



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 2422  
RETURN RECEIPT REQUESTED

February 21, 2019  
Mr. Joseph M. Bianchi  
Group EHS Manager  
Amphenol Corporation  
40-60 Delaware Avenue  
Sidney, NY 13838

Subject: Conditional Approval *Design-Level Data Soil Investigation Work Plan* (Work Plan), *Franklin Power Products, Inc./Amphenol Corporation*, dated February 19, 2019  
Administrative Order on Consent, Docket # R8H-5-99-00  
EPA ID# IND 044 587 848

Dear Mr. Bianchi:

Thank you for preparing and submitting the document *Design-Level Data Soil Investigation Work Plan* ("Work Plan"), dated February 19, 2019. The Work Plan incorporates EPA's comments on the draft version of the work plan, dated January 25, 2019. EPA conveyed its comments in a February 6, 2019 email, and during a discussion held later that day. The data set that will result from the Work Plan execution will be used to:

- 1) determine whether additional sampling is needed to characterize the nature and extent of soil contamination around the sewer lines, and
- 2) inform the interim measure remedial design.

The February 19, 2019 Work Plan is approved with the following comments.

**Comments:**

- 1) Based on clarifying information provided by IWM Consulting Group yesterday, EPA understands that PID measurements will be used in all areas to determine whether additional samples should be collected (beyond the pre-determined intervals).

- 2) IWM also clarified that evidence of NAPL will include PID readings and sheens or droplets of black/brown/yellow/clear fluid that have a solvent odor within the soil matrix.

If you have any questions, please contact me at (312) 886-3020. Also, please feel free to contact Conor Neal, EPA hydrogeologist, at (312) 886-7193 with any questions.

Sincerely,



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

Enclosure

cc: Matt Kupcak, BorgWarner, Inc. Certified Mail 7009 1680 0000 7671 2415

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