

FORM F
INTRUSIVE ACTIVITY AND WASTE MANAGEMENT DOCUMENTATION FOR
fYNOP ANNUAL POST-REMEDiation CARE PLAN ACTIVITIES

This form is used to document the results of annual post-remediation care activities for engineering and institutional controls at the Former York Naval Ordnance Plant (fYNOP) in York, Pennsylvania. These activities are to be performed in accordance with the procedures in the approved Pennsylvania Land Recycling and Environmental Remediation Standards Act (Act 2) Final Report and Post-Remediation Care Plan (PRCP) contained in Appendix J of the Final Report.

The activities covered by this form include documenting intrusive activities and managing waste generated during intrusive activities on the East and West Campus properties in accordance with Section 4.2 in the PRCP. Intrusive activities are defined in the PRCP as earthwork, including, without limitation, any digging, excavating, drilling, grading, pile driving, and/or removal of any asphalt, concrete, soil, or removal or displacement of ground cover.

This form is a companion to the completed Form A – Monitoring and Maintenance of Cap Areas for fYNOP Annual PRCP Activities which must be reviewed prior to completion of this intrusive activity and waste management form.

Date of review of completed Cap Area Form: 2/10/25

Which property does this form cover?

- ☒ East Campus property.
☐ West Campus property.

Intrusive Activities and Material Handling

Describe the procedure(s) used to authorize and document intrusive activities and manage waste generated during intrusive activities over the past year.

Harley-Davidson established a subsurface utility clearance policy/protocol that references the PRCP requirements to guide applicable intrusive site activities. Intrusive work on-site is often monitored by fYNOP contractor Hydro-Terra Group to provide Qualified Environmental Professional (QEP) services to monitor, screen and sample soil during intrusive activities. Other than ongoing intrusive activities within the munitions cleanup area (excluded from the PRCP obligations), there were three areas of intrusive activity conducted during 2024. These included: 1) Installation of new stormwater inlets and utility pipe along the north edge of the Building 3 south parking area [October 2024]; 2) Sinkhole repair work near Building 70 [November 2024]; and 3) Installation of an equipment vault by C&D Rigging beneath the floor within the north end of Building 3 [mid-December 2024]. Excess soil from the new stormwater utility installation were sampled/tested and determined to exceed clean fill standards, but met non-residential state-wide health standards, and was retained on-site. Excess soil from the sinkhole repair work was also tested and characterized, and exhibited the same characteristics, but was designated for off-site disposal. Excess soil from the Building 3 vault construction was shipped off-site to a Reclamation Fill site in York, PA.

Are you aware of intrusive activities on the property that were not performed in accordance with the PRCP to prevent exposure to contaminated soil/fill material, water, and ordnance hazards?

☐ No.

☒ Yes. If yes, describe the intrusive activity(s).

Soil removed from construction of the equipment vault within the north end of Building 3 was not monitored or screened by a QEP. Facility personnel will be retrained in 2Q 2025 with respect to construction requirements under the PRCP.

Are you aware of waste(s) generated during intrusive activities on the property that was not managed in accordance with the PRCP?

☐ No.

☒ Yes. If yes, describe how the waste(s) was managed.

Soil and concrete removed from construction of the equipment vault within the north end of Building 3 was disposed off-site as reclamation fill.

Please include copies of documentation for PRCP intrusive and waste management activity(s) with this completed form.

Intrusive Activity and Waste Management Form Prepared By:

Hydro-Terra Group

Company Name

Rodney Myers, CHMM - Sr. Program Manager

Company Representative / Title



4/8/2025

Signature / Date

Consultant- fYNOP Team Member

Relationship to Owner of the Property