



**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  
RETURN RECEIPT REQUESTED

January 23, 2020

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

Subject: On-site Investigation of Environmental Conditions, Request for 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:

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.

EPA requests that Amphenol Corp. prepare a work plan for on-Site investigations of environmental media. The purpose of the investigation is to determine whether source-areas may contribute to any ongoing groundwater and sewer-vapor contamination. This work can be divided into two parts, beginning with the sewer investigation. The sewer work should start by February 17, 2020 and the soil/NAPL investigation should start when conditions permit (for example, when the ground is no longer frozen), but no later than March 31, 2020.

As discussed with you and your consultants on January 23, 2020, the work plan can reference approved SOPs. The sewer investigation can begin with a video-logging of the on-site sewers. EPA approves the video-logging.

Sewer Investigation The on-site work plan must include at a minimum the following components:

- 1) figure showing all sample/investigation locations,
- 2) vapor sampling of manholes, sewer cleanouts,
- 3) video inspection of sewer line conditions, and
- 4) schedule.

Please provide an interim sample location figure to EPA for discussion in advance of the final work plan proposal. Upon receipt and review, EPA will work with you to identify the final sample locations for these events. The work plan should explain the purpose of the investigation and the sampling rationale.

The sewer investigation must include the on-site building and the groundwater treatment system.

Soil Investigation The soil investigation should build on historical sampling and also include areas that were not sampled previously. Samples must be taken at two-foot intervals to the top of the C-unit where NAPL could have permeated clay. During the March/February 2019 remedial design level sampling, NAPL was found near the western property boundary in one sample at depth. The extent of NAPL must be delineated, including off-site as necessary.

The sewer investigation portion of the work plan is due by January 31, 2020. The soil/NAPL investigation portion of the work plan is due February 21, 2020. To expedite the sewer work, EPA may approve discrete portions via email, as we discussed.

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

Sincerely,



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

ecc: Matt Kupcak, BorgWarner, Inc.  
Brad Gentry, IWM Consulting Group, LLC.  
Bhooma Sundar, RRB CAS2  
Motria Caudill, ATSDR  
Bryan Cress, IDEM

