



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

LR-16J

Via Email

March 17, 2020

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

Subject: Approval *On-Site Soil Investigation Work Plan* (Work Plan), Franklin Power Products/Amphenol Corporation
Former Amphenol facility, 980 Hurricane Road in Franklin, IN
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 *On-Site Soil Investigation Work Plan*, dated February 21, 2020 ("Work Plan"). EPA approves the Work Plan with the following comments, most of which were discussed with Amphenol Corp on March 5, 2020. Please address the comments in the Work Plan report as well as in an email to be sent before work begins.

1. The first paragraph of page one (and elsewhere) includes the phrase "off-site, as necessary" regarding sampling for adsorbed-phase VOCs and NAPL in soil. However, the Work Plan includes primary off-site sampling locations which are needed to investigate the extent of contamination.
2. Off-site locations are on ROW as well as private residential property. The residential property has some buildings and site features not noted on the figures. It is not clear how Amphenol will work around these constraints for "step-outs" and whether the access agreement is flexible regarding additional sampling locations. Please note that data collected on residential property is covered by the Privacy Act.
3. The Work Plan should have specified that the *Design-Level Data Soil Investigation Work Plan* and the corresponding soil borings were for the design of the sewer and soil interim remedy, which was completed in December 2019.

In the Work Plan report, please make that clear.

4. Objectives of the sampling plan – The conceptual site model (CSM) indicates that solvent releases follow the sanitary sewer line and a release to the ground near the former plating room. The sampling plan design includes data collection to verify the CSM. However, EPA is concerned that Amphenol appears to have arranged for only five additional MIP samples when the number of additional samples should be based on need and efficacy. If additional MIP samples are needed to identify the extent of adsorbed VOCs and NAPL, EPA presumes that a second mobilization will be needed unless flexibility is added to this mobilization.
5. The Work Plan does not explain how the MIP work will inform the Geoprobe® sampling work. This should be explained in the Work Plan report.
6. On page 4, the Work Plan states that “if the proposed MIP soil boring location is in the location of a previous design-level data soil boring (DSB-48 through DSB-56), a Geoprobe® soil boring will not be installed.” However, the Work Plan should state what will be the response if the MIP work indicates results not reported by the design-level work, such as the presence of adsorbed VOCs and/or NAPL
7. At least one MIP sampling point should be added east of and within 50 feet of the groundwater remedial system.

Please address these comments in the Work Plan report and an email. If you have any questions, please contact me at (312) 886-3020.

Carolyn Bury

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

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