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P.3.2

US EPA RECORDS CENTER REGION 5
1007441

August 1, 1997

MEMORANDUM

SUBJECT: Amphenol Facility, Franklin, Indiana (96RC05-001)
Report of an Evaluation of the On-Site Recovery System

FROM: Steven D. Acree, Hydrogeologist
Technical Assistance & Technology Transfer Branch

TO: Bill Buller, RPM
U.S. EPA-Region 5

Per your request for continuing technical assistance, the referenced report has been reviewed. In general, the potentiometric data indicate that the current extraction system is not depressing the water table below the elevation of the storm sewers at the site and may not be effectively capturing contaminated ground water at the site boundary. Detailed comments and recommendations concerning these issues and the proposed system upgrades are provided below.

1. Section 6.1, page 10; Section 7.2.1, page 14

The report interprets the ground-water elevation information as indicative of capture between wells RW-1 and RW-2. However, there are two concerns regarding this interpretation of the data. It appears that this interpretation relies heavily on data from the pumping wells. Ground-water elevation data from an actively pumping well are generally not representative of elevations in the aquifer immediately adjacent to the well due to head losses associated with well inefficiency. Reinterpretation of the potentiometric surface without data from the pumping wells indicates ground water in this area is influenced by extraction but complete capture is not indicated. In addition, the report notes that infiltration into the storm sewer in the vicinity of well RW-3 may be resulting in some water table depression. The same situation may be occurring near wells RW-1 and RW-2. The water table depression observed in this area may be, in part, the result of water infiltration into the sewer. The monitoring system is not sufficient to distinguish capture by the sewer system from capture by the pumping wells. Based on the positions of these features, data to make such distinctions would be difficult to obtain. Therefore, the statement that contaminated ground water in this area is captured by the pumping wells does not appear to be supported. It is noted that efforts to increase pumping rates from the recovery system are proposed. It is recommended that capture be re-evaluated following system upgrades.

2. Section 7.4, page 16

Upgrading of pumps and installation of an additional recovery well are recommended in this section to increase recovery rates. These actions will probably improve water table depression near the storm sewer and

increase capture of contaminated ground water. However, it is not clear that these efforts will be sufficient to meet the stated objectives. Other modifications, such as installation of additional conventional wells or vacuum extraction through multiple well points, may be required for effective water table depression in this setting and should be considered during this phase of investigation.

If you have any questions concerning these comments, please do not hesitate to call me at your convenience (405-436-8609). We look forward to future interactions with you concerning this and other sites.

cc: Paul Nadeau (5202G)
Mike Fitzpatrick (5303W)
Thad Slaughter, Region 5
Carol Witt-Smith, Region 5

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NATIONAL RISK MANAGEMENT RESEARCH LABORATORY
SUBSURFACE PROTECTION AND REMEDIATION DIVISION
P.O. BOX 1198 • ADA, OK 74820

January 2, 1997

OFFICE OF
RESEARCH AND DEVELOPMENT

MEMORANDUM

SUBJECT: Amphenol Facility, Franklin, Indiana (96RC05-001)
On-Site Recovery System Evaluation Work Plan

FROM: Steven D. Acree, Hydrogeologist
Technical Assistance & Technology Transfer Branch

TO: Bill Buller, RPM
U.S. EPA-Region 5

Per your request for continuing technical assistance, the referenced work plan has been reviewed. In general, the characterization proposed in this plan will provide some additional information regarding hydraulic gradients and the influence of the recovery system within the facility boundaries. However, the plan will provide little information for use in evaluating the extent of contamination east and west of the facility boundary and the extent of ground-water capture in these directions. Detailed comments and recommendations concerning this issue and other aspects of the proposed studies are provided below.

1. As noted in previous correspondence, the limits of the plume to be contained do not appear to be well defined east and west of the pumping wells. Data used to define the plume extent in these areas were obtained from Geoprobe samples collected several years ago. Limits of the plume may have changed since that time. It is suggested that additional data be obtained to better define the limits of the plume and the area to be contained. Potential locations for additional wells would be east to northeast of IT-3 and west of well MW-12.

2. The plan proposes installation of one monitoring well to define the extent of contamination in the area of Glendale Drive. However, the location of this well was not depicted on the maps provided in the plan. It is suggested that the well be located relatively close to the southern facility boundary to aid in interpretation of hydraulic gradients in this area.

3. Insufficient hydraulic head data are available to evaluate hydraulic gradients within the bounds of the off-site plume as

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currently identified. This is particularly true east and west of the site boundaries (e.g., east of well IT-3 and west of well MW-12). Once the extent of contamination is defined in these areas appropriate piezometer locations may be specified to better define hydraulic gradients and capture zones. In addition, the plan proposes installation of only three on-site piezometers. Although these wells will provide more information concerning on-site hydraulic gradients and recovery system influence, other monitoring points may ultimately be needed if detailed definitions of capture zones are desired.

4. A ground-water flow modeling study is proposed under this plan. An effective study for detailed evaluation of capture zones would require careful consideration of data needs and the available data base. Detailed characterization of sensitive parameters (e.g., hydraulic conductivity distribution) and detailed hydraulic head data for calibration would be necessary. Without such data, confidence in the results may be relatively low. It is not clear that such detailed data are available at this site. Such a study involves a significant effort and resource commitment. It is suggested that, initially, resources be used to install additional piezometers to better define site and off-site conditions prior to performing a detailed modeling study.

If you have any questions concerning these comments, please do not hesitate to call me at your convenience (405-436-8609). We look forward to future interactions with you concerning this and other sites.

cc: Paul Nadeau (5202G)
Mike Fitzpatrick (5303W)
Thad Slaughter, Region 5
Carol Witt-Smith, Region 5

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SAMUEL S WALDO
AMPHENOL CORPORATION
358 HALL AVENUE
PO BOX 5030
WALLINGFORD CT 06492-7530

4a. Article Number
Z 411 896 458

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AMPHENOL CORPORATION
358 HALL AVENUE
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WALLINGFORD CT 06492-7530

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W. Bullek
U.S. EPA
REGION 5 - HRE-8J
77 WEST JACKSON BOULEVARD
CHICAGO IL 60604-3590

DEC 2 0 1994

CERTIFIED MAIL RETURN
RECEIPT REQUESTED

HRE-8J

Mr. Samuel S. Waldo
Director of Environmental Affairs
Amphenol Corporation
358 Hall Avenue
P.O. Box 5030
Wallingford, Connecticut 06492-7530

Re: Administrative Order on Consent
Franklin Power Products Inc./Amphenol Corporation
IND 044 587 848

Dear Mr. Waldo:

Amphenol Corporations's response of November 23, 1994, to the United States Environmental Protection Agency's (U.S.EPA) letter, November 21, 1994, states that you are prepared to make arrangements to collect the two additional soil samples identified in U.S. EPA's letter as necessary to meet the requirements of the additional work required by EPA under Section VII.2.a.(4)(c)(iii) of the Administrative Order on Consent. Your letter, December 2, 1994, confirms U.S. EPA's understanding that you will collect the two samples from the two Forsythe Street locations and will provide the analytical results for this additional soil sampling to U.S. EPA by January 16, 1995.

Based on your commitment to proceed expeditiously to complete this work and conditioned on the submittal to U.S. EPA by January 16, 1995, of appropriately modified pages of the RCRA Facility Investigation (RFI) report, modified tables and data packages, for the additional soil sampling referenced above for incorporation into the RFI report, U.S. EPA considers this dispute to have been resolved and is exercising its discretion to waive the stipulated penalties that have accrued to date.

If you have any questions, please do not hesitate to call Bill Buller of my staff at (312) 886-4568.

Sincerely,

Uylaine McMahan, Chief
IN/OH/MN Technical Enforcement Section

bcc: Peg Andrews (ORC)

HRE-8J:WBULLER:f:\user\share\tes.#1\amphenol\amstip.epa

OFFICIAL FILE COPY

CONCURRENCE REQUESTED FROM REB			
SEC/BR SECRTRY			
OTHER STAFF	REB STAFF	REB SECTION CHIEF	REB BRANCH CHIEF

Amphenol

Amphenol Corporation

World Headquarters
358 Hall Avenue
P.O. Box 5030
Wallingford, CT 06492
Telephone (203) 265-8900

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DEC 0 9 1994
RCRA PERMITTING BRANCH
OR/WMD
EPA, REGION V

December 2, 1994

D.2.1

Mr. William Bulier
HRE-8J
U.S. EPA - Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3590

RECEIVED
WMD RECORD CENTER
DEC 20 1994

Re: Administrative Order on Consent (AOL)
Franklin Power Products/Amphenol Corporation (Respondents)
IND 044 587 848

Dear Mr. Buller:

The following will confirm our telephone conversations of November 30, 1994 and December 2, 1994, in which you requested a schedule for the submittal of analytical data from the additional soil sampling referenced in my November 23, 1994 letter to the Agency.

As I indicated, appropriately modified pages of the RFI report, modified tables and data packages will be submitted to your office on January 16, 1995.

If there are any questions regarding the above, please let me know.

Sincerely,

Samuel S. Waldo
Director Environmental Affairs

S064
c: J. Keith
S. Gard
P. Perez

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

NOV 1 4 1994

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

REPLY TO THE ATTENTION OF:

HRE-8J

Mr. Samuel S. Waldo
Director of Environmental Affairs
Amphenol Corporation
358 Hall Avenue
P.O. Box 5030
Wallingford, Connecticut 06492-7530

Re: Administrative Order on Consent
Franklin Power Products Inc./Amphenol Corporation
IND 044 587 848

Dear Mr. Waldo:

Paragraph VII.2.a.(4)(c)(iii) of the above captioned Administrative Order on Consent ("AOC") provides that the United States Environmental Protection Agency ("U.S. EPA") may require Respondents to submit a plan that proposes the installation of additional wells and additional sampling ("the Plan"). This requirement may be invoked in the event the initial sampling and analysis of the wells identified in Figure 12 of the October 1988 Resource Conservation and Recovery Act Facility Investigation ("RFI") Work Plan, which is attached to and incorporated into the AOC as Exhibit B, does not provide sufficient data to delineate the contaminant plume to the extent of background levels. U.S. EPA noticed that the Respondents were now being required to submit the Plan for additional wells and sampling in a letter to Respondents dated July 1, 1992.

On October 12, 1992, after revising its initial proposal for the Plan at the request of U.S. EPA, the Respondents submitted a revised expanded RFI Workplan, which contained the Plan. U.S. EPA approved the revisions as proposed, which called for a geoprobe sampling device to be employed in residential areas and permanent monitoring wells to be installed at a few critical points (at least three) in the residential area.

On November 23, 1992, Respondents submitted a preliminary RFI report to U.S. EPA recommending that monitoring wells not be installed because of potential problems with citizens and possible damage to wells. U.S. EPA's letter to Respondents dated February 9, 1993, noted that the approved October 12, 1992, Workplan had not been fully implemented. However, the letter further stated U.S. EPA's main concern that the RFI progress expeditiously and gave approval to a December 28, 1992, RFI workplan supplement, which had been submitted following discussions with U.S. EPA.

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Respondents submitted a draft RFI report dated April 27, 1993, and subsequently submitted a revised draft RFI report October 1993. In a November 15, 1993, letter, U.S. EPA advised Respondents that the October 1993 draft RFI report had been reviewed and that U.S. EPA required additional sampling of groundwater at Hurricane Creek. As you are aware, this resulted in further correspondence between Respondents and U.S. EPA as well as a telephone conference concerning this and other RFI issues. Subsequently, U.S. EPA agreed to the Respondent's proposal to sample the Hurricane Creek bed during dry conditions, and in a March 11, 1994, letter, U.S. EPA called for the Respondents to submit such proposal. The letter also required the Respondents to collect both ground-water and soil samples at three locations at the residential area at Forsythe Street where contamination apparently was caused by the sanitary sewer. Volatile organic compounds ("VOC"s), cyanide, and metal analysis was prescribed for all samples. Subsequently, U.S. EPA agreed to drop the requirement for cyanide and metal analysis of the soil samples due to the difficulty in obtaining sufficient soil sample for analysis by the geoprobe, and because these analyses would be performed for groundwater samples. This modification to the sampling analyses was approved in U.S. EPA's letter dated April 22, 1994. Under Section VII.2.a.(4)(c)(iii) of the AOC, Respondents are required to implement the Plan (which included the modified sampling analyses) within thirty (30) days of U.S. EPA's approval. In an April 28, 1994, letter to U.S. EPA, the Respondents agreed to perform the sampling analyses at Forsythe Street as modified and submit the analytical results along with appropriate revisions to the RFI report by June 15, 1994.

The Respondents submitted revisions to the RFI report on June 14, 1994, although analytical results for only one VOC soil analysis was provided rather than the three required by U.S. EPA pursuant to Section VII.2.a.(4)(c)(iii) of the AOC. On July 19, 1994, U.S. EPA approved the Revised June 14, 1994, RFI report to allow work at the facility to go forward, but expressly reserved its right to seek stipulated penalties for failure of Respondents to complete the work required under the AOC. In a September 22, 1994, telephone call, U.S. EPA's project manager advised the Respondents, that the June 14, 1994, RFI revised report did not contain VOC analysis for two of the sampling points at Forsythe Street are required.

Since June 15, 1994, the Respondents have been in noncompliance with the AOC for failure to implement fully the Plan required by U.S. EPA pursuant to Section VII.2.a.(4)(c)(iii) and to submit the analytical results. Thus, pursuant to section XVII of the AOC, stipulated penalties are accruing and will continue to accrue until Respondents have performed the soil sampling analyses for the two Forsythe Street locations and has submitted the VOC analytical results. Also, it is important to remind you that in accordance with Section XVII, the availability of stipulated penalties does not preclude U.S. EPA from pursuing any other remedies or sanctions which may be available to enforce this requirement.

If you have any questions, call William Buller of my staff at (312) 886-4568.

Sincerely yours,

Uylaine E. McMahan

Uylaine McMahan, Chief
IN/MN/OH Technical Enforcement Section

cc: J. Michael Jarvis, Franklin Power Products
Michael Sickels. IDEM

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Kathy Prosser
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SEP 12 1994
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

September 9, 1994

VIA CERTIFIED MAIL
P 215 675 773

Mr. Kevin Pierard (HRE-8J)
U.S. EPA, Region V
77 West Jackson Blvd.
Chicago, Illinois 60604

Re: RCRA Facility Investigation
Draft Corrective Measures Study
Work Plan
Franklin Power Products
Franklin, Indiana
EPA I.D. No. IND 044 587 848

Dear Mr. Pierard:

The Indiana Department of Environmental Management (IDEM) has reviewed Franklin Power Products' September 2, 1994, Corrective Measures Study Work Plan, and has the following comment:

> In the Work Plan, there are several references to "background ranges" for arsenic, beryllium, and cobalt, but there is no evidence of established site-specific heavy-metal background levels, and the "background ranges" are not given any numeric value.

If you have any questions regarding this matter, please contact Ms. Ruth Williams of my staff at 317/233-4623.

Sincerely,

Michael E. Sickels

Michael E. Sickels, Chief
Corrective Action Section
Hazardous Waste Management Branch
Solid and Hazardous Waste Management

RW/rgw

cc: Joel Morbito, USEPA
William Buller, USEPA

JUL 22 1994

Mr. Michael J. Jarvis
Franklin Power Products, Inc.
400 Forsythe Street
P.O. Box 667
Franklin, Indiana 46131

HRE-8J

Re: Franklin Power Products/
Amphenol
IND 044 587 848

Dear Mr. Jarvis:

As I discussed by phone with Sam Waldo on July 20, 1994, our letter to you of July 19, 1994, contained a typographical error that is corrected in the enclosed letter. You will notice that portions of paragraph three and new paragraph four were deleted in the letter of July 19. In the July 20, 1994, telephone conversation, Mr. Waldo stated that he had not received the letter of July 19. Corrected versions of the letter will be faxed to you and Mr. Waldo on July 22, 1994, and hopefully will arrive prior to your receipt of the July 19 letter. Hard copies will be mailed to you shortly.

We regret any inconvenience this may have caused you. Please call me at (312) 886-4568 if you have any questions.

Sincerely,

William Buller,
Technical Enforcement Section #1

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CONCURRENCE REQUESTED FROM REB

SEC/BR SECRTRY			
OTHER STAFF	REB STAFF	REB SECTION CHIEF	REB BRANCH CHIEF
	WB 7/22/94		

JUL 22 1994

HRE-8J

Mr. Michael J. Jarvis
Franklin Power Products, Inc.
400 Forsythe Street
P.O. Box 667
Franklin, Indiana 46131

Re: Franklin Power Products,
/Amphenol Corporation
IND 044 587 848

Dear Mr. Jarvis:

The RCRA Facility Investigation (RFI) Report - Franklin Power Products/Amphenol Corporation, as revised and dated June 13, 1994, and submitted in accordance with Section VII.2.c of the Administrative Order on Consent (AOC) dated November 27, 1990, is hereby approved by the United States Environmental Protection Agency (U. S. EPA). Pursuant to Section VII.3.a of the November 27, 1990, AOC, the Corrective Measures Study Work Plan shall be submitted to U.S. EPA within forty-five (45) days of receipt of this letter.

As discussed in previous correspondence between U.S. EPA and Respondents, additional RFI data to be collected by the sampling/analysis of ground water at Hurricane Creek may be deferred until dry conditions occur at the creek. The Supplemental Work Plan "Sampling Creek Bed Water in Hurricane Creek - RFI, Amphenol Corporation" dated June 14, 1994, is hereby approved by U.S. EPA with the following condition: the list of analytes shall include cyanide and the metals previously analyzed in groundwater samples for this RFI.

For clarification purposes, please note that the approved Quality Assurance Project Plan (QAPP) referred to in the June 14, 1994 Work Plan is dated May 25, 1991, and the correct date of U.S. EPA's letter of the QAPP approval is December 12, 1991, letter.

All data collected pursuant to the June 14, 1994, Work Plan shall be incorporated in Respondents Corrective Measures Study (CMS) draft report. If dry conditions do not occur during the period preceding the CMS draft report due date, Respondent shall provide to U.S. EPA verification that dry conditions did not occur. The non-occurrence of dry conditions at Hurricane Creek during this interim period does not relieve Respondents of implementing the June 14, 1994 Work Plan.

U.S. EPA reserves all rights, in accordance with Section XVII of the AOC dated November 27, 1990, to seek stipulated penalties for failure of Respondents to implement and/or complete work required under the AOC.

Sincerely,

Kevin M. Pierard, Chief
Technical Enforcement Section #1

cc: Samuel S. Waldo, Amphenol
James Keith, Earth Tech

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CONCURRENCE REQUESTED FROM REB			
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OTHER STAFF	REB STAFF	REB SECTION CHIEF	REB BRANCH CHIEF
	WB 7/22/94	WB for KMP 7/22/94	

JUL 1 9 1994

HRE-8J

Mr. Michael J. Jarvis
Franklin Power Products, Inc.
400 Forsythe Street
P.O. Box 667
Franklin, Indiana 46131

Re: Franklin Power Products
Amphenol Corporation
IND 044 587 848

Dear Mr. Jarvis:

The RCRA Facility Investigation (RFI) Report - Franklin Power Products/Amphenol Corporation, as revised and dated June 13, 1994, and submitted in accordance with Section VII.2.c of the Administrative Order on Consent (AOC) dated November 27, 1990, is hereby approved by the United States Environmental Protection Agency (U.S. EPA). Pursuant to Section VII.3.a of the November 27, 1990, AOC, the Corrective Measures Study shall be submitted to U.S. EPA within forty-five (45) days of receipt of this letter.

As discussed in previous correspondence between U.S. EPA and Respondents, additional RFI data to be collected by the sampling/analysis of ground water at Hurricane Creek may be deferred until dry conditions occur at the creek. The Supplemental Workplan "Sampling Creek Bed Water in Hurricane Creek - RFI, Amphenol Corporation" dated June 14, 1994, is hereby approved by U.S. EPA with the following condition: the list of analytes shall include cyanide and the metals previously analyzed in ground water samples for this RFI.

For clarification pursuant to the June 14, 1994, Workplan shall be incorporated in Respondents Corrective Measures Study (CMS) draft report. If dry conditions do not occur during the period preceding the CMS draft report due date, Respondent shall provide to the U.S. EPA verification that dry conditions did not occur. The non-occurrence of dry conditions at Hurricane Creek during this interim period does not relieve Respondents of implementing the June 14, 1994 Workplan.

U.S. EPA reserves all rights, in accordance with Section XVII of the AOC dated November 27, 1990, to seek stipulated penalties for failure of Respondents to implement and/or complete work required under the AOC.

If you have any questions regarding this matter, please contact Bill Buller of my staff at 312-886-4568.

Sincerely yours,

Kevin M. Pierard, Chief
Technical Enforcement Section #1

cc: Samuel S. Waldo, Amphenol
James Keith, Earth Tech

bcc: Peg Andrew, ORC

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WW Engineering & Science
A Summit Company

June 14, 1994

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JUN 17 1994
OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

Mr. William Buller
U.S. EPA, Region 5, HRE-8J
77 West Jackson Boulevard
Chicago, IL 60604-3590

Dear Mr. Buller:

Enclosed, please find five copies of updated and revised draft RFI report material for the former Amphenol site in Franklin, Indiana. This submittal contains revised Sections 6.0 and 7.0, covering the Ecological Risk Assessment and the additional groundwater and soil sampling along Forsythe Street. Revised tables, additions to appendixes, sheets and Table of Contents are also provided, along with blue divider sheets that will assist you in incorporating this information into the body of the draft report. Because there appear to be problems with the legibility of the some of the tables, replacement copies have been reprinted and are also provided.

The work plan for sampling the interstitial water of Hurricane Creek will be sent under separate cover.

If you have any comments or questions regarding this submittal, please let me know.

Very truly yours,

James H. Keith
Project Manager

cc: Sam Waldo
Susan Gard

5010 Stone Mill Road Bloomington, IN 47408 812/336-0972 Fax 812/336-3991
Bloomington, IN Chattanooga, TN Columbus, OH Detroit, MI Grand Rapids, MI Indianapolis, IN Milwaukee, WI Minneapolis, MN

WW Engineering & Science
A Summit Company

May 17, 1994

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MAY 1 6 1994
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

William Buller
U.S. EPA, Region 5, HRE-8J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Dear Mr. Buller:

Enclosed, please find five copies of

1) A draft Ecological Risk Assessment (ERA)
2) A revised Bibliography section
3) Draft Figure 15
4) Draft Appendix M

This material is submitted in response to your agency's certified letter dated March 11, 1994 and received by Amphenol Corporation on March 18, 1994. We did not attempt to fully incorporate the above information into the draft RFI report at this time since we are awaiting the results of the additional soil and water samples collected along Forsythe Street.

The information for our next submittal and the information submitted today will be prepared for integration into the draft RFI report. The ERA will be the new Section 6.0. The "Additional Ground Water Sampling and Analysis", now shown as Section 6.0, will be renumbered Section 7.0, and the sampling and analysis we are now completing will also be incorporated into Section 7.0.

If you have any comments or questions regarding this submittal, please let me know.

Very truly yours,

James H. Keith

James H. Keith
Project Manager

cc: Sam Waldo
Susan Gard

5010 Stone Mill Road Bloomington, IN 47408 812/336-0972 Fax 812/336-3991
Bloomington, IN Chattanooga, TN Columbus, OH Detroit, MI Grand Rapids, MI Indianapolis, IN Milwaukee, WI Minneapolis, MN

Amphenol

phenol Corporation

World Headquarters
358 Hall Avenue
P.O. Box 5030
Wallingford, CT 06492
Telephone (203) 265-8900

RECEIVED
MAY 02 1994
OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

April 28, 1994

D.2.1

Mr. Kevin M. Pierard, Chief
Technical Enforcement Section #1
USEPA, Region 5 HR-8J
77 West Jackson Boulevard
Chicago, IL 60604-3590

Re: Administrative Order on Consent (AOC)
Franklin Power Products/Amphenol Corporation (Respondents)
IND 044 587 848

Dear Mr. Pierard:

I am in receipt of a facsimile copy of your letter of April 22, 1994, addressing my letter of March 25, 1994 which requested a modification to the sampling program outlined in your letter of March 11, 1994. The Respondents hereby agrees to perform the requested testing as modified by your April 22, 1994 letter. The Respondents shall submit the results of this supplemental investigation, along with appropriate revisions to the RFI Report by June 15, 1994. This date reflects the time necessary for the Respondents and the USEPA to reach agreement on a sampling program and is within 60 days of the Agency's April 22, 1994 authorization to proceed.

On a related matter, the Respondents are prepared to submit the qualitative ecological risk assessment discussed at our February 24, 1994 telephone conference, along with a sampling plan to collect groundwater samples from the Hurricane Creek stream bed, by May 17, 1994 which is 60 days from the date of receipt of your March 11, 1994 letter.

Should you have any questions concerning the information presented above, please don't hesitate to contact me at (203) 265-8760.

Sincerely,

Samuel S. Waldo
Director Environmental Affairs

WP010

c: S. Gard
G. Pendygraft
P. Perez
J. Keith
R. Williams - IDEM
J. Cooley - USEPA

bcc: Joe Cooley, ORC

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	4/22/94	4.21.94	

Amphenol

Amphenol Corporation

World Headquarters
358 Hall Avenue
P.O. Box 5030
Wallingford, CT 06492
Telephone (203) 265-8900

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MAR 28 1994
OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

March 25, 1994

Mr. Kevin M. Pierard, Chief
Technical Enforcement Section #1
USEPA, Region 5 HRE-8J
77 West Jackson Boulevard
Chicago, IL 60604-3590

Re: Administrative Order on Consent (AOC)
Franklin Power Products/Amphenol Corporation (Respondents)
IND 044 587 848

Dear Mr. Pierard:

I received your letter of March 11, 1994 on March 18, 1994, directing the Respondents to perform additional work necessary to complete the RCRA Facility Investigation (RFI) for the subject location. In general, the additional work described conforms to the agreements reached during our telephone conference of February 24, 1994. There are specific discrepancies in our understanding of the agreements reached during that conference, however, which bear pointing out and which may require further discussion.

In the course of our discussions on February 24, a request was made to collect samples from two additional locations along Forsythe Street. The Agency felt that these samples were necessary to more accurately characterize the plume previously identified in the draft RFI. The Respondents agreed to perform this sampling activity, suggesting at the same time that sample analysis should be limited to VOCs (see the following discussion on this matter). Instead, the Agency has directed the collection of samples at three locations and has also requested at least one soil sample be taken, with analysis for VOCs, metals and cyanides.

We concur that the data from the two sampling locations identified in your Attachment I on Forsythe Street between Hamilton Ave. and Ross Ct. will help to better define plume characteristics. The southernmost location, however, appears to be very close to earlier sampling points and will serve only to confirm existing data. We do not believe, therefore, that this additional sampling location is necessary or warranted.

As you may note from a review of the draft RFI, the previous investigative efforts along Forsythe Street have indicated that the major constituents of concern are VOCs. There were no unusual concentrations of metals or cyanides found. I would emphasize that the draft RFI has also demonstrated that neither constituent is found in significant concentrations in the soil or ground water on the Site. During the course of the RFI investigation seven soil borings were collected near the old sewer line break on the Site at depths at or below ten feet: MW21 (10-12 feet and 16-18 feet), MW22 (8-10 feet and 17-19 feet), MW23 (19.5-21.5 feet), SB6 (16-18 feet) and SB7 (15-17 feet). Table 3 in the draft RFI shows that the only metals exceeding ARARs (Table 11) were arsenic, beryllium and cobalt, the same metals in the same concentrations as found in upgradient wells, MW20 and MW26. The draft concluded that those metals concentrations are naturally occurring and are unrelated to Site activities. Cyanides were reported from only one of the above-noted borings (MW21 at a depth of 10-12 feet) at a concentration of 1.0 mg/kg for both total and amenable cyanide. There are no data which indicate or suggest that metals or cyanides are present in significant concentrations adjacent to the old sewer line or that these materials have migrated off site in ground water. These conclusions based on the extensive database from Site investigations were confirmed in the Geoprobe^{tm} activities along Forsythe Street.

Notwithstanding the above, the methodology employed to collect all previous samples on Forsythe Street is not amenable to collecting the significant amount of soil necessary to analyze for VOCs, metals and cyanide. Approximately two liters of soil are required to perform all analytical activities, including QA/QC. In order to collect this volume of soil, six to eight side-by-side insertions of the Geoprobe^{tm} would be necessary to accumulate enough sample. The additional sample handling, increased time for sample collection and corresponding decontamination procedures make the methodology infeasible and the data invalid.

The Respondents are willing to proceed with sampling along Forsythe Street but would request that the Agency consider modifying the requirements contained in the March 11, 1994 letter. Specifically, we request that alienates be limited to VOCs. If the Agency continues to require that a soil sample be collected, we request that it be analyzed for VOCs only. Furthermore, we request that the QA/QC requirement for a duplicate and matrix spike/duplicate for the soil sample be waived, due to the limitations in sample size. The Respondents would also request that the Agency reevaluate its request for the southernmost sampling point, taking into account the location of previous sampling efforts.

The Respondents will prepare a sampling plan to collect ground water samples from the Hurricane Creek stream bed during no-flow conditions. As indicated during our conference, work on the Corrective Measures Study (CMS) will proceed independently of the scheduling of this effort and in accordance with the appropriate

provisions of the AOC. In keeping with the information presented above with respect to the analyses of metals and cyanides , we do not believe that these stream bed samples need to be tested for those parameters, and would request that the Agency review its requirement.

During the February 24, 1994 conference, the Respondents agreed to perform certain qualitative ecological assessment activities, notwithstanding our firm belief that the AOC makes no provision for such work. The Respondents reiterate that agreement here, reserving any rights available under the AOC. A qualitative assessment will be submitted within the time frame requested by the Agency.

In a recent conversation with Bill Buller, it was mentioned that the Respondents are considering an interim corrective measure (ICM) at the Site. In general, the ICM will be a ground water recovery and treatment system designed to mitigate on site source areas and will be amenable to being incorporated into final remedial measures at the Site. The Respondents will keep the Agency apprised of all ICM activities.

Should you have any questions concerning the information presented above, please don't hesitate to contact me at (203)265-8760.

Sincerely yours,

Samuel S. Waldo
Director Environemental Affairs

SW239
c: S. Gard
G. Pendygraft
P. Perez
J. Keith
R. Williams - IDEM
J. Cooley - USEPA

3/11/94

HRE-8J

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Samuel S. Waldo
Director of Environmental Affairs
Amphenol Corporation
358 Hall Avenue
P.O. Box 5030
Wallingford, Connecticut 06492-7530

Re: Administrative Order on Consent
Franklin Power Products/
Amphenol Corporation
IND 044 587 848

Dear Mr. Waldo:

This letter is in follow-up to the February 24, 1994, telephone conference of Franklin Power Products/Amphenol and the United States Environmental Protection Agency (U.S. EPA) representatives. U.S. EPA concludes that additional data is required to complete the RCRA Facility Investigation (RFI) and pursuant to the terms of Section VII 2.a.(4)(c)(iii) of the Administrative Order on Consent (AOC), dated November 27, 1990, U.S. EPA directs Respondents to perform additional work as prescribed below.

All samples shall be collected in accordance with the methodologies as set forth in U.S. EPA's letter to Respondents dated January 21, 1994. Respondents shall collect ground-water samples at the approximate locations numbered 1, 2, and 3 in Attachment I. At least one soil sample shall also be collected at these same locations at depth intervals about midway between the base of the sanitary sewer line and the water table. All samples shall be analyzed for volatile organic compounds (VOCs), cyanide, and the list of metals previously applied to groundwater samples. The sampling/analysis results shall be included in a revised RFI report which shall be submitted within sixty (60) days of receipt of this letter.

In our recent telephone conference Respondents once again proposed an alternative to collecting samples at the locations as directed in our December 14, 1993, and January 21, 1994, letters. However, in addition to proposing collecting groundwater samples for VOC analysis from the Hurricane Creek stream bed during no-flow conditions, the Respondents have proposed to proceed with the Corrective Measures Study (CMS) on a parallel tract while awaiting for the appropriate conditions at Hurricane Creek. Prior to

approving such a proposal, we are requesting that Respondents submit such proposal in writing which would specify the locations to be sampled and an agreement to proceed with the CMS while waiting for the appropriate conditions. The proposal shall include at least one sampling location near the drainage ditch down stream of the storm drain outfall. The samples shall be analyzed for VOCs, cyanide, and the groundwater metal list.

If a parallel tract were to be taken for the additional sampling in the Hurricane Creek area, the results for either sampling at locations as directed in our previous letters, or the results of Respondents' proposed alternative sampling, if approved by U.S. EPA, shall be included in the Corrective Measures Study draft report that is required by the AOC.

To satisfy the requirements for the ecological risk assessment the following information is required.

1 Provide a written statement from the U.S. Fish and Wildlife Service (F&WS), Bloomington Office, confirming that the endangered species, the Indiana Bat, has not been identified in the vicinity of the site.

2 Provide a discussion which includes appropriate references, of VOC concentrations in Hurricane Creek stream water and sediment, and their subchronic, chronic and lethal effects on past or present species supported by Hurricane Creek. Due to the variation in Hurricane Creek stream flow and variance of contaminant input to the storm drain, Respondents should use the worst case assumptions to establish historical contaminant concentrations in Hurricane Creek.

3 If these exercises do not establish that the impact of VOCs was minimal, Respondents shall perform, in accordance with U.S. EPA's guidance, a qualitative biosurvey to evaluate such impact. The qualitative assessment shall establish as to whether such species are known to exist in similar habitat and whether such species are absent or present in Hurricane Creek. References shall be provided to support the statement that there is no bioaccumulation risk at the site.

4 The risk assessment data, as needed to satisfy the above requirements, shall be included in the revised RFI report due within sixty (60) days of receipt of this letter.

In our recent telephone conference, U.S. EPA encouraged Respondents to employ an interim corrective measure to reduce the discharge of contaminated water to Hurricane Creek by the storm drain at the site. A temporary diversion of the contaminated storm drain water to a storage pond to enhance volatilization of the VOCs, was suggested. U.S. EPA again encourages Respondents to employ such measure to mitigate the storm drain impact on Hurricane Creek.

Questions on legal matters should be addressed to Joseph Cooley at (312) 886-5313, questions on the ecological risk assessment addressed to Diane Sharrow at (312) 886-6199, and all other issues addressed to William Buller at (312) 886-4568.

Sincerely yours,

Kevin M. Pierard, Chief
Technical Enforcement Section #1

cc: J. Michael Jarvis, Franklin Power Products
James Keith, WW Engineering and Science

bcc: Joe Cooley, (ORC)
Diane Sharrow, (REB)

HRE-8J\WBULLER\ab\6-4568\f:...tes.#1\FPPALET.MAR\March 10, 1994

| OFFICIAL FILE COPY |

CONCURRENCE REQUESTED FROM REB			
SEC/BR SECRTRY	AB 10 MAR 94		
OTHER STAFF	REB STAFF	REB SECTION CHIEF	REB BRANCH CHIEF
	3/11/94	3/11/94	

bcc: Joe Cooley, (ORC)
Diane Sharrow, (REB)

HRE-8J\WBULLER\ab\6-4568\f:...tes.#1\FPPALET.MAR\March 7, 1994

| OFFICIAL FILE COPY |

CONCURRENCE REQUESTED FROM REB			
SEC/BR SECRTRY	AB 7 MAR 94		
OTHER STAFF	REB STAFF	REB SECTION CHIEF	REB BRANCH CHIEF

ATTACHMENT I 3/4/84 letter

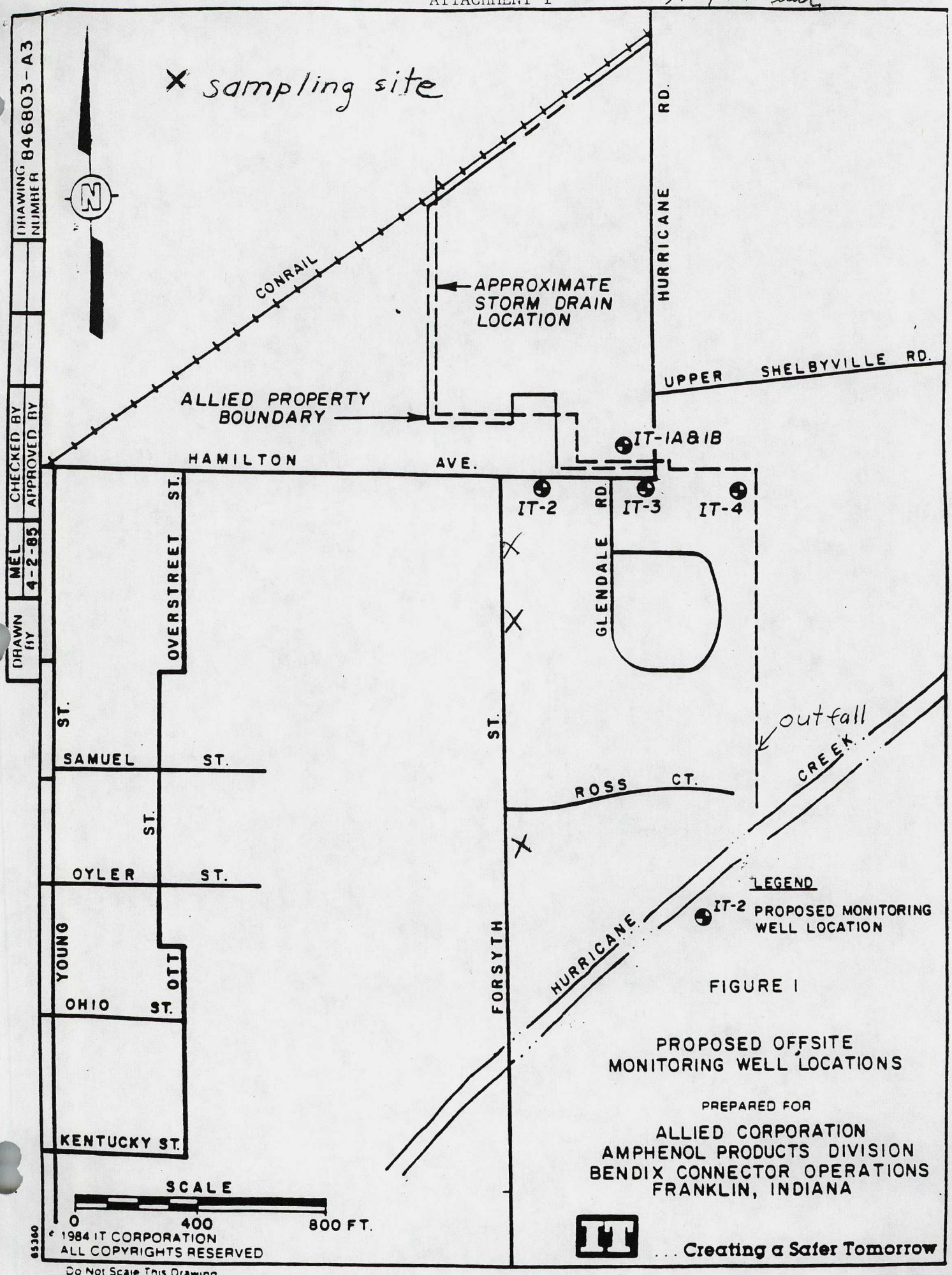

FIGURE I

PROPOSED OFFSITE MONITORING WELL LOCATIONS

PREPARED FOR

ALLIED CORPORATION
AMPHENOL PRODUCTS DIVISION
BENDIX CONNECTOR OPERATIONS
FRANKLIN, INDIANA

WW Engineering & Science
A Summit Company

RECEIVED
MAR 8 1994
OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA REGION V

March 7, 1994

William Buller
U.S. EPA, Region 5, HRE-8J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Dear Mr. Buller:

As a result of our March 3 telephone conversation, we examined Hurricane Creek on March 4 to determine by what means an interstitial water sample could be best collected from the sediments in the creek bottom during a period of zero flow.

On March 4, Hurricane Creek from just downstream of Forsythe Street to the storm sewer outfall was running 8 to 12 feet wide, and the water depth was 6 to 18 inches. The creek bottom is 3 to 6 feet below the surrounding land surface and the creek runs within cut banks (photo A). The stream runs as a series of pools separated by areas of cobblestone riffles. A tile probe was used to test for sediment depth. Sediments consisted of sand, gravel and cobbles 3 inches to 18 inches in thickness. Beneath the sediments was a layer of dense gray clay that could not be penetrated by the probe even by hammering.

Photo B shows the location at which SD-2 (see Figure 9 in the RFI report) was collected. The storm sewer outfall is in the background. The channel between the storm sewer outfall and Hurricane Creek runs 200 feet in a more or less north-south direction, and appears to be dredged. It is 3 to 5 feet wide and water depth is generally 3 to 6 inches. The channel at the outfall is filled to a thickness of 2 feet above the storm sewer invert by cobbles and large gravel. These could not be penetrated by the tile probe past a foot. The area of large cobbles extends about 30 feet downstream from the outfall, and is replaced by a soft sand/mud bottom. This sand/mud layer varies between 30 and 54 inches in thickness. Below this layer is the dense gray clay layer. The flow velocity in the outfall channel is insufficient to clear the channel of fine sediments; however these fine sediments have been removed by the swifter flow of Hurricane Creek.

The dense gray clay layer that underlies the creek sediments is clearly Unit C (Sheet 4A in the RFI report), which consists of up to 25 feet of pebbly gray till. Any sampling activities in the

5010 Stone Mill Road Bloomington, IN 47408 812/336-0972 Fax 812/336-3991
Bloomington, IN Chattanooga, TN Columbus, OH Detroit, MI Grand Rapids, MI Indianapolis, IN Milwaukee, WI Minneapolis, MN

bed of Hurricane Creek would take place above this unit. Soil boring samples collected below the surface of Unit C in the RFI study area (FCR-SB-MW25-35.0 and FCR-SB-MW27-23.0) showed only traces of target constituents in areas where VOC concentrations in overlying ground water are higher than in the storm sewer outfall water.

Water samples can be collected from the sediments during a zero flow period by utilizing a set of Geoprobe rods. Since the sampling depth would be very shallow, the rods can be manually placed in the sediments and hammered in place, if necessary. Water in the rods would be purged by means of a battery-operated Geopump, the rods allowed to refill, and a sample of the interstitial water collected by means of a Teflon mini-bailer with a stainless steel foot valve. Samples would be analyzed for VOCs only. This water sampling method is identical to that employed during previous Geoprobe sampling, except that the rods are advanced manually rather than by hydraulics. Rods would be decontaminated prior to use, and a new set of rods would be used for each sampling location. QA/QC samples would be collected as described in the project-specific QAPP.

If you have any questions, please contact me.

Very truly yours,

James H. Keith

James H. Keith
Project manager

cc: Sam Waldo
Susan Gard

WW Engineering & Science
A Summit Company

February 8, 1994

RECEIVED
FEB 11 1994
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

Mr. William Buhler
U.S. EPA, Region V
77 W. Jackson Boulevard
Chicago, IL 60604

Dear Mr. Buhler:

I am extremely pleased to announce today that our holding company, Summit Environmental Group, Inc., has signed a Definitive Agreement to merge with the Earth Technology Corporation, a geotechnical and environmental consulting firm headquartered in Long Beach, California. Founded in 1970 as a geotechnical consulting firm, Earth Technology has grown to be a $63 million (revenue) firm with over 470 employees in 17 offices. We consider them to be one of the preeminent geotechnical/environmental firms in the world with extraordinary background and assignments in: large public works projects; complex seismic zone design support; hazardous waste assessment, remediation; environmental permitting; complex siting; and water management. As an example, they are currently finishing up the largest soils bioremediation project ever undertaken in the United States. Their computerized U.S. GIS database is most likely the finest available anywhere.

Combined with Summit's approximately 1,000 employees, 15 offices, and full services in environmental sciences and engineering, laboratory services, infrastructure, facilities engineering, construction management, and operations and maintenance, we will be a well-balanced, 1500-person national consulting and engineering firm. Our combined revenues will be in excess of $150 million and we will rank in the Engineering News Record (ENR) Top 50 engineering firms and in the top 25 firms in the nation that provide environmental services to both the public and private sectors. Our Air Science and Engineering Program, alone, will bring together over 80 professionals actively engaged in testing, complex modeling and permitting, and design engineering for clients around the world.

This is a significant and exciting merger because both parties bring unique and complementary skills to the market place. The combination of these skills will offer powerful synergies and solutions to our many customers.

GR-jvh/c:\SSS\ETMerge

5555 Glenwood Hills Parkway SE PO Box 874 Grand Rapids, MI 49588-0874 616/942-9600 Fax 616/942-6499
Bloomington, IN Chattanooga, TN Columbus, OH Detroit, MI Indianapolis, IN Milwaukee, WI Minneapolis, MN

We're extremely proud of the fact that our practice here at WW Engineering & Science has been in continuous existence since 1924. This is not the end of a 70-year organization, but a new beginning - one that will permit us to continue to provide the best services available to our clients while expanding our capabilities both geographically and professionally. As we move toward the 21st century, it has become very clear that the old ways of doing business are not good enough. Effective, competitive, professional partnerships will become absolutely critical to the survival of public and private institutions everywhere. Through the financial and professional power of this organization, we will be eager to focus on:

- bringing world class technologies and solutions from around the globe to the problems facing our customers;
- developing and helping to negotiate multi-media and flexible environmental permitting for our customers;
- truly partnering with our many clients through on-line communications and finance as they continue to out source more and more engineering services; and
- helping industries in the NAFTA region re-engineer facilities to meet global productivity challenges.

As a very valued customer of WW Engineering & Science, we wanted you to know about this merger at the earliest possible moment. We look forward to receiving your comments, and additionally, to the prospect of enhancing our fine relationship.

Sincerely,

WW ENGINEERING & SCIENCE, INC.

Bijan S. Saless, P.E.
President

GR-jvh/c:\SSS\ETMerge

Amphenol

mphenol Corporation

orld Headquarters
358 Hall Avenue
P.O. Box 5030
Wallingford, CT 06492-7530
Telephone (203) 265-8900

RECEIVED
FEB 02 1994
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

February 1, 1994

D.2.1

Mr. Joseph M. Boyle, Chief
RCRA Enforcement Branch (HRE-8J)
U.S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, IL 46131

Re: Administrative Order on Consent
Franklin Power Products, Inc./ Amphenol Corporation
Franklin, IN
IND 044 587 848

Dear Mr. Boyle:

Amphenol Corporation and Franklin Power Products, Inc. (the Respondents) are in receipt of your letter of January 21, 1994 regarding the collection of additional ground water samples along the southern bank of Hurricane Creek and the performance of an ecological risk assessment as part of the RFI. At this time, we are requesting a meeting with the USEPA to discuss these activities for the following reasons.

The Respondents remain convinced that the USEPA's concerns regarding the potential for site constituents affecting ground water in the Hurricane Creek stream bed are unwarranted. We believe that the information included in the December 14, 1993 letter from James Keith of WW Engineering & Science on the Respondents behalf sets forth the framework of our position on this matter and fully responds to the USEPA's concerns. Furthermore, we believe that a meeting would allow us the opportunity to more fully describe our position and would also allow us to respond directly to any questions or concerns which the USEPA may have.

Notwithstanding our belief that the additional sampling is unnecessary, we have serious concerns with the location of the sampling points described in your November 15, 1993 letter. First, we believe that samples taken south of Hurricane Creek will describe conditions associated with the hydrogeologic regime on that side of the creek's drainage basin and will not accurately reflect ground water conditions in the stream bed on the north side of the drainage basin. In addition, our preliminary assessment has determined that at least one of the sampling locations is effectively inaccessible. Another sampling point may be affected by the presence of an electrical substation adjacent to Forsythe Street and Hurricane Creek. A photocopy of an aerial photograph of the area is attached for your information.

Your letter also requests that the Respondents perform an ecological risk assessment as a requirement for the finalization of the RFI. We would like to point out, however, that neither the AOC nor the approved RFI Work Plan call for an ecological risk assessment. As part of our meeting, we would like to discuss more fully the basis for the USEPA's request for this work.

The Respondents believe that an open discussion of these matters will result in a mutually satisfactory resolution. We will contact you to arrange a convenient time. In the interim, please don't hesitate to contact me if you have any questions with respect to the above.

Very truly yours,

Samuel S. Waldo
Director Environmental Affairs

SW233/nvw
c: J. M. Jarvis
S. Gard, Esq.
G. Pendygraft, Esq.
P. Perez, Esq.
J. Keith
M. Sickles (IDEM)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JAN 21 1994

REPLY TO THE ATTENTION OF:

HRE-8J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
Mr. J. Michael Jarvis
Franklin Power Products, Inc.
400 Forsythe Street
P.O. Box 667
Franklin, Indiana 46131

Re: Administrative Order on Consent
Franklin Power Products,
Inc./Amphenol
IND 044 587 848

Dear Mr. Jarvis:

This letter is in response to the December 14, 1993, letter your contractor, WW Engineering & Science, submitted on the Respondents' behalf to the United States Environmental Protection Agency (U.S. EPA). The Respondents' letter suggests an alternative to U.S. EPA's directive contained in our November 14, 1993 letter addressed to you which advised Respondents to collect additional ground-water samples from three designated areas along the south bank of Hurricane Creek.

Upon evaluation of Respondents' discussion of potential aquifer contamination at Hurricane Creek, U.S. EPA concludes that this discussion does not rule out the possible occurrence of ground-water contamination at Hurricane Creek. Therefore, U.S. EPA disapproves the response presented in Respondents' letter of December 14, 1993 and again, pursuant to the terms of Section VII 2.a.(4)(c)(iii) of the Administrative Order On Consent (AOC), dated November 27, 1990, directs Respondents to perform the additional sampling as U.S. EPA directed in its November 15, 1993 letter.

Your letter of December 14, 1993, stated that representative samples could only be collected at the stream bed. U.S. EPA believes that it would be very difficult to obtain representative ground-water samples during flow conditions and it is likely that such conditions will occur for several months. Further, if samples are collected at the stream bed or at the north bank of the creek and contaminants are detected, then additional sampling would be required to determine how far the contamination extends south of the creek, a location which includes a residential area. For these reasons, U.S. EPA believes that conditions warrant the collection of ground-water analytical data at the locations directed in its November 15, 1993 letter.

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Pursuant to the terms of Section VII 2.a.(4)(c)(iii) of the AOC, the "...Respondents shall, within thirty (30) days of ... notification by EPA [of need for additional sampling], submit to EPA a plan proposing the installation of additional wells and additional sampling...." U.S. EPA has previously approved the sampling methodologies contained in the Respondents' RFI Work Plan, as Supplemented (Work Plan). In its November 15, 1993 letter, U.S. EPA approved the use of optional sampling methodologies for the additional sampling. U.S. EPA reaffirms this position. Upon the Respondents' assurance that one of these methodologies will be employed in the additional sampling, the Respondents will have thirty (30) days to implement the Work Plan for the additional sampling. To avoid any additional delays in finalizing the RFI Report, the Respondents are directed to communicate to U.S. EPA within ten (10) days of receipt of this letter to adopt the Work Plan for the additional sampling.

U.S. EPA is aware that at least part of the expanded sampling area is located on property not owned by the Respondents. Pursuant to Section XII 2. of the AOC, the Respondents were required to obtain access agreements from such owners within thirty (30) days of the effective date of the AOC. In the event such agreements were not obtained, Respondents were required to notify U.S. EPA of both the lack of and its failure to obtain such agreements within ten (10) days thereafter. U.S. EPA has not received such a notice from the Respondents and interprets this lack of notice from the Respondents to mean that the Respondents have obtained agreements from the concerned property owners. If this is not the case, Respondents are directed to notify U.S. EPA within ten (10) days of receipt of this letter of what efforts the Respondents have made or will make to obtain such agreements from the owners of the property from which the additional sampling is required.

In the November 15, 1993, letter, U.S. EPA had requested that the Respondents submit the revised RFI report within seventy-five (75) days of that letter. Under the existing circumstances, it is unlikely the Respondents will comply with this request. Pursuant to Section VII 2.b. of the AOC, the Respondents are required to submit the additional information obtained during the above sampling in a revised RFI report within seventy-five (75) days of approval of the supplemental work plan. As discussed above, U.S. EPA asserts that the Work Plan, previously approved, is acceptable for the additional sampling. Allowing the Respondents the ten-day period to submit its assurance to employ the Work Plan for the additional sampling, the Respondents will have no more than eighty-five (85) days from receipt of this letter to submit the revised RFI report.

In our September 2, 1993 letter, U.S. EPA notified the Respondents that the RFI report should include an ecological risk assessment. Although U.S. EPA stated that this assessment could be deferred to the corrective measures study phase, U.S. EPA is concerned that the delays in finalizing the RFI report will lead to unnecessary delays in completing the ecological risk assessment. Also, U.S. EPA is concerned that an unnecessary delay in the ecological risk assessment will postpone the selection of corrective actions. For these reasons, U.S. EPA suggested in its November 15, 1993 letter, that the Respondents complete the ecological risk assessment within seventy-five (75) days of receipt of that letter. The Respondents have failed to respond to

this request. If such a time-frame is unacceptable to the Respondents please notify U.S. EPA within ten (10) days of receipt of this letter, why this time-frame is unacceptable and include an alternative proposed schedule. Once a schedule for the ecological risk assessment is approved by U.S. EPA, it will be incorporated into the AOC.

If you have any technical questions on this matter, please call Mr. William Buller at (321) 886-4568. Any legal questions should be directed to Mr. Joseph A. Cooley, Assistant Regional Counsel, at (312) 886-5313.

Sincerely yours,

Joseph M. Boyle

Joseph M. Boyle, Chief
RCRA Enforcement Branch

cc: James Keith, WW Engineering & Science
Samuel Waldo, Amphenol
Michael Sickels, IDEM

WW Engineering & Science
A Summit Company

December 14, 1993

Joseph M. Boyle, Chief
RCRA Enforcement Branch HRE-8J
U.S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, Illinois 46131

RECEIVED
DEC 15 1993
OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

Dear Mr. Boyle:

This letter is prepared and transmitted by WW Engineering & Science at the request of Mr. Michael Jarvis, President of Franklin Power Products. Your agency's letter of November 15, 1993 was reviewed. The primary concern appears to be the possibility that during times in which Hurricane Creek has zero flow conditions, the storm sewer under the former Amphenol property is still intercepting ground water from the site and depositing water with measurable levels of constituents of concern into the dry creek bed. The aquifer along the creek bed might then be recharged with contaminated water. The letter goes on to state that the constituents may have moved in a downstream direction in response to the ground water gradient. The letter directs that additional ground water samples be collected from the upper ten feet of the saturated zone at three locations along the south bank of Hurricane Creek.

It is our clients' opinion that EPA concerns are not justified. We offer the following information and justification to support this opinion.

1) Stream Flow Since no measured long-term flow data are available for Hurricane Creek, flow data were acquired for Youngs Creek, to which Hurricane Creek is tributary. The gaging station is located about six miles downstream from the point where Hurricane Creek enters. From these data a flow duration curve was constructed for Hurricane

5010 Stone Mill Road Bloomington, IN 47408 812/336-0972 Fax 812/336-3991
Bloomington, IN Chattanooga, TN Columbus, OH Detroit, MI Grand Rapids, MI Indianapolis, IN Milwaukee, WI Minneapolis, MN

Creek using area ratio techniques. The resulting flow duration curve (attached) indicates that on the average, Hurricane Creek will exhibit a flow of zero (no flow) approximately seven percent of the time.

2) Ground Water Gradient The bed of Hurricane Creek in the vicinity of the Forsythe Street bridge is approximately 716 feet above sea level. The lowest ground water elevations measured on the site were just above 718 feet. The ground water flow gradient extends toward Hurricane Creek. There is no reason, based upon accepted hydrologic principles or evidence gathered from site studies, to believe that hydrogeologic conditions differ south of the creek. That is, the ground water gradient also extends toward Hurricane Creek.

3) Mobility of Constituents in Soil The four organic constituents of concern all have very low Log Octanol/Water Partition Coefficients as reported in Handbook of Environmental Fate and Exposure Data for Organic Chemicals, Volume II - Solvents (Philip H. Howard, 1990, Lewis Publishers, Inc., Chelsea, Michigan).

DCA - 1.79

PCE - 3.40

TCA - 2.49

TCE - 2.42

DCA and TCA are not expected to be retained on soils. Approximately 0.01 percent of PCE was found to be retained on soils, and retention of TCE was no more than 4 to 6 percent on silty clay loams, and less than that on other soils. The soil in the vicinity of Hurricane Creek is Ockley silt loam, which is a clay loam, sandy clay loam and gravel loam in the subsurface (Soil Survey of Johnson County, SCS, 1979). It is our contention that even the maximum concentrations of constituents measured in the storm sewer outfall in May 1986 (DCA - 4.4 ug/l; PCE - 1500 ug/l; TCA - 720 ug/l and TCE - 850

ug/l) would not be retained on soils in measurable quantities, but would be readily removed by water flow. We note that among the constituents of concern, only PCE was detected in Hurricane Creek and storm sewer sediment samples collected and analyzed during the RFI (Table 6 of the RFI report). The levels reported (4 to 5 ug/kg) are below detection limits.

4) Delivery of Storm Sewer Flow to Hurricane Creek In order for contaminated water to be deposited in the dry bed of Hurricane Creek, the creek must have zero flow while the water table on the site is still above the invert of the storm sewer. The stream will have no flow an average of seven percent of the time, but since the drainage area of the storm sewer is insignificant when compared with that of Hurricane Creek (250 acres vs. 15 square miles), we expect that the water table in the vicinity of the storm sewer should respond at least as quickly as the regional water table. Therefore when conditions are such that Hurricane Creek exhibits zero flow, the water table on the site will have dropped below the storm sewer invert. The EPA scenario cannot be ruled out entirely, but is expected to be a rare event (occurring much less than seven percent of the time) brought about by unusual weather conditions, or unusual conditions in the vicinity of the site.

5) Recharge of Hurricane Creek Saturated Zone If conditions are present that would allow the recharge of the saturated zone by contaminated water from Hurricane Creek, the available evidence indicates that this would be a temporary phenomenon, and that any contaminated water that moved into the aquifer would move back toward Hurricane Creek once normal ground water flow is again established. There would be no measurable retention of constituents on sediments, and there would be considerable dilution by ground water.

6) Plume Along Hurricane Creek In the event that constituents of concern are delivered to Hurricane Creek during low flow conditions, there will be dilution of the constituents as soon as normal flow is restored. We believe that dilution will lower the concentration of any constituents to levels below detection limits.

7) Sampling In light of the above information, the sampling activity proposed by EPA will not address the agency's concerns. Further, we believe that if EPA persists in requesting the collection of additional samples, notwithstanding the information presented above, the only locations from which representative samples could be collected is the stream bed itself during periods of low flow.

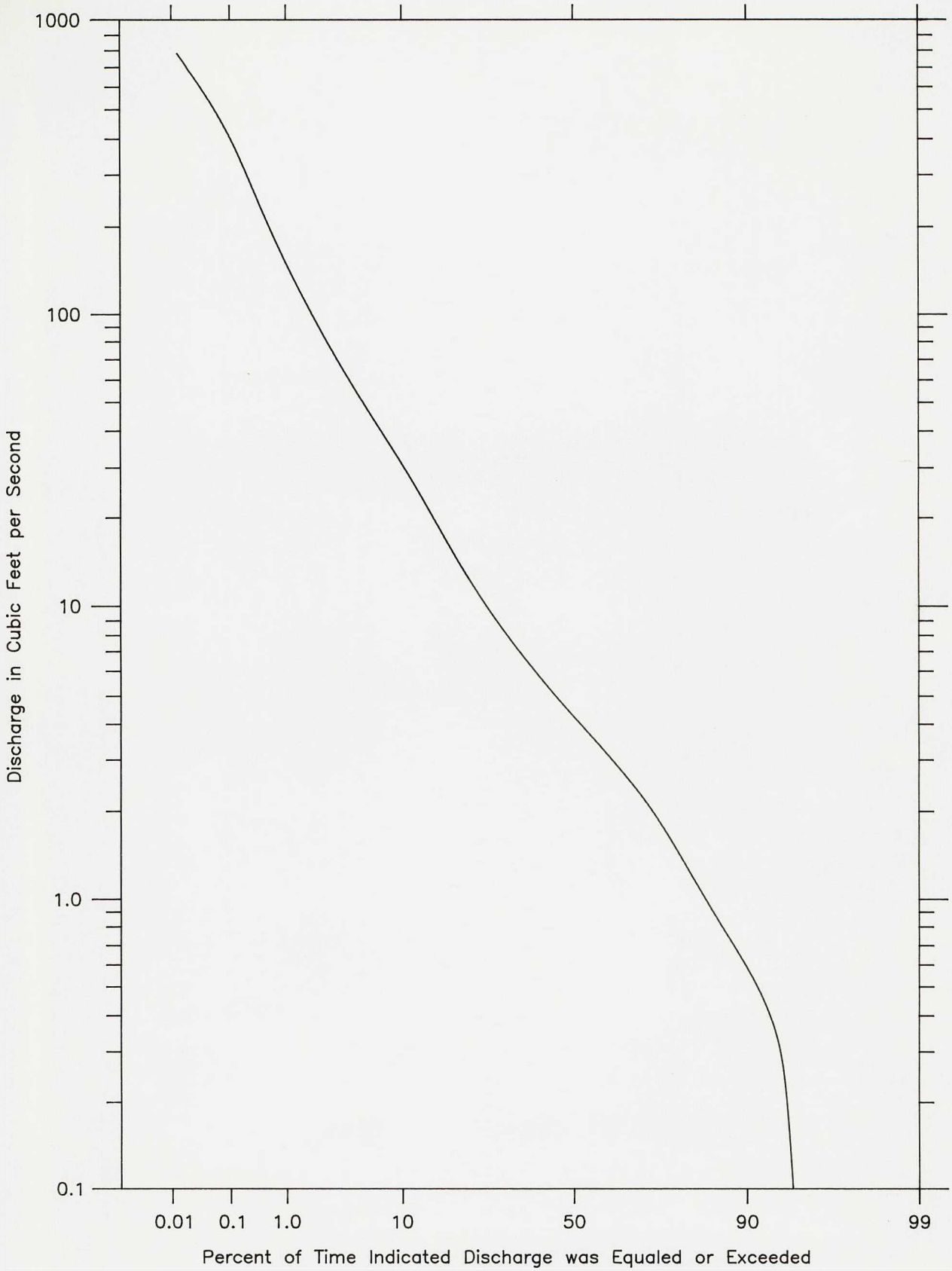
If you have any questions, please contact us.

Very truly yours,

James H. Keith

James H. Keith
Project Manager

cc: Michael Jarvis
Susan Gard
Sam Waldo



Theoretical duration curve of daily flow, Hurricane Creek – based on area ratio techniques applied to Youngs Creek Station, 1944–1992.

1:1
702600F1
NW121493

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

NOV 15 1993

HRE-8J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. J. Michael Jarvis
Franklin Power Products, Inc.
400 Forsythe Street
P.O. Box 667
Franklin, Indiana 46131

Re: Administrative Order on Consent
Franklin Power Products,
Inc./Amphenol
IND 044 587 848

Dear Mr. Jarvis:

The United States Environmental Protection Agency (U.S. EPA) has reviewed the RCRA Facility Investigation (RFI) report with the revisions of October 1993. This document was submitted in accordance with Section VII.c. of the Administrative Order on Consent (AOC) dated November 27, 1990. Review of the additional data has resulted in the following concern.

Data indicates that contaminant concentrations in groundwater decrease to low levels southward of the facility. However, the existence of the 72 inch storm drain which transverses the site and drains to Hurricane Creek, creates the possibility that contaminated groundwater at the facility may have been recharged to the aquifer in the area of the storm drain outfall. Data indicates that the storm drain intercepts contaminated ground-water at the facility when ground-water levels are above the base of the storm drain. During periods of stream flow this water would be dispersed by the stream flow of Hurricane Creek. However, site conditions may occur in which the creek becomes dry but interception of contaminated water by the storm drain continues for sometime before water levels equilibrate upgradient. Under such conditions recharge of contaminated water to the aquifer near the outfall would occur. Over a period of several years the recharge of contaminated water to the aquifer may have been significant. Further, the contaminants may have moved in a downstream direction in response to the ground-water gradient. At present, Respondents have not provided ground-water data for this critical area.

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To address this concern, additional ground-water samples shall be collected at the approximate locations shown in Attachment I. Respondents may collect samples by installing monitoring wells or by the geoprobe method described in "Supplement to October 12, 1992, RFI Work Plan" dated December 28, 1992. Samples shall be collected from the upper ten (10) feet of the saturated zone.

U.S. EPA provides seventy-five (75) days from date of receipt of this letter to submit the additional information in a revised RFI report. In a September 2, 1993 letter, U.S. EPA advised you that the response to comments pertaining to Risk Assessment could be deferred to the corrective measures part of the AOC. Since U.S. EPA has provided seventy-five (75) days to submit the modification, U.S. EPA requests that the Risk Assessment information also be provided with the modification to the RFI report.

If Respondent does not agree to perform additional sampling, Respondent shall notify U.S. EPA within thirty (30) days of receipt of this letter of such response. Such response shall provide an alternative approach to resolve the data gap.

If you have any questions call William Buller of my staff at (312) 886-4568.

Sincerely yours,

Joseph M. Boyle, Chief
RCRA Enforcement Branch

cc: Samuel Waldo, Amphenol
Mike Sickles, IDEM

ATTACHMENT I

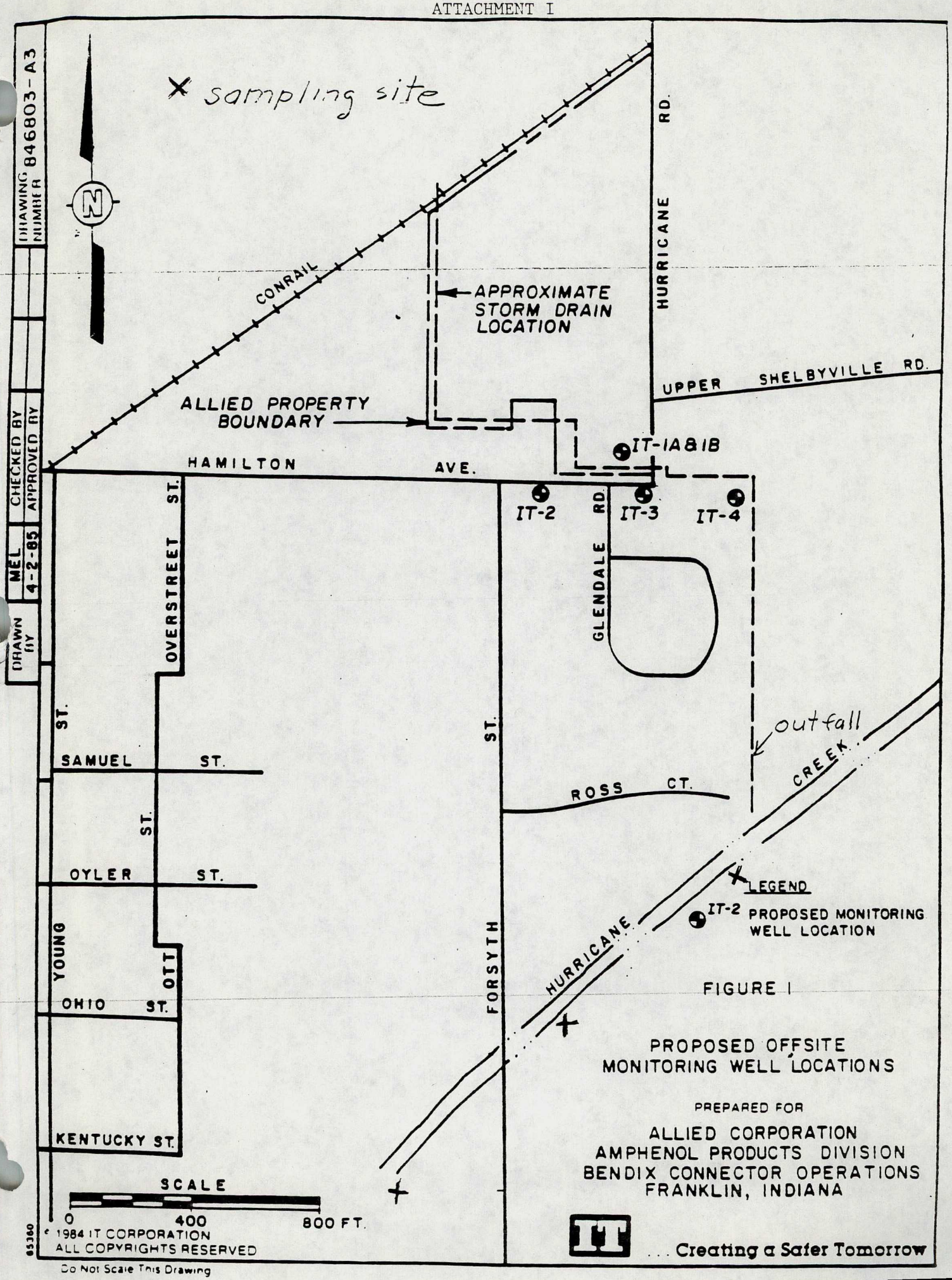

FIGURE I

PROPOSED OFFSITE MONITORING WELL LOCATIONS

PREPARED FOR

ALLIED CORPORATION
AMPHENOL PRODUCTS DIVISION
BENDIX CONNECTOR OPERATIONS
FRANKLIN, INDIANA

WW Engineering & Science
A Summit Company

October 6, 1993

William Buller
U.S. EPA, Region 5, HRE-8J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

RECEIVED
OCT 07 1993
OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

Dear Mr. Buller:

In a September 2, 1993 letter to Mr. Jarvis regarding the report "RCRA Facility Investigation (RFI) Activities at the Former Amphenol Site, Franklin, Indiana", your agency requested that within 30 days of receipt of the letter, verification be sent of well information requests sent to Franklin residents and the responses submitted by residents. On October 4, 1993, WW Engineering & Science prepared and transmitted by FAX the requested information as a partial response to that letter.

A number of other comments were included in that letter, some of which would require additional data collection and literature searches, and letter responses from other agencies. A complete response to the comments in the September 2 letter cannot be submitted within the 30-day time period specified in AOC section VII.2.c. After a telephone conversation with you on October 5, it was determined that the following information would be an appropriate partial response to the September 2 letter at this time. Five copies are provided of:

1) Isoconcentration maps of VOCs in soil at various depths
2) An isoconcentration map of total VOCs in ground water
3) Additional discussion on the potential for Hurricane Creek to act as a ground water "sink," and prevent Unit B ground water from continuing to flow southward
4) A map delineating the residential area in which residents were contacted about well information

5010 Stone Mill Road Bloomington, IN 47408 812/336-0972 Fax 812/336-3991
Bloomington, IN Chattanooga, TN Columbus, OH Detroit, MI Grand Rapids, MI Indianapolis, IN Milwaukee, WI Minneapolis, MN

5) An address list of persons contacted, a sample letter, and a summary of replies

For Item 1), two new sheets, 5A and 5B, have been prepared for insertion in the back of Volume 1 of the report. Ground water isoconcentration maps have been renumbered 6A through 6D.

For Item 2), Sheet 6E has been prepared for insertion in the back of Volume 1 of the report. New marked pockets have been provided for all sheets.

For Item 3, a paragraph has been added to the end of Section 4.1.2 discussing Hurricane Creek.

Items 4 and 5 are combined into Appendix L which can be inserted at the and of Volume 3.

The Table of Contents should be replaced in its entirety with the pages provided. The body of the report past page 28 should be removed and replaced in its entirety with the pages provided.

In accordance with paragraph 3 of your September 2 letter, we believe that item 5 (ecological risk assessment) should be deferred to the corrective measures work plan and report, and that action levels can also be established at that time.

If you have any questions, please let me know.

Very truly yours,

James H. Keith

James H. Keith
Project Manager

cc: Susan Gard
Sam Waldo

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live

Evan Bayh
Governor
Kathy Prosser
Commissioner

105 South Meridian Street
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Telephone 317-232-8603
Environmental Helpline 1-800-451-6027

RECEIVED
AUG 30 1993
OFFICE OF RCRA
WASTE MANAGEMENT DIV
EPA, REGION V

August 20, 1993

VIA CERTIFIED MAIL P 215 679 806

Ms. Susan Sylvester
U.S. EPA, Region V
77 West Jackson Blvd.
Chicago, Illinois 60604

Dear Ms. Sylvester:

Re: RCRA Facility Investigation
Draft Final Report
Franklin Power Products
Franklin, Indiana
EPA I.D. No. IND 044 587 848

The Indiana Department of Environmental Management (IDEM) has reviewed Franklin Power Products' April 27, 1993, RCRA Facility Investigation (RFI). Comments are attached.

If you have any questions regarding this matter, please contact Ms. Ruth Williams of my staff at 317/233-4623.

Sincerely,

Michael E. Sickels, Chief
Corrective Action Section
Hazardous Waste Management Branch
Solid and Hazardous Waste
Management

RW/rgw

cc: Fayola Wright, USEPA
William Buller, USEPA

COMMENTS
Franklin Power Products
Franklin, Indiana
IND 044 587 848

Soil background levels should be site specific, not obtained from generalized publications such as James Dragun's *Elements in North American Soils* (1991). Since the agricultural land is apparently not affected by the facility's operations, soil borings should not be difficult to locate there.

IDEM does not recognize the example soil and groundwater action levels in the proposed RCRA Subpart S table as acceptable ARARs.

The report does not propose any further actions, nor does it propose no further action.

WW Engineering & Science
A Summit Company

April 27, 1993
received 4/28/93 MV
Due on or about 4/27/93

William Buller
U.S. EPA, Region V, HRE-8J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Dear Mr. Buller:

Enclosed for your review are five copies of the draft RFI report for the former Amphenol site in Franklin, Indiana. Each report is contained in three 3-ring binders. The first binder contains the report, tables, figures and sheets; the second contains Appendices A through J, and the third contains Appendix K. Copies of this report have been distributed in accordance with Section XVI of the Consent Order. An additional copy has been provided to Susan Gard, Corporate Counsel for SerVaas, Inc.

We await your questions and comments.

Very truly yours,

James H. Keith

James H. Keith
Project Manager

Enclosures

cc: Susan Gard
Mike Jarvis
Sam Waldo
Thomas E. Linson - 1 copy

5010 Stone Mill Road Bloomington, IN 47408 812/336-0972 Fax 812/336-3991
Bloomington, IN Chattanooga, TN Columbus, OH Detroit, MI Grand Rapids, MI Indianapolis, IN Milwaukee, WI Minneapolis, MN

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

FEB 09 1993

REPLY TO THE ATTENTION OF:

HRE-8J

CERTIFIED RETURN
RECEIPT REQUESTED

Mr. J. Michael Jarvis
Franklin Power Products, Inc.
400 Forsythe Street
P.O. Box 667
Franklin, Indiana 46131

Re: Administrative Order on Consent
Franklin Power Products, Inc./Amphenol
IND 044 587 848

Dear Mr. Jarvis:

The United States Environmental Protection Agency (U.S. EPA) has received the December 21, 1992 letter from Susan Gard which requests an extension of time for submittal of the draft RCRA Facility Investigation (RFI) report. Salient events and issues relevant to this matter are discussed below.

Paragraph VII 2.a.(4)(c)(iii) of the above captioned Administrative Order on Consent (AOC) specified that if the initial RCRA Facility Investigation (RFI) did not provide sufficient data to delineate the ground-water contamination plume extent to background levels, as so specified in Section VII of the AOC, Respondent shall submit an expanded RFI Workplan. Pursuant to the AOC, Franklin Power Products/Amphenol (FFP/A) submitted such a Workplan. After receiving U.S. EPA's comments, FPP/A submitted a revised expanded workplan dated October 12, 1992.

The ground-water contaminant plume extends off-site and necessitates that ground-water sampling be performed in residential areas. The revised Workplan proposed that a geoprobe sampling device be employed in residential areas and that permanent monitoring wells be installed at a few critical points in the residential areas. U.S. EPA approved this Workplan on October 19, 1992.

FPP/A implemented the revised Workplan on November 4, 1992. On November 23, 1992, FPP/A submitted a preliminary report to U.S. EPA which summarized the results of the expanded investigation. These results were obtained by geoprobe sampling and analysis by a mobile laboratory. This report recommended that monitoring wells should not be installed in residential areas due to potential problems with citizens and possible damage to wells.

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This issue was subsequently discussed by FPP/A's consultant and U.S. EPA's project coordinator.

It was agreed that geoprobe sampling, which is accomplished by hydraulically forcing a hollow rod through soil to the desired sampling depth, and thereby minimizing citizen disturbance, is preferable to the conventional well drilling/installation methods, in residential areas. To employ the geoprobe for development of critical data, sampling/analysis procedures must satisfy the contract laboratory protocol (CLP) as specified in the approved Quality Assurance Project Plan. Upon review of this matter, U.S. EPA has concluded that collection of samples from the geoprobe with a mini-bailer is essentially the same as the approved methods for sampling conventional monitoring wells, and therefore is acceptable.

Following discussions by FPP/A and U.S. EPA representatives, FPP/A submitted a document titled "Supplement to the October 12, 1992 RFI Workplan - SOP (Standard Operating Procedure) for Off-site Geoprobe Ground-Water Sampling for CLP Analysis for the Former Amphenol Site RFI" dated December 28, 1992. This document incorporates the acceptable geoprobe sampling methods and analytical protocol.

U.S. EPA, hereby, approves Franklin Power Product's SOP for of-site geoprobe ground-water sampling - dated December 28, 1992. It is important to note that the revised Workplan states that sufficient samples will be collected to delineate the ground-water plume to background concentrations, the criteria specified in Section VII of the AOC. Approval of the October 12, 1992 and December 28, 1992, documents does not assure that this criteria will be met. Satisfaction of this requirement depends upon the analytical results and location of the sampling points; it is FPP/A's responsibility to ensure that sufficient samples are collected.

Upon consideration of your request for a time extension for submittal of the draft RFI report, U.S. EPA is concerned that Respondents did not pursue full implementation of the approved October 12, 1992, Workplan. This Workplan proposed off-site well drilling\installation, but Respondents decided not to implement this part of the Workplan because of potential citizen concern. However, an alternative method for off-site sampling has been agreed upon, and Respondents have been cooperative in developing the alternate method. U.S EPA's primary concern is that the RFI work progress in timely fashion.

U.S. EPA hereby grants your request for a time extension to submit the draft RFI report. The December 28, 1992 Supplemental Workplan involves mobilization and operation of field equipment, laboratory turn around time, and incorporation of the additional data into the draft RFI report. FFP/A shall submit a draft RFI report within seventy-five (75) days of receipt of this letter.

If you have any legal questions on these matters, please call Mr. Joseph A. Cooley at (312) 886-0814. If you have any technical questions, you may call Mr. William Buller at (312) 886-4568.

Sincerely yours,

Joseph M. Boyle

Joseph M. Boyle, Chief
RCRA Enforcement Branch

cc: Samuel S. Waldo, Amphenol
Mike Sickles, IDEM

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Governor
Kathy Prosser
Commissioner

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Indianapolis, Indiana 46206-6015
Telephone 317-232-8603
Environmental Helpline 1-800-451-6027

February 8, 1993

RECEIVED
FEB 12 1993
OFFICE OF RCRA
WASTE MANAGEMENT DIV
EPA REGION V

VIA CERTIFIED MAIL P 323 805 483

D.2.1

Ms. Susan Sylvester
U.S. EPA, Region V
77 West Jackson Blvd.
Chicago, Illinois 60604

Dear Ms. Sylvester:

Re: RCRA Facility Investigation
Supplement to Phase II Work Plan
Franklin Power Products
Franklin, Johnson County
EPA I.D. No. IND 044587848

The Indiana Department of Environmental Management (IDEM) has reviewed Franklin Power Products' December 28, 1992, Supplement to the October 12, 1992, RCRA Facility Investigation (RFI) Phase II Work Plan ("SOP for Off-Site Geoprobe ground Water Sampling for CLP Analysis for the Former Amphenol Site RFI") and has the following comments:

1. It appears that CLP methods are being proposed. Analyses should follow SW-846 methods instead.

2. The plan proposes that two (2) groundwater samples be collected at any sampling location where the saturated unit thickness is four (4) feet or greater. It is not clear whether these samples will be taken at the same or different depths.

3. It is not clear what is meant by, "Soil samples will be retained and returned to the site for disposal." (Page 3) Describe specifically how and where the soil samples will be handled and disposed, and how it will be decided what constitutes proper disposal. Also clarify whether this sentence refers to soil samples or the entire cores.

4. Water for volatiles analysis should be withdrawn from borings using a stainless steel bailer.

5. Again, it is not clear what is meant by, "...water will be collected and discarded into a plastic container for return to the site and disposal,..." (Page 3) Describe specifically how and where the water will be handled and disposed, and how it will be decided what constitutes proper disposal.

6. It is unclear what exactly is being proposed under "Sampling Locations," on pages 4 and 5, by the sentence, "The latter sample will be used as a check against standard screened well bailer sampling that will also be conducted at MW-12."

7. On page 5, under "Equipment Decontamination," it is not specified how many DI water rinses will be performed after the Alconox wash.

If you have any questions regarding this matter, please contact Ms. Ruth Williams of my staff at 317/233-4623.

Sincerely,

Michael E. Sickels

Michael E. Sickels, Chief
Corrective Action Section
Hazardous Waste Management Branch
Office of Solid and Hazardous Waste

RW/rgw

cc: Fayola Wright, USEPA
William Buller, USEPA

WW Engineering & Science
A Summit Company

January 6, 1993

RECEIVED
JAN 7 1993
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

William Buller
U.S. EPA, Region V, 5HR-12
230 South Dearborn Street
Chicago, Illinois 60604

Dear Mr. Buller:

In our January 4, 1993 telephone conversation, you indicated that the Agency has requested two more changes as a condition to approval of the SOP Addendum to the October 12, 1992 Work Plan for the former Amphenol site: one relating to the type of bailer to be used, and one relating to additional sampling.

We have thoroughly reviewed the 1986 "RCRA Ground-Water Technical Enforcement Guidance Document" (TEGD - September 1986) as well as Volumes I and II of the 1989 "Interim Final RCRA Facility Investigation (RFI) Guidance". We find nothing in any of these documents requiring the exclusive use of a bottom-delivery bailer for ground water sampling work. We do note that page 106 of the TEGD specifies acceptable sampling devices for all ground water analytical parameters. It lists "Bailer (fluorocarbon resin or stainless steel), provided that it is equipped with double check valves and bottom emptying device". The TEGD also lists "Single check valve fluorocarbon resin or stainless steel bailer" without qualification or explanation. We have used the latter device on this and other ground water projects. Neither the IT Work Plan nor the Consent Order specifies a bottom delivery bailer. I have checked with a number of bailer and sampling equipment suppliers, and with Applied Research Associates in Vermont. No one makes or uses a 7/16" OD bailer with a bottom delivery. Accordingly, we believe it advisable, and well within appropriate guidelines, to use the Teflon and stainless steel single check valve bailers that we have used in the past. Field sampling personnel will transfer samples from the bailers into sample containers with a minimum of disturbance and exposure to the atmosphere in accordance with standard WWES field sampling procedures.

5010 Stone Mill Road Bloomington, IN 47408 812/336-0972 Fax 812/336-3991
Bloomington, IN Chattanooga, TN Columbus, OH Detroit, MI Grand Rapids, MI Indianapolis, IN Milwaukee, WI Minneapolis, MN

You also requested that a Geoprobe sample be obtained on-site at the southwest property corner near the location of former ATEC monitoring well 6, and adjacent to a large above ground storage tank on property occupied by Farm Bureau.

We have documentation that ATEC monitoring well 6 was sampled by ATEC in 1984, sampled again by IT in 1985, and subsequently removed by IT as one of those wells whose construction and analytical results were suspect. No additional on-site work was proposed in that area in the IT Work Plan, nor in the Consent Order signed by Amphenol and Franklin Power Products. Our own RFI work has provided no information that suggests that there is a ground water contaminant plume in that area, and the area is in fact sidegradient, or slightly upgradient from the documented contaminant plume. For these reasons, my clients are of the opinion that the additional on-site sampling location is neither required by the Consent Order, nor warranted by the results of any information gathered, nor is it consistent with the intent of the SOP addendum.

The preparation of the SOP addendum was necessitated because we believe it inadvisable to install ground water monitoring wells in off-site public rights-of-way; as an alternative we proposed that the sampling be done by Geoprobe. The SOP addendum was prepared and submitted to provide the Agency with procedures and documentation that the off-site samples to be collected will be of suitable quality for contract laboratory analysis. I suggest that the SOP addendum be approved as submitted so that we may proceed with the delineation of the area of real concern: the plume south of Hamilton Avenue.

If you have any questions, please get in touch with me.

Very truly yours,

James H. Keith

James H. Keith

cc: Susan Gard
Sam Waldo

WW Engineering & Science
A Summit Company

January 6, 1993

RECEIVED
JAN 7 1993
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

William Buller
U.S. EPA, Region V, 5HR-12
230 South Dearborn Street
Chicago, Illinois 60604

Dear Mr. Buller:

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5010 Stone Mill Road Bloomington, IN 47408 812/336-0972 Fax 812/336-3991
Bloomington, IN Chattanooga, TN Columbus, OH Detroit, MI Grand Rapids, MI Indianapolis, IN Milwaukee, WI Minneapolis, MN

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If you have any questions, please get in touch with me.

Very truly yours,

James H. Keith

James H. Keith

cc: Susan Gard
Sam Waldo

WW Engineering & Science
A Summit Company

December 28, 1992

Mr. William Buller
U.S. EPA, Region V, 5HR-12
230 South Dearborn Street
Chicago, Illinois 60603

RECEIVED
DEC 30 1992
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

Dear Mr. Buller:

In accordance with our telephone conversation of this date, I have revised the SOP for collecting ground water for CLP analysis using a Geoprobe test vehicle. The SOP is attached for your review. If you have any questions, please get in touch with me.

Very truly yours,

James H. Keith

James H. Keith
Project Manager

cc: Susan Gard
Sam Waldo

5010 Stone Mill Road Bloomington, IN 47408 812/336-0972 Fax 812/336-3991
Bloomington, IN Chattanooga, TN Columbus, OH Detroit, MI Grand Rapids, MI Indianapolis, IN Milwaukee, WI Minneapolis, MN

SUPPLEMENT TO OCTOBER 12, 1992 RFI WORK PLAN:
Installation of Additional Monitoring Wells and Sampling,
RCRA Facility Investigation (RFI)
Former Amphenol Facility, Franklin, Indiana

SOP FOR OFF-SITE GEOPROBE GROUND WATER SAMPLING FOR CLP ANALYSIS FOR THE FORMER AMPHENOL SITE RFI

METHOD DESCRIPTION

In order to avoid placing permanent monitoring wells off-site in the Franklin City right-of-way, ground water samples from the Unit B saturated sand will be recovered through a hollow Geoprobe sampling train inserted to sampling depth by a truck-mounted hydraulic ram. Samples will be analyzed by the CLP contract laboratory for volatile organic compounds, total metals and total and amenable cyanide as described in the project QAPP approved May 25, 1991. Sample locations and ground elevations will be established by a surveyor and tied into the existing on-site locational grid.

EQUIPMENT

1) Truck-mounted Geoprobe ground water sampling system with steel alloy and stainless steel rods
2) Screen point ground water sampler
3) Stainless steel or Teflon mini-bailer
4) Soil sampling point with acetate insert
5) Peristaltic pump with battery power supply and Teflon tubing
6) Steam cleaner, DI water, Alconox for decontamination

SAMPLING EQUIPMENT AND PROCEDURES

Description of Equipment

The Geoprobe sampler operates by inserting a string of one-inch diameter threaded steel alloy hollow rods vertically into the ground with the aid of a truck-mounted hydraulic ram capable of exerting 15,000 pounds of force. The system has an air hammer attachment to advance the rods into dense or hard materials. Rod sections are three feet long.

Two special sampling points will be used. The first is a soil sampler with two-foot long acetate inserts (Figure 1). The sampler is capable of recovering a soil core up to 24 inches long and 1.5 inches in diameter. The sampler is installed at the bottom of the sampling string and is advanced with the air hammer. After being advanced for two feet, the sampler is withdrawn and the soil sample removed for description. Continuous soil samples can be collected in this manner.

The second point is a screen point ground water sampler (Figure 2). This sampler is installed at the bottom of the sampling string and is advanced hydraulically or by air hammer to the desired sampling depth with decontaminated stainless steel rods. While driving, the point is sealed from outside contamination. At sampling depth, the sampling string is withdrawn two feet, the 0.0057" screen is exposed, and water enters the sampler. The water can then be retrieved to the surface by a Teflon or stainless steel mini-bailer, or pump. The bailers are 7/16" OD and 20 inches long with a ball and seat.

Sampling Procedures

Based upon previous drilling and Geoprobe work, sampling depth is expected to vary between 12 and 22 feet, the depth being controlled by a layer of material (assumed to be the Unit C till layer) that is very difficult to penetrate by hydraulic force alone. The

saturated sand unit appears to be only two to three feet thick in the off-site areas. If saturated unit thickness at any sampling location is four feet or greater, two samples will be collected for VOC analysis per four feet of saturated thickness at that location.

Two Geoprobe holes will be advanced at each sampling location. The first will be advanced using the soil sampler to collect continuous soil samples. Soil samples will be collected, described and measured by a WWES geologist to determine the stratigraphy of the sample location. Soil samples will be collected until three to five feet of the underlying Unit C till has been penetrated. The location of the saturated sand will be noted and this information will be used to determine the sampling depth for the screen point ground water sampler. Stratigraphic information will be recorded by the geologist for later incorporation into geologic cross sections. Soil samples will be retained and returned to the site for disposal.

Following completion of the first hole, the sampling string will be withdrawn, and the hole backfilled and sealed with bentonite granules. A second hole will be advanced one to three feet away from the first to a depth that will allow the exposed screen to sample water in the proper interval of the saturated sand. The sampling rods will be withdrawn two feet to expose the screen.

Water for CLP volatile organic compounds will be collected by a Teflon or stainless steel mini-bailer. Three bailers full of water will be collected and discarded into a plastic container for return to the site and disposal, then the water will be sampled. Water collected in this manner is carefully poured from the bailer into the VOA sample containers. Water for metals, and total and amenable cyanide will be collected by means of a portable peristaltic pump and Teflon tubing inserted down the hollow sampling train (Figure 3). Water is pumped directly into the sample containers. The volatile portion of

the sample will be collected first followed by metals and cyanide. Ground water samples for metals will have passed through the 0.0057" screen and will not be filtered after collection.

The sampling methods described allow:

1) Volatiles samples to be collected without subjecting them to air pressures lower than ambient atmospheric pressure by bailing.
2) Sufficient sample quantities for metals and cyanide analysis by peristaltic pumping.
3) Stratigraphic measurements which will be used to determine sampling depth, and will also be used to determine off-site stratigraphy.

Following withdrawal of the second tubing train, the hole will be backfilled with bentonite pellets, and a steel rebar stake will be installed flush with the ground at the site of the first (soil sampling) point to permit relocation of the sampling point. Sampling point elevations and coordinates with respect to the existing monitoring well system will be established by survey.

All samples collected, other than those collected for screening, will be submitted for analysis to Southwest Laboratories of Oklahoma, Inc. as noted in Section 1.1 of the project QAPP approved May 25, 1991

Sampling Locations

See Figure 4. Ground water samples are proposed at four locations: between former Geoprobe locations SGP-6 and SGP-7 (PGP-1), south of GNS-4 (PGP-2), the vicinity of the Forsythe Street - Hamilton Avenue intersection (PGP-3), and adjacent to MW-12 (PGP-4). The latter sample will be used as a check against standard screened well and

bailer sampling that will also be conducted at MW-12. To assure that the edge of the plume is being monitored at PGP-3, water samples will be collected at several locations in the vicinity and analyzed using the on-board purge-and-trap GC before selecting the sampling point for the CLP samples.

Sample Quantities, Containers and Preservation

Sample quantities, containers and preservation will be conducted as described in the project QAPP approved May 25, 1991 (see Table 1 of the QAPP).

Sample Handling and Record Keeping

Sample handling and record keeping will be conducted in accordance with the project QAPP approved May 25, 1991 (see Section 4 and 5 of the QAPP).

QA/QC

1. Equipment Decontamination

All rods will be scrubbed in an Alconox solution, steam cleaned, rinsed with DI water and allowed to dry prior to use. All rods will be changed between holes such that rods will not be reused from sample point to sample point. Teflon tubing employed for the peristaltic pump will be decontaminated between sample points by pumping DI water through it for at least five minutes. The bailers will be cleaned with an Alconox detergent solution, rinsed with DI water and allowed to dry before use.

2. QA/QC Samples

QA/QC Geoprobe samples will be collected separately from on-site monitoring well samples. The following QA/QC samples will be collected for the volatiles analyses:

1 equipment blank

1 trip blank

1 duplicate

1 matrix spike/duplicate

The following QA/QC samples will be collected for metals and total and amenable cyanide:

1 equipment blank

1 duplicate

QA/QC samples will be collected in accordance with Section 4.10 of the QAPP.

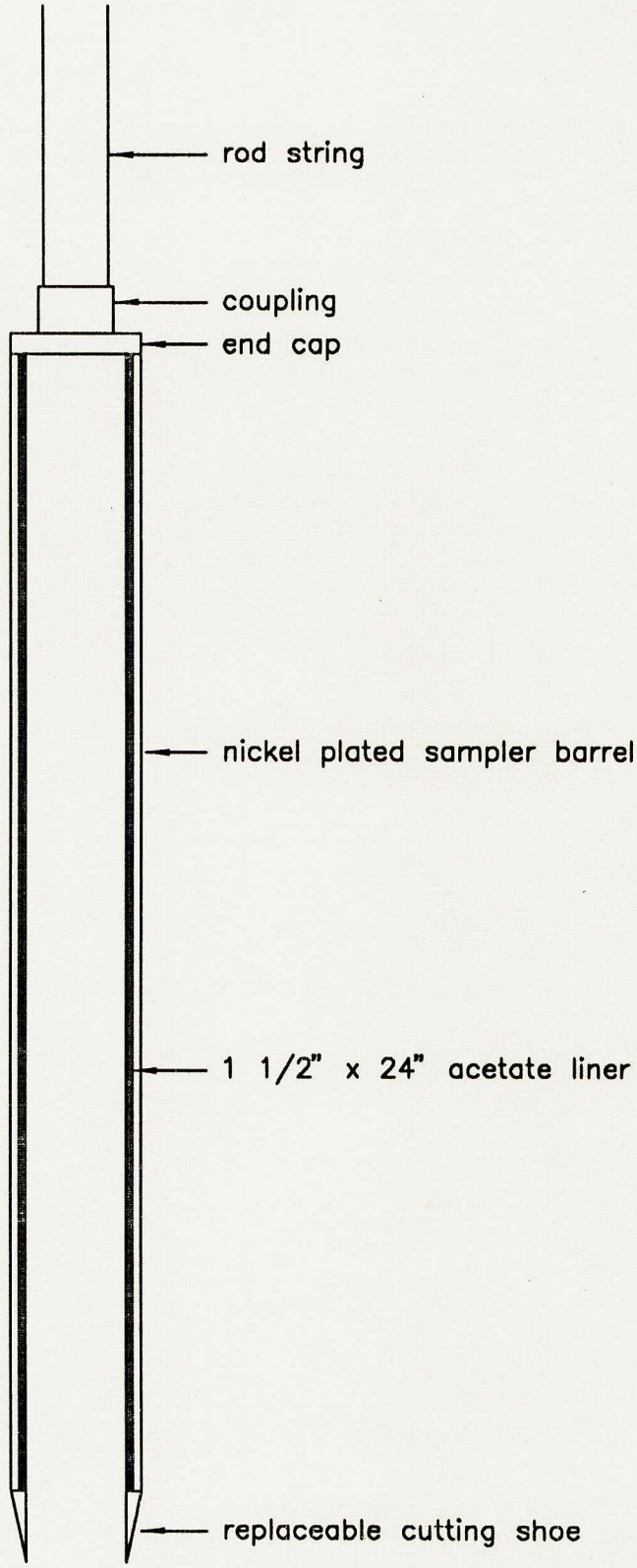

Figure 1. Soil sampler assembly.

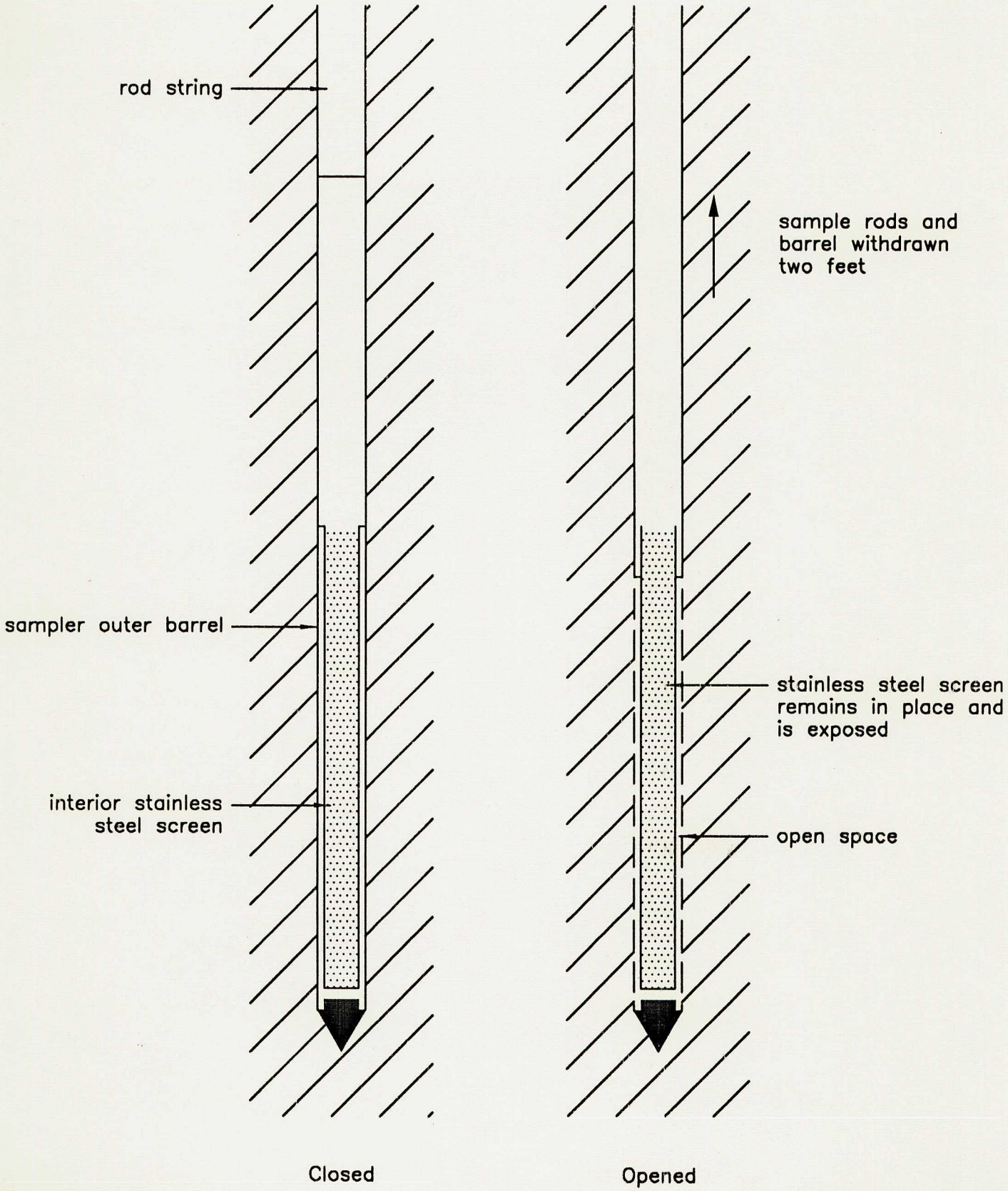

Figure 2. Screened ground water sampler.

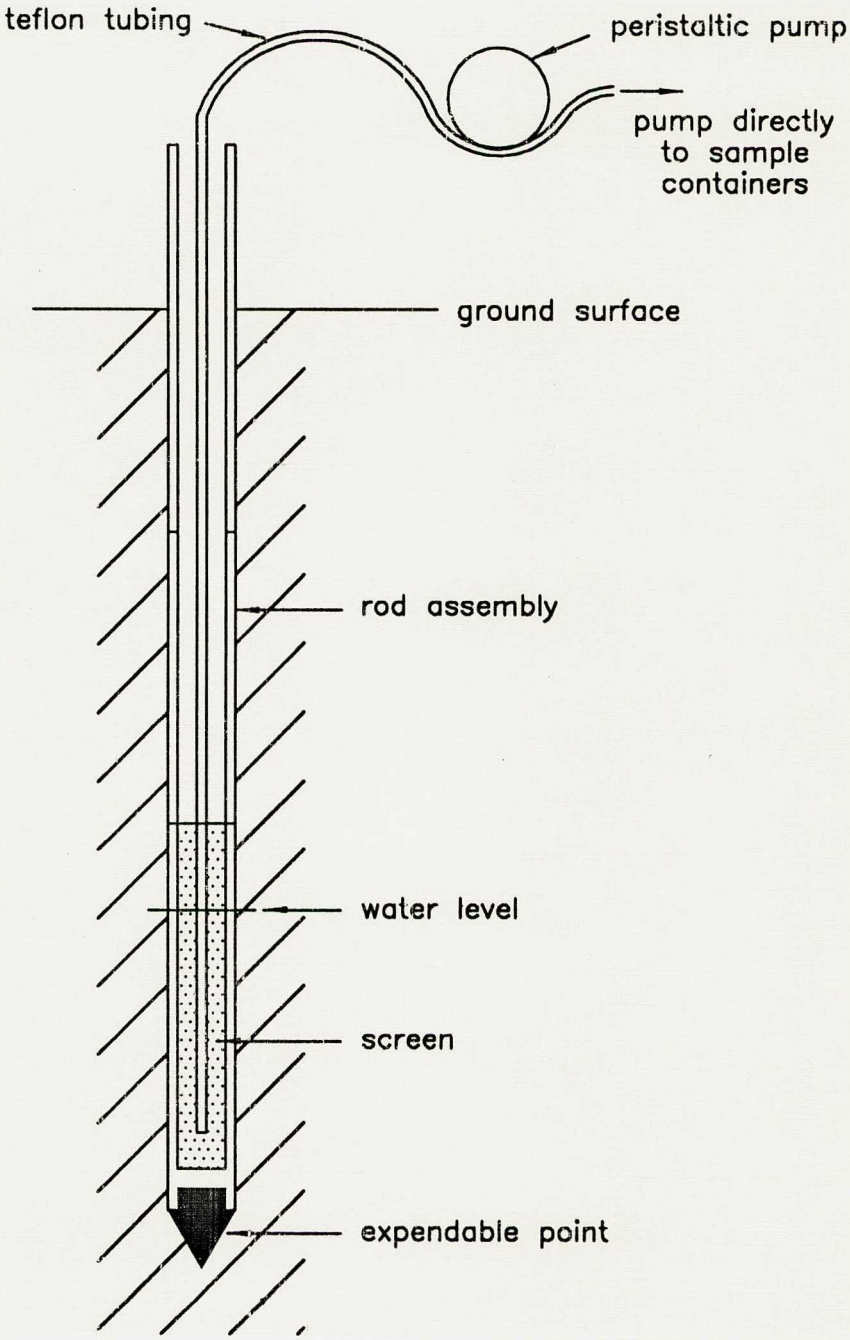

Figure 3. Sampling ground water for metals and cyanide by peristaltic pumping.

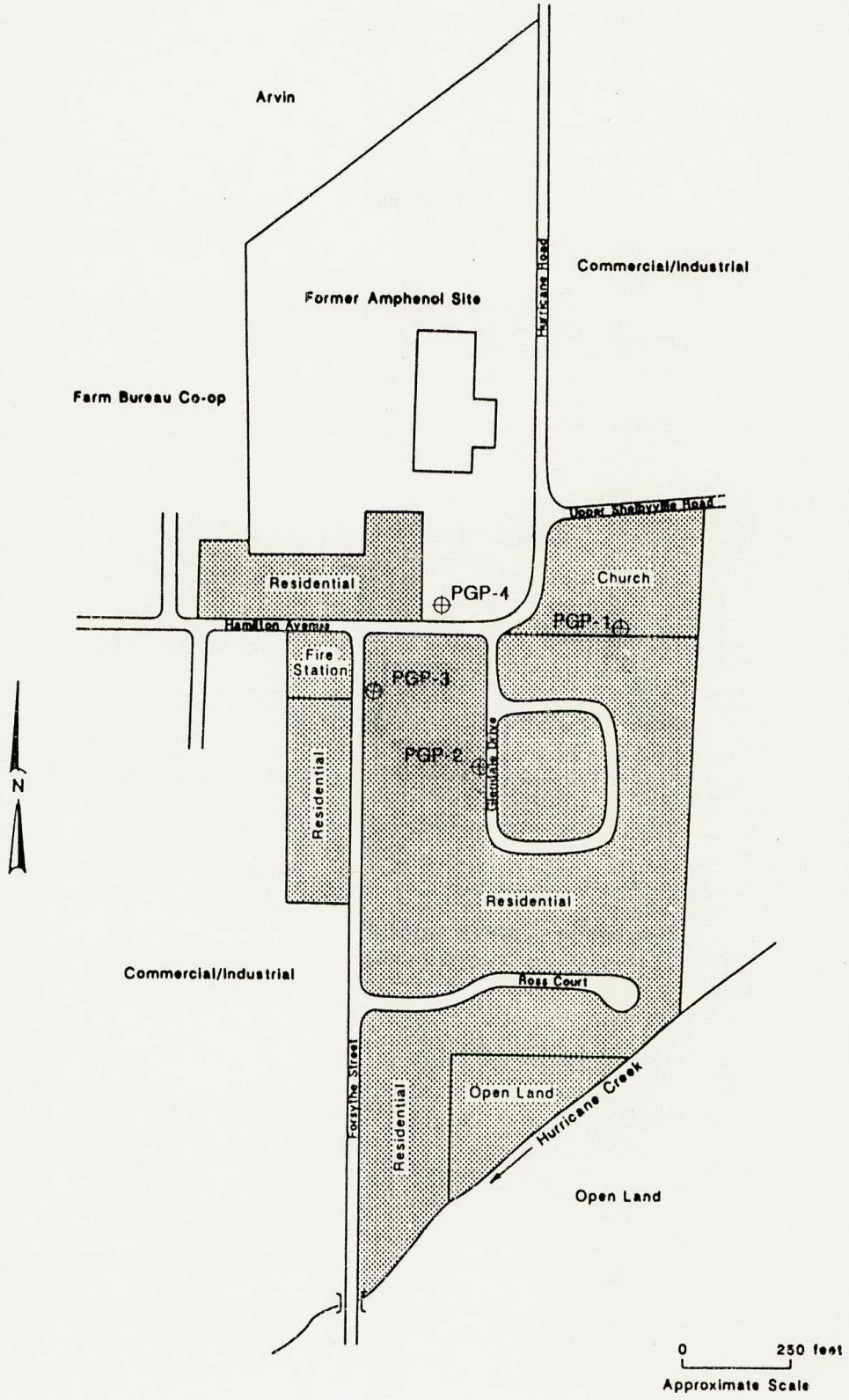

Figure 4. Locations of proposed Geoprobe sampling points.

FRANKLIN POWER PRODUCTS™

RECEIVED
DEC 24 1992
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

December 21, 1992

William Buller
RCRA Enforcement Branch (5HR-12)
Waste Management Division
U.S. Environmental Protection Agency
230 South Dearborn Street
Chicago, Illinois 60604

RE: Administrative Order on Consent IND 044 587 848
Franklin Power Products, Inc. and Amphenol Corporation
REQUEST FOR EXTENSION OF TIME TO SUBMIT DRAFT RFI REPORT

Dear Mr. Buller:

Article VII 2(b) of the referenced Consent Order requires that a draft RFI report be submitted to you within 75 days of the approval of the supplemental plan. Our records indicate the supplemental plan was approved on October 19, 1992, making the draft RFI report due on January 2, 1993.

The 75 day deadline is reasonable and appropriate in a case where only additional sampling and analysis of existing wells is necessary prior to completing the draft RFI. Seventy-five days is not sufficient time in a situation where a greater scope of work is required. On October 26, 1992, our consultant, James Keith of W. W. Engineering and Science, Inc., acknowledged in writing Region V's approval of a supplemental Work Plan and, based on the scope of work of the Plan, included a preliminary schedule indicating that the Draft RFI report would be submitted by March 2, 1993. That letter was for informational purposes only, and was not a formal request for extension of time. Shortly after the approval of the supplemental Work Plan, the Respondents, through W. W. Engineering and Science, performed additional on-site sampling and initial off-site sampling. Based upon those results, a revised Work Plan was submitted with modified off-site sampling procedures. You have had a number of discussions with Mr. Keith regarding the sampling methodology and operating procedures to be employed; based on your comments, a modified Work Plan has been submitted and is awaiting your further comment or approval.

Please accept this as a formal request on behalf of the Respondents for an extension of time until no later than April 1, 1993 in which to submit a draft RFI report. We believe that we have proceeded with all due diligence, and that we could not reasonably foresee at the time the Consent Order was signed that

FRANKLIN POWER PRODUCTS INC. 400 Forsythe St.
Franklin, IN 46131 (317) 738-2117

75 days would be inadequate to complete any required supplemental work and submit a draft RFI. This request is not made for the purpose of delay but rather to allow Respondents to fully comply with the spirit and intent of the Consent Order.

Article XIX provides that such an extension shall be accomplished through written amendment to the Consent Order. Would you please forward a copy of a proposed amendment, or have someone in your legal department contact me, so that we may make sure we remain in compliance. My office is located at 1000 Waterway Boulevard, Indianapolis, IN 46202; my direct phone number is 317/633-2069; my fax is 317/634-1791. Your prompt attention to this matter is greatly appreciated.

Very truly yours,

FRANKLIN POWER PRODUCTS, INC.

BY: Susan W. Gard
Susan W. Gard
Corporate Counsel

Via certified mail - P676 651 822
Via fax 312/353-4788

cc: James Keith - WW Engineering & Science
Mike Jarvis - Franklin Power Products, Inc.
Sam Waldo - Amphenol Corporation

WW Engineering & Science
A Summit Company

RECEIVED
OCT 30 1992
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

October 26, 1992

William Buller
US EPA, Region V, 5HR-12
230 South Dearborn Street
Chicago, Illinois 60604

Dear Mr. Buller:

We received U.S. EPA Region V written approval of our Work Plan "Installation of Additional Monitoring Wells and Sampling, RCRA Facility Investigation, Former Amphenol Facility, Franklin, Indiana". Franklin Power Products, Inc. has spent the intervening period working out final details on the encroachment license with the City of Franklin that allows work on the city right-of-way. The city is willing to grant the license for Geoprobe work and for monitoring well placement, but not on the same license. Once we know where we want to place off site monitoring wells, we have to go to the city for another license. The mailing for residents located in the "Area of Concern" (Work Plan, Figure 2) is also being prepared and sent in cooperation with the Johnson County Health Department.

Below is a preliminary schedule for completion of RFI activities. The schedule depends upon the timely granting of licenses to work on Franklin right-of-ways by the city.

November 3	Begin Geoprobe work
November 6	End Geoprobe work
November 23	Begin installation of ground water monitoring wells
December 2	Begin ground water sampling
January 4	Receive analytical data from laboratory
February 2	Receive validated analytical data

5010 Stone Mill Road Bloomington, IN 47408 812/336-0972 Fax 812/336-3991
Bloomington, IN Chattanooga, TN Columbus, OH Detroit, MI Grand Rapids, MI Indianapolis, IN Milwaukee, WI Minneapolis, MN

March 2 Submit draft RFI report

If you have any questions, please let me know.

Very truly yours,

James H. Keith
Project Manager

cc: Mike Jarvis
Susan Gard
Sam Waldo
John Bonsett

WW Engineering & Science
A Summit Company

November 23, 1992

RECEIVED
NOV 24 1992
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

Mr. William Buller
U.S. EPA, Region V, 5HR-12
230 Dearborn Street
Chicago, IL 60604

Dear Mr. Buller:

Upon the completion of the Geoprobe study at the former Amphenol site, we determined that the ground water contaminant plume is not significantly further than described in our June 23, 1992 Plume Delineation Report. We have revised our recommendations for off-site well installation as described in the enclosed Technical Memorandum. Three copies are provided for the use of your agency.

If you have any questions, please let me know.

Very Truly Yours,

James H. Keith

James H. Keith
Senior Ecologist

Enclosure

BL/mke/JHK/b:/CURTIS FRANKLIN/07026.05/1/WB112393.doc

5010 Stone Mill Road Bloomington, IN 47408 812/336-0972 Fax 812/336-3991
Bloomington, IN Chattanooga, TN Columbus, OH Detroit, MI Grand Rapids, MI Indianapolis, IN Milwaukee, WI Minneapolis, MN

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

OCT 19 1992

REPLY TO THE ATTENTION OF:
HRE-8J

Mr. J. Michael Jarvis
Franklin Power Products, Inc.
400 Forsythe Street
P.O. Box 667
Franklin, Indiana 46131

Dear Mr. Jarvis:

Your Work Plan "Installation of Additional Monitoring Wells and Sampling, RCRA Facility Investigation, Former Amphenol Facility, Franklin, Indiana" dated October 12, 1992, is hereby approved by the United States Environmental Protection Agency, with the following condition:

> The analysis of monitoring well samples shall include the volatile organic compound analytes and metal analytes listed in the Quality Assurance Project Plan dated May 25, 1991.

Thank you for your cooperation on this matter. If you have any questions please call William Buller of my staff at (312) 886-4568.

Sincerely yours,

Paul E. Dennett
for Joseph M. Boyle, Chief
RCRA Enforcement Branch

Printed on Recycled Paper

Sylvester
10-26-92

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live

Evan Bayh
Governor
Kathy Prosser
Commissioner

105 South Meridian Street
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Telephone 317-232-8603
Environmental Helpline 1-800-451-6027

RECEIVED
OCT 22 1992
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

October 16, 1992

VIA CERTIFIED MAIL P 730 167 726

Ms. Susan Sylvester
U.S. EPA, Region V
77 West Jackson Blvd.
Chicago, Illinois 60604

Dear Ms. Sylvester:

Re: RCRA Facility Investigation
Phase II Work Plan
Franklin Power Products
Franklin, Indiana
EPA I.D. No. IND 044587848

The Indiana Department of Environmental Management (IDEM) has reviewed Franklin Power Products' August 4, 1992, and October 12, 1992, RCRA Facility Investigation (RFI) Phase II Work Plans for the installation of additional monitoring wells and sampling. The Work Plans are adequate as submitted.

If you have any questions regarding this matter, please contact Ms. Ruth Williams of my staff at 317/233-4623.

Sincerely,

Michael E. Sickels

Michael E. Sickels, Chief
Corrective Action Section

RW/rgw

cc: Fayola Wright, USEPA

THE CURTIS PUBLISHING COMPANY

1000 Waterway Boulevard, Indianapolis, Indiana 46202, Phone (317) 636-1000
Telex: 27440, Panafax (317) 634-1791

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SEP 11 1992
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

September 9, 1992

William Buller
U.S. EPA, Region V, 5HR-12
230 South Dearborn Street
Chicago, Illinois 60604

RE: Former Bendix Facility, Hurricane Road, Franklin, IN
Administrative Consent Order IND 044 587 848
(Our subsidiary, Franklin Power Products, Inc.)

Dear Mr. Buller:

Per your request to Jim Keith at WW Engineering & Science, enclosed is a copy of the notice that we propose to send to households in the area where hydropunch sampling will be conducted. The letter is acceptable to the Johnson County Department of Health and will appear on their letterhead.

We anticipate that this letter will be mailed as soon as we have firm dates for the sampling. If you have any questions or comments, please do not hesitate to contact me at 317/633-2069.

Very truly yours,

Susan W. Gard

Susan W. Gard
Corporate Counsel

SWG/dc
cc: Jim Keith
Mike Jarvis - Franklin Power Products
Sam Waldo - Amphenol Corporation
John Bonsett - Johnson County Health Dep't

DRAFT 9/9/92
ON JOHNSON COUNTY HEALTH DEPARTMENT LETTERHEAD
September *, 1992

*
*
*

Dear:

On September ___ and ___, 1992, GeoTrace, Inc. and WW Engineering & Science, Inc. will be collecting groundwater samples in the vicinity of the Glendale subdivision. The purpose of this sampling is to determine the presence of any volatile organic compounds. This work will be conducted within the municipal right-of-way and is authorized by an encroachment license issued by the City of Franklin.

The work will consist of the insertion of a metal probe into the ground for the purpose of collecting a water sample, and will cause little, if any, disturbance to the right-of-way property. Utilities will be notified in advance of the sampling, and will mark the location of their underground installations with colored paint. Each sampling location will be promptly restored as closely as possible to its original condition. Depending upon the sampling results, two or three monitoring wells may later be installed in the right of way as long term sampling points.

Our records show that all water in the area is supplied by Indiana Cities Water Corporation. If you have and are using a well, please let us know.

We are most appreciative of your consideration during this activity, and anticipate that you will be caused no inconvenience. If you have any questions prior to work starting, during the sampling, or after it is completed, please do not hesitate to contact us. In addition, representatives of WW Engineering & Science will be present during the testing and will answer any questions you may have at that time.

Very truly yours,

Dr. Craig Moorman
Commissioner of Health

John Bonsett
Director of Environmental Health

Amphenol an LPL company

phenol Corporation

rporate Headquarters
358 Hall Avenue
P.O. Box 5030
Wallingford, CT 06492-7530
Telephone (203) 265-8900

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SEP 9 1992
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

Amphenol 1932 - 1992
Making the Right Connections for Over 60 Years

September 2, 1992

IND 044 587 848

Mr. William Buller
U.S.EPA-Region V, 5HR-12
230 Dearborn Street
Chicago, IL 60604

D.2.1

Dear Mr. Buller:

I understand from recent conversations with Susan Gard and Jim Keith that there is some residual concern on your part regarding the necessity for an NPDES application for groundwater infiltration into the storm sewer at the former Amphenol/Bendix facility in Franklin, IN. The Consent Order requires that an application be submitted within 30 days of notice from IDEM that such is required.

This issue was discussed at some length at our February 18, 1988 meeting in Chicago with EPA. At that time I indicated that, while I didn't believe an application was necessary or appropriate, I would follow up with IDEM to confirm that viewpoint. Those conversations resulted in revised consent order language being proposed, in my March 3, 1988 letter, which is currently reflected in the final order (an additional sentence was added to the end of the subject Interim Measure later in our negotiations).

I have confirmed IDEM's requirements for NPDES applications in a September 1, 1992 telephone conversation with Joe Krieger, IDEM Permits Supervisor. An NPPES permit is required for all indirect or direct point source discharges into surface waters of the state. He confirmed that groundwater infiltration into a storm sewer is not a point source. He further noted that a permit could not be issued for a condition "in violation of surface water quality standards," and that treatment of the noncompliant condition would be required before a permit to discharge could be issued; this last point is clearly the reason the additional sentence was placed in the Interim Measures clause of the Consent Order.

Mr. Krieger indicated that if a remedial system were installed which discharged to the storm sewer, a permit would be required. Until that time, no permit is necessary.

Please don't hesitate to contact me if you have any questions regarding the above.

Sincerely,

Samuel S. Waldo
Director, Environmental Affairs

lmc:buller-wp

c: S. Gard
J. Keith

WW Engineering & Science, Inc.
5010 Stone Mill Road • Bloomington, IN 47408 • (812) 336-0972, Fax (812) 336-3991

August 28, 1992

RECEIVED
AUG 31 1992
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

Mr. William Buller
U.S. EPA, Region V, 5HR-12
230 Dearborn Street
Chicago, IL 60604

Dear Mr. Buller:

In accordance with your telephone request of August 28, 1992, I am forwarding copies of correspondence from my files that document the information received by IDEM and the State Board of Health about conditions and activities at the former Amphenol site. These are as follows:

- a letter dated 1/30/85 form John Bonsett to Robert Carter of the ISBH
- a memo dated 2/21/85 to Earl A. Bohner from Robert Carter
- a letter to John Bonsett from Indiana Cities Water Corporation (cc to Robert Carter)
- a letter dated 5/29/85 to Roy Harbert of the ISBH from Wayne Barto
- a letter dated 6/12/85 to Jeff Eads of the ISBH from B.N. Fleischer
- a letter dated 9/11/85 from David Lamm of the ISBH to William Miner, USEPA
- a letter dated 9/12/85 to Roy Harbert from B.N. Fleischer
- a letter dated 3/24/86 to John Bonsett from B.N. Fleischer (cc to Roy Harbert) with first quarter ground water analytical data attached
- a letter dated 6/13/86 to John Bonsett form B.N. Fleischer (cc to Roy Harbert) with second quarter ground water analytical data attached
- a letter dated 10/13/86 to John Bonsett form B.N. Fleischer (cc to Roy Harbert) with third quarter ground water analytical data attached

If you have any questions, please let me know.

Very Truly Yours,

James H. Keith
Senior Ecologist

Enclosure

cc: Susan Gard

WW Engineering & Science, Inc.
5010 Stone Mill Road • Bloomington, IN 47408 • (812) 336-0972, Fax (812) 336-3991

January 20, 1992

RECEIVED
JAN 21 1992
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

Bill Buller
US EPA, Region V, 5 HR-12
230 South Dearborn Street
Chicago, IL 60604

Dear Mr. Buller:

Enclosed is an aerial photograph copy of the former Amphenol Site in Franklin, Indiana. The copy indicates the photo date is January 3, 1992, but is in error. The photo was taken on January 11, 1992. We are having the mylar master revised and will issue another photo with the corrected date when we get it.

I have talked with Jim Meyers of Metcalf & Eddy. We anticipate beginning field work on January 27, 1992, and will start with the soil gas survey. We hope to be in drilling activities by the middle or end of that week if weather permits.

Very truly yours,

James H. Keith
Project Manager

Enclosure

cc: Mike Jarvis
Susan Gard

HRE-8J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. J. Michael Jarvis
Franklin Power Products, Inc.
400 Forsythe Street
P.O. Box 667
Franklin, Indiana 46131

Re: Administrative Order on Consent
Franklin Power Products,
Inc./Amphenol
IND 044 587 848

Dear Mr. Jarvis:

The United States Environmental Protection Agency (U.S. EPA) has reviewed the RCRA Facility Investigation (RFI) report with the revisions of October 1993. This document was submitted in accordance with Section VII.c. of the Administrative Order on Consent (AOC) dated November 27, 1990. Review of the additional data has resulted in the following concern.

Data indicates that contaminant concentrations in groundwater decrease to low levels southward of the facility. However, the existence of the 72 inch storm drain which transverses the site and drains to Hurricane Creek, creates the possibility that contaminated groundwater at the facility may have been recharged to the aquifer in the area of the storm drain outfall. Data indicates that the storm drain intercepts contaminated ground-water at the facility when ground-water levels are above the base of the storm drain. During periods of stream flow this water would be dispersed by the stream flow of Hurricane Creek. However, site conditions may occur in which the creek becomes dry but interception of contaminated water by the storm drain continues for sometime before water levels equilibrate upgradient. Under such conditions recharge of contaminated water to the aquifer near the outfall would occur. Over a period of several years the recharge of contaminated water to the aquifer may have been significant. Further, the contaminants may have moved in a downstream direction in response to the ground-water gradient. At present, Respondents have not provided ground-water data for this critical area.

To address this concern, additional ground-water samples shall be collected at the approximate locations shown in Attachment I. Respondents may collect samples by installing monitoring wells or by the geoprobe method described in "Supplement to October 12, 1992, RFI Work Plan" dated December 28, 1992. Samples shall be collected from the upper ten (10) feet of the saturated zone.

U.S. EPA provides seventy-five (75) days from date of receipt of this letter to submit the additional information in a revised RFI report. In a September 2, 1993 letter, U.S. EPA advised you that the response to comments pertaining to Risk Assessment could be deferred to the corrective measures part of the AOC. Since U.S. EPA has provided seventy-five (75) days to submit the modification, U.S. EPA requests that the Risk Assessment information also be provided with the modification to the RFI report.

If Respondent does not agree to perform additional sampling, Respondent shall notify U.S. EPA within thirty (30) days of receipt of this letter of such response. Such response shall provide an alternative approach to resolve the data gap.

If you have any questions call William Buller of my staff at (312) 886-4568.

Sincerely yours,

Joseph M. Boyle, Chief
RCRA Enforcement Branch

cc: Samuel Waldo, Amphenol
Mike Sickles, IDEM

bcc: Joseph Cooley, ORC

asimpkins:buller:10/9/93:disk #2 Filename:franlrfi.re2

11/10/93

| OFFICIAL FILE COPY |

SIGNATURE/INITIAL CONCURRENCE REQUESTED - RCRA ENFORCEMENT BRANCH (REB)

TYP.	AUTH	IL/IN TES CHIEF	MI/WI TES CHIEF	MN/OH TES CHIEF	IL/MI/WI EPS CHIEF	IN/MN/OH EPS CHIEF	REB BRANCH CHIEF	RCRA ASSOC. DIR.	WMD DIV. DIR.
11/10/93	11/10/93	for Susan Gleason 11/10/93					11/2/93		

ATTACHMENT I

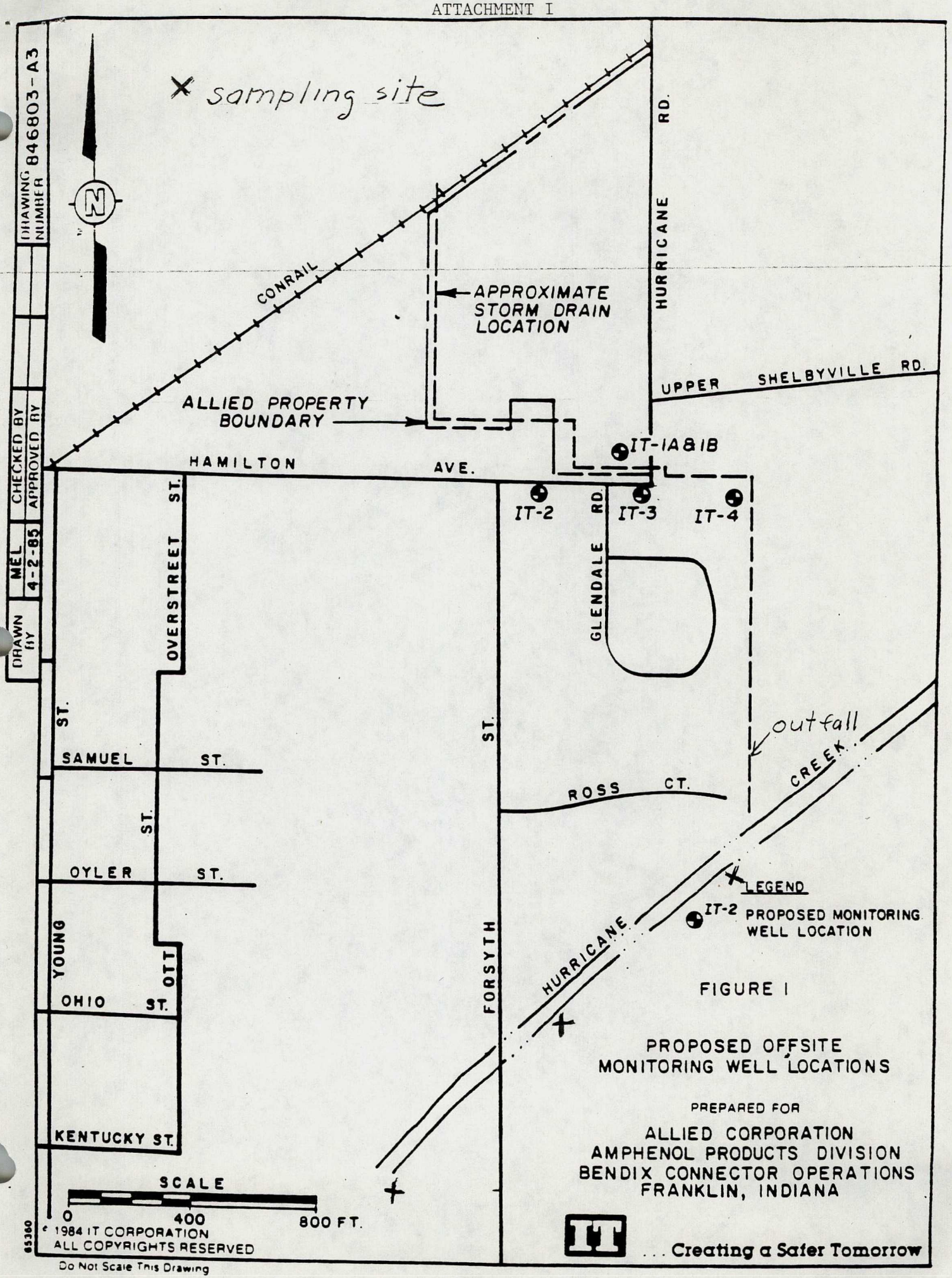

FIGURE I

PROPOSED OFFSITE MONITORING WELL LOCATIONS

PREPARED FOR

ALLIED CORPORATION
AMPHENOL PRODUCTS DIVISION
BENDIX CONNECTOR OPERATIONS
FRANKLIN, INDIANA

RECEIVED FEB 18 1993
WMD RCRA
RECORD CENTER Compliance

HRE-8J

CERTIFIED RETURN
RECEIPT REQUESTED

Mr. J. Michael Jarvis
Franklin Power Products, Inc.
400 Forsythe Street
P.O. Box 667
Franklin, Indiana 46131

Re: Administrative Order on Consent
Franklin Power Products, Inc./Amphenol
IND 044 587 848

Dear Mr. Jarvis:

The United States Environmental Protection Agency (U.S. EPA) has received the December 21, 1992 letter from Susan Gard which requests an extension of time for submittal of the draft RCRA Facility Investigation (RFI) report. Salient events and issues relevant to this matter are discussed below.

Paragraph VII 2.a.(4)(c)(iii) of the above captioned Administrative Order on Consent (AOC) specified that if the initial RCRA Facility Investigation (RFI) did not provide sufficient data to delineate the ground-water contamination plume extent to background levels, as so specified in Section VII of the AOC, Respondent shall submit an expanded RFI Workplan. Pursuant to the AOC, Franklin Power Products/Amphenol (FFP/A) submitted such a Workplan. After receiving U.S. EPA's comments, FPP/A submitted a revised expanded workplan dated October 12, 1992.

The ground-water contaminant plume extends off-site and necessitates that ground-water sampling be performed in residential areas. The revised Workplan proposed that a geoprobe sampling device be employed in residential areas and that permanent monitoring wells be installed at a few critical points in the residential areas. U.S. EPA approved this Workplan on October 19, 1992.

FPP/A implemented the revised Workplan on November 4, 1992. On November 23, 1992, FPP/A submitted a preliminary report to U.S. EPA which summarized the results of the expanded investigation. These results were obtained by geoprobe sampling and analysis by a mobile laboratory. This report recommended that monitoring wells should not be installed in residential areas due to potential problems with citizens and possible damage to wells.

This issue was subsequently discussed by FPP/A's consultant and U.S. EPA's project coordinator.

It was agreed that geoprobe sampling, which is accomplished by hydraulically forcing a hollow rod through soil to the desired sampling depth, and thereby minimizing citizen disturbance, is preferable to the conventional well drilling/installation methods, in residential areas. To employ the geoprobe for development of critical data, sampling/analysis procedures must satisfy the contract laboratory protocol (CLP) as specified in the approved Quality Assurance Project Plan. Upon review of this matter, U.S. EPA has concluded that collection of samples from the geoprobe with a mini-bailer is essentially the same as the approved methods for sampling conventional monitoring wells, and therefore is acceptable.

Following discussions by FPP/A and U.S. EPA representatives, FPP/A submitted a document titled "Supplement to the October 12, 1992 RFI Workplan - SOP (Standard Operating Procedure) for Off-site Geoprobe Ground-Water Sampling for CLP Analysis for the Former Amphenol Site RFI" dated December 28, 1992. This document incorporates the acceptable geoprobe sampling methods and analytical protocol.

U.S. EPA, hereby, approves Franklin Power Product's SOP for of-site geoprobe ground-water sampling - dated December 28, 1992. It is important to note that the revised Workplan states that sufficient samples will be collected to delineate the ground-water plume to background concentrations, the criteria specified in Section VII of the AOC. Approval of the October 12, 1992 and December 28, 1992, documents does not assure that this criteria will be met. Satisfaction of this requirement depends upon the analytical results and location of the sampling points; it is FPP/A's responsibility to ensure that sufficient samples are collected.

Upon consideration of your request for a time extension for submittal of the draft RFI report, U.S. EPA is concerned that Respondents did not pursue full implementation of the approved October 12, 1992, Workplan. This Workplan proposed off-site well drilling\installation, but Respondents decided not to implement this part of the Workplan because of potential citizen concern. However, an alternative method for off-site sampling has been agreed upon, and Respondents have been cooperative in developing the alternate method. U.S EPA's primary concern is that the RFI work progress in timely fashion.

U.S. EPA hereby grants your request for a time extension to submit the draft RFI report. The December 28, 1992 Supplemental Workplan involves mobilization and operation of field equipment, laboratory turn around time, and incorporation of the additional data into the draft RFI report. FFP/A shall submit a draft RFI report within seventy-five (75) days of receipt of this letter.

If you have any legal questions on these matters, please call Mr. Joseph A. Cooley at (312) 886-0814. If you have any technical questions, you may call Mr. William Buller at (312) 886-4568.

Sincerely yours,

ORIGINAL SIGNED BY
JOSEPH M. BOYLE

Joseph M. Boyle, Chief
RCRA Enforcement Branch

cc: Samuel S. Waldo, Amphenol
Mike Sickles, IDEM

asimpkin:bbuller:02/03/93:disk #2 Filename: fppgeopo.2

SIGNATURE/INITIAL CONCURRENCE REQUESTED - RCRA ENFORCEMENT BRANCH (REB)

TYP.	AUTH	IL/IN TES CHIEF	MI/WI TES CHIEF	MN/OH TES CHIEF	IL/MI/WI EPS CHIEF	IN/MN/OH EPS CHIEF	REB BRANCH CHIEF	RCRA ASSOC. DIR.	WMD DIV. DIR.
2/3/93	2/3/93	J.A for SS 2/4/93					2/5/93		

2C
jal 2/4/93

bcc: Mike DeRosa
Joe Cooley

THE CURTIS PUBLISHING COMPANY

1000 Waterway Boulevard, Indianapolis, Indiana 46202, Phone (317) 636-1000
Telex: 27440, Panafax (317) 634-1791

March 5, 1990

Steven P. Kaiser, Esq.
U.S. EPA, Region 5
230 South Dearborn Street
Chicago, Illinois 60604

RE: Franklin Power Products / Amphenol Corporation
Administrative Order on Consent, IND 044 587 848

Dear Steve:

We have reviewed the proposed consent order accompanying your cover letter dated February 22, 1990. A few changes are required on page 11. Subparagraph b, next to the bottom line, "approval or the supplemental plan" should be "approval of the supplemental plan." The last line of the subparagraph should read Section "VII 2.a.(4)(c)(iii)." The second line of the following subparagraph c should read "Section VII 2.b".

Beyond that, Franklin, Amphenol, and our consultants, WW Engineering & Science, Inc., are concerned with what appears to be inconsistent treatment by the EPA of the October, 1988 RCRA Facility Investigation Work Plan prepared by IT Corporation - the document in accordance with which the investigation will be performed.

In particular, the approach envisioned by the Plan is to update already existing analytical results and eliminate "the few remaining data gaps," since "with the exception of the 1984 Hydrogeologic Investigation analytical results, that data collected to date can be considered quantitative in nature." (Plan, 3-1, 3-2). Accordingly, we intend to use previously gathered data, particularly from upgradient well 9, along with data gathered during this investigation, to determine background concentrations and to identify what has been occurring in the soil, ground water and surface water from 1985 to the present. We bring this matter to your attention because on occasion the EPA has ignored previous analytical results and may have forgotten the stated goals in IT's Plan.

Moreover, we have had discussions about the testing methodology to be employed in detecting VOC's; at one point the EPA indicated a preference for 8010. However, the Plan, at Tables 8 and 9, clearly contemplates the use of method 8240, whose detection limits are those set forth on Table 9, and which is part of Test Methods for Evaluating Solid Waste, SW846, 3d Ed., 9/86 as set forth in footnote 4 to Table 8. We trust that this is no longer an issue, and that you agree that 8240 is an acceptable analytical technique.

I also want to confirm the verbal understanding reached during our June 22, 1989 meeting regarding the analysis of water samples from shallow wells prior to drilling the deep wells. Those samples will not be sent to the laboratory referred to in Consent Order Section VII 2.a.(1); rather they will be sent to a local laboratory in Indianapolis, approved by EPA, in order to save time. This is alluded to in Section VII 2.a.(4)(a)(ii), being one of the procedures that will "be addressed in the QAPP." I raise it only as a detail that may have been subsequently forgotten.

Please review this letter with the appropriate Agency personnel, so that if there is a misunderstanding about these issues, it can be resolved now. In the meantime, I have circulated the Consent Order for review and ultimate signature.

Very truly yours,

Susan W. Gard

Susan W. Gard
Corporate Counsel

SWG/dc
cc: Sam Waldo - Amphenol Corporation
J. Michael Jarvis - Franklin Power Products, Inc.
James Keith - WW Engineering & Science, Inc.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:
5WQP-TUB-8

JUL 21 1988

Mr. Charles Bardonner
Assistant Commissioner for Water
Indiana Department of Environmental Management
AMAX Building, 105 S. Meridian Street
P.O. Box 6015
Indianapolis, Indiana 46225-6105

Dear ~~Mr. Bardonner~~ Charles:

I have recently learned of a facility in Indiana that is reportedly discharging, without an NPDES permit, contaminated groundwater into a storm sewer and thereby into a surface water. The facility in question is Amphenol Corporation, formerly Allied Signal Corporation/Bendix Connector Operations, in Franklin, Indiana. By this letter I am requesting that the Indiana Department of Environmental Management (IDEM) investigate and permit the discharge as appropriate.

The situation was referred to us by Bill Buller of the Region V Hazardous Waste Enforcement Branch. Mr. Buller is assisting in the preparation of a Resource Conservation and Recovery Act consent order under which Amphenol will conduct corrective actions to investigate and possibly remediate contamination at the facility. One of the environmental media that is potentially subject to corrective action cleanup requirements is the groundwater, which is contaminated by organic pollutants. Data indicate that the contaminated groundwater plume is presently being intercepted by the storm sewer, which discharges without treatment into Hurricane Creek. Removal of the storm sewer as a corrective measure is not definite and quite likely it will remain in place for some time; therefore, the discharge will probably continue into the foreseeable future.

A discharge such as that reported at the Amphenol facility is a point source that should be permitted and limited as appropriate under the National Pollutant Discharge Elimination System. Amphenol apparently is willing to apply for an NPDES permit if IDEM notifies the company of the need to obtain a permit and provides a permit application. The draft consent order contains language to this effect.

Please give this matter your attention and notify me at your earliest convenience of your assessment of the situation. If you require any

additional information please feel free to contact me at (312) 353-2079 or Howard Duckman of my staff at (312) 886-6099.

Sincerely yours,

Ken

Kenneth A. Fenner, Chief
Water Quality Branch

cc: L. Brunfield, IDEM
B. Buller, 5HS

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:
5CS-TUB-3

JUL - 7 1988

Mr. Samuel S. Waldo
Director of Environmental Affairs
Amphenol Corporation
358 Hall Avenue
Wallingford, Connecticut 06492-0384

Re: Amphenol Corporation
IND 044 587 848

RE: Revisions to RFI Work Plan
Amphenol Corporation
IND 044 587 848

Dear Mr. Waldo:

We have completed the review of the Amphenol Corporation RCRA Facility Investigation (RFI) Work Plan dated April 1988.

To ensure that the RFI closely corresponds to U.S. EPA guidelines, we recommend that certain revisions to this Work Plan be made. I have enclosed a copy of the Recommended Revisions which should be incorporated into a revised RFI Work Plan and submitted to me within thirty (30) days of receipt of this letter. Upon U.S. EPA approval of the revised RFI Work Plan, or sooner, I will provide a revised draft Consent Order which incorporates the approved RFI Work Plan and includes an outline for a Corrective Measures Study (CMS). Upon completion of the RFI and CMS, a second Order will be required to address the implementation of any corrective measures deemed necessary.

Thank you for your cooperation and prompt response in this matter. If you have any questions, please contact me at (312) 886-6613.

Sincerely yours,

Charles McKinley
Assistant Regional Counsel

Enclosures

cc: Mark Herdrich, IDEM

ALLIED Amphenol Products

World Headquarters
4300 Commerce Court
Lisle, IL 60532
Telephone (312) 983-3500

October 13, 1986

Mr. John Bonsett
Director of Environmental Health
Johnson County Health Department
86 West Court Street
Court House Annex
Franklin, IND 46131

Dear Mr. Bonsett:

Attached you will find a copy of the analytical results of the groundwater samples obtained by, our consultant, IT Corporation from our facility located in Franklin, Indiana. The samples, taken on August 7, 1986, represent the third round of quarterly groundwater samples obtained from site wells, located both on and off plant property, and the Hurricane Creek outfall. The fourth round of quarterly sampling is schedule for November, 1986.

The following is a summary of the analytical results:

- IT-1A, shows decreased concentrations of 1,1-Dichloroethane (1,1-DCA) and 1,1,1,-Trichloroethane (1,1,1-TCA) and slightly increased concentrations of tetrachloroethylene (TTCE) and trichloroethylene (TCE).

- Well No. IT-2, located south of the facility and across Hamilton Avenue, shows slight increases in the concentrations of 1,1-DCA, 1,1-Dichloroethylene (1,1-DCE), TTCE, 1,1,1-TCA, and TCE.

- The concentration of 1,1,1-TCA in Well No. IT-3 decreased to approximately 150 micrograms per liter (u/l) and slight increases in the concentrations of 1,1-DCE, TTCE, and TCE were exhibited.

- Well No. MW-3, which is located immediately down-gradient of the former plating room, displayed about the same concentrations of volatile priority pollutants detected during the second quarter sampling period.

- Well No. MW-9, which is upgradient from the facility, showed a decrease in TTCE and TCE while maintaining approximately the same concentration of 1,1,1-TCA as shown in the second quarter sampling period.

- Well No. MW-12, located downgradient of the facility and near the property line, displayed decreases in 1,2-Dichloroethane (1,2-DCA), TTCE, and 1,1,1-TCA while concentrations of 1,1-DCA and TCE remain relatively the same as last quarter.

- The outfall at Hurricane Creek showed decreased concentrations of all of the volatile priority pollutants which were present in the second round of sampling except for concentrations of 1,1-DEC which increased slightly.

Groundwater contours observed this quarter are more laminar than previously observed and the effect of the storm sewer is less pronounced. This is due primarily to the low groundwater elevation observed in the downgradient IT-3. Groundwater in IT-3 was 7 to 8 feet lower than has been previously observed, while all other wells had depths to groundwater which approximated previous measurements. This well will be carefully inspected and measured next quarter.

If you have any questions on the above, or require additional information, please contact me at your convenience.

Sincerely yours,

AMPHENOL PRODUCTS

B. N. Fleischer
Director,
Environmental Affairs

cc: W. H. Miner, Chief
Hazardous Waste Enforcement Branch
U.S. EPA, Region V
230 South Dearborn Street
Chicago, IL 60604

Attch.
BNF:dg

TABLE 1

WATER ANALYSIS SUMMARY
OF VOLATILE PRIORITY POLLUTANT RESULTS
FOR ALLIED CORPORATION; FRANKLIN, INDIANA
PROJECT NO. 303033

PARAMETER	CAS NUMBER[1]	SAMPLE IDENTIFICATION			
		OHC-1	IT-1A	IT-2	IT-3
		Concentration μg/ℓ[2]			
Acrolein	107-02-8	<10	<10	<10	<10
Acrylonitrile	107-13-1	<10	<10	<10	<10
Benzene	71-43-2	<1.0	<1.0	1.2	1.0
Bromoform	75-25-2	<1.0	<1.0	<1.0	<1.0
Carbon Tetrachloride	56-23-5	<1.0	<1.0	<1.0	<1.0
Chlorobenzene	108-90-7	<1.0	<1.0	<1.0	<1.0
Chlorodibromomethane	124-48-1	<1.0	<1.0	<1.0	<1.0
Chloroethane	75-00-3	<10	<10	<10	<10
2-Chloroethylvinyl ether	110-75-8	<1.0	<1.0	<1.0	<1.0
Chloroform	67-66-3	<1.0	<1.0	<1.0	<1.0
Dichlorobromomethane	75-27-4	<1.0	<1.0	<1.0	<1.0
1,1-Dichloroethane	75-34-3	<1.0	<1.0	11	7.5
1,2-Dichloroethane	107-06-2	<1.0	<1.0	<1.0	<1.0
1,1-Dichloroethylene	75-35-4	35	<1.0	29	38
1,2-Dichloropropane	78-87-5	<1.0	<1.0	<1.0	<1.0
1,3-Dichloropropylene[3]	542-75-6	<1.0	<1.0	<1.0	<1.0
Ethylbenzene	100-41-4	<1.0	<1.0	<1.0	<1.0
Methyl bromide	74-83-9	<10	<10	<10	<10
Methyl chloride	74-87-3	<10	<10	<10	<10
Methylene chloride	75-09-2	<10	<10	<10	<10
1,1,2,2-Tetrachloroethane	79-34-5	<1.0	<1.0	<1.0	<1.0
Tetrachloroethylene	127-18-4	96	49	38	24
Toluene	108-88-3	<1.0	<1.0	<1.0	<1.0
trans-1,2-Dichloroethylene	156-60-5	<1.0	<1.0	<1.0	<1.0
1,1,1-Trichloroethane	71-55-6	69	<1.0	120	150
1,1,2-Trichloroethane	79-00-5	<1.0	<1.0	<1.0	<1.0
Trichloroethylene	79-01-6	200	26	120	50
Vinyl Chloride	75-01-4	<10	<10	<10	<10

TABLE 1
(Continued)

PARAMETER	CAS NUMBER[1]	SAMPLE IDENTIFICATION MW-3	MW-9	MW-12
		Concentration µg/ℓ[2]		
Acrolein	107-02-8	<10	<10	<10
Acrylonitrile	107-13-1	<10	<10	<10
Benzene	71-43-2	2.0	<1.0	1.3
Bromoform	75-25-2	<1.0	<1.0	<1.0
Carbon Tetrachloride	56-23-5	<1.0	<1.0	<1.0
Chlorobenzene	108-90-7	<1.0	<1.0	<1.0
Chlorodibromomethane	124-48-1	<1.0	<1.0	<1.0
Chloroethane	75-00-3	<10	<10	<10
2-Chloroethylvinyl ether	110-75-8	<1.0	<1.0	<1.0
Chloroform	67-66-3	<1.0	<1.0	<1.0
Dichlorobromomethane	75-27-4	<1.0	<1.0	<1.0
1,1-Dichloroethane	75-34-3	<1.0	<1.0	310
1,2-Dichloroethane	107-06-2	24	<1.0	<1.0
1,1-Dichloroethylene	75-35-4	4.1	8.8	3,000
1,2-Dichloropropane	78-87-5	<1.0	<1.0	<1.0
1,3-Dichloropropylene[3]	542-75-6	<1.0	<1.0	<1.0
Ethylbenzene	100-41-4	<1.0	<1.0	<1.0
Methyl bromide	74-83-9	<10	<10	<10
Methyl chloride	74-87-3	<10	<10	<10
Methylene chloride	75-09-2	61	<10	<10
1,1,2,2-Tetrachloroethane	79-34-5	<1.0	<1.0	<1.0
Tetrachloroethylene	127-18-4	11,000	<1.0	18,000
Toluene	108-88-3	<1.0	<1.0	<1.0
trans-1,2-Dichloroethylene	156-60-5	8.9	<1.0	5.6
1,1,1-Trichloroethane	71-55-6	<1.0	30	9,600
1,1,2-Trichloroethane	79-00-5	<1.0	<1.0	<1.0
Trichloroethylene	79-01-6	9,700	6.6	6,100
Vinyl Chloride	75-01-4	<10	<10	<10

TABLE 1 FOOTNOTES

(1) The numbers presented in this column are the Chemical Abstracts Service (CAS) numbers used for cataloging the indicated compounds in the Chemical Abstracts Index.

(2) μg/ℓ = micrograms per liter or parts per billion.

(3) The indicated compound is incorrectly identified in Part C of NPDES Form 2C as 1,2-Dichloropropylene. However, the sample was screened for the presence of both compounds.

TABLE 2

WATER ANALYSIS SUMMARY
OF VOLATILE NON-PRIORITY POLLUTANT COMPOUNDS
FOR ALLIED CORPORATION; FRANKLIN, INDIANA
PROJECT NO. 303033

PARAMETERS	CAS NUMBER[1]	SAMPLE IDENTIFICATION						
		OHC-1	IT-1A	IT-2	IT-3	MW-3	MW-9	MW-12
		Concentration μg/ℓ[2]						
Acetone	67-64-1	<10	<10	<10	<10	<10	<10	<10
2-Butanone	78-93-3	<10	<10	<10	<10	<10	<10	<10
Carbon disulfide	75-15-0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
2-Hexanone	591-78-6	<10	<10	<10	<10	<10	<10	<10
4-Methyl-2-pentanone	108-10-1	<10	<10	<10	<10	<10	<10	<10
Styrene	100-42-5	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
Vinyl acetate	108-05-4	<10	<10	<10	<10	<10	<10	<10
Total Xylenes	95-47-6	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0

(1) The numbers presented in this column are the Chemical Abstracts Service (CAS) numbers used for cataloging the indicated compounds in the Chemical Abstracts Index.

(2) μg/ℓ = micrograms per liter or parts per billion.

TABLE 3

SURROGATE SPIKE PERCENT RECOVERY SUMMARY
OF VOLATILE PRIORITY POLLUTANT COMPOUNDS
FOR ALLIED CORPORATION; FRANKLIN, INDIANA
PROJECT NO. 303033

SAMPLE IDENTIFICATION	PARAMETER		
	4-BROMOFLUOROBENZENE	1,2-DICHLOROETHANE-d_4	TOLUENE-d_8
	Percent Recovery		
OHC-1	107%	90%	103%
IT-1A	107%	90%	104%
IT-2	106%	89%	106%
IT-3	107%	90%	106%
MW-3[1]	104%/103%	92%/89%	104%/105%
MW-9	106%	87%	105%
MW-12[1]	108%/100%	76%/88%	102%/103%

[1] Two analyses were necessary for complete quantitation of the indicated samples.

TABLE 4

GROUND WATER ELEVATIONS

WELL NO.	GROUND WATER ELEVATIONS (ft msl)			
	5/3/85	2/5/86	5/7/86	8/7/86
IT-1A	723.39	724.35	723.42	721.00
IT-2	721.08	720.98	720.43	720.35
IT-3	719.22	719.98	719.07	712.68
MW-3	721.03	719.74	720.80	720.55
MW-9	724.27	723.80	723.45	722.53
MW-12	719.87	720.10	719.70	719.70

Results of quarter 3 Analysis
provided to IDEM
Cindy Deal 12/87

ALLIED Amphenol Products

World Headquarters
4300 Commerce Court
Lisle, IL 60532
Telephone (312) 983-350(

June 13, 1986

Mr. John Bonsett
Director of Environmental Health
Johnson County Health Department
86 West Court Street
Court House Annex
Franklin, IN 46131

Dear Mr. Bonsett:

Attached you will find a copy of the analytical results of the groundwater samples obtained by, our consultant, IT Corporation from our facility located in Franklin, Indiana. The samples, taken on May 7, 1986, represent the second round of quarterly groundwater samples obtained from wells located on and off plant property and the Hurricane Creek outfall. We have scheduled the third round of sampling for August, 1986.

The following is a summary of the analytical results:

- Well IT-1A, located on site, shows decreased concentrations of methylene chloride and 1,2-dichloroethane (1,2-DCA) but contains an increased concentration of tetrachloroethylene (TTCE).

- Well No. IT-2, located south of the facility and across Hamilton Avenue, shows decreased concentrations of 1,1,1-trichloroethane (1,1,1-TCA) and 1,1-dichloroethane (1,1,-DCA) with a slight increase in the concentration of trichloroethylene (TCE).

- The concentration of 1,1,1-TCA in Well No. IT-3 remained consistent but a decrease in TTCE and TCE are apparent this quarter.

- Well No. MW-3, located immediately downgradient of the former plating room, shows a reduction in TCE concentration and a slight increase in the TTCE concentration.

- Well No. MW-9, upgradient from the facility, showed a decrease in TTCE and continuing decreases in 1,1,1,-TCA and TCE concentrations.

- o Well No. MW-12, located downgradient of the facility and near the property line, revealed decreases in 1,1,-DCA and 1,1,-dichloroethylene concentrations along with a decrease in the concentration of 1,2-DCA. Increases appear to be continuing in the concentration of TCE, TTCE, and 1,1,1,-TCA. These three compounds also appear in increased concentration at the Hurricane Creek outfall. Additionally, increases in 1,2-DCA and 1,1-DCA are also evident at the outfall to Hurricane Creek.

Should you have any questions on the above, or require additional information, please contact me at your convenience.

Sincerely yours,

AMPHENOL PRODUCTS

B. N. Fleischer
Director,
Environmental Affairs

cc: Mr. Roy Harbert
Indiana State Board of Health
Division of Land Pollution Control
1330 West Michigan Street
Indianapolis, IN 46206-1964

BNF:dg

TABLE 1

WATER ANALYSIS SUMMARY
OF VOLATILE PRIORITY POLLUTANT RESULTS
FOR ALLIED CORPORATION; FRANKLIN, INDIANA

PARAMETER	CAS NUMBER(1)	SAMPLE IDENTIFICATION			
		HCO-2	IT-1A	IT-2	IT-3
		Concentration μg/ℓ(2)			
Acrolein	107-02-8	<10	<10	<10	<10
Acrylonitrile	107-13-1	<10	<10	<10	<10
Benzene	71-43-2	<1.0	<1.0	<1.0	<1.0
Bromoform	75-25-2	<1.0	<1.0	<1.0	<1.0
Carbon Tetrachloride	56-23-5	<1.0	<1.0	<1.0	<1.0
Chlorobenzene	108-90-7	<1.0	<1.0	<1.0	<1.0
Chlorodibromomethane	124-48-1	<1.0	<1.0	<1.0	<1.0
Chloroethane	75-00-3	<10	<10	<10	<10
2-Chloroethylvinyl ether	110-75-8	<1.0	<1.0	<1.0	<1.0
Chloroform	67-66-3	<1.0	<1.0	<1.0	<1.0
Dichlorobromomethane	75-27-4	<1.0	<1.0	<1.0	<1.0
1,1-Dichloroethane	75-34-3	4.4	3.7	10	10
1,2-Dichloroethane	107-06-2	15	<1.0	3.6	11
1,1-Dichloroethylene	75-35-4	1.0	<1.0	<1.0	1.9
1,2-Dichloropropane	78-87-5	<1.0	<1.0	<1.0	<1.0
1,3-Dichloropropylene(3)	542-75-6	<1.0	<1.0	<1.0	<1.0
Ethylbenzene	100-41-4	<1.0	<1.0	<1.0	<1.0
Methyl bromide	74-83-9	<10	<10	<10	<10
Methyl chloride	74-87-3	<10	<10	<10	<10
Methylene chloride	75-09-2	<10	<10	<10	<10
1,1,2,2-Tetrachloroethane	79-34-5	<1.0	<1.0	<1.0	<1.0
Tetrachloroethylene	127-18-4	1500	21	7.5	<1.0
Toluene	108-88-3	<1.0	<1.0	<1.0	<1.0
trans-1,2-Dichloroethylene	156-60-5	<1.0	<1.0	<1.0	<1.0
1,1,1-Trichloroethane	71-55-6	720	5.2	64	200
1,1,2-Trichloroethane	79-00-5	<1.0	<1.0	<1.0	<1.0
Trichloroethylene	79-01-6	850	4.0	93	27
Vinyl Chloride	75-01-4	<10	<10	<10	<10

TABLE 1
(Continued)

PARAMETER	CAS NUMBER(1)	SAMPLE IDENTIFICATION MW-3	MW-9	MW-12
		Concentration µg/ℓ(2)		
Acrolein	107-02-8	<10	<10	<10
Acrylonitrile	107-13-1	<10	<10	<10
Benzene	71-43-2	<1.0	<1.0	<1.0
Bromoform	75-25-2	<1.0	<1.0	<1.0
Carbon Tetrachloride	56-23-5	<1.0	<1.0	<1.0
Chlorobenzene	108-90-7	<1.0	<1.0	<1.0
Chlorodibromomethane	124-48-1	<1.0	<1.0	<1.0
Chloroethane	75-00-3	<10	<10	<10
2-Chloroethylvinyl ether	110-75-8	<1.0	<1.0	<1.0
Chloroform	67-66-3	<1.0	<1.0	<1.0
Dichlorobromomethane	75-27-4	<1.0	<1.0	<1.0
1,1-Dichloroethane	75-34-3	1.0	<1.0	280
1,2-Dichloroethane	107-06-2	5.2	<1.0	1,400
1,1-Dichloroethylene	75-35-4	<1.0	<1.0	120
1,2-Dichloropropane	78-87-5	<1.0	<1.0	<1.0
1,3-Dichloropropylene(3)	542-75-6	<1.0	<1.0	<1.0
Ethylbenzene	100-41-4	<1.0	<1.0	<1.0
Methyl bromide	74-83-9	<10	<10	<10
Methyl chloride	74-87-3	<10	<10	<10
Methylene chloride	75-09-2	<10	<10	<10
1,1,2,2-Tetrachloroethane	79-34-5	<1.0	<1.0	<1.0
Tetrachloroethylene	127-18-4	12,000	18	34,000
Toluene	108-88-3	<1.0	<1.0	<1.0
trans-1,2-Dichloroethylene	156-60-5	<1.0	<1.0	<1.0
1,1,1-Trichloroethane	71-55-6	100	30	25,000
1,1,2-Trichloroethane	79-00-5	<1.0	<1.0	<1.0
Trichloroethylene	79-01-6	8,000	24	5,400
Vinyl Chloride	75-01-4	<10	<10	<10

TABLE 1 FOOTNOTES

(1) The numbers presented in this column are the Chemical Abstracts Service (CAS) numbers used for cataloging the indicated compounds in the Chemical Abstracts Index.

(2) μg/ℓ = micrograms per liter or parts per billion.

(3) The indicated compound is incorrectly identified in Part C of NPDES Form 2C as 1,2-Dichloropropylene. However, the sample was screened for the presence of both compounds.

TABLE 2

WATER ANALYSIS SUMMARY
OF VOLATILE NON-PRIORITY POLLUTANT COMPOUNDS
FOR ALLIED CORPORATION; FRANKLIN, INDIANA

PARAMETERS	CAS NUMBER[1]	SAMPLE IDENTIFICATION						
		HCO-2	IT-1A	IT-2	IT-3	MW-3	MW-9	MW-12
		Concentration μg/ℓ[2]						
Acetone	67-64-1	<10	<10	<10	<10	<10	<10	<10
2-Butanone	78-93-3	<10	<10	<10	<10	<10	<10	<10
Carbon disulfide	75-15-0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
2-Hexanone	591-78-6	<10	<10	<10	<10	<10	<10	<10
4-Methyl-2-pentanone	108-10-1	<10	<10	<10	<10	<10	<10	<10
Styrene	100-42-5	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
Vinyl acetate	108-05-4	<10	<10	<10	<10	<10	<10	<10
Total Xylenes	95-47-6	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0

(1) The numbers presented in this column are the Chemical Abstracts Service (CAS) numbers used for cataloging the indicated compounds in the Chemical Abstracts Index.

(2) μg/ℓ = micrograms per liter or parts per billion.

TABLE 3

GROUND WATER ELEVATIONS

WELL NO.	GROUND WATER ELEVATIONS (ft msl)		
	5/3/85	2/5/86	5/7/86
IT-1A	723.39	724.35	723.42
IT-2	721.08	720.98	720.43
IT-3	719.22	719.98	719.07
MW-3	721.03	719.74	720.80
MW-9	724.27	723.80	723.45
MW-12	719.87	720.10	719.70

ALLIED Amphenol Products

World Headquarters
4300 Commerce Court
Lisle, IL 60532
Telephone (312) 983-3500

September 12, 1985

Mr. Roy Harbert
Indiana State Board of Health
Division of Land Pollution Control
1330 West Michigan Street
Indianapolis, IN 46206-1964

Dear Mr. Harbert:

At the meeting held on August 27, 1985, in the offices of the Johnson County Health Department, it was agreed that we would, by September 15, 1985, submit for your review a proposed groundwater monitoring plan for the Allied/Amphenol facility located in Franklin, Indiana.

In accordance with the above, attached you will find the proposed groundwater monitoring plan for your review. We are prepared to begin sampling, pending your approval, during the fourth quarter of 1985. Sampling would continue on a quarterly basis for a period of one year in order to establish a suitable data base. At that point in time, we would schedule a meeting with all affected parties to review the data trends and assess the need for continued monitoring. In addition, as the data is developed, copies will be sent to all affected parties.

Presently existing monitoring wells, with the exception of those to be used in the monitoring plan, will be removed and the borings sealed with a cement slurry.

Any comments or questions on the proposed monitoring plan should be addressed to my attention.

Sincerely yours,

AMPHENOL PRODUCTS

B. N. Fleischer
Director, Environmental Affairs

BNF:mmr
Attachment
cc: Jeff Eads
John Bonsett

PROPOSED GROUND WATER MONITORING PLAN
ALLIED CORPORATION
AMPHENOL PRODUCTS DIVISION
BENDIX CONNECTOR OPERATIONS
FRANKLIN, INDIANA

In order to evaluate the effectiveness of source removal and the natural removal of residual organics previously detected beneath the site, ground water samples will be obtained for analysis on a quarterly basis from selected site ground water monitoring wells.

The monitoring wells selected for quarterly sampling will provide information on ground water quality upgradient of the facility, near the suspected source area and downgradient of the source area, as well as offsite and downgradient of the storm sewer, which lies perpendicular to the direction of ground water flow and is intercepting the majority of offsite contaminant flow.

SITE STORM SEWER

This storm sewer is 72 inches in diameter and lies in a trench which was reportedly excavated to depths of up to 20 feet below ground surface. This places the storm sewer in the near-surface sand layer observed on site, the same stratigraphic unit that all site wells except IT-1A are monitoring. Ground water beneath the site was normally encountered 10 to 12 feet below ground surface. Visual observation through manholes and drains indicated the storm drain intercepts the depth of the ground water table and is rarely if ever found 20 feet below the site surface. It is assumed the trench which was excavated for installation of the storm sewer was backfilled with the excavated, sandy soil.

Contaminant loading in ground water is greatly reduced by the presence of the storm sewer, as the pipe is apparently cracked or otherwise open to intercept offsite flow. While nearly 30,000 parts per billion (ppb) of total volatile organic compounds were detected in ground water at monitoring well MW-12 upgradient from the storm sewer, less than 150 ppb total volatile organics were detected downgradient

in monitoring well IT-2, approximately 100 feet away on the downgradient side of the storm sewer, a contaminant reduction of approximately 99.5 percent. A similar reduction (92 percent) was observed between monitoring well MW-11 and IT-3, also on opposite sides of the storm sewer and approximately 100 feet apart.

The maximum flow rate through the storm sewer cannot be determined at this time with the data available. While the capacity of the storm sewer could be several hundred cubic feet per second, the actual flow is dependent upon the infiltration of ground water permitted through any openings in the pipe as well as inflow from any other drains tied into this line and the amount of open channel flow which enters this storm drain near the northwestern corner of the Allied property.

QUARTERLY SAMPLING PLAN

The following are the proposed quarterly sampling locations.

- Monitoring Wells
  - MW-9
  - MW-3
  - MW-12
  - IT-1A
  - IT-2
  - IT-3
- Storm drain outfall at Hurricane Creek.

Water level measurements will be made in each well prior to purging and sampling and an estimate made of the rate of discharge at the storm sewer outfall. In order to insure that representative samples are obtained, each well will be purged by either pumping or lifting of at least three well volumes of water. Purging will remove any silt which has accumulated in the well since the last sampling event and draw ground water from the surrounding area into the well sensing zone. Water levels will be permitted to recover in the wells prior to

sampling. Additional waters will be purged from the wells immediately prior to sampling. Sampling and the purging done immediately prior to sampling will be done utilizing either a Kemmerer or an ISCO bladder pump. Between use at each well, the sampler will be decontaminated according to the following procedure:

- Rinsed once with distilled water
- Washed thoroughly with methanol
- Rinsed three times with distilled water.

The storm sewer outfall sample at Hurricane Creek will be collected by immersing the sample containers directly into the outfall. Water samples will be packed on ice for shipment to the laboratory.

Around the same time that quarterly sampling is initiated, the twelve ground water monitoring wells which will not be utilized for quarterly monitoring will be removed and the boring sealed with a cement slurry.

The quarterly water samples will be analyzed for priority and nonpriority pollutant volatile organic compounds. Each quarter's analytical results will be compared with the results of previous analyses in order to determine if the organic content of site ground water is decreasing over time. Results of analyses and recognized data trends will be submitted by Allied to the appropriate state and local agencies. Allied proposes that a meeting be held with the agencies involved after a suitable data base has been established (approximately one year) in order to determine the necessity for future ground water monitoring.

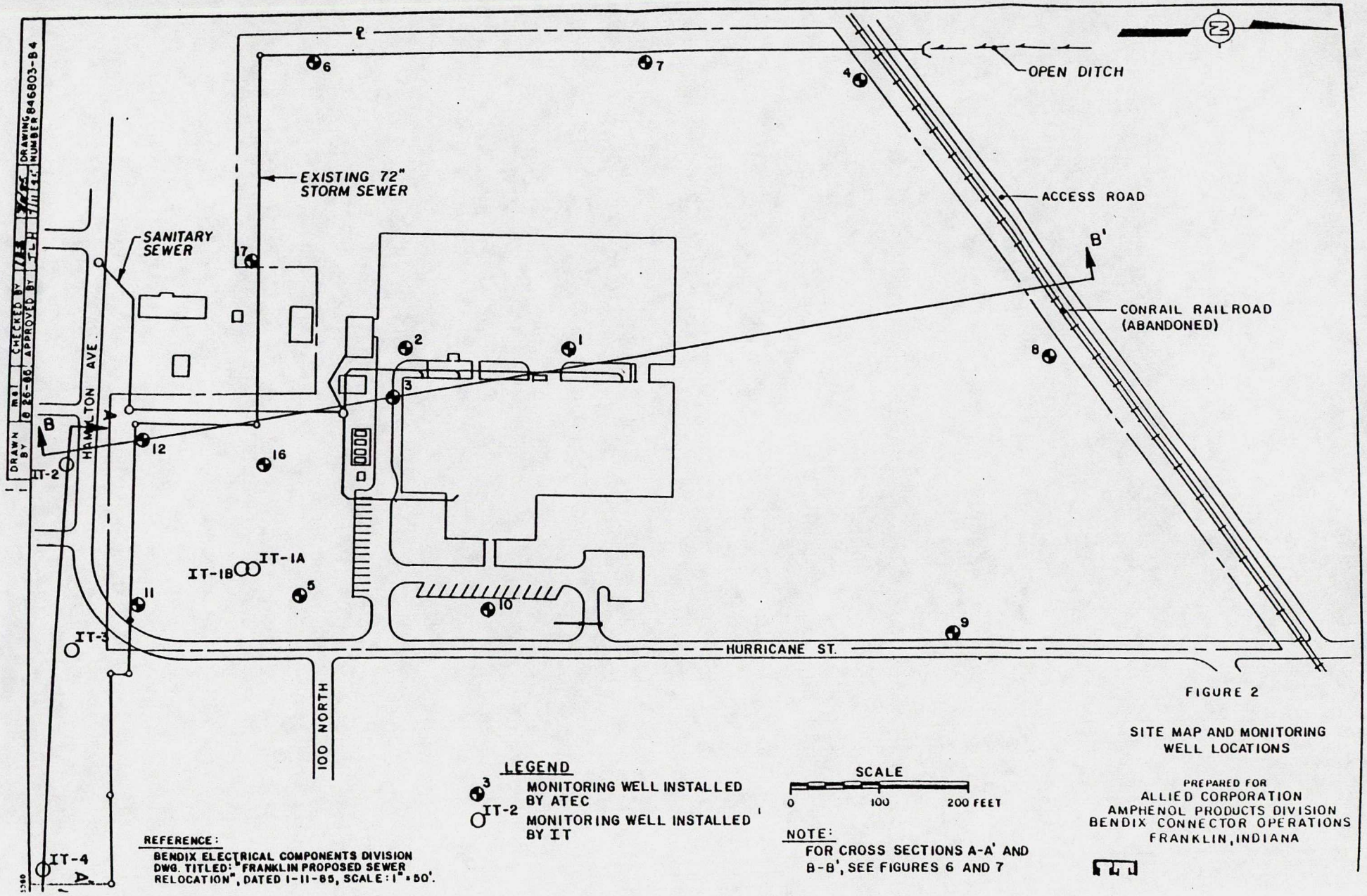

FIGURE 2

SITE MAP AND MONITORING WELL LOCATIONS

PREPARED FOR
ALLIED CORPORATION
AMPHENOL PRODUCTS DIVISION
BENDIX CONNECTOR OPERATIONS
FRANKLIN, INDIANA

ALLIED Amphenol Products

World Headquarters
4300 Commerce Court
Lisle, IL 60532
Telephone (312) 983-350

July 12, 1985

Mr. Jeffrey F. Eads
Groundwater Section
Division of Water Pollution Control
Indiana State Board of Health
1330 West Michigan Street
P.O. Box 1964
Indianapolis, IN 46206-1964

Dear Mr. Eads:

This is in response to your letter of July 8, 1985, in which you request the status of activities at the Amphenol Products facility in Franklin, Indiana.

Decontamination and removal of the cyanide contaminated soil in the plating room is now complete. Approximately 430 yards of soil was removed and sent to the Adams Center Landfill in Fort Wayne, Indiana for disposal. Contaminated soil was removed until the residual cyanide soil concentration was less than 10 ppm. Prior to backfilling with clean fill, the excavated areas were washed with a sodium hypochlorite solution to react with the possible residual cyanide in the soil.

Regarding the on-going groundwater activity at the facility, off-site and additional on-site wells have been installed and sampled. The results from these wells will be used to determine the extent and magnitude of the off-site organic material migration. It is expected that this report will be finalized within the next two weeks. At that time we will schedule a meeting with your office and the Johnson County Health Department to develop a course of action designed to satisfactorily resolve this issue.

Sincerely,

B. N. Fleischer
Director,
Environmental Affairs

cc: Mr. John Bonsett
Johnson County Health Department
Franklin, IN 46131

Allied Amphenol Products

Bendix Connector Operations
40-60 Delaware Street
Sidney, NY 13838-1395

Mr. Roy Harbert
Indiana State Board of Health
Division of Land Pollution Control
1330 West Michigan Street
Indianapolis, Indiana 46206

May 29, 1985

Re: Allied Amphenol Products
Bendix - Franklin Facility
Sewer Line Replacement

Dear Mr. Harbert:

As discussed during our telephone conversation on May 23, 1985, Allied Corporation has replaced the eight (8) inch effluent sewer line from the Bendix - Franklin facility to the municipal sewer. Replacement of this line was deemed necessary subsequent to internal television inspection which showed a crushed section of pipe directly above the point of crossing of the 72 inch storm sewer line.

The new sewer was offset 35 feet from the old line to avoid excavation of any possibly contaminated subsoils. The offset distance was determined by a series of hand auger borings which showed very low levels of contamination at this point. Please refer to the enclosed drawing and boring analyses for further information. The project details were reviewed with Mr. Bob Carter of the Indiana State Board of Health and Mr. John Bonsett of the Johnson County Health Department prior to proceeding.

If there are any further questions regarding the sewer effluent line replacement at the Bendix - Franklin facility, please do not hesitate to contact me at (607) 563-5506.

Very truly yours,

Wayne F. Barto

Wayne F. Barto, P.E.
Plant Environmental Engineer

cc: Mr. B. N. Fleischer
Mr. J. Bonsett

/vt

INDIANA CITIES WATER CORPORATION

March 4, 1985

John Bonsett
Johnson County Health Department
86 W. Court St.
Courthouse Annex
Franklin, IN 46131

Subject: Possible Groundwater Contamination Bendix (Allied Corp.)
Franklin, Indiana

Dear Mr. Bonsett:

Your office notified Indiana Cities Water on 1/25/85 of a potential problem at the old Bendix plant in Franklin. It was indicated at that time there would be printed information available to us from the Allied Corporation.After our discussion, I decided to have a set of cyanide and VOC samples run on our Webb Well Water Plant. On 1/31/85 VOC and cyanide samples were collected and sent to the water lab. I received my copy of the printed information on 2/4/85.

On 2/6/85 the lab reported no VOC compounds detected down to a detection limit on 0.002 mg/l, however the cyanide sample indicated the presence of cyanide in the amount of 0.002 mg/l on a grab sample collected from all wells. On 2/10/85 another set of samples was collected from each individual well. On 2/13/85 the lab called indicating a heavy amount of cyanide in all wells. I asked the lab to run an in-house quality control check on each of the samples collected. After they ran this test the report came back "result doubtful due to the age and non-preservation of samples." It is suggested that the samples collected 2/10/85 be null and void due to the preservation of the samples.

On 2/15/85 all wells were re-sampled for VOC's and cyanide. The VOC's once again showed no compounds detectable down to detection limits. There was a small amount of cyanide detected in the following samples.

Well #2	.001 mg/l
Well #3	.012
Well #4	~~.997~~ .007
Well #5	.019

The finished water sample after chlorination showed less than 0.001 mg/l which shows that the chlorine has totally destroyed all traces of cyanide. There was also a cyanide and VOC samples run on the Masonic Well. The cyanide results were 0.002 mg/l with no VOC compounds detected.

INDIANA CITIES WATER CORPORATION
Post Office Box 427—1000 North Madison
Greenwood, Indiana 46142
317 881-8607

The U.S. Public Health Service Drinking Water Standards for 1946 contains no limits for cyanide. Since 1946, standards have been developed for cyanide by other agencies as shown in the following tabulation.

International Standards for Drinking Water-Geneva 1958	0.01 mg/l
Netherlands	0.01
USSR	0.2
Ohio Water Pollution Control Board	0.15
New York Water Pollution Control Board	0.1

The concentration of cyanide in the water is deemed to present no health risk even without chlorine treatment. As you noted in the finished water sample the chlorine has totally destroyed the cyanide in the finished water.

At the present time Indiana Cities Water will be collecting cyanide samples every two weeks to determine if there is going to be a trend of increase or decrease in the concentration in the water. I will be sending you, Robert Carter, and Arnie Viere of the Water Supply Section a copy of these results as I receive them. I would ask that you forward them on to the Allied Corporation.

I wish to thank you and the Allied Corporation for keeping us informed of the situation at Franklin.

Very truly yours,

James M. Morris

James M. Morris
Vice President - Operations

JMM/rs

cc: C. F. Bealer
Jay Shutt
Jim Walsh
Arnie Viere
Robert Carter

INDIANA CITIES WATER CORPORATION

March 6, 1985

Mr. John Bonsett
Johnson County Health Department
86 w. Court St.
Courthouse Annex
Franklin, IN 46131

Subject: Possible Groundwater Contamination Bendix (Allied Corp.)
Franklin, IN

Dear Mr. Bonsett:

In our letter dated March 4, 1985 we stated the cyanide detected in Well #4 on 2/15/85 was .997. This was incorrect. The correct amount was .007. Please make this correction.

We are sorry for any confusion this may have caused.

Very truly yours,

James M. Morris
Vice President, Operations

JMM/rs

cc: C. F. Bealer
Jay Shutt
Jim Walsh
Arnie Viere
Robert Carter

INDIANA CITIES WATER CORPORATION
Post Office Box 427—1000 North Madison
Greenwood, Indiana 46142
317 881-8607

STATE BOARD OF HEALTH

INDIANAPOLIS

OFFICE MEMORANDUM

DATE: February 21, 1985

TO: Earl A. Bohner

THRU:

FROM: L. Robert Carter

RECEIVED
FEB 22 1985
INDIANA STATE BOARD OF HEALTH
PUBLIC WATER SUPPLY DIVISION

SUBJECT: Possible Groundwater Contamination
Bendix (Allied Corporation), Franklin

A few months ago, we were contacted by officials of the above company, stating that following the close of the plant at Franklin and prior to attempting to sell the plant, they conducted an environment study and found the following:

1. Gross contamination of soil by cyanide and volatile organic compounds (TCE and PCE) beneath the floor of the plating room.

2. High (1,000-70,000 ppb) total VOCs in shallow groundwater on the plant site, particularly along the plant sewer line.

They had just gotten preliminary data from their consultant, ATEC, and informed us that they would proceed to do further studies and propose remedial action.

I met with company representatives again at the Johnson County Health Department on February 14, 1985, at the request of John Bonsett, Sanitarian. Jay Schutt and Jim Morris of the Indiana Cities Water Corporation were also present, as they own the water utility in Franklin.

Allied Corporation has hired a new consultant, IT Corporation of Pittsburgh, as they believe the integrity of work done by ATEC may have been compromised by drilling, sampling, or analytical procedures.

The company is proposing and will implement removal of cyanide-contaminated soil down to 10 ppm and dispose of it at Adams Center Landfill, Fort Wayne (500 cu. yd. or 25 truckloads). They will then apply a chlorine solution to the remainder to change the cyanide to cyanate, a nontoxic form. This removal and treatment of cyanide is to preclude the possibility of a future owner spilling sulfuric acid which would react to form hydrogen cyanide gas causing a risk to workers.

As far as can be determined so far, the area is served by ICWC and no private wells exist in the immediate vicinity. However, this will continue to be checked out by the health department and the water company.

Even though the ICWC wells are 3/4 mile ENE from Bendix and are upgradient, it is possible that the radius of the cone of depression extends to the Bendix property (the water company has in the past drawn caustic leachate from a pond of a former tomato cannery just east of Bendix).

The water company recently analyzed their production system and found cyanide in the wells ranging from 105 to 473 ppb, with 32 ppb in the finished water. Their wells are 100 feet deep in a sandy aquifer extending up to within about eight feet of the ground surface. The dynamic water level is 43 feet. No VOCs were detected. *

Whether or not the Bendix site is the source of the cyanide remains to be seen. On would expect to find VOCs as well. However, off-site migration is to be studied by Bendix.

There is no drinking water standard for cyanide, but the concentrations in the water are deemed to present no health risk. However, additional reduction could be accomplished fairly easily by pH adjustment.

We took split samples of the ICWC wells on February 15 for cyanide. We will sample for VOCs later, as some of the lab's equipment was down at the time.

I believe the situation is well in hand at this point. Allied Corporation appears to be willing and able to do whatever is necessary as determined by state and local authorities and is approaching the matter in a very professional, scientific, and environmentally sound manner. We will keep on top of this.

LRC/bt
cc: Mr. Ralph C. Pickard
Mr. Arnold J. Viere ✓
Mr. Joseph C. Stallsmith
Ms. Jacqueline Strecker
Mr. Jeff Eads

CERTIFIED MAIL DE-9J
RETURN RECEIPT REQUESTED

Mr. Samuel S. Waldo
Director of Environmental Affairs
Amphenol Corporation
358 Hall Avenue
P.O. Box 5030
Wallingford, Connecticut

Re: Franklin Power Products, Inc./Amphenol
Franklin, Indiana
Administrative Order on Consent
for Corrective Measures Implementation
IND 044 587 848

Dear Mr. Waldo:

Enclosed please find a copy of the fully executed Administrative Order on Consent entered into by Franklin Power Products, Inc./Amphenol and the United States Environmental Protection Agency. Should you have any questions feel free to contact William Buller of my staff at (312) 886-4568.

Sincerely,

ORIGINAL SIGNED BY
JOSEPH M. BOYLE

Joseph M. Boyle, Chief
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division

Enclosure

cc: J. Michael Jarvis, Franklin Power Product
John Gunter, IDEM (with enclosure)

CERTIFIED MAIL DE-9J
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Mr. Samuel S. Waldo
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Amphenol Corporation
358 Hall Avenue
P.O. Box 5030
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ORIGINAL SIGNED BY
JOSEPH M. BOYLE

Joseph M. Boyle, Chief
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division

Enclosure

cc: J. Michael Jarvis, Franklin Power Product
John Gunter, IDEM (with enclosure)

bcc: Larry Johnson, ORC (with enclosure)

ENFORCEMENT AND COMPLIANCE ASSURANCE BRANCH

SECRETARY	SECRETARY	SECRETARY	SECRETARY	SECRETARY	SECRETARY
AUTHOR/ TYPIST	MINN/OHIO SECTION CHIEF	MICHIGAN/ WISCONSIN SECTION CHIEF	ILLINOIS/ INDIANA SECTION CHIEF	ECAB BRANCH CHIEF	WPTD DIVISION DIRECTOR
MD 11/18/98		RL 11-19-98		JMB 11/24/98	