

PUBLIC INFORMATION AND INVOLVEMENT PLAN

The Former York Naval Ordnance Plant Remediation Project

Revised July 2019

Prepared by

AMO Environmental Decisions, Inc.
Danboro, Pennsylvania
&
The Rozelle Group, Ltd.
Phoenix, Arizona

TABLE OF CONTENTS

1.0 Overview	4
1.1 Purpose of Public Information and Involvement Plan	
1.2 Site History	
1.3 Previous Investigations and Remedial Work	
2.0 Recent and Future Work Activities	7
3.0 Community Profile and Demographics	8
4.0 Stakeholders and their Concerns	8
5.0 Public Information and Involvement Program	9
5.1 Objectives	
5.2 Responsibilities	
5.3 Public Information and Involvement Techniques	
Appendices	
A. Site Map	12
B. Project Contact List	13
C. Stakeholder List	14

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
NP	NP York 58, LLC
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

The PIIP has been developed to establish a forum and procedures for informing the community of the findings on planned and future investigations, and corrective measures at the Site. This Public Information and Involvement Plan (PIIP) addresses all activities related to environmental remediation under the One Cleanup Program and the Military Munitions Response Program (MMRP).

The U.S. Government (overseen by the U.S. Army Corps of Engineers) and Harley-Davidson (collectively, the “fYNOP Remediation Team”) perform the investigation and remediation activities at the fYNOP (or “Site”) pursuant to an agreement between the United States Government and Harley-Davidson. The fYNOP was the first site to volunteer and enroll in the One Cleanup Program between the U.S. Environmental Protection Agency (EPA) and the Pennsylvania Department of Environmental Protection (PADEP) whereby EPA and PADEP work together to oversee the cleanup.

Development of the PIIP relied on the guidance in the USEPA *Superfund Community Involvement Handbook, January 2016*. The fYNOP Remediation Team will lead public participation with support from the USEPA and PADEP.

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). York Safe and Lock, the U.S. Navy, and Blaw-Knox utilized the Site for manufacturing military equipment and munitions. In addition to

manufacturing snow mobiles, bowling lane supplies, and golf carts, AMF was also 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, Harley-Davidson's motorcycle assembly operations 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 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 were performed to-date by the fYNOP Remediation Team in substantial compliance with the National Contingency Plan (NCP).

In May 2002, the fYNOP Remediation Team 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, the fYNOP Remediation Team submitted a NIR (Notice of Intent) to PADEP for the fYNOP. The PADEP and USEPA Region III acknowledged the NIR and confirmed that the fYNOP 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 and/or statewide health standards for soils depending on the specific area of concern. Interim remedial measures for soil and groundwater were conducted throughout the history of remedial investigations at the Site.

During 2009, Harley-Davidson restructured its York, Pennsylvania motorcycle production facility to focus on the core operations of motorcycle fabrication, paint and assembly. As part of the York Facility consolidation efforts, Harley-Davidson sold approximately 58 acres of its property (the West Campus) to the York County Industrial Development Authority (YCIDA) on June 14, 2012. As of January 3, 2017, the West Campus ownership was transferred to NP York 58, LLC (NP). The parcel extends from just west of the current Building 3 through the former West Parking Lot, which is adjacent to Eden Road (see Appendix A – Site Map). All of the former existing buildings on the NP parcel were demolished and a new warehouse/distribution building was constructed.

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 NP property existing at the time of the sale to YCIDA, and the fYNOP Remediation Team will retain access to the NP property, and to all monitoring wells and remediation facilities/utilities.

1.3 Previous Investigations and Remedial Work

Investigation and remedial activities have been ongoing at the fYNOP since 1986 under the supervision of the PADEP. These investigations and remedial activities have been documented

in over 70 reports prepared between 1986 and 2018. Site investigations and research have indicated that much of the contamination on the Site 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. These volatile organic compounds have been detected in groundwater in prior investigations of the Site. 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 that have already been subjected to remedial actions.

The fYNOP Remediation Team currently operates a groundwater extraction system. The groundwater extraction and treatment system contains and treats the affected groundwater on the fYNOP.

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 fYNOP in 2006. The stated purpose of the evaluation was to determine if the fYNOP 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 on the site. Although there is no hazard to the public, the fYNOP Remediation Team took 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 complete MMRP activities at the fYNOP. The fYNOP Remediation Team now manages the MMRP work. Project planning activities began in late 2014 and investigation activities were completed by the end of 2018.

2.0 RECENT & FUTURE WORK ACTIVITIES

The fYNOP Remediation Team 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. A Project Contact List is attached as Appendix B. The reports and studies identified below are available to the public at: www.yorksiteremedy.com.

Phases of Cleanup

The cleanup of soils and groundwater is addressed in four major phases:

1. **Remedial Investigation (RI)** - Define and evaluate the nature and extent of the soils and groundwater contamination. The RI has also included a supplemental remedial investigation (SRI) to further evaluate site conditions.
2. **Risk Assessment (RA)** – Analyze the potential risks from exposure associated with contaminant levels in soils and groundwater that may have impacts to humans, users of the site, and the ecological resources.
3. **Remedial Alternatives Analysis (RAA)** – Using the data from the RI/SRI and RA, study possible cleanup remedies and provide the basis for a final selection of the best means to clean up soils and the groundwater.
4. **Proposed Plan – Final Remedy (PP-FR)** - Using the data from the RI/SRI, RA, and RAA select the most appropriate remedy to clean up soils and the groundwater.

Soils

Soils have been extensively sampled. The EPA and the PADEP approved the SRI Report for Soils in 2010. A site-wide Soil Risk Assessment Report was approved by EPA and PADEP in 2012. Both agencies have determined that no unacceptable risk to human health related to soil exists at the fYNOP. Much of the area of contamination is now encapsulated under the NP York distribution center in a manner that was approved by EPA and PADEP.

Groundwater

Part 1 of the supplemental remedial investigation (SRI) for groundwater was approved by EPA and PADEP in early 2012. The SRI recommended certain additional investigation activities, as detailed in the Field Sampling Plan for the SRI for groundwater. That Part 2 investigation commenced in 2012.

During 2016, the fYNOP Remediation Team completed the Groundwater SRI and Risk Assessment. The findings of the site-wide groundwater investigation and the human health RA were summarized in reports to the PADEP and EPA in September 2016. The fYNOP Remediation Team addressed PADEP and EPA comments, finalized the reports, and submitted them in March 2018. PADEP and EPA issued letters of approval of the revised groundwater SRI and Risk Assessment reports in July 2018.

As part of the response to PADEP and EPA comments on the SRI and Risk Assessment, the fYNOP Remediation Team initiated activities to further assess groundwater conditions, and to evaluate potential groundwater remedial options for the southern portion of the fYNOP site. As a result, a shallow groundwater extraction system was designed and installed for this portion of the site during 2018. A final SRI report for the southern portion of fYNOP, including details of the system design, construction, and startup of a groundwater extraction system along the southeast corner of fYNOP was submitted during the fourth quarter of 2018. PADEP and EPA approved the report in February 2019.

Military Munitions Response Program Site Inspection

The USACE, in response to the Military Munitions Response Program (MMRP) for formerly used defense sites, determined that remedial investigation work was necessary at various locations at the site. Although no hazard exists to the public, the fYNOP Remediation Team implemented precautionary measures (such as signs, locks, barricades and fencing) to secure old building structures and potential ordnance hazard areas from contact with employees and contractors.

In 2016, a work plan to conduct Phase 2 of the remedial investigation (RI) of the Munitions Response Areas at the fYNOP was submitted to and approved by the regulators, and the RI field work was completed that same year. This work identified several ordnance items requiring removal or detonation. The Final MMRP RI report was prepared and submitted to EPA and PADEP in April 2018. The PADEP and the EPA approved the MMRP RI report in July 2018.

Groundwater Treatment System and Water Quality Monitoring

The fYNOP Remediation Team has operated a groundwater capture and treatment system for more than 25 years. The fYNOP Remediation Team continues to evaluate the reliability, efficiency, and operation of each component of the treatment system. Special emphasis is placed on compliance with applicable permits, operational reliability, and efficiencies in operation and maintenance. Notifications and modifications were completed for the system permitting to allow addition of the new groundwater extraction system along the southeast corner of fYNOP during 2018.

Chlorinated solvents are the primary constituents of concern at the fYNOP site. Based on groundwater monitoring data collected to-date, there have been large concentration reductions (over 90% in most wells) of the historically used chlorinated solvents. The significant reduction in concentrations over time demonstrates that remediation to-date has been successful. The fYNOP Remediation Team completed annual sampling of monitoring wells during October 2018. The results are under evaluation and will be reported in the 2018 Annual Groundwater Report to be issued during the second quarter 2019.

Remedial Alternative Analysis (RAA)/Proposed Plan – Final Remedy (PP-FR)

The RAA/PP-FR for soil, groundwater, and MMRP areas at fYNOP was submitted to PADEP and EPA during January 2019. The fYNOP Remediation Team anticipates PADEP and EPA approval of the RAA/PP-FR during the second quarter of 2019. Cleanup Plans for soil, groundwater, and the MMRP areas will be submitted during the third quarter 2019.

During 2019, the fYNOP Remediation Team will work with PADEP and EPA to select the Final Remedy for the site, including the MMRP areas. When finalized, details will be presented to the stakeholders in a special newsletter. The fYNOP Remediation Team anticipates that the selection of the Final Remedy will be completed in 2019 and implementation will occur shortly thereafter.

3.0 COMMUNITY PROFILE AND DEMOGRAPHICS

The fYNOP 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 Reserves has a Unit on the southeast side of the Site along Route 30. Manufacturing and warehousing/distribution facilities exist on the Site. The West Campus is now comprised of a warehouse owned by NP.

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 occupied homes.

The fYNOP is located in Springettsbury Township and the county seat is the City of York. The fYNOP Remediation Team has a positive working relationship with Township staff. Over the years, the fYNOP Remediation Team has interacted with the neighboring community adjacent to the Site. The Team has been proactive in understanding the issues and sensitivities that are of concern to residents.

4.0 STAKEHOLDERS AND THEIR CONCERNS

The fYNOP Remediation Team is in close communication with the regulatory agencies of USEPA and PADEP. Agency representatives have the opportunity to review and comment on information that is distributed to the public.

Public information and involvement activities are tailored to meet the needs of the various stakeholders. Some are content to receive information from a website or the newspaper, while others prefer a different form of communication.

The following stakeholders have been identified:

- Harley-Davidson York Facility employees
- NP York 58, LLC
- Residential neighborhoods surrounding the Site
- Businesses to the south and southwest of the Site
- Springettsbury Township officials
- State and local elected officials

Concerns are likely to include:

- Any risk to human health or the environment
-
- Any impact on property values
- Timely 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 fYNOP Remediation 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 contact 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 input and involvement 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 fYNOP Remediation Team, USEPA, and PADEP 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

The fYNOP Remediation Team, along with the USEPA and PADEP, 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:

fYNOP Remediation Team

- Provide professional guidance and expertise to support the public information and involvement program for the One Cleanup Program and MMRP 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 and PADEP

- Provide public information and involvement expertise and recommendations to the fYNOP Remediation Team 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 fYNOP Remediation Team in coordination of public involvement events, activities and written materials when possible.
- Issue the PP-FR to the public via a local newspaper for 30-day public comment (USEPA).
- Issue a Decision Document to the public that addresses public comments and presents the selected Final Remedy for the site.

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:

Newsletters – Newsletters will continue to be prepared annually and disseminated to explain the One Cleanup Program and MMRP activities. They will be provided at any community meetings, mailed to stakeholders, and included on the web site.

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

Public/neighborhood meetings – Public or neighborhood meetings may be announced and held, as necessary.

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.

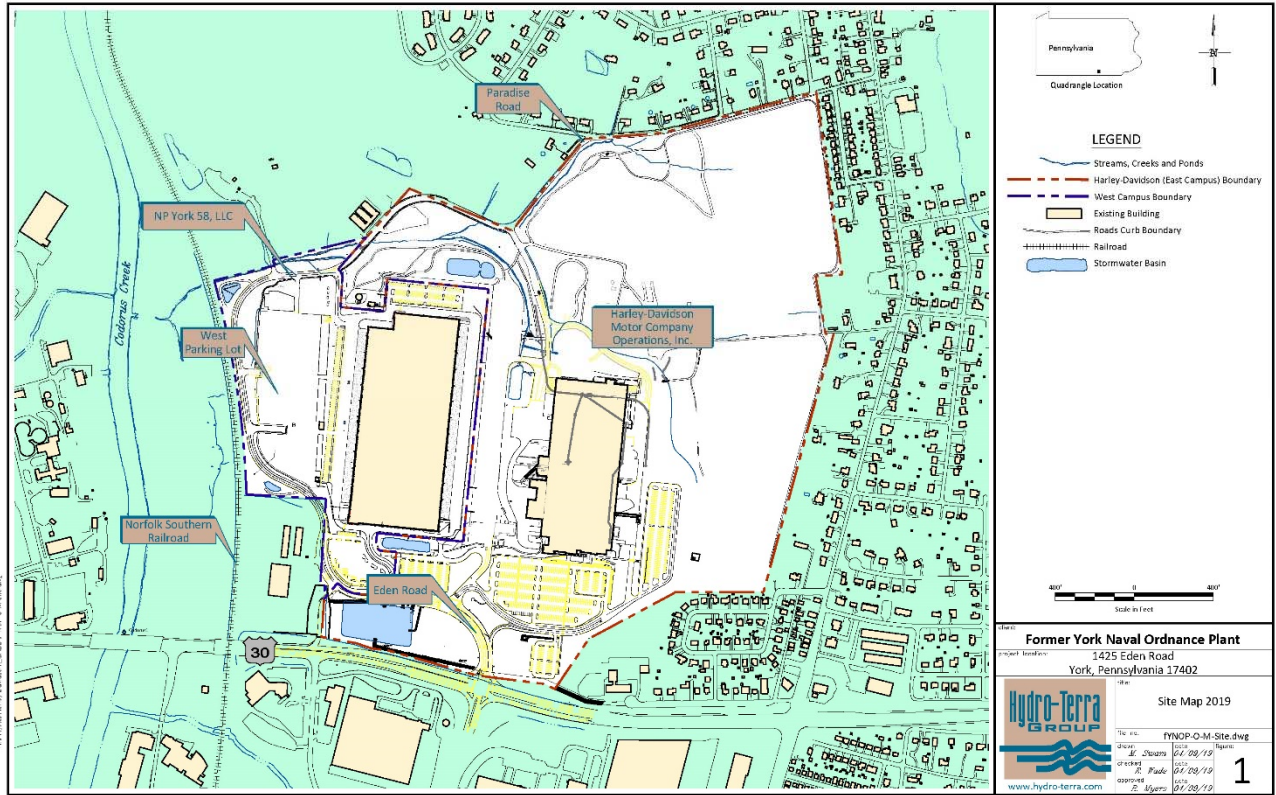
Public notices – A public notice(s) in the form of a paid advertisement in a local newspaper of general circulation will announce a public meeting or comment period.

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

Employee Communications – Employees at the Harley-Davidson York Vehicle Operations Facility will receive all fYNOP Remediation Team external communications regarding MMRP actions and remedial investigation site activities just before or at the same time 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, as necessary. A public notice may be delivered to the addresses of the immediate neighbors. A news release may be sent to the local media. Local emergency response officials will be notified.

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
Patricia Sweeney Business Planning Manager	3700 W. Juneau Ave Milwaukee, WI 53208	414-343-8199
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 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

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

Springettsbury Township

Ben Marchant, Township Manager, 1501 Mt. Zion Road York PA, 17402

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

Dori Bowders, Manager of Administrative Operations, dbowders@springettsbury.com

Springettsbury Board of Supervisors

1501 Mt. Zion Road York PA, 17402

U.S. Congressman

Madeleine Dean, US Congressman 4th District House of Representatives, 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

Kristen Phillips-Hill, 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

Susan Byrnes, President Commissioner, The Board of Commissioners York
County, Pennsylvania Administrative Center, 28 East Market St. York,
PA 17401-1588

York County Rail Trail Authority

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

NP York 58, LLC

Greg Norris, Project Manager, 5015 NW Canal Street, Suite 200, Riverside, MO 64150