Message

From: Joe Bianchi [jbian@amphenol-aao.com]
Sent: 10/23/2018 5:47:19 PM
To: Bury, Carolyn [bury.carolyn@epa.gov]; Brad Gentry (bgentry@iwmconsult.com) [bgentry@iwmconsult.com]
Subject: RE: Amphenol Corp. Requests and Questions - EWA

Thank you, Carolyn. So we're consistent, could we see the EPA's response. Just want to make sure that we are saying the same things to property owners should they ask similar questions.

From: Bury, Carolyn [mailto:bury.carolyn@epa.gov]
Sent: Tuesday, October 23, 2018 10:43 AM
To: Brad Gentry (bgentry@iwmconsult.com); Joe Bianchi
Subject: FW: Amphenol Corp. Requests and Questions - EWA

fyi

From: shannon@edisonwetlands.org [mailto:shannon@edisonwetlands.org]
Sent: Monday, October 22, 2018 1:39 PM
To: Bury, Carolyn <bury.carolyn@epa.gov>
Cc: Moore, Tammy <moore.tammy@epa.gov>; Gonzalez, Rafael <Gonzalez.RafaelP@epa.gov>; Cisneros, Jose <Cisneros.Jose@epa.gov>; Asque, Gillian <asque.gillian@epa.gov>; Boone, Denise <boone.denise@epa.gov>; Harris, Michael <harris.michael@epa.gov>
Subject: Amphenol Corp. Requests and Questions - EWA

Dear Ms. Bury,

I am writing to formally request a response to these follow-up questions regarding the former Amphenol site history and ongoing investigation:

1. EPA records indicate that in 1985, a voluntary cleanup was undertaken by Bendix Connector Corporation, which involved the removal of plating waste-contaminated (VOCs, cyanide) soils beneath the plating room floor.

- Were confirmation samples taken to validate that impacted soils were fully removed beneath the plating building, including metals and VOC analysis? Were soil samples taken beneath any other portion of the building, particularly those that were demolished by subsequent owners of the property, e.g., the "wash room" originally located west of the plating room according to historical site assessments and work plans?
- EPA's USEPA's August 30 "Request for Vapor Intrusion Investigation" includes off-site soil and sewer line sampling, but what soil sampling activities are planned to be conducted onsite within the next several months to assess current soil conditions on the property and potential impacts to groundwater, surface water, and indoor air?

2. Several documents, including permits filed by Bendix and Site Assessment reports prepared on behalf of Amphenol Corporation note the presence of several above-ground and underground storage tanks, including at least three (3) 1,000 gallon in-ground storage tanks (one cyanide overflow tank west of the plating room, and two tanks containing unconfirmed material, believed to be "mineral spirits"). Furthermore, a 1985 memo from the Indiana State Board of Health requested that a Corrective Action Order (CAO) be issued to address the old sewer line left in place at the site as well as the UST(s), stating, "…there is an underground storage tank on-site used for storage of cyanide plating wastes, which has not been addressed in the sampling and cleanup activities." (EPA Region 5 Records Ctr. Doc# 287275)

- Were USTs and above-ground storage tanks removed as part of any site remediation effort? Was a Corrective Action Order issued to address the USTs after the Indiana State Board of Health expressed its concerns?
- If USTs are known to be still left in place, what is the inspection schedule, including but not limited to: tightness tests, leak tests, corrosion tests, repair/operation & maintenance, and walkthrough inspections?
- Since EPA asserted this site will "be treated as if it was a new site" and that "actual and potential threats to human health and the environment [are] addressed," we request a UST assessment be conducted immediately as part of the groundwater and soil delineation activities planned per USEPA's August 30 "Request for Vapor Intrusion Investigation," including a magnetometer sweep/ground penetrating radar (GPR) to confirm any storage tanks potentially onsite.This is important in the context of identifying any sources as part of the Conceptual Site Model, evaluating the effectiveness of the current pump-and-treat system against other alternatives, and understanding contaminant distribution.

3. Inter-agency memos and RCRA reports detail the replacement of a portion of the sanitary sewer line on the former Amphenol site property, ("old" vs. "new" sewer lines) in the early 1980s. However, it is unclear in historical documents and recent reports the extent of original sewer lines remaining from the time that untreated plating waste was discharged directly into the municipal sewer system.

- Was the sanitary sewer line down Forsythe St. replaced, and was confirmation sampling conducted in this area?
- As part of the delineation activities being conducted on- and off-site, including the sewer lines, samples should be analyzed for the full TAL. Constituents known to have been historically used and/or disposed of onsite, such as chromium and cyanide, should at least be included along with the VOC list requested in the aforementioned EPA August 30 letter - please explain why they are not being listed for analysis.
- Amphenol's September 10, 2018 Sewer Gas Vapor Intrusion Work Plan (no longer posted on EPA's website) should include sludge and sediment sampling in combination with air sampling of the sewers. TCE and PCE can bind to sediment for a long time, potentially being a more persistent source for VOC vapors than groundwater infiltration itself, and a more reliable indicator in combination with sewer air sampling given the variable nature of vapor concentrations. This should be a particular pathway to target comprehensively, as wastes from Bendix plating operations were reported to have been routed through the sewer system for over 20 years and could have remained for a long time.

EPA also recently stated that the agency would be assessing the effectiveness of Amphenol's current remediation system against other alternatives. What is the status of this assessment? We request that EPA put together a Stakeholder Information Package that includes: site summary/brief history, routes of exposure and exposure scenarios, corrective action objectives and remediation goals, description of remedial alternatives, and time/cost comparison of alternative remedies. This package will serve to promote meaningful community involvement and understanding of the EPA RCRA process at this stage.

I would appreciate a written response to these inquiries by Friday, October 26th. I also request a response to each question and comment in our August 15, 2018 letter and accompanying memo sent to your office over 2 months ago (another copy is attached to this email for your convenience).

Respectfully,

Shannon Lisa
Program Director

Edison Wetlands Association
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