



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 2385
RETURN RECEIPT REQUESTED

October 23, 2018

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

Subject: Conditional Approval *Off-site Groundwater Investigation Work Plan Franklin Power Products, Inc./Amphenol Corporation*, dated October 18, 2018
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 *Off-site Groundwater Investigation Work Plan Franklin Power Products, Inc./Amphenol Corporation*, dated October 18, 2018 ("Work Plan"). The groundwater data will contribute information to the vapor intrusion investigation in the residential area near the former Franklin Power Products, Inc./Amphenol Corporation facility and support the understanding of current off-site conditions. EPA reviewed the proposed Work Plan and discussed the proposed Work Plan with Amphenol and IWM Consulting Group, resulting in the following comments and approval conditions.

Comments:

- 1) The report should include a table comparing groundwater concentrations to both MCLs and VISLs.
- 2) Amphenol will initially advance each boring to the bottom of Unit B/Top of Unit C and then determine where the screened interval (or how many intervals) will be sampled. If it is determined that the saturated unit is less than five feet thick, then one temporary well will be installed at the top of the saturated zone (~1.75 feet of screen below the top of the observed saturated zone and ~0.25 feet of screen above the top of the saturated zone). If the saturated unit is greater than

five feet thick, then one two-foot screen will be installed at the base of saturated Unit B and then a second boring will be installed adjacent to the first boring to facilitate the installation of the shallow screen at the top of the saturated zone.

- 3) The borings/temporary wells will be sampled a minimum of 12 hours following installation.
- 4) If bailers are used rather than a submersible pump due to slow recovery rate and minimal volume, they will be bottom-loading disposable polyethylene bailers, preferentially with a double-check valve.
- 5) If a monitoring well is pumped dry before stabilization criteria are met, the well will be allowed to refill and a sample may be collected without meeting all stabilization criteria.
- 6) Since submitting the Work Plan, Amphenol has revised Figure 2 to include sample identification and will provide the revised figure to EPA this week.
- 7) *Sample Identification, Collection, & Analysis* (page 5) – The identified one MS/MSD per 20 samples is consistent with EPA requirements. However, one field duplicate *per 10* samples is required, not one per 20 samples, as stated.

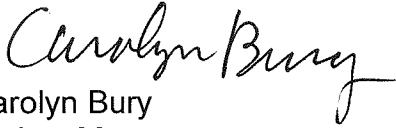
Approval Conditions:

- 1) **Condition One:** Until the data are reviewed, no wells west of Forsythe St. may be considered as background wells. Either MW-9 or MW-26 can be used as a background well north of the Site, following redevelopment.
- 2) **Condition Two:** The statement that EPA agreed that the laboratory's Method Detection Limit (MDL) for vinyl chloride (VC) is acceptable should be qualified. The MDL for VC is above the Target Groundwater Concentration for Residential Vapor Intrusion Screening Level (VISL) but below the MCL. VC, which is on the analyte list due to being present, has been measured in low concentrations in Site-related media compared to PCE and TCE, and is not considered to be a risk-driver. Nonetheless, since the MDL for vinyl chloride is greater than the VISL, Amphenol should evaluate VI (with soil gas sampling) if the result is at or above the MDL.
- 3) **Condition Three:** One field duplicate per 10 samples is required.

4) Condition Four: Temporary wells should be two-inch wells where feasible.

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

cc: Matt Kupcak, BorgWarner, Inc. Certified Mail 7009 1680 0000 7621 2378

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

