



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 7621 1753
RETURN RECEIPT REQUESTED

September 27, 2018

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

Subject: Conditional Approval *Vapor Intrusion Investigation – Exterior Soil Gas Sampling Work Plan Franklin Power Products, Inc./Amphenol Corporation*
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 *Vapor Intrusion Investigation – Exterior Soil Gas Sampling Work Plan Franklin Power Products, Inc./Amphenol Corporation*, dated September 24, 2018 (“Work Plan”). The Work Plan is a component of a broader vapor intrusion (VI) investigation in the residential area near the former Franklin Power Products, Inc./Amphenol Corporation facility (“facility” or “site”).

Comments:

- 1) Include a discussion of localized sewer conditions (cracks, fissures, etc.) with the analysis of utility bedding soil samples results.
- 2) The soil gas sample points will be approximately six feet bgs to correspond to the average basement depth. This is also generally the mid-point between the water table and the ground surface.
- 3) A ten-minute grab sample is approved, however, based on data evaluation, a longer sample duration may be required at selected locations in a future phase of investigation to refine the conceptual site model.
- 4) EPA will review the sewer and soil gas data lines of evidence with Amphenol to determine the scope of homes where the vapor intrusion (VI) pathway may be

complete and to identify the next steps in the investigation. We will analyze the data using EPA and IDEM risk screening-values.

- 5) Please refer to the document *Guidance for Documenting the Investigation of Utility Corridors*, WDNR, October 2013 at <https://semspub.epa.gov/work/05/927674.pdf>, specifically the discussion on page 3 in the section "Refine Site Conceptual Model through Field Work" as a basis for integrating the data collected in this Work Plan into the CSM for the Site.

Approval Conditions:

- 1) **Condition One:** Provide a schedule as an addendum to this Work Plan by October 3, 2018.
- 2) **Condition Two:** Prior to sampling, IWM should measure the depth to the top of the sewer pipe in nearby manholes and use observations from the borings to confirm whether they are drilling in native soils or sewer backfill sands and gravels before sampling. Log the results.
- 3) **Condition Three:** Revise the Appendix A data collection sheet to be medium-specific and project-specific before using it in the field.
- 4) **Condition Four:** The soil gas sampling locations do not provide sufficient coverage in the Glendale Drive and Ross Court areas. While evidence does not suggest that these areas are impacted, the investigation must be complete. Add three soil gas sample points around Glendale Drive at the mid-points of the south, west, and east sides of the (court-shaped) street, as discussed by phone on 9-27-18, and one sample point along Ross Court near manhole 250042 on the north side of the street. In addition, add two soil gas sewer backfill samples on Glendale Drive where the sewer line breaks are represented by red diamonds on Figure 4.
- 5) **Condition Five:** Purge and helium leak tests must to be completed just before sampling (not in advance).

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 with VI investigation questions.

Sincerely,

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

cc: Matt Kupcak, BorgWarner, Inc. Certified Mail 7009 1680 0000 7621 1760

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

