



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

The Honorable Steve Barnett
Mayor of Franklin
70 E. Monroe Street
P.O. Box 280
Franklin, Indiana 46131

AUG 03 2018

Dear Mayor Barnett:

Thank you for your July 31, 2018 letter asking the U.S. Environmental Protection Agency to protect the citizens of Franklin and Johnson County, Indiana from potential exposures to unsafe levels of contamination. In response, in short, one main focus of ours is the former Amphenol site, which is under our jurisdiction, to see whether it contributes to any environmental issues in Franklin. As part of our support for the Indiana Department of Environmental Management (IDEM), and in partnership with the Agency for Toxic Substances and Disease Registry, we also are taking a broader look at Johnson County to identify other potential contamination sources for further assessment.

The former Franklin Power Products, Inc./Amphenol Corporation (Amphenol) site at 980 Hurricane Road in Franklin has been under the jurisdiction of the Resource Conservation and Recovery Act (RCRA) Corrective Action program, administered by the EPA, since 1990. Following an investigation of groundwater conditions, EPA required Amphenol to install a groundwater recovery system to remediate volatile organic compound (VOC) contamination in groundwater. This system was installed in 1995 and continues to operate today. EPA is requiring further investigations at the site to determine whether additional actions are needed.

As to VOCs around the Amphenol site:

1. Under supervision by EPA and IDEM, Amphenol collected 8-hour ambient (outside) air samples from six locations around the boundary of its site on July 26. A laboratory analyzed the samples and an independent data validation company has checked the results. These samples were analyzed for the nine volatile organic compound (VOC) chemicals associated with the historic releases from the former Amphenol site.
2. Preliminary results at the fence line indicate that air concentrations of VOCs are below EPA's health-based screening levels for residential exposure. EPA has directed the lab to re-analyze two VOC compounds using a more sensitive method to confirm these preliminary results.

3. The emission pipe at Amphenol's groundwater recovery air stripping system was also sampled. Emissions there were measured at a rate of approximately 8 pounds total VOCs per year. To put this in perspective, IDEM requires an air permit when emissions are between 20,000 and 50,000 pounds per year. In sum, current emissions from the Amphenol air stripping system are well below levels that would require an air permit.
4. On August 3, Amphenol installed a filter (vapor carbon system) on the emissions pipe to virtually eliminate its VOC emissions.
5. In addition, EPA will work with Amphenol to develop sampling and analysis plans to investigate other potential impacts in the area around the former Amphenol facility. The investigations will follow a systematic approach of evaluating a potential migration pathway of VOC-contaminated groundwater from the Site to the adjacent residential neighborhood, including a vapor intrusion study, as needed. Vapor intrusion can occur when VOCs in groundwater enter a gas phase and rise through soil into buildings such as through foundation cracks.
6. If evidence indicates the potential for vapor intrusion in the residential area around the former Amphenol site, the following actions could be taken to determine whether a "complete pathway" exists:
 - a. Analysis of the groundwater and soil vapor data to determine what areas may require additional investigation;
 - b. Evaluation of potential preferential pathways such as vapor migration from the site to the neighborhood through sewer lines;
 - c. Completion of "sub-slab" sampling in buildings/homes to determine if chemical vapor is accumulating directly beneath these structures and evaluate the results using risk-based threshold values; and,
 - d. If warranted, based on results from the above steps, conduct indoor air sampling to determine if air quality in homes has been compromised and exceeds health-based standards.

In general, when sample results confirm that vapor intrusion poses a risk to people occupying a building, a standard approach is to install a vapor mitigation system. This is the same type of system used to mitigate radon intrusion.

7. EPA is posting on its webpage data and information for the Amphenol site.

As part of our support for IDEM, EPA also is identifying other potential contaminant sources in the area so that we can systematically evaluate their nature, extent, and associated pathways. EPA is working with IDEM to identify other potential sources that may require additional monitoring.

We will continue to share information as it becomes available.

Again, thank you for your letter. If you have questions, please contact me or your staff may contact Eileen Deamer or Denise Fortin, the Region 5 Congressional Liaisons, at (312) 886-3000.

Sincerely,

A handwritten signature in blue ink that reads "Jim Payne for". The signature is written in a cursive, flowing style.

Cathy Stepp
Regional Administrator