US EPA RECORDS CENTER REGION 5
1007455

Amphenol

Amphenol Corporation

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

June 2, 2010

Mr. Juan Thomas
United States Environmental Protection Agency Region 5
RCRA Enforcement and Compliance Assurance Branch, DE-9J
77 West Jackson Boulevard
Chicago, IL 60604

Re: **Implementation Schedule – Full Scale Enhanced Bioremediation Activities**
Implemented Corrective Measures – Groundwater Recovery and Treatment System
Former Amphenol Facility #IND 044 587 848
980 B Hurricane Road
Franklin, Indiana

Dear Mr. Thomas:

In accordance with your letter dated April 28, 2010, Amphenol Corporation is pleased to submit this letter documenting the proposed **Implementation Schedule** for the **Full Scale Enhanced Bioremediation Activities** at the above referenced Site. IWM Consulting Group, LLC (IWM Consulting), Amphenol's environmental consultant, has provided a schedule as it relates to implementation of the work activities and the schedule has been included in **Attachment A**.

IWM Consulting also contacted a representative (Mr. Doug Griffin) from the Indiana Department of Environmental Management (IDEM), Office of Land Quality, Hazardous Waste Permits Section regarding the proposed work activities. The IDEM staff requested that they be notified of the proposed Implementation Schedule, so I am also copying them on this submittal.

Following the full-scale implementation of enhanced bioremediation activities, Amphenol is anticipating a significant reduction of dissolved VOC concentrations along the former sanitary sewer and existing storm sewer lines. Additionally, Amphenol is expecting that this will shorten the lifetime that the existing Pump and Treat Remediation System will be required to be operational at the Site.

If you have any questions or comments regarding the Implementation Schedule, please do not hesitate to contact me at (203) 265-8760.

Best Regards,

Samuel S. Waldo
Director, EHS & Support Services

cc: Remy International Inc.
Indiana Department of Environmental Management, Doug Griffin, Hazardous Waste Permitting Section
Indiana Department of Environmental Management, NPDES Permitting Section
Brad Gentry, IWM Consulting Group, LLC

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3. Article Addressed to:
Mr. Samuel S. Waldo
Director of Environmental Affairs
Amphenol Corp.,
338 Hall Ave.,
P.O. Box 5030
Wallingford, Connecticut 06492

4a. Article Number
P-140-673-277

4b. Service Type
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☐ Express Mail ☐ Insured
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Thomas ST Onge

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3. Article Addressed to:
Mr. J. Michael Jarvis
Franklin Power Products
400 Forsythe Street
Franklin, In 46131

4a. Article Number
P-140-673-278

4b. Service Type
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6. Signature: *(Addressee or Agent)*
X Jerry Michael Jarvis

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3. Article Addressed to:
Scott Hall
Daily Journal - Johnson County
Indiana
P.O. Box 699
Franklin, In 46131

4a. Article Number
P-140-673-282

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7. Date of Delivery
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6. Signature: *(Addressee or Agent)*
X Pat Phillips

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US Postal Service
Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail *(See reverse)*

Sent to Mr. J. Michael Jarvis	
Street & Number 400 Forsythe Street	
Post Office, State, & ZIP Code Franklin, In 46131	
Postage	$ 3.00
Certified Fee	1.25
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	1.20
Return Receipt Showing to Whom, Date, & Addressee's Address	
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I also wish to receive the following services (for an extra fee):

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2. ☐ Restricted Delivery

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3. Article Addressed to:
Mr. Eric W. Thornburg
Vice President-Operations
Indiana-American Water Co., Inc.
401 Camby Court
P.O. Box 570
Greenwood, IN 46142

4a. Article Number
P-140-673-280

4b. Service Type
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☐ Express Mail ☐ Insured
☐ Return Receipt for Merchandise ☐ COD

7. Date of Delivery
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6. Signature: *(Addressee or Agent)*
X Mark H. Scott

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SEP 04 1997
USPS - 46142

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Thank you for using Return Receipt Service.

ATTACHMENT A

Proposed Implementation Schedule

IWM Consulting Group, LLC
Proposed Implementation Schedule

	Install Injection Wells & Recovery Well	Install System upgrade equipment & piping	Conduct Baseline GW Sampling Event	Initiate operation of RW-5 & the Oxygen Injection System	*Full scale operation & initiate CL-Out Injection Activities (every 6-weeks)	*Record Field measurements (bi-weekly 1st month, monthly for months 2-6)	Confirmation GW sampling (4 weeks post 2nd CL-Out Injection Event)	Deactivate Oxygen Injection System & CL-Out Injection Activities	Conduct 4 Qtly GWS events
June 2010	X								
July 2010	X	X							
August 2010		X	X	X	X	X			
September 2010						X			
October 2010					X	X			
November 2010						X	X		
December 2010					X	X			
January 2011						X			
February 2011					X	X			
March 2011								X	X
April 2011									
May 20111									
June 2011									X
July 2011									
August 2011									
September 2011									X
October 2011									
November 2011									X
December 2011									

*The above schedule assumes that the oxygen amended water and CL-Out injection program will no longer be warranted 6 months after the first CL-Out injection event. Additionally, the above schedule is only tentative and the actual operation time, oxygen amended water and CL-Out injection schedule, and groundwater sampling program may be modified based upon the results of the confirmation groundwater sampling events.

Sam Waldo
<waldo@amphenol.com>

07/27/01 10:49 AM

To: Juan Thomas/R5/USEPA/US@EPA
cc:
Subject: Franklin, IN Supplemental Remediation

Juan,

As I mentioned in my voice mail, I have requested a proposal from our consultants regarding the potential application of Hydrogen Release Compound (HRC) technology at the Franklin, IN project as a means of expediting cleanup at the site. I'm not sure if you are familiar with the technology, so I've attached excerpts from the draft proposal that give some additional explanation of the process. (Note that this a preliminary proposal; actual implementation would certainly be tailored to address agency comments, if any.)

This site is somewhat unique in that there is an existing ground water recovery systems that effectively provides hydraulic capture of the area proposed for this application. Even if it doesn't work as expected, we still have control over the plume.

At this point I want to make sure that we address the EPA's needs with respect to the extent of the work plan to be developed so that we minimize the iterations of the plan going forward. My view is that this project is truly supplemental in scope, with no effect on the operation of the existing system, therefore the work plan does not need to include extensive preliminary assessment work.

Our expectation is that if the program works, we significantly shorten remediation duration. If it doesn't, the existing system continues to operate as approved. (To put our interest in perspective, you should know that we spend approximately $125,000/year on OM&M at the facility. The total anticipated cost of this supplemental activity is less than one year's OM&M.)

Please give me a call if you have any questions on the above.

Beat regards,

Sam Waldo

HRC Preliminary Proposal - Frank waldo.vc

DRAFT

Consulting services pertaining to the implementation of additional corrective measures and continued Corrective Measures Implementation - Groundwater Recovery and Treatment System (CMI-GRTS) Semi-annual Reporting for the Franklin Power Products facility in Franklin, Indiana.

The scope of work (SOW) discussed in this proposal is designed to enhance current corrective measures for groundwater remediation at the facility via the injection and monitoring of a Hydrogen Release Compound (HRC). HRC has been successfully used to enhance *in situ* biodegradation rates for chlorinated hydrocarbons in groundwater by supporting anaerobic reductive dechlorination processes. HRC is a proprietary polylactate ester that, upon being injected into the subsurface, slowly releases lactate substances. The lactate is metabolized by naturally occurring microorganisms, resulting in the creation of anaerobic aquifer conditions and the production of hydrogen. The microorganisms capable of reductive dechlorination then use the hydrogen to progressively remove chlorine atoms from the chlorinated hydrocarbon contaminants. Routine groundwater sampling and analyses is then used to monitor the effectiveness of the dechlorination process.

The objective of the HRC injection program is to provide a cost-effective, low maintenance, method to accelerate the reduction of existing concentrations of chlorinated hydrocarbons present in the Site groundwater and thereby expedite shut-down of the existing GRTS. Based on the known concentrations of chlorinated hydrocarbons in the Site groundwater, it is feasible that, subsequent to injection of the HRC into the aquifer, these concentrations could be effectively reduced by several orders of magnitude within the first year. If necessary, after the first year a second injection of HRC could be applied to further reduce the concentrations of chlorinated hydrocarbons to acceptable regulatory levels which would allow shut-down of the GRTS.

In addition to the HRC injection and monitoring program, the proposed SOW would include the development of semi-annual reports which fulfill requirements pursuant to Section VIII of the Administrative Order on Consent (AOC) for Corrective Measures Implementation (CMI), United States Environmental Protection Agency (USEPA), I.D. #IND 044 587 848 for the Site, performed in accordance with the approved Post Closure Monitoring Work Plan. The reports will describe routine "Work Efforts" implemented at the Site including, operation and maintenance of the GRTS, monthly effluent discharge analytical results, groundwater elevation monitoring, groundwater sampling analyses, and the overall effectiveness of the HRC injection program.

Details of the proposed SOW are described as follows:

Proposed Scope of Work

Task 1 - Development of a HRC Injection and Monitoring Plan

Prior to initiating the HRC injection program, a HRC Injection and Monitoring Plan will be developed and submitted to USEPA-Region 5 for review and approval. The purpose of the Plan will be to outline the activities to be completed at the site. The Plan will describe in detail these activities and frequencies pertaining to implementation of the following work tasks:

- HRC injection methods and procedures;
- HRC groundwater monitoring and analytical program, and;
- Semi-annual reporting

Task 2 - Implementation of the HRC Injection and Monitoring Program

HRC Injection
Subsequent to USEPA approval of the HRC Injection and Monitoring Plan, the HRC Injection and Monitoring Program will be implemented. Preliminary estimates by Regensis indicate that an area of approximately 20,000 sq.ft. requires treatment. Activities would consist of the injection of HRC into the underlying saturated zone (approximately 12 ft. in thickness) using direct-push drilling technology. To deliver the HRC, drive rods (minimum 0.625-inch I.D.) are hydraulically pushed or hammered to the bottom of the contaminated saturated zone and then HRC is injected as the rods are withdrawn.

AS proposed, the HRC would be injected into the aquifer at 12 ft. interval spacings using an estimated 150 injection points. At each injection point an estimated 50 pounds of HRC will be deposited into the aquifer. In this manner, an estimated 7,500 lbs. of HRC will be deposited into the defined the area of concern.

Site Monitoring
Upon completion of the HRC injection program, site groundwater would be chemically monitored from selected wells to assess the effectiveness of the enhanced reductive dechlorination process. Selected site monitoring wells to be sampled will include MW-12, MW-22, MW-28, and MW-30. (The existing sampling network approved under the Post Closure Monitoring Plan would <u>not</u> be affected.) Prior to HRC injection an initial round of sampling will be performed to establish "baseline groundwater quality conditions. Subsequent to HRC injection, the wells will be sampled monthly for the first six months, followed by quarterly sampling.

The HRC monitoring program will employ low flow groundwater sampling techniques and include the following field/chemical parameters:

- Laboratory analyses of chlorinated hydrocarbon compounds;
- Laboratory analyses of natural attenuation parameters: total and dissolved iron, total and dissolved manganese, nitrate sulfate, sulfide, and chloride;
- Laboratory analyses of HRC-based electron donors: total organic carbon and metabolic acids (lactic, pyruvic, acetic, propionic, and butyric), and;
- Field parameters: dissolved oxygen, ORP, pH, and temperature.

Task 3 - Semi-annual Report Development

Semi-annual letter reports will be prepared discussing results of the activities performed in accordance with Task-IV of the CMI-GRTS Monitoring Plan. The semi-annual reports will include, a summary of groundwater flow conditions, groundwater quality data, and a discussion of the overall effectiveness of the GRTS and HRC injection program.

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

FEB 07 2000

VIA FACSIMILE AND CERTIFIED MAIL
RETURN RECEIPT REQUESTED

REPLY TO THE ATTENTION OF
DE-9J

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

Re: Franklin Power Products, Inc./Amphenol
CMI Groundwater Recovery and
Treatment System Upgrade Report,
Treatability Study AS/SVE, and
Webb Field Evaluation Approvals
Franklin, Indiana
IND 044 587 848

Dear Mr. Waldo:

The United States Environmental Protection Agency (U.S. EPA) has reviewed the October 20, 1999, letter from Secor International, Inc. (Secor) which was prepared on behalf of Franklin Power Products, Inc. and Amphenol Corporation in response to U.S. EPA's September 23, 1999, letter and October 5, 1999, teleconference regarding the Corrective Measure Implementaion (CMI) Groundwater Recovery and Treatment System Upgrade Report, Treatability Study AS/SVE, and Webb Field Evaluation for the Franklin, Indiana (Franklin) site.

In addition, U.S. EPA has reviewed additional historical data from the Franklin Power Products/Amphenol Remedial Investigation Report that was provided by Secor.

In general, the groundwater elevation data collected by Franklin does generally support the conclusion that, at the present time, the natural groundwater flow direction in the water table aquifer at the Franklin site is north to south across the site, with no evidence of a component of flow towards the northeast or east. As a result, it does not appear that it will be necessary for Franklin to install additional monitoring wells/piezometers east or northeast of the site to demonstrate that there is not a natural groundwater flow component toward the Webb Well Field. Over the four month period of May through August 1999, it appears that the pumping of the upgraded recovery system has created two well developed cones of depression in the water table. The first

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encompasses recovery wells RW-2 and RW-3 and the second surrounds new recovery well RW-4. It appears that the combined capture zone for the two cones of depression extends throughout the area bounded roughly by lines drawn between monitoring wells MW-24, MW-30, IT-2, MW-12, MW-29 and MW-21. It is possible that the capture zone actually extends further to the east toward Hurricane Road. However, there are insufficient monitoring points in this area to establish the eastern extent.

In summary, U.S. EPA has reviewed the October 20,1999, response to U.S. EPA's September 23, 1999, letter regarding the CMI Groundwater Recovery and Treatment System Upgrade Report; the Treatability Study AS/SVE System Report; and the Webb Field Evaluation Report, and hereby approves of those documents with the October 20, 1999, Secor response to U.S. EPA's comments. This completes Section VIII. Work To Be Performed requirement for paragraphs E, F, G, H and I of the CMI Consent Order. Pursuant to Section VIII, paragraph N "Additional Work" of the Consent Order, Franklin Power Products/Amphenol shall provide a CMI Groundwater Recovery and Treatment System (GRTS) Monitoring Plan within thirty (30) days from receipt of this letter. The CMI GRTS Monitoring Plan shall include:

Continued Groundwater Recovery and Treatment System - Operations and Maintenance

Operation and maintenance (O&M) of the existing on-site Groundwater Recovery and Treatment System will be performed on a bi-weekly basis. The existing system consists of four groundwater recovery wells and an air stripper. During the bi-weekly) O&M inspections performance of the system will be reviewed and general maintenance performed as necessary.

Flow rates from the recovery wells to the air stripper will be monitored and recorded on a monthly basis. Influent samples from each of the recovery wells and an effluent sample from the stripper system discharge line will be collected quarterly. The influent and effluent samples will be laboratory analyzed for volatile organic compounds (VOCs).

Groundwater Elevation Monitoring

Groundwater elevations will measured from all site monitoring wells on a semi-annual basis. These data will be used to evaluate site groundwater flow patterns and the effectiveness of the recovery system to hydraulically control the off-site flow of groundwater.

Groundwater Sampling and Analyses

To assess on and off-site groundwater quality, groundwater samples will be collected from select monitoring wells on a semi-annual basis. Wells to be sampled will include; IT-2, IT-3, MW-12, MW-20, MW-22, MW-28, MW-29, and MW-30. Groundwater samples will be collected from each well using a bottom loading bailer. Groundwater samples will be laboratory analyzed for VOCs.

Reporting

Subsequent to each groundwater elevation monitoring and sampling and analyses event, a letter report will be prepared. The semi-annual reports will include, a summary of groundwater flow conditions, groundwater quality data, and a discussion of the over-all effectiveness of the Groundwater Recovery and Treatment System.

If you should you have any questions please contact me at (312) 353-4921, or Juan Thomas (312) 886-6010.

Sincerely,

Walt Francis

Walt Francis, Project Manager
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division

cc: J. Michael Jarvis, Franklin Power Products, Inc.
William Gabriel, Secor International-Syracuse
John Gunter, IDEM

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

SEP 23 1999

VIA FACSIMILE AND CERTIFIED MAIL
RETURN RECEIPT REQUESTED

REPLY TO THE ATTENTION OF
DE-9J

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

Re: Franklin Power Products, Inc./Amphenol
Review of CMI Groundwater Recovery
and Treatment System Upgrade Report,
Treatability Study AS/SVE, and
Webb Field Evaluation
Franklin, Indiana
IND 044 587 848

Dear Mr. Waldo:

The United States Environmental Protection Agency (U.S. EPA) has reviewed: the Corrective Measures Implementation (CMI) Groundwater Recovery and Treatment System Upgrade Report; the Treatability Study Air Sparging/Soil Vapor Extraction (AS/SVE) System Report; and the Webb Field Evaluation Report that were submitted to U.S. EPA on May 6, 1999, by O'Brien & Geere Engineers, Inc. on behalf of Franklin Power Products, Inc. and Amphenol Corporation.

Groundwater Recovery and Treatment System Upgrade Report

In general, U.S. EPA did not find the data presented in the Groundwater Recovery and Treatment System Upgrade Report to be of adequate quantity or quality to enable verification of the conclusions reached by the Report, specifically the conclusion regarding the containment of on-site groundwater. Specific comments are provided in the enclosure which specify the additional information that should be obtained and/or submitted to support the statements made in the Report.

The Groundwater Recovery and Treatment System Upgrade Report states that one of the objectives for replacing the recovery wells' pneumatic pumps with electric submersible pumps was to increase the groundwater withdrawal rates sufficiently to suppress the water level within the aquifer to an elevation below the invert elevation of a 72-inch diameter storm drain which

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crosses the site. Based on the data and statements (page 3) presented within the Report, this objective does not appear to have been accomplished. The Report recommends (page 3) a continuation of the groundwater elevation monitoring to determine whether continued pumping of the upgraded system will, over time, result in the dewatering of the water bearing zone, and lowering of the water table to an elevation below the storm sewer invert. U.S. EPA concurs with the recommendation for the short-term since the new pumps and additional extraction well have resulted in an overall increase in groundwater withdrawal rates. However, since the report indicates (page 3) that after approximately one month of pumping with the upgraded system the groundwater level adjacent to the storm sewer was still one foot above the invert of the storm sewer, U.S. EPA suggests that if the groundwater elevation adjacent to the storm sewer does not show a substantial continued decreasing trend during the first six months of operation, that Franklin implement other measures to prevent continued groundwater infiltration to the storm sewer pursuant to Section VIII, Work To Be Performed, Paragraph E of the Consent Order.

Treatability Study: Air Sparging/Soil Vapor Extraction

Due to the nature of this document, U.S. EPA has not generated any deficiency comments, but rather provided the following information on the efficacy of the system. U.S. EPA reviewed the Amphenol Franklin Power Products Treatability Study: Air Sparging/Soil Vapor Extraction (AS/SVE) System Final Report (May 1999) prepared by O'Brien and Gere Engineers Inc. (Treatability Study). The primary objective of the Treatability Study was to evaluate the feasibility of using AS/SVE technology to supplement the existing groundwater recovery system and enhance the removal of volatile organic compounds (VOCs) from ground water in the vicinity of the storm sewer. The pilot study included the installation of two air sparge injection wells, one soil vapor extraction well and two new monitoring wells (equipped with both a shallow and deep monitoring point).

The treatability study consisted of three phases. In the first, only the air sparging portion of the system was operated and monitored. In the second phase, only the soil vapor extraction system was operated and monitored and in the third stage, both systems were operated in unison. Based on the information provided in the Treatability Study Report, it appears that the Treatability Study was performed and monitored in an appropriate manner. The Treatability Study results were used to determine an average perchloroethylene (PCE) removal rate for the study and to calculate a radius of influence for both the injection and extraction well points to establish an appropriate design for a

full scale air sparging/soil vapor extraction system. O'Brien & Gere determined that the average PCE removal rate was equal to approximately 0.005 pounds per hour (page 9). They also found that in order to appropriately cover the proposed treatment area, a full scale system would have to consist of 80 injection wells and 9 extraction wells distributed across an area of approximately 200 feet by 40 feet (page 10). Page 10 of the Treatability Study indicates that the effective PCE removal rate for the ground water recovery system is approximately 0.02 pounds per hour. The primary conclusion of the Treatability Study presented on page 10, is that due to the large number of wells required for the full scale AS/SVE system and the relatively low expected PCE recovery rate, the design and installation of a full scale system is not recommended.

Based on U.S. EPA's evaluation of the information provided in the Treatability Study Report, U.S. EPA concurs with the conclusion that the design and installation of a full scale AS/SVE system for the Franklin site is not appropriate. Our primary rationale is that the very low PCE removal rate established during Treatability Study does not appear to warrant the costs associated with installing, operating and monitoring a full scale air sparging/soil vapor extraction system at the Franklin site. Thus, Franklin Power Products has in essence, fulfilled the requirements of Section VIII.F of the Consent Order and is released from from the requirements of Sections VIII.G and H of the Consent Order.

Webb Well Field Evaluation (May 5, 1999)

U.S. EPA reviewed the Franklin Power Products Webb Well Field Evaluation (May 5, 1999) prepared by O'Brien and Gere Engineers Inc. (O'Brien and Gere Evaluation). The primary purpose of the O'Brien and Gere Evaluation was to assess the report titled "Protecting Ground Water at the Indiana American Water Company's Webb Well Field Near Franklin, Indiana" (June 30, 1997), by Wittman Hydro Planning Associates (WHPA Report) and to assess the validity of the primary conclusion of the WHPA Report that "DCE contamination at the Franklin Power Products facility is very likely ending up in the community drinking water supply" (Page 11).

The O'Brien and Gere Evaluation (pages 3 and 4) identifies deficiencies in the modeling and conclusions of the WHPA Report, and O'Brien and Gere (page 4) conclude that the modeling described in the WHPA Report cannot be used to demonstrate that the Franklin Power Products site is the source of VOCs detected in the Webb Well Field.

U.S. EPA does not disagree with the deficiencies identified by O'Brien and Gere in the WHPA Report and in fact, many of the deficiencies noted in the O'Brien and Gere Evaluation are similar to concerns that U.S. EPA identified during our 1998 evaluation of the WHPA Report. In addition, U.S. EPA agrees that the WHPA groundwater modeling described in the WHPA Report does not appear adequate to demonstrate that the Franklin Power Products site is the source of VOCs in the Webb Well Field. However, U.S. EPA also found that the O'Brien and Gere Evaluation did not provide any additional hydrogeologic information to refute this contention and to demonstrate that the Franklin Power Products site absolutely did not contribute to the VOC contamination detected at the Webb Well Field and thus did not fulfill the requirements of Section VIII.I of the Consent Order.

U.S. EPA recommends that Franklin install additional temporary or permanent piezometers/monitoring wells in the area east and northeast of the Franklin site to: 1) Help demonstrate that there is not a natural, or Webb Field pumping induced, groundwater flow component towards the east or northeast, and 2) Obtain additional information regarding the extent of the capture zone of the upgraded groundwater recovery and treatment system.

In summary, U.S. EPA has reviewed the: CMI Groundwater Recovery and Treatment System Upgrade Report; the Treatability Study AS/SVE System Report; and the Webb Field Evaluation Report that were submitted to U.S. EPA on May 6, 1999, by O'Brien & Geere Engineers, Inc. on behalf of Franklin Power Products, Inc. and Amphenol Corporation. Please provide responses to our comments and/or a revised version of the Corrective Measures Implementation Groundwater Recovery and Treatment System Upgrade Report within thirty (30) days from receipt of this letter. U.S. EPA suggested on page 2 of this letter that if the groundwater elevation adjacent to the storm sewer does not show a substantial continued decreasing trend during the first six months of operation, that Franklin implement other measures to prevent continued groundwater infiltration to the storm sewer. In addition, Section 2.5 Conclusions section of the Treatability Study: AS/SVE System report proposes further evaluation and possible enhancement of the upgraded on-site ground water recovery system as a feasible remedial alternative to the AS/SVE system. Please provide additional information on the possible enhancement of the on-site ground-water recovery system. Also, U.S. EPA has identified some additional work on the Webb Well Field project. Please respond to our comments on the next steps for the Webb Well Field project/report with thirty (30) days from receipt of this letter.

If you should you have any questions please contact me at (312) 353-4921.

Sincerely,

Walt Francis

Walt Francis, Project Manager
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division

Enclosure

cc: J. Michael Jarvis, Franklin Power Product
William Gabriel, O'Brien & Gere
John Gunter, IDEM

FRANKLIN POWER PRODUCTS INC./AMPHENOL
TECHNICAL REVIEW
GROUND WATER RECOVERY AND TREATMENT SYSTEM
UPGRADE REPORT

SPECIFIC COMMENTS

1. Paragraph 2 on page 2 of the Ground Water Recovery and Treatment System Upgrade Report (Report) states, "To increase the individual yields of the existing three on-site recovery wells (RW-1, RW-2, and RW-3), existing pneumatic pumps and ancillary equipment were replaced with electric submersible pumps." However, the Report does not provide a description of the new equipment. The description should include but not be limited to the type and model number of the submersible pumps, the operating capacity of the pumps, and the depth at which the pumps were installed. This information is necessary in order to evaluate and understand how the recovery system was modified and the potential capability of the modified recovery system.

2. Paragraph 5 on page 2 of the Report states, "Subsequent to completion, RW-4 was developed to remove fine grained sediments from the well screen and casing, and to promote hydraulic connection with the surrounding aquifer." However, the Report does not provide information regarding the well development methods used by the facility at RW-4. The Report should provide a full description of the methods used to develop RW-4, including the number of gallons removed during development, turbidity measurements collected during well development activities, and the amount of time required to develop the well. This information is necessary in order to evaluate well installation and development procedures and how it might impact the recovery system. In addition, if any aquifer tests were conducted at RW-4 to establish the optimum pumping rate for the well, those results should be presented in this Report. The Report should also include information regarding the type of pump installed in the new recovery well, the model of the pump, the pump's operating capacity, and the depth at which the pump was installed.

3. Paragraph 7 on page 2 of the Report states, "Prior to installation of the electric pumps, the average flow from the recovery wells during January 8 to 29, 1999, was 9.1 gpm. Subsequent to installation of the electric pumps, the average flow as measured from March 10 to 25, 1999, increased to 25.9 gpm." However, it is important to note

that along with the replacement of the pneumatic pumps and ancillary equipment with electric submersible pumps, an additional recovery well (RW-4) was also installed at the facility to increase groundwater recovery operations. In order to understand better the differences in recovery rate using electric submersible pumps as opposed to pneumatic pumps, the Report should also present a calculated average pumping rate for each recovery well over an average 24-hour period. This information would better convey the realized increase in recovery rate based on replacing the pneumatic pumps with submersible electric pumps.

In addition, the Report states that the modified recovery system is operating 24 hours a day. However, the Report does not provide any information on the system's method of operation. The Report should include a description of how the modified system is operated. For instance, are the pumps within the recovery wells operated on a continuous basis or are the pumps cycled using timers or float switches.

4. Paragraph 1 on page 3 of the Report states, "The figure (Figure 2) shows that under static conditions, ground water flows from north to south across the site." However, the Report does not provide sufficient data to support this statement. Based on Figure 2 it appears that the pre-upgrade groundwater elevation contour map was prepared using static groundwater levels collected at only 10 of the 19 available water level monitoring points shown on the map. No static water levels were collected between monitoring wells MW-9 and MW-21, and it does not appear that there are any water level monitoring points located along the far eastern and western boundaries of the site. The only area of the site where sufficient data were gathered to verify static groundwater flow was from the southeastern portion of the site and even there, data was not collected from MW-23, MW-25, IT-2 and IT-3. Therefore, the statement that Figure 2 shows that groundwater flows from "north to south across the site" is not fully supported by the data presented in this Report. To support the interpreted groundwater flow direction for the site, additional groundwater elevation monitoring points could be installed along the eastern property line between MW-9 and MW-30 and along the western property line.

5. Paragraph 1 on page 3 of the Report indicates that Figure 3 depicts ground water flow conditions during active pumping

of the upgraded system. Figure 3 shows that well developed cones-of-influence have been developed by the recovery wells, which extend across the site to the downgradient property boundary. However, the Report does not provide sufficient data to support this statement.

The groundwater contour elevations depicted in Figure 3 represent the facility's interpretation of the groundwater elevation data collected during the operation of the upgraded recovery system. However, based on the groundwater elevation data presented in Figure 3, it is not clear whether the cones-of-influence actually extend across the site between RW-4 and RW-3. Note that U.S. EPA is aware that it may be difficult to obtain data to conclusively demonstrate that the cones of influence between the two pumping wells actually intersect due to problems associated with installing piezometers on the residential property south of RW-4. However, the installation of even a temporary piezometer on the residential property west of MW-22 would provide much needed data.

In addition, it does not appear that the interpreted cone-of-influence from RW-4 extends to the western property boundary of the facility. Therefore, the statement that the cones-of-influence extend across the site to the downgradient property boundary is not supported by the data presented in this Report for the portion of the facility west of RW-3.

To support and verify the interpretations of static groundwater flow present at the site and cones-of-influence that result from the operation of the groundwater recovery system, the facility should install additional monitoring points in the form of piezometers or additional groundwater monitoring wells west and south of RW-4.

6. The second bullet under the conclusions section on page 3 of the Report states, "The cones-of-influence developed by the ground water recovery wells extend across the site to the downgradient property boundary providing a hydraulic barrier to off-site groundwater flow." This statement implies that the recovery wells are providing containment of groundwater flow across the site and that this containment prevents groundwater from flowing off-site. Data which demonstrates capture zones for each of the recovery wells have not been provided in this Report since based on Figure 3, it does not appear that there are an adequate number of groundwater elevation monitoring points along the southeastern and

southern property boundaries to verify the size of the capture zones in the area south, east and west of RW-1 and RW-2.

To support and verify the modified groundwater recovery system's ability to contain the on-site groundwater, Franklin should install additional groundwater elevation monitoring points at intervals along Hamilton Avenue from the intersection with Upper Shelbyville Road to a point where an extension of the western property boundary would intersect Hamilton Avenue. In addition, the facility should conduct groundwater modeling using data from on-site monitoring and recovery wells and all newly installed groundwater elevation monitoring points to support that containment is achieved through the operation of the current on-site recovery system. The modeling should include particle transport modeling to verify capture. Note that if site specific data has not already been obtained, additional aquifer testing may be required to derive parameters such as hydraulic conductivity, transmissivity, and storativity.

Amphenol

Amphenol Corporation

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

Certified Mail, Return Receipt Requested

December 8, 1998

Mr. Charles R. Littleton, Jr.
Public Works Superintendent
City of Franklin
796 S. State Street
Franklin, IN 46131

Re: Corrective Measures Implementation
Franklin Power Products/Amphenol Corporation
980 Hurricane Road
IND 044 587 848

Dear Mr. Littleton:

As you are aware, Amphenol, in conjunction with Franklin Power Products (FPP), the current owner of the former Bendix/Amphenol facility on Hurricane Road, has been conducting a RCRA Corrective Action Program at this site. In its Interim Final Decision which identified the selected remedy for corrective measures at the site (attached), USEPA included certain institutional controls to prevent potential contact with contaminants.

In furtherance of that decision, the Administrative Order on Consent between USEPA, FPP and Amphenol Corporation directed FPP and Amphenol to implement standard confined space entry procedures for all sewer manholes on facility property, for storm sewer manholes at all off-site locations (i.e., between the facility and the storm sewer outfall on Hurricane Creek) and for all sanitary sewer manholes on Forsythe Street. Standard confined space entry procedures as used here would consist of those requirements found in the OSHA standard for confined space entry at 29CFR1910.146 (copy attached). Because employees of the City or contractors hired by the City are most apt to enter the off-site manholes, this notice is being sent to you for your information and use.

Please note that the USEPA's requirement does **not** envision additional actions beyond those which would typically be required when entering a confined space such as a sewer manhole. Furthermore, there are **no** data which suggest that there is a problem related to site conditions in those manholes. Any potential risk associated with site conditions will be further reduced as the remedial measures are fully implemented in the coming months.

If any of the remaining remedial actions affect the current discharge to the Franklin sewer system, you will be advised as early in the process as possible. Should you have any questions regarding the above please contact me at (203)265-8760.

Yours sincerely,

Samuel S. Waldo
Director, Environmental Affairs

cc: J. M. Jarvis - FPP (w/o att)
R. Baker - FPP (w/o att)
W. Buller - USEPA (w/o att)
W. Gabriel - O'Brien & Gere (w/o att)
P. Perez, Esq - Amphenol (w/o att)
I. DeVoren, Esq - Dechert, Price & Rhoads (w/o att)

Amphenol

phenol Corporation

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

D.4.1

VIA FEDERAL EXPRESS

November 6, 1998

Joseph M. Boyle, Chief
United States Environmental Protection Agency
Region 5
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division
77 West Jackson Boulevard
Chicago, IL 60604-3590

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

Dear Mr. Boyle:

Enclosed please find the revised Administrative Order on Consent for the subject site. The Order contains an original signature page. I am also including two (2) additional signature pages. Please sign both pages and mail one (1) to each of the Respondents.

If you have any comments or questions, feel free to call 203/265-8645 or fax at 203/265-8827.

Very truly yours,

Plinio Perez
Associate General Counsel

PP/mss
cc:
Ivan DeVoran, Esq. - (Dechert, Price & Rhoads - w/o encl.)
J. Michael Jarvis - (Franklin Power Products - w/o encl.)
S.S. Waldo - (w/o encl.)
E.C. Wetmore, Esq. - (w/o encl.)

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Amphenol

Amphenol Corporation

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

VIA FEDERAL EXPRESS

April 22, 1998

Joseph M. Boyle, Chief
United States Environmental Protection Agency
Region 5
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division
77 West Jackson Boulevard
Chicago, IL 60604-3590

RE: RCRA Consent Order - Corrective measures implementation IND 044 587 848

Enclosure: Letter from Ivan DeVoren, Esq. (Franklin Power/Marine Corp. of America) to P. Perez dated April 20, 1998

Dear Mr. Boyle:

On April 17, 1998 I forwarded to your attention a redlined version of the proposed Consent Order on behalf of Respondents. Shortly thereafter, I received the enclosed communication from Owner Respondent which we submit for your consideration. It is self-explanatory. We trust the requested correction is not objectionable to EPA.

If there are any comments or questions the undersigned may be reached at 203/265-8645 or via facsimile at 203/265-8827.

Very truly yours,

Plinio Perez
Associate General Counsel

PP/mss
cc: J. Copeland - Delco Remy
I. DeVoren, Esq.
J. Gunter - IDEM
J.M. Jarvis - Marine Corp.
S.S. Waldo - Amphenol

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** TOTAL PAGE.002 **

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DECHERT PRICE & RHOADS

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1717 ARCH STREET
PHILADELPHIA, PA 19103-2793

TELEPHONE: (215) 994-4000
FAX: (215) 994-2222

30 ROCKEFELLER PLAZA
NEW YORK, NY 10112
(212) 698-3500

PRINCETON PIKE CORPORATE CENTER
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(609) 520-3200

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WASHINGTON, DC 20006-2401
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1050 BRUSSELS, BELGIUM
(32-2) 535-5411

TITMUSS SAINER DECHERT
2 SERJEANTS' INN
LONDON EC4Y 1LT, ENGLAND
(44-171) 583-5353

151, BOULEVARD HAUSSMANN
75008 PARIS, FRANCE
(33-1) 53 83 84 70

Direct Dial: (215) 994-2759
IDeVoren@dechert.com

April 20, 1998

VIA FAX

Plinio Perez, Esquire
Amphenol World Headquarters
358 Hall Avenue
P.O. Box 5030
Wallingford, CT 06492

Re: RCRA Consent Order - Corrective Measures Implementation IND 044 587 848

Dear Plinio:

As we discussed, the respondent/ordered party in the Consent Order should be changed from Marine Corporation of America to Franklin Power Products, Inc. Franklin Power Products, Inc. is the owner of the property. Marine Corporation of America is a tenant who will be vacating the property shortly. Apparently there was some confusion on the part of the EPA, as highlighted in Section V.F. of the draft Consent Order, which may have resulted when Marine Corporation of America applied for an air permit under its name. EPA mistakenly took that as a change in ownership of the facility, which was not the case. Accordingly, please notify EPA that Marine Corporation of America should be stricken from the Consent Order and replaced, where appropriate, with Franklin Power Products, Inc.

Please give me a call if you have any questions.

Sincerely,

Ivan S. DeVoren

ISD/bww
cc: Mr. Michael Jarvis
Mr. Larry Light

Amphenol

Amphenol Corporation

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

VIA FEDERAL EXPRESS

April 17, 1998

D. 5.1

Joseph M. Boyle, Chief
United States Environmental Protection Agency
Region 5
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division
77 West Jackson Boulevard
Chicago, IL 60604-3590

RE: RCRA Consent Order - Corrective Measures Implementation IND 044 587 848

Enclosure: Draft Administrative Order on Consent - "Lined" with Proposed Changes from Respondents

Dear Mr. Boyle:

Enclosed you will find EPA's draft Administrative Order on Consent ("AOC"). The respondents respectfully request that certain changes be allowed on EPA's AOC form. For your ease of reference, the suggested changes have been inserted into the text of the enclosed order by means of a *double underline and italics* font. Deletions are shown with ~~strikeout lines~~ running through the text.

We request a meeting with you and other EPA officials involved on this project, in which we can explain our concerns and show how the suggested changes address those concerns. We trust that EPA will give fair consideration to our proposed changes and that our tradition of compliance and cooperation at this site continues.

If you have any comments or questions feel free to call me at 203/265-8645 or fax at 203/265-8827.

Very truly yours,

Plinio Perez
Associate General Counsel

PP/mss
cc: J. Copeland - Delco Remy - (w/o enclosure)
I. DeVoren, Esq. - (w/enclosure)
J. Gunter - IDEM - (w/enclosure)
J. M. Jarvis - Marine Corp. - (w/enclosure)
S. Waldo - Amphenol - (w/o enclosure)

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AUG 28 1997

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

DRE-8J

Mr. David C. Hudak
U.S. Fish and Wildlife Service
Bloomington Field Office
620 South Water Street
Bloomington, Indiana 47403-2121

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

Dear Mr. Hudak:

Please find enclosed a copy of the Interim Final Decision/Response to Comments which describes the remedy selected for the Franklin Power Products/Amphenol Facility by the United States Environmental Protection Agency continue to inform the public, through appropriate means, about the corrective for the facility.

If you have any questions or comments p (312) 886-4668.

Sincerely,

William Buller, Project Coordinator
Enforcement and Compliance Assurance Br
Waste, Pesticides and Toxics Division
MI/WI Section

cc: Michael Sickels, IDEM

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Mr. David C. Hudak
U.S. Fish + Wildlife Service
Bloomington field office
620 S. Water Street
Bloomington, IN 47403-2121

4a. Article Number
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PS Form 3811, December 1994

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MB 8/28/97					

AUG 28 1997

CERTIFIED MAIL
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DRE-8J

Mr. Scott Hall
Daily Journal-Johnson County Indiana
P.O. Box 699
Franklin, Indiana 46131

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

Dear Mr. Hall:

Thank you for your interest concerning the Franklin Power Products/Amphenol Facility, Franklin, Indiana. Please find enclosed a copy of the Interim Final Decision/Response to Comments which describes the remedy selected for the facility by the United States Environmental Protection Agency (U.S. EPA). U.S. EPA will continue to inform the public, through press releases or other appropriate means, about the corrective measures implementation for the facility.

If you have any further comments or questions pertaining to the facility, please call me at this toll free number 800-621-8431, or at (312) 886-4568.

Sincerely,

William Buller, Project Coordinator
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division
MI/WI Section

cc: Michael Sickels, IDEM

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
MJ 8/26/97					

Amphenol

phenol Corporation

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

D. 3. 6

March 17, 1998

Mr. William Buller - DRE-9J
Enforcement and Compliance Assurance Branch
U. S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3590

Re: Marine Corporation of America/Amphenol Corporation, Franklin, IN
IND 044 587 848

Dear Mr. Buller:

Pursuant to our conversation on Friday, March 13, 1998, I have enclosed copies of O & M summaries for the ICM. Those summaries cover the period of July 17, 1997 to the present. I am prepared to continue to send these reports to you on a voluntary basis although I would suggest that the submittal frequency coincide with the schedule presented in the draft AOC, e.g., every six months.

I received the draft AOC file via e-mail; it is presently under review. As a point of reference regarding the due date of comments, please note that the certified letter transmitting the hard copy of the draft AOC was received on March 6, 1998. The review period expires on April 20, 1998.

As I noted in our conversation, we are proceeding to select a contractor to perform the tasks outlined in the draft Scope of Work. I will keep you advised of our progress in this effort.

Please let me know if you have any questions regarding the above.

Yours sincerely,

Samuel S. Waldo
Director, Environmental Affairs

MAY 15 2000

VIA FACSIMILE AND CERTIFIED MAIL
RETURN RECEIPT REQUESTED

DE-9J

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

Re: Franklin Power Products, Inc./Amphenol
CMI Groundwater Recovery and
Treatment System Monitoring Work Plan
Approval and Notification of
Change in U.S. EPA Project
Coordinator
Franklin, Indiana
IND 044 587 848

Dear Mr. Waldo:

The United States Environmental Protection Agency (U.S. EPA) has reviewed the March 30, 2000, letter and work plan from Secor International, Inc. (Secor) which was prepared on behalf of Franklin Power Products, Inc. and Amphenol Corporation in response to U.S. EPA's February 7, 2000, letter regarding the Corrective Measure Implementation (CMI) Groundwater Recovery and Treatment System Monitoring Work Plan for the Franklin, Indiana (Franklin) site.

The CMI Groundwater Recovery and Treatment System (GRTS) Monitoring Work Plan describes additional work to be implemented at the site, specifically this includes bi-weekly maintenance, monthly maintenance, and quarterly sampling and analysis on the GRTS. In addition, groundwater elevation monitoring will be measured on a semi-annual basis for wells IT-2, IT-3, MW-3, MW-9, MW-12, MW-20, MW-21, MW-22, MW-23, MW-24, MW-25, MW-26, MW-27, MW-28, MW-29, and MW-30. Also, groundwater samples will be collected from wells IT-2, IT-3, MW-12, MW-20, MW-22, MW-28, MW-29 and MW-30 to assess on- and off-site groundwater quality.

In summary, U.S. EPA has reviewed the March 30, 2000, CMI GRTS Monitoring Work Plan, and hereby approves of the document. Subsequent to each semi-annual groundwater elevation monitoring and sampling and analyses event, a letter report will be prepared and sent to U.S. EPA. The semi-annual reports will include a

FEB 07 2000

VIA FACSIMILE AND CERTIFIED MAIL
RETURN RECEIPT REQUESTED

DE-9J

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

Re: Franklin Power Products, Inc./Amphenol
CMI Groundwater Recovery and
Treatment System Upgrade Report,
Treatability Study AS/SVE, and
Webb Field Evaluation Approvals
Franklin, Indiana
IND 044 587 848

Dear Mr. Waldo:

The United States Environmental Protection Agency (U.S. EPA) has reviewed the October 20, 1999, letter from Secor International, Inc. (Secor) which was prepared on behalf of Franklin Power Products, Inc. and Amphenol Corporation in response to U.S. EPA's September 23, 1999, letter and October 5, 1999, teleconference regarding the Corrective Measure Implementaion (CMI) Groundwater Recovery and Treatment System Upgrade Report, Treatability Study AS/SVE, and Webb Field Evaluation for the Franklin, Indiana (Franklin) site.

In addition, U.S. EPA has reviewed additional historical data from the Franklin Power Products/Amphenol Remedial Investigation Report that was provided by Secor.

In general, the groundwater elevation data collected by Franklin does generally support the conclusion that, at the present time, the natural groundwater flow direction in the water table aquifer at the Franklin site is north to south across the site, with no evidence of a component of flow towards the northeast or east. As a result, it does not appear that it will be necessary for Franklin to install additional monitoring wells/piezometers east or northeast of the site to demonstrate that there is not a natural groundwater flow component toward the Webb Well Field. Over the four month period of May through August 1999, it appears that the pumping of the upgraded recovery system has created two well developed cones of depression in the water table. The first

summary of groundwater flow conditions, groundwater quality data, and a discussion of the over-all effectiveness of the GRTS. The report will also contain monthly GRTS - O&M Reports, groundwater sampling logs, and laboratory data sheets. In addition, pursuant to Section VII of the Administrative Order on Consent, U.S. EPA hereby provides written notice changing its Corrective Action Project Coordinator. The new Project Coordinator is Juan Thomas. All future communications, documents, reports, approvals, and other correspondence concerning the activities performed pursuant to the terms and conditions of this Order shall be directed to:

Juan Thomas (DE-9J)
U.S. EPA, Region 5
Waste, Pesticides and Toxics Division
Enforcement and Compliance Assurance Branch
Corrective Action Section
77 West Jackson Blvd.
Chicago, IL 60604

If you should you have any questions please contact me at (312) 353-4921, or Juan Thomas (312) 886-6010.

Sincerely,

Walt Francis, Project Manager
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division

cc: J. Michael Jarvis, Franklin Power Products, Inc.
William Gabriel, Secor International-Syracuse
John Gunter, IDEM

bcc: Larry Johnson, ORC (C-14J)
Juan Thomas, ECAB (DE-9J)
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ENFORCEMENT AND COMPLIANCE ASSURANCE BRANCH

SECRETARY	SECRETARY	SECRETARY	SECRETARY	SECRETARY	SECRETARY
AUTHOR/ TYPIST W.F. 5/15/00	MINN/OHIO SECTION CHIEF	MICHIGAN/ WISCONSIN SECTION CHIEF	ILLINOIS/ INDIANA SECTION CHIEF	ECAB BRANCH CHIEF	WPTD DIVISION DIRECTOR

encompasses recovery wells RW-2 and RW-3 and the second surrounds new recovery well RW-4. It appears that the combined capture zone for the two cones of depression extends throughout the area bounded roughly by lines drawn between monitoring wells MW-24, MW-30, IT-2, MW-12, MW-29 and MW-21. It is possible that the capture zone actually extends further to the east toward Hurricane Road. However, there are insufficient monitoring points in this area to establish the eastern extent.

In summary, U.S. EPA has reviewed the October 20,1999, response to U.S. EPA's September 23, 1999, letter regarding the CMI Groundwater Recovery and Treatment System Upgrade Report; the Treatability Study AS/SVE System Report; and the Webb Field Evaluation Report, and hereby approves of those documents with the October 20, 1999, Secor response to U.S. EPA's comments. This completes Section VIII. Work To Be Performed requirement for paragraphs E, F, G, H and I of the CMI Consent Order. Pursuant to Section VIII, paragraph N "Additional Work" of the Consent Order, Franklin Power Products/Amphenol shall provide a CMI Groundwater Recovery and Treatment System (GRTS) Monitoring Plan within thirty (30) days from receipt of this letter. The CMI GRTS Monitoring Plan shall include:

Continued Groundwater Recovery and Treatment System - Operations and Maintenance

Operation and maintenance (O&M) of the existing on-site Groundwater Recovery and Treatment System will be performed on a bi-weekly basis. The existing system consists of four groundwater recovery wells and an air stripper. During the bi-weekly) O&M inspections performance of the system will be reviewed and general maintenance performed as necessary.

Flow rates from the recovery wells to the air stripper will be monitored and recorded on a monthly basis. Influent samples from each of the recovery wells and an effluent sample from the stripper system discharge line will be collected quarterly. The influent and effluent samples will be laboratory analyzed for volatile organic compounds (VOCs).

Groundwater Elevation Monitoring

Groundwater elevations will measured from all site monitoring wells on a semi-annual basis. These data will be used to evaluate site groundwater flow patterns and the effectiveness of the recovery system to hydraulically control the off-site flow of groundwater.