. Data from the sampling event must be provided to EPA upon receipt and third-party validation. EPA will then determine whether additional characterization is required to determine the remedial extent or to refine the remedial design elements.

2) Corrective Action Objectives Amphenol must propose risk-based Corrective Action Objectives (CAOs) for each medium and incorporate these into the remedial design. For example, because contaminated soil is a source of contamination to groundwater, the CAO for soil should meet groundwater protection standards and the CAO for groundwater should include MCLs and VISLs. The CAOs will be used along with confirmation sampling data following cleanup to verify whether the IM is complete.

3) Construction Design Amphenol must provide a complete description of construction design for all phases of the remediation, including engineering design drawings, waste disposal characterization data and profiles, and comprehensive documentation of instructions to contractors. All planned restoration must be included and clean backfill is required. In addition, as-built drawings are required upon completion of construction for EPA review and approval.

4) Materials Management Plan (MMP) Amphenol must include a MMP for all contaminated materials to be excavated and handled that require proper disposal in accordance with local, State, and Federal regulations based on waste classification. The MMP must include a plan for handling any non-aqueous phase liquids encountered.

5) Best Management Practices (BMPs) Amphenol must incorporate BMPs into the construction plan, including the monitoring and controlling releases of VOC vapors and fugitive dust, and other BMPs such as erosion control. Details such as an air monitoring plan with contingency measures must be included.

6) Storm Water Pollution Prevention Plan (SWPPP) Amphenol must prepare and submit a SWPPP to IDEM and obtain a permit for Storm Water Discharges from Construction Site Activities. EPA must be copied on the proposed plan.

7) Permits The work plan must include a list of permits needed and obtained, including for excavation and traffic control. All needed permits must be obtained prior to mobilization to the Site.

8) Access The work plan must include access needs and Amphenol's plan to obtain access.

9) Public notification The work plan must include how the public will be notified of work including schedules, and whether sewer connections will be interrupted and the plan for accommodating households during periods of interruption. The plan should include a description of how Amphenol will coordinate with the City of Franklin.

10) Confirmation sampling Following removal, Amphenol must perform confirmation sampling to verify that the excavation limits are consistent with the CAOs.

11) Existing Structures and Utilities The plan must include measures for protection and/or replacement of existing structures and property, including utility infrastructure, driveways, sidewalks, yards, trees, etc.

12) Health and Safety Plan (HSP) The work plan must include a HSP that covers controlling potential exposures in the neighborhood, hazardous materials training requirements of contractors, and a traffic safety plan.

13) Schedule The plan must include a proposed schedule of all activities.

Quality Assurance

Previously approved quality assurance (QA) measures may be referenced in the work plan; references must be explicit. New QA measures must be proposed in the work plan. Please refer to EPA's QA/R-5, *EPA Requirements for Quality Assurance Project Plans* (EPA 2001) found at https://www.epa.gov/sites/production/files/2016-06/documents/r5-final_0.pdf. All samples must be analyzed by a laboratory with appropriate ELAP certification, as specified in the guidance. Please also refer to *Guidance for Quality Assurance Project Plans*, EPA QA/G-5 (EPA 2002) when developing the QA/Quality Control portions of the Work Plan.

By January 25, 2019, EPA requests that you submit an Off-Site Interim Measure Remedial Design Work Plan as described above.

If you have any questions, please contact me at (312) 886-3020.

Sincerely,

Carolyn Bury

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

ecc: Brad Gentry, IWM Consulting Group, LLC.
Don Stilz, IDEM
Bhooma Sundar, RRB CAS2
Conor Neal, RRB CAS2
Motria Caudill, ATSDR