

PUBLIC INFORMATION AND INVOLVEMENT PLAN

The Former York Naval Ordnance Plant Remediation Project

Harley-Davidson Motor Company Site York Vehicle Operations

Revised February 2015

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LIST OF ACRONYMS AND ABBREVIATIONS

AMF	American Machine & Foundry Company
EI	Environmental Indicator
fYNOP	former York Naval Ordnance Plant
MEC	munitions and explosives of concern
MMRP	Military Munitions Response Program
NCP	National Contingency Plan
NIR	Notice of Intent to Remediate
PADEP	Pennsylvania Department of Environmental Protection
PCE	tetrachloroethene
PIIP	Public Information and Involvement Plan
RA	Risk Assessment
RCRA	Resource Conservation and Recovery Act
SHS	statewide health standards
SI	site inspection
SRI	Supplemental Remedial Investigation
SSS	Site Specific Standard
TCA	1,1,1-trichloroethane
TCE	trichloroethene
USACE	United States Army Corps of Engineers
USEPA	United States Environmental Protection Agency
YCIDA	York County Industrial Development Authority

1.0 OVERVIEW

1.1 Purpose of the Public Information and Involvement Plan

In May 2002, Harley-Davidson Motor Company (Harley-Davidson) entered into an Agreement with the U.S. Environmental Protection Agency (USEPA) under the Facility Lead Program to prepare and implement a work plan for additional work necessary to satisfy the Resource Conservation and Recovery Act (RCRA) Corrective Action requirements at the facility. In 2005, Harley-Davidson submitted a Notice of Intent to Remediate (NIR) to Pennsylvania Department of Environmental Protection (PADEP) for the Former York Naval Ordnance Plant (fYNOP) site. The PADEP and USEPA Region III acknowledged the NIR and noted that the fYNOP was the first site in the nation to volunteer and enroll in the One Cleanup Program. Under the One Cleanup Program, the USEPA and the PADEP are working closely together on the cleanup of the affected soil and groundwater at the fYNOP.

The final selection of remediation measures has not been completed to date, but will likely include use of site-specific standards (SSS) for groundwater, and a combination of site-specific or statewide health standards (SHS) for soils depending on the specific area of concern. Interim remedial measures for soil and groundwater have been conducted throughout the history of environmental investigations at the facility.

Harley-Davidson believes that its enrollment in the One Cleanup Program demonstrates the company's continued commitment to improve the Site since its acquisition in 1981. Extensive investigations and corrective measures had been performed under supervision of the PADEP and the USEPA prior to entering the One Cleanup Program. These measures included the installation and operation of a groundwater extraction and treatment system. Under the One Cleanup Program, Harley-Davidson is further committed to conducting additional work necessary to meet PADEP and USEPA requirements. Harley-Davidson will continue to carry out the pre-existing cleanup program that is being conducted under an agreement by which the U.S. Navy shares in the cost of the cleanup.

As discussed more fully in the next section, prior to Harley-Davidson's acquisition, previous owners manufactured, assembled and tested military products and military service weapons. The U.S. Army Corps of Engineers (USACE) is responsible for investigating and removing ordnance and explosives on Site.

This Public Information and Involvement Plan (PIIP) will address all activities related to environmental remediation under the One Cleanup Program and the removal of Munitions and Explosives of Concern (MEC) by the U.S. government. The PIIP has been developed to establish a forum and procedures for informing the community of the findings of the planned and future investigations and corrective measures at the Site. Notification protocols for all ordnance and explosive removal actions are introduced in this PIIP.

Development of the PIIP relied on the guidance in the USEPA *Superfund Community Involvement Handbook, April 2002*. Harley-Davidson or its representatives will conduct all public participation and will keep the USEPA, PADEP, and USACE informed.

The PIIP is divided into the following sections:

- Overview and purpose of the PIIP
- Site History
- Previous Investigations and Remedial Work
- Proposed Work Activities
- Community Profile and Demographics
- Stakeholders and their Concerns
- Public Information and Involvement Objectives and Techniques
- Responsibilities
- Timing of Activities
- Appendices

1.2 Site History

The Site is located in the northern part of York County, Pennsylvania. It is bordered on the south by U.S. Route 30, on the west by Eden Road and a Norfolk Southern Railroad line, on the north by Eden Road and Paradise Road, and on the east by residential properties.

From 1941 until the early 1970's previous owners manufactured, assembled, and tested military products and military-service weapons. Based on our understanding of the operations conducted at the Site, significant contamination of the property likely occurred during that time. These owners included the York Safe and Lock Company, the U.S. Navy, Blaw-Knox Company, and American Machine & Foundry Company (AMF). AMF was awarded a federal government contract to manufacture anti-submarine rocket launching equipment, gun directors, and other materials formerly manufactured at the York facility.

In 1969, AMF acquired Harley-Davidson. In 1973, the motorcycle assembly operations of Harley-Davidson were moved to the York Facility property. In the 1970s and through the 1980s the facility manufactured snow mobiles, bowling lane pin spotters, golf carts, wire twisters for wiring harnesses, high speed printers for IBM, motorcycles, and they periodically produced bomb casings and ordnances. On February 26, 1981, thirteen Harley-Davidson senior executives signed a letter of intent to purchase Harley-Davidson Motor Company from AMF. The York property and improvements were part of that purchase. In 1986, Harley-Davidson was listed on the American Stock Exchange and subsequently moved to the New York Stock Exchange.

In 1995 Harley-Davidson and the U. S. Department of the Navy, represented by the USACE, agreed to share the costs for investigation and remediation of any releases or

potential releases of hazardous substances/wastes at the Site. Under this cost sharing agreement, extensive investigations and corrective measures have been performed to date in substantial compliance with the National Contingency Plan (NCP).

In May 2002, Harley-Davidson entered into an Agreement with the USEPA under the Facility Lead Program to prepare and implement a work plan for additional work necessary to satisfy the RCRA Corrective Action requirements at the facility. In 2005, Harley-Davidson submitted a NIR to PADEP for the fYNOP site. The PADEP and USEPA Region III acknowledged the NIR and confirmed that Harley-Davidson is enrolled in the One Cleanup Program. The final selection of remediation measures has not been completed to date, but will likely include use of site-specific standards for groundwater, and a combination of site-specific or statewide health standards for soils depending on the specific area of concern. Interim remedial measures for soil and groundwater have been conducted throughout the history of remedial investigations at the facility.

During 2009, in response to the U.S. economic recession and worldwide slowdown in consumer demand, Harley-Davidson committed to significant planned actions, including restructuring its York, Pennsylvania motorcycle production facility to focus on the core operations of motorcycle fabrication, painting and assembling. As a result, the manufacturing campus at York, Pennsylvania has been consolidated into basically one facility, located at Building 3, which has been expanded and is now fully occupied.

As part of the York Facility consolidation efforts, Harley-Davidson sold approximately 58 acres of its property to the York County Industrial Development Authority (YCIDA) as of June 14, 2012. That sale was initially announced in January 2010. The YCIDA is evaluating options for the future development of the property, and those efforts will continue. Harley-Davidson and the U.S. Government, as part of their existing cost share agreement, have retained environmental liability and obligations relating to the environmental conditions on the YCIDA property existing at the time of the sale, and Harley-Davidson will retain access to the YCIDA property and to all monitoring wells and remediation facilities/utilities in order to complete the investigation and remediation.

The parcel included in the sale agreement extends from just west of the current Building 3 through the West Parking Lot, which is adjacent to Eden Road (see Appendix A – Site Map). All of the buildings on the YCIDA parcel, with the exception of Building 1 (the building that contained the York County Visitors Center) have been demolished to allow for the future development of the property.

1.3 Previous Investigations and Remedial Work

Harley-Davidson has been conducting investigation and remedial activities on the Site since 1986 under the supervision of the PADEP. These investigations and remedial activities have been documented in over 60 reports prepared between 1986 and 2014. Site investigations and research have indicated that much of the contamination on the property can be attributed to the U.S. Navy or AMF.

Previous remedial activities at the Site indicate that the primary constituents of concern are chlorinated solvents, including trichloroethene (TCE), tetrachloroethene (PCE), and 1,1,1-trichloroethane (TCA). Possible degradation products of these compounds, including vinyl chloride and 1,2-dichloroethene, are also present. These volatile organic compounds have been detected in groundwater in prior investigations of the Site at concentrations ranging from 1 ug/l to more than 10 mg/l. The distribution of these contaminants in the groundwater suggests that they have originated from multiple historical sources on the Site.

Other hazardous substances encountered on the Site, but at a lower frequency, include benzene, ethylbenzene, toluene, xylenes, lead, hexavalent chromium, nickel, and cyanide. These substances appear to be restricted to specific source locations, several of which have already been subjected or are being subjected to remedial actions. Harley-Davidson currently operates a groundwater extraction system. The groundwater extraction and aeration treatment system contains and treats the affected groundwater on the property.

The USACE began investigations on the Site for all MEC material and MEC-related scrap in 1991, concentrating on areas having the highest potential for MEC materials and contamination. Between 1993 and 1995, using non-intrusive methods, the USACE found and documented 3-inch rounds, 20mmTP and spent cartridge cases. In late 2002, USACE found additional MEC at Building 16, which was an indoor firing range for inert 40mm Anti-Aircraft practice and 37mm dummy-fused projectiles.

The USACE, in consideration of the Military Munitions Response Program (MMRP) for Formerly Used Defense Sites, began an 18-month evaluation of the Harley-Davidson property in 2006. The stated purpose of the evaluation was to determine if the fYNOP site warrants further cleanup of MEC, or if the site can proceed to a “no further action” status with the Department of Defense.

As part of the MMRP, the final Site Inspection (SI) Report for the fYNOP was issued by USACE in late August 2008. Remedial Investigation work was recommended at various locations at the site. Although there is no hazard to the public, Harley-Davidson has taken measures (such as signs, locks, barricades and fencing) to secure old buildings and potential ordnance hazard areas from contact with plant workers and contractors.

Harley-Davidson entered into an agreement with the U.S. government on November 27, 2013 to address the cleanup of residual ordnance and explosive waste (“OEW”) at the Former York Naval Ordnance Plant. Harley-Davidson is now responsible for management of the OEW work, with technical review and input from USACE. Project planning activities began in late 2014 and investigation activities are expected to be complete by the end of 2015.

2.0 PROPOSED WORK ACTIVITIES

Harley-Davidson will continue to work with the PADEP and the USEPA in undertaking a site-wide soil and groundwater remedial investigation/feasibility study under the One Cleanup Program and pursuant to the cost-sharing agreement with the U.S. Navy. A Project Contact List is attached as Appendix B.

The overall project objective of the SRI is to define and evaluate the nature of environmental conditions in the soil and groundwater at the site. The resulting data will be used to complete a comprehensive Feasibility Study of site specific remedies for cleaning up the fYNOP, and eventually will be used as the basis for selection of cleanup remedies for soils and groundwater at the site.

During 2009 and 2010, in cooperation with the USEPA, the PADEP and the USACE, Harley-Davidson completed preparation of the Soils SRI report. The report was submitted to EPA and PADEP during December 2009. USEPA and PADEP approved the Soils SRI Report during March 2010.

The document "Proposed Approach to Groundwater Human Health Risk Assessment: Exposure Pathway Model, Former York Naval Ordnance Plant" dated June 16, 2014, was submitted to PADEP and USEPA for review and comment on June 18, 2014. USEPA provided an e-mail response on August 13, 2014, which confirmed the general approach, and requested additional investigation activities be conducted in the area south of the southeast property boundary. USEPA subsequently submitted a revised Environmental Indicator (EI) Determination for FYNOP on August 27, 2014. In the revised EI, USEPA concluded that:

- There are no unacceptable exposures to soil at the site under the current and future land use assumptions
- Residential exposure to groundwater does not constitute a significant exposure
- Recreational use of Codorus Creek does not constitute a significant exposure to sediment and surface water
- Additional information is needed to assess potential residential exposure to indoor air via the vapor intrusion pathway
- Additional information is needed to evaluate exposure to food sources (fish) related to sediment and surface water in Codorus Creek

Additional groundwater characterization work was completed from 2009 through 2011. The Groundwater SRI - Part1 was submitted to USEPA and PADEP during the fourth quarter of 2011. Additional groundwater, surface water and soil vapor investigation activities, which include the data collection needs identified by USEPA in their 2014 EI, will continue throughout 2015, and the results will be incorporated into the Groundwater SRI – Part 2. Thereafter, the RA Report for groundwater will be prepared.

Although uncertainty exists concerning the nature and scope of the environmental investigation and remediation that will ultimately be required at the Site to meet applicable cleanup standards, Harley-Davidson has established reserves for this cleanup and expects to incur costs over a period of several years ending in 2030. Harley-Davidson has fully disclosed this and related environmental matters in all of its public filings.

3.0 COMMUNITY PROFILE AND DEMOGRAPHICS

The Site is located in a mixed-use area of commercial, industrial, residential and undeveloped properties. Industrial properties include a mining operation, manufacturing facilities, and a wastewater treatment facility situated north, south and west of the Site, respectively. Single-family homes are located north, east and southeast of the Site. In some instance homes share a fence line with the Site. Commercial properties, which include an auto dealership and various restaurants, hotels and other retail establishments, are to the south and southwest of the Site. The U.S. Army Reserve has a Unit on the southeast side of the Site along Route 30. Redevelopment of the West Campus is anticipated for industrial and/or commercial uses.

Population density varies near the Site, but generally increases south-southwest of the Site in the direction of the City of York. The neighborhood appears to be well established with owner-occupied homes.

The Site is located in the Springettsbury Township and the county seat is the City of York. The environmental staff of the Harley-Davidson facility has a positive working relationship with Township staff. Over the years, Harley-Davidson has interacted with the neighboring community adjacent to the plant. The company has been proactive in understanding the issues and sensitivities that are of concern to residents. This was evidenced by a series of town hall meetings that took place in the planning phases of Project Keystone - the construction of what is now the York Vehicle Operations motorcycle manufacturing facility. The manufacturing facility is screened from the view of adjacent residents by a heavily wooded area and topography.

4.0 STAKEHOLDERS AND THEIR CONCERNS

Harley-Davidson Environmental staff and their consultants are in close communication with the regulatory agencies, USACE, USEPA, and PADEP. Agency representatives will have the opportunity to review and comment on information materials that will be distributed to the public.

Public information and involvement activities will be tailored to meet the needs of the various stakeholders. Some will be content to receive information from a web site or the newspaper, while others may prefer a different form of communication. In 2004, Harley-Davidson conducted personal interviews with some neighbors and representatives of key stakeholder groups. The results of these interviews were used to develop specific information needs and involvement activities.

The following stakeholders have been identified:

- Harley-Davidson York Facility employees
 - York County Industrial Development Authority (YCIDA)
 - Residential neighborhoods surrounding the Site
 - Businesses to the south and southwest of the Site
 - Springettsbury Township officials
 - State and local elected officials
 - U.S. Army Reserves
-
- Concerns are likely to include: Any risk to human health
 - Any risk to the environment
 - Any impact on property values
 - Timely and complete disclosure in the event of any off-site migration of hazardous substances
 - Timely notification and education regarding MEC removal actions

In discussions and interviews with residents and local officials, the Harley-Davidson Communications Team defined these and other community concerns. This PIIP will remain flexible in its goals and objectives to address public concerns as the work proceeds. A list of stakeholders is provided as Appendix C.

5.0 PUBLIC INFORMATION AND INVOLVEMENT PROGRAM

5.1 Objectives

A successful Public Information and Involvement Program must accomplish several objectives to meet the needs of the various stakeholders.

- Identify and reach out to all stakeholders who may be affected by or interested in the corrective and removal actions at the Site
- Keep stakeholders informed of Site activities and provide meaningful opportunities for them to provide input and be involved in actions regarding the corrective and removal measures
- Address stakeholder questions and concerns promptly
- Provide stakeholders an opportunity to review and comment on the work being conducted, additional studies, remedial action alternatives and decisions
- Keep the project team, USEPA, PADEP, and USACE sensitive to and informed about changes in public concerns, attitudes, information needs, and activities regarding the Site. Use these factors in evaluating and modifying the public information and involvement program.
- Promote two-way communication between project personnel and the stakeholders during the project

5.2 Responsibilities

Harley-Davidson will lead the public involvement program for the Site. The effectiveness of this program and its contributions to the overall success of the project rests with the entire project team and interested stakeholders. Specific responsibilities include:

Harley-Davidson Project Team

- Provide professional guidance and expertise to support the public information and involvement program for the One Cleanup Program and MEC removal activities.
- Prepare public statements and media releases at major milestone achievements or in conjunction with public notification on site-related activities.
- Serve as spokesperson and community point of contact. Respond to local, regional, and national queries using statements or information provided by the project manager or in subsequent cleared statements.
- Inform the project manager of all queries, releases, and requests for public briefings or visits to the Site.
- Refer queries pertaining to supporting agencies to the appropriate public affairs office.
- Schedule, and coordinate the necessary requirements for implementation of community or public meetings.
- Distribute fact sheets, reports and other pertinent information to the project web site.
- Develop and maintain a detailed mailing list of individuals and groups interested in the Site activities.

USEPA, USACE and PADEP

- Provide public information and involvement expertise and recommendations to Harley-Davidson in support of the program.
- Review public statements and media releases prior to their release when possible.
- Serve as a community point of contact to respond to questions or concerns using information provided by the project manager or as provided in subsequent cleared statements.
- Assist the project team in coordination of public involvement events, activities and written materials when possible.

5.3 Public Information and Involvement Techniques

The following activities and techniques will be used to meet the objectives of the public information and involvement program:

Fact sheet/Bulletins – Fact sheets and bulletins will continue to be periodically prepared and disseminated to explain the One Cleanup Program and MEC Removal process and activities. They will be provided at any community meetings, mailed to stakeholders, and included on the project web site.

Web site – A web site, www.yorksiteremedy.com, includes fact sheets and public notices, final reports, public meetings, milestone schedules, and announcements.

Public/neighborhood meetings – Public or neighborhood meetings will be announced and held as necessary prior to the start of future MEC Removals and the selection and implementation of the final site cleanup remedy.

Presentations and Informal Discussions – Informal discussions or presentation can be arranged to provide information on the progress of the project or to discuss specific questions or concerns.

Public notices – A public notice(s) in the form of a paid advertisement in a local newspaper of general circulation will announce a public meeting or comment period.

Mailing list – A detailed mailing list of individuals and groups is maintained by Harley-Davidson. Those on the list receive periodic mailings to inform them of progress and notify them of upcoming meetings. Harley-Davidson will continue to update the list as it receives changes in contact information.

News Media – News releases, media advisories, and media days are used to inform local news media when a project milestone has begun or been completed and to announce public meetings or issuance of a document for public comment.

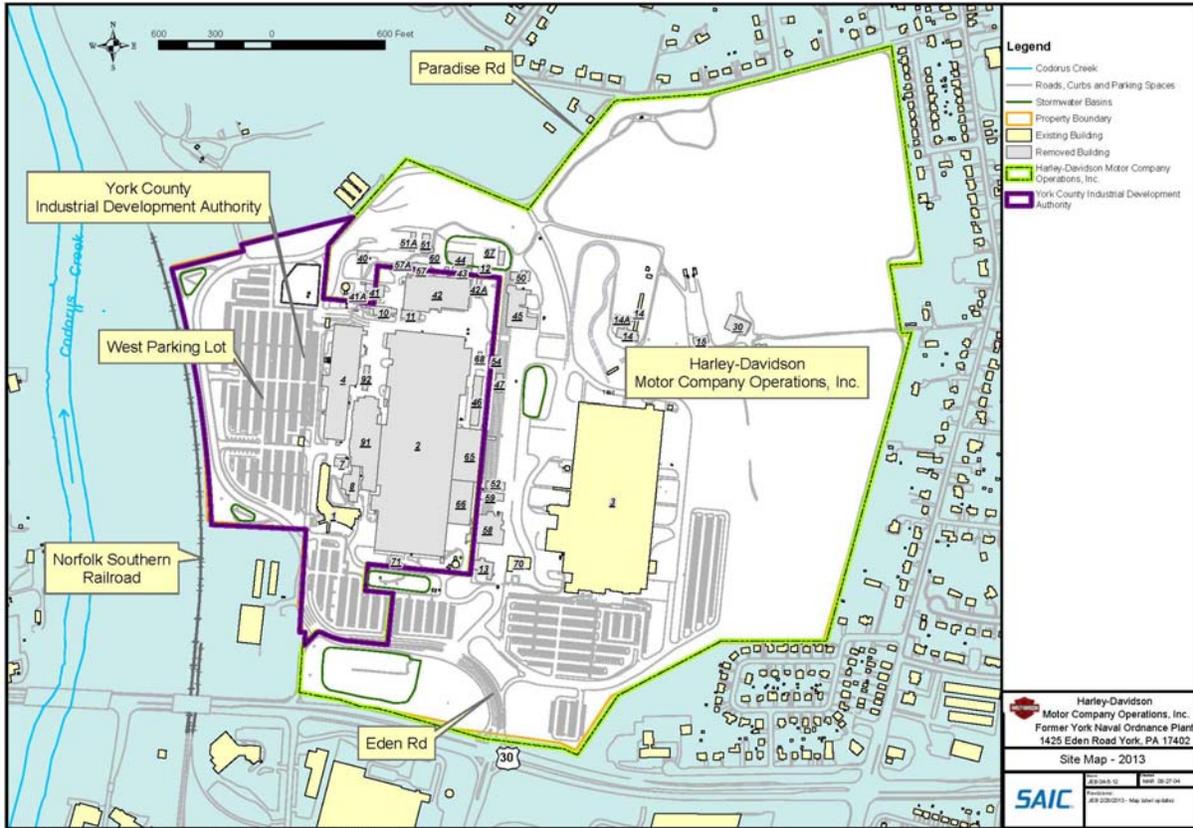
Employee Communications – Employees at the Harley-Davidson York Vehicle Operations Facility will receive all Harley-Davidson external communications regarding MEC removal actions and remedial investigation site activities just before or at the same time as they are released to the public.

Open Detonation Notification Protocols – During any future detonation project, prior to the first MEC open detonation for the project, specific procedures will be developed for notifying the neighbors, media, and local officials. A public notice will be delivered to the addresses of the immediate neighbors. A news release will be sent to the local media. Local emergency response officials will also be notified.

6.0 TIMING OF ACTIVITIES

Timing for public meetings will coincide with project milestones, off-site work, or scheduled open detonations.

APPENDIX A: SITE MAP



APPENDIX B: PROJECT CONTACT LIST

Project Information Line – 717-852-6664		
Project Web Site – www.yorksiteremedy.com		
Name/Title	Address	Phone/Fax
Harley-Davidson		
Sharon Fisher Environmental Manager	1425 Eden Road York, PA 17402	717-852-6544 717-852-6718
Bernadette Lauer Communication Manager	1425 Eden Road York, PA 17402	717-505-4199
Contractors		
Ralph Golia Project Manager AMO Environmental Decisions, Inc.	4327 Point Pleasant Pike PO Box 410 Danboro, PA 18916	215-230-8282 267-249-0417
Pennsylvania Department of Environmental Protection		
Pam Trowbridge	909 Elmerton Avenue, Harrisburg, PA 17103	717-705-4839
U.S Environmental Protection Agency		
Griff Miller Project Manager	1650 Arch Street Philadelphia, PA 19103- 2029	215-814-3407
U.S. Army Corps of Engineers		
Hamid Rafiee Project Manager	Baltimore District, USACE 10 South Howard St. ATTN: CENAB-EN-HN Baltimore, MD 21201-1715	410-962-7546

APPENDIX C: STAKEHOLDER LIST

Area Residents and Businesses

The *Community Update: News and Information about the Former York Naval Ordnance Plant Remediation Project* is mailed to every resident and business address within the following boundaries from the Site.

1. North - Park Avenue (includes properties on south side of the road only)
2. West - Codorus Creek
3. South - State Route 30 (Includes properties on south side of the road)
4. East - Sherman Street (Includes properties on east side of road up to Druck Valley Rd.

Public Officials

York

C. Kim Bracey, Mayor City of York, 50 W. King St. York, PA 17401

Springettsbury Township

Kristen Denne, Township Manager, 1501 Mt. Zion Road York PA, 17402

Abby Gibb, Events/Public Relations/Grants Coordinator, 1501 Mt. Zion Road York PA, 17402

Dori Bowers, Manager of Administrative Operations, dbowers@springettsbury.com

Springettsbury Board of Supervisors

George Dvoryak, Chairman, 3624 Pleasant Valley Road, York, PA

Julie Landis, Vice Chairman, 3360 Druck Valley Road, York, PA

William Schenk, 4030 Old Orchard Rd York, PA

Kathleen Phan, 3841 Silver Spur Dr., York, PA

Mark Swomley, Asst. Secretary/Treasurer, 3366 Barwood Rd., York, PA

U.S. Congressman

Scott Perry US Congressman 4th District House of Representatives (Robert Reilly, Deputy Chief of Staff) 2209 East Market Street York, PA, 17402

Local Representatives/Senators Keith J. Gillespie, 47th Legislative District
Pennsylvania House of Representatives, 4188 Lincoln Highway York, PA
17405

Mike Folmer, Senate District 48 Pennsylvania State Senate , 400 8th Street,
101 Municipal Bldg., Lebanon, PA 17042

Scott Wagner, Senate District 28 Pennsylvania State Senate, 218 North
George Street York, PA 17401

Robert Casey, U.S. Senator, 393 Russell Senate Office Bldg., Washington, DC 20510

Pat Toomey, U.S. Senator, 248 Russell Senate Office Bldg., Washington, DC 20510

York County Commissioners

M. Steve Chronister, President, The Board of Commissioners York
County, Pennsylvania Administrative Center, 28 East Market St.
York, PA 17401-1588

York County Industrial Development Authority

Blanda Nace, Project Manager, YCIDA 144 Roosevelt Ave., Suite 100, York PA 17401

York County Rail Trail Authority

Gwen Loose, CPRP, Executive Director, York County Rail Trail Authority, P.O. Box 335,
Seven Valleys, PA 17360