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

REPLY TO THE ATTENTION OF:

LU-16J

Via E-mail and Certified Mail 7009 1680 7621 2293
RETURN RECEIPT REQUESTED

August 30, 2018

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

Subject: Conditional Approval *Residential Vapor Intrusion Work Plan* – Ex. 6 Personal Privacy (PP)
Franklin Power Products, Inc./Amphenol Corporation
Administrative Order on Consent, Docket # R8H-5-99-002
EPA ID# IND 044 587 848

Dear Mr. Bianchi:

This letter supersedes the conditional approval letter that I emailed you yesterday.

Thank you for preparing and submitting the *Residential Vapor Intrusion Work Plan* Ex. 6 Personal Privacy (PP) Ex. 6 Personal Privacy (PP) *Franklin Power Products, Inc./Amphenol Corporation*, dated August 27, 2018 ("Work Plan"). The Work Plan is the first submittal related to a broader vapor intrusion (VI) investigation in the residential area near the former Franklin Power Products, Inc./Amphenol Corporation facility ("facility" or "site").

During our meetings with Amphenol Corporation on August 7 and 8, 2018, EPA discussed prioritization of the building on the property Ex. 6 Personal Privacy (PP) Ex. 6 Personal Privacy (PP) as this location appeared to the most likely to be potentially impacted by historical facility releases. Other nearby buildings should be prioritized as the VI investigation proceeds. Last week, EPA made a verbal request for the subject Work Plan.

EPA conditionally approves the Work Plan with the following comments and conditions.

Comments:

1) A discussion describing the rationale for the proposed approach should be included in the final report. To support transparency in the investigation approach described in the Work Plan, I have included a summary of the rationale in this comment.

   The two VI pathways being investigated under this Work Plan are the sewer and soil gas pathways to indoor air. The investigation will determine whether either pathway is complete from source to receptor.

   For the VI sewer pathway, the indoor air living space sample locations are the downstairs and upstairs bathrooms.

   For the groundwater/soil gas pathway, the indoor air samples in the basement and crawl space will represent concentrations in the upstairs living space (other than the bathrooms). These measurements will be used to make conclusions about whether the VI pathway is complete and for decisions regarding the need for mitigation.

   When EPA and Amphenol Corp. met on August 7, 2018, Amphenol stated its preference for basing complete pathway conclusions on crawl space/basement VOC measurements rather than taking additional measurements in living space, for the soil gas pathway evaluation, due to potential confounding VOC sources and to avoid disturbing residents. In the case of homes not having subsurface features, indoor air living spaces would be sampled. EPA concurred with this conservative approach.

2) On page 4, Reporting section, text states that sampling results will be compared to USEPA Regional Residential Vapor Intrusion Screening Levels and/or Ambient Air Screening Levels, using both the carcinogenic target cancer-risk of 10E-06 and the non-carcinogenic hazard quotient of one. Text also states that sampling results will be evaluated using the Indiana Department of Environmental Management (IDEM) Vapor Remedy Selection and Implementation Guidance Document, dated February 2014 (Appendix D).

   Please note that EPA views the IDEM guidance decision matrix described in Table 1: *Evaluation of Paired SGss/SGe-IA Sample Results* as a starting point for data analysis within the context of determining need for remedial action, and not as direction.

3) Page 4, second paragraph, last sentence: For future work plan submittals, if the work plan will rely on information that was provided in previously approved work plans, the text should include a placeholder for the information and explicitly reference the location of the information (document title, page number, etc.).

4) In the residential VI investigation report:
   a. include access agreement documentation as an attachment; and,
   b. revise Figure 2 to include details such as sample locations, sewer lines, floor layout, and basement and crawl space areas.

Conditions

Approval Conditions:

1) **Condition One:** As feasible, the home should be tested at the western corner of the building footprint so that Ex. 6 Personal Privacy (PP) Ex. 6 Personal Privacy (PP) Ex. 6 Personal Privacy (PP) For example, sample IA-CS1, located in the central portion of the crawl space, should be moved to the west side of the crawl space.

2) **Condition Two**: While sampling indoor air in the first and second floor bathrooms, the bathroom fans should be continuously operating to induce negative pressure.

3) **Condition Three**: Ensure that the laboratory documents the canister pressures when they are shipped for the sampling event in addition to the laboratory documenting the canister pressures upon their receipt, following the sampling event. These two pressure readings are independent and different from the Initial and Final Field Readings that are documented in the Chain of Custody process.

If you have any questions, please contact me at (312) 886-3020. Also, please feel free to contact Dr. Bhooma Sundar, EPA risk assessor, at (312) 886-1660 with VI investigation questions.

Sincerely,

Carolyn Bury

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

cc: Matt Kupcak, BorgWarner, Inc.
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ecc: Brad Gentry, IWM Consulting Group, LLC.
Bhooma Sundar, RRB CAS2
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