



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
INSPECTOR GENERAL

June 27, 2019

MEMORANDUM

SUBJECT: Management Alert: Certain Risk Communication Information for Community Not Up to Date for Amphenol/Franklin Power Products Site in Franklin, Indiana Report No. 19-N-0217

FROM: Tina Lovingood, Director
Land Cleanup and Waste Management Directorate
Office of Audit and Evaluation

A handwritten signature in black ink, appearing to read "Christina Lovingsood", is written over the printed name of Tina Lovingood.

TO: Cathy Stepp, Regional Administrator
Region 5

Barry Breen, Acting Assistant Administrator
Office of Land and Emergency Management

Summary

While conducting the *Audit of Communication of Human Health Risks Posed by Sites in the Office of Land and Emergency Management's Programs* (Project No. OA&E-FY19-0031), the U.S. Environmental Protection Agency's (EPA's) Office of Inspector General (OIG) decided to issue a management alert informing the agency of our discovery that the [Cleanups in My Community](#) public website is not depicting the most up-to-date risk information for the Amphenol/Franklin Power Products (hereafter referred to as Amphenol) site in Franklin, Indiana. The milestones¹ on the EPA's website show both the human health exposure² and contaminated groundwater migration³ as "controlled" when the EPA's Corrective Action Project Manager, Corrective Action Section Chief, and Branch Chief for Region 5 have had information since 2018 that it should no longer be identified as "controlled."

The OIG is alerting you to this matter because impacted communities rely on the EPA's Cleanups in My Community website. At that website, individuals can gather information about local sources of pollution to make informed decisions, such as for a home purchase or sale. The OIG is issuing this report because the EPA should convey the most accurate, reliable and up-to-date information on matters related to public health.

¹ Milestones in this case refers to the EPA's Environmental Indicators. Environmental Indicators are measures used by the EPA's Resource Conservation and Recovery Act (RCRA) Corrective Action Program to track progress at Corrective Action sites in environmental terms.

² The EPA defines human health exposure on its [website](#) as "controlled" when people near a particular facility are not exposed to unacceptable levels of contaminants.

³ The EPA defines contaminated groundwater migration on its [website](#) as "controlled" when contaminated groundwater does not spread and further contaminate groundwater resources.

Scope and Methodology

We conducted our work from November 2018 to June 2019. We reviewed EPA Amphenol site documentation, EPA guidance and other documentation on environmental indicators, conducted a site visit in May 2019, and interviewed regional staff. This report does not constitute an audit done in accordance with generally accepted government auditing standards.

Background

The Amphenol site is located about 20 miles south of Indianapolis, Indiana (see Appendix A). Amphenol became a RCRA site in 1990, and the site was listed as “controlled” in 2000. The Amphenol site is surrounded by other industrial and residential properties. Waste was released at this site and into the sanitary system and ground for 20 years. Hazardous contaminants migrated through the sewer system, which led to the development of a groundwater plume⁴ beneath homes.

The EPA’s Cleanups in My Community website is an application designed for public use. The purpose of this website is to put all cleanup information in one place, with related content, and provide easy access, a better understanding, and improved analysis of sites in one’s community.

The website maps, lists and provides cleanup progress profiles for sites, facilities and properties that have been contaminated by hazardous materials and are being, or have been, cleaned up under the Superfund, RCRA or Brownfields cleanup programs. The information can help members of the public understand what is happening in their community, what has happened, and potential health or environmental impacts at the individual cleanup sites.

The EPA has ongoing work at the Amphenol site, and there is an active EPA technical investigation to determine where and to what extent contamination exists in the surrounding community. Yet, the environmental indicators—referred to as “milestones” on the Cleanups in My Community website for the RCRA corrective action site progress profile and the RCRAInfo status for the Amphenol site—still list the assessment date⁵ as January 21, 2000.⁶ The milestones should tell the public whether: (1) human exposure is “under control” and (2) contaminated groundwater migration is “under control” (see Figure 1). According to the guidance on the EPA’s RCRA information forms, the status must be changed when the EPA becomes aware of contrary information.

⁴ If there is a continuous source of contamination entering moving groundwater, an area of contaminated groundwater, called a plume, can form.

⁵ The assessment date is the point in time the environmental indicators are determined to be “under control” or “not under control,” or when it is determined that more information is needed.

⁶ As of June 13, 2019.

Figure 1. EPA website excerpt of milestone status for the Amphenol site in Franklin, Indiana

Cleanup Status

Government Performance and Results Act (GPRA) Milestones:

EPA is required to report on the following milestones under the Government Performance & Results Act. Here are 2 milestones relevant to this cleanup site.

Milestone	Status	Date Assessed
Human Exposure Under Control (CA 725)	Yes, Controlled	01-21-2000
Groundwater Migration Under Control (CA 750)	Yes, Controlled	01-21-2000

Site Facts

EPA RCRA ID: IND044587848
Location: 980 HURRICANE ROAD, FRANKLIN, IN, 46131
Property Area: 22 acres
Other Names: [Alternative Site Names](#)
Cleanup Status: Solution for the Cleanup has been Implemented
Human Exposures under Control: Yes, Controlled
Groundwater under Control: Yes, Controlled

Source: Excerpt from the EPA's [Cleanups in My Community website](#) retrieved on June 13, 2019.

The goal of the EPA’s RCRA Corrective Action Program is to complete and achieve final cleanup status at contaminated sites. One way the EPA records the intermediate success of the program is using milestones that mark progress toward its national cleanup goals. These measures were established in accordance with the Government Performance and Results Act of 1993 and are reported at the end of each fiscal year. The milestones are not the EPA’s final remedy or site closure goals. They should be changed or updated as the site conditions and the EPA’s understanding of the site conditions change.

OIG Concerns

The EPA’s Cleanups in My Community website is not providing current or accurate information to the public regarding the Amphenol site. This is inconsistent with the guidance on the EPA’s RCRA information forms used to support the milestones presented on the website and in the RCRAInfo database, which states the status must be changed when the EPA becomes aware of contrary information.

In the fall of 2018, according to the site’s project manager, the EPA became aware that the status of the milestones was improperly indicated as “controlled” and was no longer current or accurate. That individual acknowledged to the OIG during our work that the website had not been updated with the correct status of the site. Two managers overseeing this site explained that the status would not be updated until after testing and analysis are complete. This plan is not consistent with the EPA’s guidance and does not provide the public with a complete picture of the EPA’s work to address current contamination at the site.

The EPA's communication of inaccurate and outdated human health exposure and groundwater migration information for the Amphenol site may impact human health. Individuals may consult the EPA's website and use the outdated information to make decisions about whether, when and how they may want to take protective measures to limit their exposure while living, working and playing near the site.

Response Requested

The OIG recommends that the Region 5 Regional Administrator update the Cleanups in My Community website and any other relevant websites to correct the status of human health and groundwater migration milestones for the Amphenol site and that the website(s) be kept current.

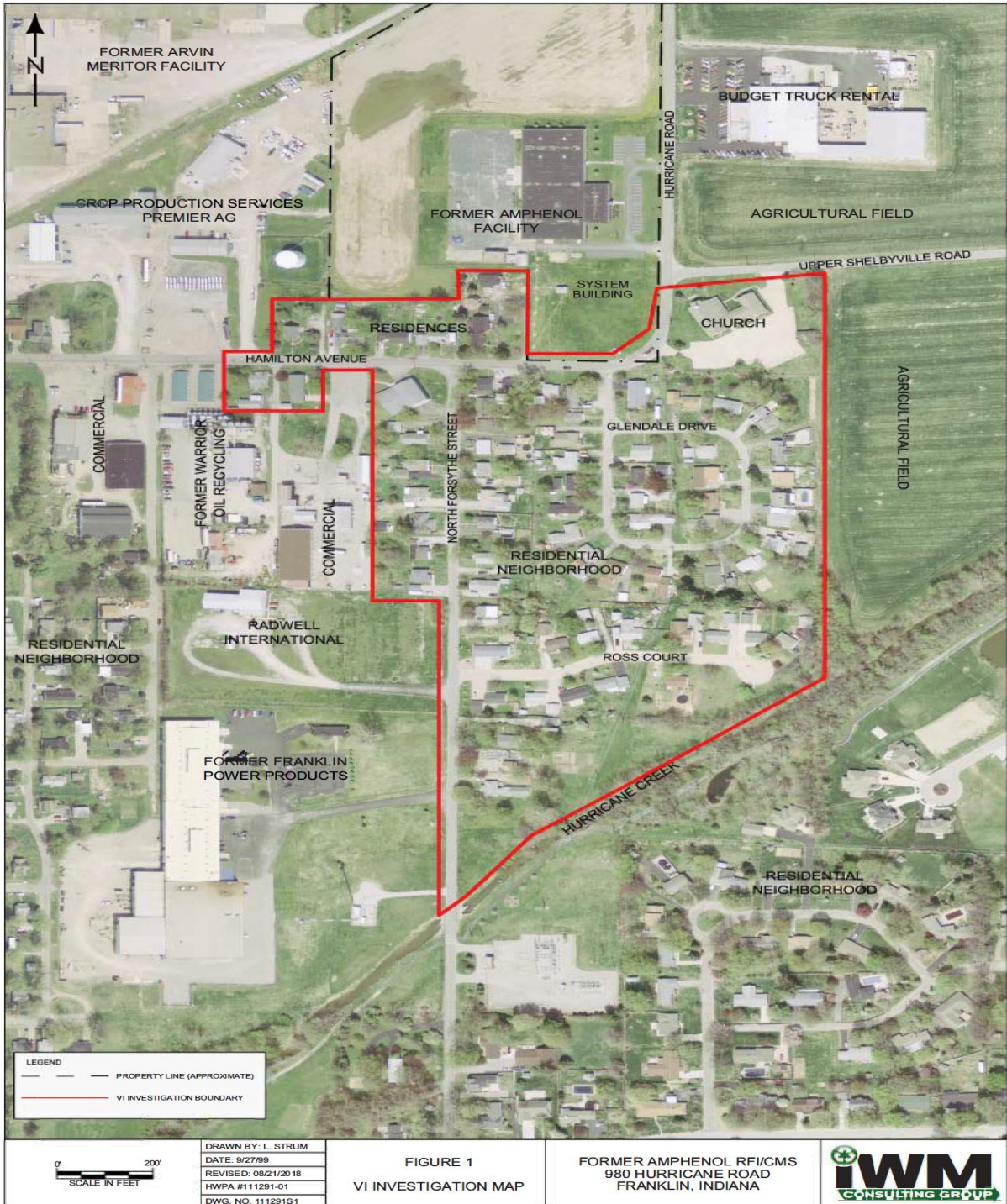
In addition, the OIG recommends that the Assistant Administrator for Land and Emergency Management remind all regions to verify that the status of human health and groundwater migration milestones is accurate and up-to-date on the EPA's websites.

Within 15 calendar days, we request that you provide a response, including the corrective actions planned to address the recommendations. The OIG will include information on the planned corrective actions to address the OIG's concerns—for the Amphenol site and all sites within the Office of Land and Emergency Management programs—in a future report. If you or your staff have any questions, please contact me at (202) 566-2906 or lovingood.tina@epa.gov; or Kevin Christensen, Assistant Inspector General for Audit and Evaluation, at (202) 566-1007 or christensen.kevin@epa.gov.

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Appendix A. Amphenol Site Investigation Map

Map of the Amphenol Site in Franklin, Indiana, dated September 27, 1999, and revised August 21, 2018. The area outlined in red shows where the EPA is currently conducting a vapor intrusion investigation. The EPA's technical investigation is based on historical data that show migration of contaminants from the Amphenol site into the residential area through groundwater and sewer lines. Additional details are available at the [website](#) for the Amphenol Site.



Source: [EPA website](#) retrieved on May 28, 2019.