

MEMORANDUM



To: File - Harley-Davidson Motor Company Operations, Inc. (Harley-Davidson)
York Facility Remediation Trust Fund

From: Rodney G. Myers/Emily M. Wade (SAIC)

Date: February 10, 2011

Re: Demolition of the Thermal Fume Oxidizer (TFO), Groundwater Treatment System

Distribution: Sharon Fisher (Harley-Davidson), Ralph Golia (AMO Environmental Decisions),
Nicki Faterly (USACE, Baltimore District)

The purpose of this memorandum is to summarize the demolition of the TFO. An illustration of the TFO before it was demolished is shown on Figure 1, below.



Figure 1. Photo of Thermal Fume Oxidizer before demolition (arrows show direction of off-gas flow).

SUMMARY

Abandonment and removal/salvage of the TFO (and associated Lower Flammability Limit (LFL) monitoring equipment) was recommended, due to deterioration and resultant airflow restriction found in the heat exchanger unit; uncertainty regarding the long term reliability of other TFO components; and the high cost of heat exchanger replacement. The TFO was in operation since 1994 (for over 15 years) and has exceeded its life expectancy. Replacement was not recommended, due to availability of the existing granular-activated carbon (GAC) for off-gas VOC treatment.

DEMOLITION OF THE TFO

Prior to the demolition activities, SAIC removed all monitoring and electrical equipment and secured the control panel from all electrical sources. Wiring was pulled from the active TFO components to the TFO control panel and disconnected. SAIC will attempt to return the Lower Flammability Limit (LFL) meter for refund or resale. Unused portions of compressed hydrogen cylinders were returned to the manufacturer.

SAIC subcontracted with Stewart & Tate, Inc. to remove the remaining TFO and LFL equipment (with the exception of the moisture knock-out tank, blower and associated control panel). York Waste Disposal was used for transportation and disposal of non-salvageable construction/demolition waste and refractory material, using existing Harley-Davidson waste profiles. Consolidated Scrap Resources (CSR) was contacted and scheduled for salvage of metallic scrap from the TFO to include carbon steel, stainless steel, aluminum, and insulated copper wiring. CSR provided individual roll-off containers for salvage/credit of each type of scrap metal.

The demolition activities began on September 28, 2010. Stewart & Tate (S&T) disassembled, removed, and segregated metal for salvage/scrap or for disposal of all TFO and LFL components. The existing moisture knock-out tank and TFO blower were retained, in the event that future or additional off-gas scrubbing is required for the GWTS. The LFL utilities and compressed gas supply pad (block wall and fencing) was removed and disposed as construction/demolition waste. Photographs of the demolition process are included in Appendix A. Items segregated for salvage (via Consolidated Scrap Resources [CSR]) included exterior aluminum sheeting, stainless steel (from the heat exchanger); carbon steel (from structures, pipe, etc); and wiring. Items for disposal included all refractory, fire brick and insulation; non-metallic ductwork; and miscellaneous construction debris (block, etc). Stewart & Tate completed the demolition work on October 29, 2010.

CSR issued a salvage credit settlement directly to the Trust Fund for the amount of \$20,470.78 in accordance with current salvage rates and net weights shipped of each salvage material. The credit settlement for the salvaged material is included in Appendix B. The York waste invoice for disposal of the refractory, insulation, and other construction/demolition debris (two loads) totaled \$666.16, which is included in Appendix C.

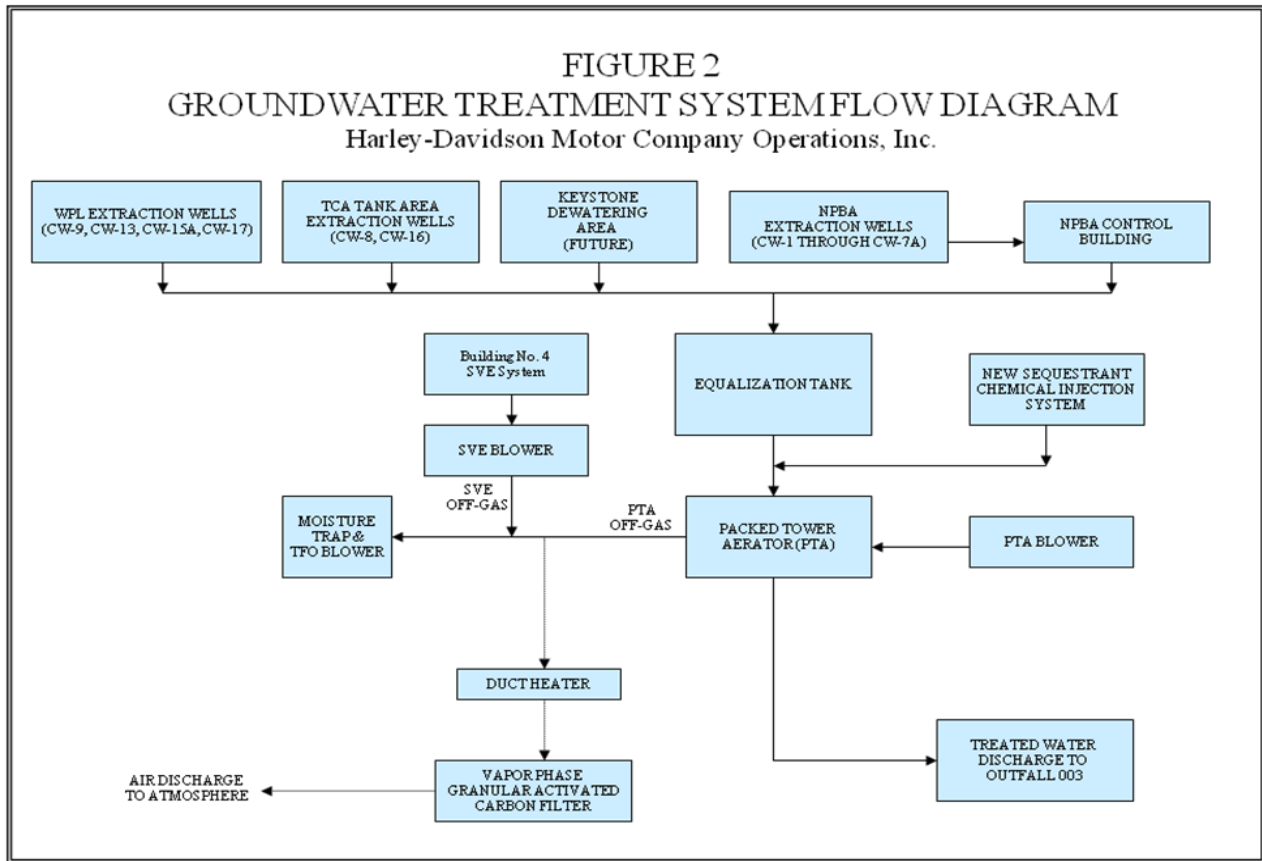
COMPLETION OF TFO ABANDONMENT

Following demolition, Stewart & Tate restored the surrounding area and installed a guardrail along the east side of the former TFO pad. All wall penetrations were sealed. SAIC completed the removal and securing of the electrical control panel components, and exterior conduit connections. Wiring and control capacity was retained for the moisture knock-out tank pump and monitoring sensor; and for the

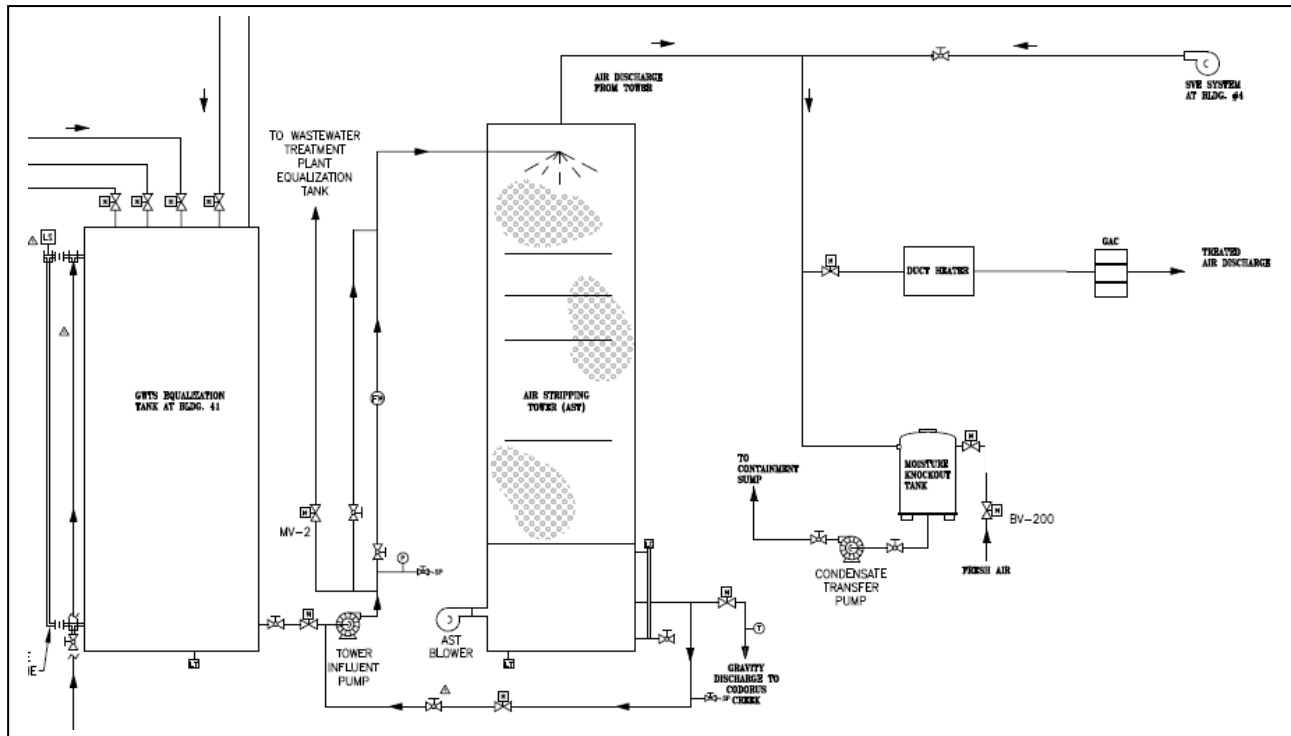
TFO blower. The exterior disconnect switch for the TFO blower was secured in the off position with a pad lock and lock-out tag. The former waste air valve actuator was disconnected, and secured in the closed position with a manual valve. In addition, the discharge opening to the former TFO blower was sealed with a PVC cap.

All off-gas treatment for the groundwater treatment system (GWTS) is now facilitated solely via the GAC unit for VOC treatment. A chemical sequestering agent injection system was added to address scale buildup on the PTA packing, and should help to eliminate the need for any future acid washing of the PTA. Figure 2 illustrates the current groundwater treatment system flow diagram and schematic.

FIGURE 2
GROUNDWATER TREATMENT SYSTEM FLOW DIAGRAM
 Harley-Davidson Motor Company Operations, Inc.



GROUNDWATER AND SVE TREATMENT SYSTEM SCHEMATIC



APPENDIX A

Photographs



TFO before demolition.



S&T removing the bolts in the flexible joint.



Crane used to lift stacks.



TFO western stack lying on the ground looking at the refractory bricks.



TFO burner on left side of stack and insulation can be seen on the right side of the stack.



TFO recuperator rods are being removed for scrap. The near side is carbon steel and the far side is stainless steel. These corroded rods restricted air flow through the TFO.



Stainless steel recuperator rods.



The bottom of the recuperator where the air passed from the carbon steel to the stainless steel rods.



Looking east inside the recuperator once the rods were removed.



View of the east stack of the TFO (effluent side) being lifted off.



TFO looking east. Both stacks, the recuperator, and the platform was removed.



The eastern stack is on the ground for demolition.



Looking east at the TFO pad after the TFO and hydrogen storage area were removed.



Looking northeast at the TFO pad after the TFO was removed.

APPENDIX B

CSR Settlement Credit Statement

SETTLEMENT



PO BOX 389
YORK, PA 17405

Account: YORK102
YORK FACILITY REMED TRUST FUND
C/O RALPH GOLIA/AMO ENVIRON
P O BOX 410
DANBORO PA 18916

11/10/2010

Page 1 of 1

Invoice #	Recv Date	Description	Comment	Reference	Net	Price / UM	Amount
37507	10/01/2010	UNPREPARED STEEL/SHEA		37507	7,980	200.00 / GT	712.50
1207685	10/07/2010	UNPREPARED STEEL/SHEA		1207685	8,020	200.00 / GT	716.07
1208726	10/08/2010	18/8 PREPARED SS SOLIDS		1208726	10,180	0.90 / LB	9,162.00
1208726	10/08/2010	18/8 UNPREPARED SS SOLI		1208726	8,040	0.85 / LB	6,834.00
1208870	10/08/2010	UNPREPARED STEEL/SHEA		1208870	7,140	200.00 / GT	637.50
1209894	10/11/2010	UNPREPARED STEEL/SHEA		1209894	6,360	200.00 / GT	567.86
1210520	10/12/2010	UNPREPARED STEEL/SHEA		1210520	6,720	200.00 / GT	600.00
1211644	10/13/2010	UNPREPARED STEEL/SHEA		1211644	6,280	200.00 / GT	560.71
1211644	10/13/2010	UNPREPARED STEEL/SHEA		1211644	3,300	200.00 / GT	294.64
1215085	10/14/2010	LOW GRADE INSULATED CC		1215085	17	0.90 / LB	15.30
1215085	10/14/2010	18/8 PREPARED SS SOLIDS		1215085	67	0.90 / LB	60.30
1215085	10/14/2010	PAINTED ALUMINUM SIDING		1215085	516	0.60 / LB	309.60
Totals					64,620		20,470.48

CONSOLIDATED SCRAP RESOURCES, INC.
120 HOKES MILL ROAD - YORK, PA 17405

Check Date: 11/10/2010


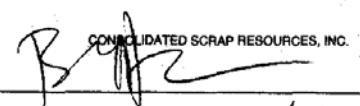
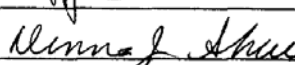
Check #: 224335

Transaction	Type	Tran-Date	Comment	Amount
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Refer to enclosed statement for additional payment detail.

Vendor: YORK102	YORK FACILITY REMED TRUST FUND	Amount:	20,470.48
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THIS DOCUMENT CONTAINS ULTRAVIOLET FIBERS, A CHEMICAL VOID STAIN FEATURE, BLEED THRU MICR NUMBERS AND A WATERMARK ON THE BACK.

 Consolidated Scrap Resources, Inc. 120 HOKES MILL ROAD, P.O. BOX 389 YORK, PA 17405-0389	M&T BANK HARRISBURG, PENNSYLVANIA		60-295 313
	CHECK # 224335	DATE 11/10/2010	AMOUNT *****20,470.48
PAY EXACTLY*****20,470 DOLLARS AND 48 CENTS			
PAY TO THE ORDER OF YORK FACILITY REMED TRUST FUND C/O RALPH GOLIA/AMO ENVIRON P O BOX 410 DANBORO, PA 18916		 CONSOLIDATED SCRAP RESOURCES, INC.	
		 VOID AFTER 180 DAYS	

⑈ 224335⑈ ⑆ 031302955⑆ 88867521⑈

APPENDIX C
York Waste Invoice

YORK WASTE DISPOSAL
 A REPUBLIC SERVICE
 3730 Sandhurst Drive
 York, PA 17406

Account Summary

Account Number 3-0811-0105167
 Invoice Date October 31, 2010
 Invoice Number 0611-000443928
 Previous Balance \$0.00
 Payments/Adjustments \$0.00
 Unpaid Balance \$0.00
 Current Invoice Charges \$666.16

Pay This Amount

\$666.16
 Due By: 11/20/10

Contact Information

Customer Service (717) 845-1657
 Customer Service (800) 210-9675

Important Information

FOR YOUR CONVENIENCE TWO ALTERNATIVE METHODS TO PAY: WWW.DISPOSAL.COM OR PAY BY PHONE @ 877-892-9729 BOTH METHODS HAVE NO PROCESSING FEE

To pay on-line or sign up for convenient auto pay, go to:

A division of REPUBLIC SERVICES
 Visit us at www.disposal.com

BENHAM AN SAIC COMPANY

Invoice
 Page 1 of 2

Current Invoice Charges

Benham/Harley Davidson Bldg #41 (L1) PO SUBK#450MR00188
 York, PA

1 - Rolloff (30 Yd) On Call Service (S1) Construction/Demolition Debris

Date	Description	Reference	Quantity	Unit Price	Amount
10/27	Disposal/Recycling	104478	3.7900 Tons		\$181.92
	Receipt Number	30940			
10/27	Basic Service	Ju/Jm	1.0000	\$95.00	\$95.00
	Receipt Number	30940			

1 - Rolloff (30 Yd) On Call Service (S2) Special Waste

Date	Description	Reference	Quantity	Unit Price	Amount
10/27	Disposal/Recycling	104578	6.1300 Tons		\$294.24
	Receipt Number	30941			
10/27	Basic Service	Ju/Jm	1.0000	\$95.00	\$95.00
	Receipt Number	30941			

Current Invoice Charges **\$666.16**

450MR00188
 Rec'd
 11/8/10

OK.
[Signature]
 11/8/10

CURRENT	PAYABLE	PAID	BALANCE
666.16	0.00	0.00	0.00

- SA
- Visit our website, www.dlposal.com to make your payment electronically or to sign up for our convenient automatic payment plan.
 - Please see reverse side for terms and conditions



Please Return This Portion
 With Payment

Pay This Amount \$666.16
 Account Number 3-0811-0105167
 Invoice Date October 31, 2010
 Invoice Number 0611-000443928
 Payment Due Date November 20, 2010

Return Service Requested
 003215-000001-003215 2067910 22409T03_5 3
 BENHAM AN SAIC COMPANY
 SUBK#450MR00188
 6310 ALLENTOWN BLVD
 HARRISBURG PA 17112-2739

Make Checks Payable To:

YORK WASTE DISPOSAL #611
 PO BOX 9001099
 LOUISVILLE, KY 40290-1099

30611010516700000004439280000666160000666161