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 0000 7671 2354
RETURN RECEIPT REQUESTED

September 13, 2018

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

Subject: Conditional Approval *Sewer Gas Vapor Intrusion Investigation Work Plan Franklin Power Products, Inc./Amphenol Corporation*
Administrative Order on Consent, Docket # R8H-5-99-00
EPA ID# IND 044 587 848

Dear Mr. Bianchi:

Thank you for preparing and submitting the *Sewer Gas Vapor Intrusion Investigation Work Plan, Franklin Power Products, Inc./Amphenol Corporation,* dated September 10, 2018 ("Work Plan"). The Work Plan is a component of a broader vapor intrusion (VI) investigation in the residential area near the former Franklin Power Products, Inc./Amphenol Corporation facility ("facility" or "site").

EPA discussed the Work Plan with Mr. Brad Gentry, of IWM Consulting, yesterday. EPA conditionally approves the Work Plan with the following comments and conditions.

Comments:

1) EPA will review the sewer and soil gas data lines of evidence with Amphenol to determine the scope of homes where sewer laterals and/or sub slab samples will be needed.
2) The statement on page 1, bullet two, describing the sampling objective to, "Determine the lateral extent of vapor phase VOCs within the sewer corridors ..." needs clarification. The objective is to ensure that the scope of the main sewers and the laterals, as indicated by the data, will be evaluated within the study area, and beyond the study area, as warranted.

3) Page 2, paragraph 4 – EPA requested paired sampling of a grab sample with a longer-term sample such as the eight-hour sample duration proposed in the Work Plan, to verify that the grab samples would be representative. EPA considers that an on-site sample could be too variable due to the potential influence of the recovery well system. Amphenol should select one of the northern manholes on Forsythe Streets for this work; EPA suggests manhole # 250051. For the paired sampling, the procedures described in Work Plan section titled "Proposed Sampling Activities, Procedures, and Laboratory Analytical Methods" must be followed.
4) Page 4, Timeline. EPA assumes that the data validation step is implied and both raw and validated data will be submitted to EPA upon receipt.
5) Manhole # 250130 to the NE should be considered a background location.
6) The final report should include a summary of the sewer reconfiguration work completed at the site in the 1980's to correspond to the sewers labeled "old" and "new" in Figures 2-7.
7) The final report should include the details from the surface inspection to document manhole type/design, photo of manhole, and condition of the ground surface within a 10-foot radius of the cover.
8) Figures 2 – 7, the legends have a place-holder for sewer depths which will be determined during the Work Plan activities and be added to figures/tables in the final report.
9) Attachment B, *IWM Consulting SOP Group F Sewer Gas Vapor Sampling Activities* – this SOP should be dated; include the date in the final report.
10) Appendix A to SOP F should be revised to be project-specific before using it in the field. For example, "Building #" should be changed to "Manhole #."

Approval Conditions:

1) **Condition One:** The Work Plan is project-specific, while the sewer sampling SOP presented in Attachment B is generic. Where the Work Plan and the SOP differ, the sampling approaches in the Work Plan should take precedence. For example, procedure # 4 of the SOP is superseded by the steps described under "Proposed Sampling Activities, Procedures, and Laboratory Analytical Methods" on page 2 of the Work Plan. The site-specific sampling approaches must be communicated to the field team.
2) **Condition Two**: Provide the updated IWM Chain of Custody SOP and the worker health and safety plan to EPA, for inclusion in the Work Plan, before sampling within the Study Area.
3) **Condition Three**: During the sampling event, Amphenol must confirm that manhole # 250054 is the terminus for the sewer line running east-west on Hamilton.

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.
Certified Mail 7009 1680 0000 7671 2361

ecc: Brad Gentry, IWM Consulting Group, LLC.
Bhooma Sundar, RRB CAS2
Motria Caudill, ATSDR
Conor Neal, RRB CAS2