SEP 12 1996

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

DRE-8J

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

10/7 Faxed to Steve Kerce

Re: Administrative Order on Consent
(Dated November 27, 1990)
Franklin Power Products/Amphenol
IND 044 587 848

Dear Mr. Waldo:

The United States Environmental Protection Agency (U.S.EPA) has reviewed the document "Report of Additional Corrective Measures Studies (CMS) for the Former Amphenol Facility, Franklin Indiana" (dated June, 1996) which was submitted in accordance with the above referenced Administrative Order on Consent (AOC). U.S. EPA does not approve of the above referenced document as submitted and requires Respondents to amend the document in accordance with the comments noted in Attachment I of this letter. Certain issues pertaining to Hurricane Creek and the on-site groundwater recovery system require additional data collection as discussed below.

Visual observation of geologic and hydrologic conditions were employed to evaluate potential groundwater contamination at Hurricane Creek. U.S. EPA has determined that these observations as reported do not demonstrate that groundwater at Hurricane Creek has not been impacted. Respondent shall address this matter by implementing one of the two options described below:

Option 1 - Sampling of groundwater at Hurricane Creek during low flow conditions at the approximate locations specified in the June 1994 Workplan. Employ a modified sampling procedure to that specified in the June 1994 Workplan for collecting representative groundwater samples during low flow conditions.

Option 2 - Installation and sampling of at least one monitoring well at Hurricane Creek screened in the uppermost water bearing zone. The monitoring well shall be installed at either creek bank and at a location that is not more than 500 feet upstream or downstream of Forsythe Street.

U.S. EPA hydrologists have reviewed the existing data pertaining to the operation of the on-site groundwater recovery system and determined that the data are insufficient to evaluate the recovery system's effectiveness. U.S. EPA concludes that to fully evaluate the recovery system, additional piezometers/monitoring wells are needed to define the potentiometric surface during operation of the system.

Within seventy five (75) days of receipt of this letter, Respondents shall submit to U.S. EPA for approval, an On-site Recovery System Evaluation Workplan which incorporates the specifics of Attachment I. Since contaminant reduction may have occurred following the last sampling event, existing monitoring wells shall be sampled/analyzed so that the proposed piezometer locations are based on a recent plume delineation.

Within thirty (30) days of receipt of this letter, Respondents shall submit a revised report for the June 1996 CMS report which addresses all the general and specific comments given in Attachment I of this letter. The revised report shall clearly state which option Respondents have chosen to evaluate contamination at Hurricane Creek, and the specifics for implementing the investigative option. All revisions to the report shall be clearly identified by highlighting all additions and striking out all deletions. The report submittal shall include a response to comments which summarizes the responses and notes where the revisions were inserted in the report. If Respondents believe that certain deviations from the directives in this letter are necessary, such changes shall be discussed with U.S. EPA and approved prior to submittal of documents.

Should Amphenol fail to satisfactorily respond to all items in Attachment I and the Hurricane Creek and recovery system data needs, U.S. EPA may exercise its right to perform work as needed to fulfill the data requirements and complete the CMS report.

If you wish to discuss any items please contact me at (312) 886-4568.

Sincerely,

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

cc: J. Michael Jarvis, Franklin Power Products with enclosure
Michael Sickles, IDEM with enclosure
John Koehnen, A.T. Kearney, with enclosure

bcc: Larry Johnson, ORC with enclosure
Author Copy
Branch Copy
Section Copy

ATTACHMENT I

On Site Recovery System Evaluation Workplan

The Recovery System Evaluation Workplan shall include the following:

- Procedures to ensure that the existing recovery system will be operated to maximize the recovery and containment of contaminants.

- Results of analysis for volatile organic compounds (VOC)s. At a minimum, wells sampled and analyzed shall include MW 3, MW 22, MW 24, MW 27, MW 28, MW 30, and IT 3.

- A map showing the current and proposed piezometer/well locations. Unless the contaminant plume is diminished significantly, six or more piezometer/wells may be needed. At least two of the piezometers at perimeter locations (preferably all of them) shall be constructed so that representative groundwater samples can be collected. Following installation, all wells and piezometers shall be measured during operation of the recovery system and within a short time frame.

- A schedule of implementation for the Workplan including submittal of a Recovery System Evaluation Report. The report shall provide a map showing potentiometric head data for each measuring point, potentiometric contours and groundwater flow lines.

U.S. EPA Comments on June, 1996 CMS Report

General Comments

1. The June 1996 report describes an investigation that had already been completed, however the field procedures are discussed in the context that the work is forthcoming, rather than stating the procedures were performed in accordance with the Work plan. The text shall be revised to state that the Workplan procedures were followed and note any procedures which deviated from the plan.

2. The groundwater contour levels in sheet 1 do not correspond to the water level data of wells MW31, MW32,and MW33. These data indicate that groundwater flow direction at the time of measurement was to the southwest at this location. This flow direction is significantly different than the southeastern direction shown. The figure should be revised to show water level contours that correspond to the data.

3. The report cites that VOC contaminant concentrations at Forsythe Street are much lower than previous sample results and draws the conclusion that significant natural attenuation of contaminants has occurred. The text should note the different sampling methods (geoprobe vs monitor wells) and how data comparisons for the two methods may overstate attenuation. Also the text should discuss when monitor well samples were collected; that is, were samples collected prior to pump tests or after.

4. The conclusion that natural attenuation of VOCs is significant should be supported by data - comparison of on-site to off-site concentrations of VOCs, ratios of the VOC parent compounds (i.e. PCE, TCE) to daughter compounds (i.e., DCE, vinyl chloride).

5. The report states that utility lines may prevent installation of a pipeline at Forsythe street (Operable Area 3). All available information including location, depth, and dimensions of utility lines at Area 3 shall be provided.

6. Unless existing utility lines preclude such construction, the discussion of remedies for Operable Area 3 shall be expanded to include the construction and operation of an extraction/infiltration gallery at Forsythe Street. The remedy shall be discussed in accordance with Attachment I of the AOC and include a discussion on installation by horizontal drilling methods.

7. To provide monitoring of the Unit D aquifer, the proposed groundwater monitoring system proposed shall include a monitoring well located near MW-32 screened in Unit D.

8. A detection limit of 80 parts per billion (ppb) was reported for lead analysis for treated groundwater, whereas the action level is 15 ppb. The treated water shall be resampled and the lead content determined by an analytical method with a detection limit of 15 ppb or less.

Specific Comments

1. Page 14 - Text does not clarify that the existing recovery

system is operated so as to maximize recovery/containment of contaminants. The existing system shall be operated to maximize its effectiveness and the text shall be revised accordingly.

2. Page 20 - the word public is misspelled.

3. Page 24 - The Statement "there is no evidence that Hurricane Creek is a groundwater sink" shall be deleted.