



June 28, 2012

Mr. John Oren
Facilities Manager
Southcentral Regional Office
Waste Management Program
909 Elmerton Avenue
Harrisburg, PA 17110

via FedEx and electronic

Re: Building 51 Closure Report
Harley-Davidson Motor Company (York Facility)
SAIC Project 2603100069/3000/100

Dear Mr. Oren:

SAIC Energy, Environment & Infrastructure, LLC (SAIC), on behalf of Harley-Davidson Motor Company (Harley-Davidson), is pleased to provide you with two copies of the enclosed Closure Report for the Harley-Davidson <90-day hazardous waste storage facility formerly located at Building 51. This report was extracted from another remediation report that was recently issued to the United States Environmental Protection Agency (EPA) and Pennsylvania Department of Environmental Protection (PADEP), Land Recycling program for the former York Naval Ordnance Plant (fYNOP) remedial investigation activities, entitled "Interim Removal and Closure Report, Building 4, Building 41, Building 51 and Historic Wastewater Conveyance Areas."

The closure plan for Building 51 was approved by the Pennsylvania Department of Environmental Protection (PADEP) in 2006 when Harley-Davidson planned to move their <90-day hazardous waste storage facility to Building 57. That move never materialized, and the closure plans were placed on hold until 2010, when plans were made to move the <90-day hazardous waste storage facility to another location on the property (Building 70). PADEP returned for a site inspection of Building 51 on November 23, 2010. A letter issued by PADEP (Lisa Wilt) on December 2, 2010, acknowledged the site visit and confirmed the acceptance of the work plan modifications for the closure of Building 51. Building 51 was subsequently demolished by Harley-Davidson in May 2011. The enclosed report documents the demolition, pad removal, and soil investigation which followed the closure plan.

Please contact Sharon Fisher, Harley-Davidson Environmental Manager, at (717) 852-6544, or me at (717) 901-8836, if you have any further questions about the closure of this facility as discussed in the attached report.

Respectfully submitted,

SAIC Energy, Environment & Infrastructure, LLC

Rodney G. Myers
Project Manager

Enclosures

cc: Sharon Fisher (Harley-Davidson) – w/ bound report copy
Lisa Wilt (PADEP) – electronic copy only
Linda Houseal (PADEP) - electronic copy only
Pam Trowbridge (PADEP) – w/ bound report copy
Hamid Rafiee (USACE, Baltimore District) - electronic copy only
Ralph Golia (AMO Environmental Decisions) - electronic copy only
Scott Gould (McNees, Wallace and Nurick, LLC) - electronic copy only

FINAL

**BUILDING 51 CLOSURE REPORT
FORMER LESS THAN 90-DAY HAZARDOUS WASTE
STORAGE FACILITY
FORMER YORK NAVAL ORDNANCE PLANT**

SAIC Project 2603100069 / 3000 / 100

Prepared for:

**Harley-Davidson Motor Company Operations, Inc.
York Vehicle Operations
1425 Eden Road
York, PA 17402**

June 2012



FINAL

Building 51 Closure Report
Former Less Than 90-Day Hazardous Waste Storage Facility
Former York Naval Ordnance Plant

SAIC Project 2603100069 / 3000 / 100

Prepared for:

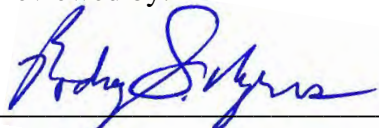
Harley-Davidson Motor Company Operations, Inc.
York Vehicle Operations
1425 Eden Road
York, PA 17402

Prepared by:

SAIC Energy, Environment & Infrastructure, LLC
6310 Allentown Boulevard
Harrisburg, PA 17112
(717) 901-8100

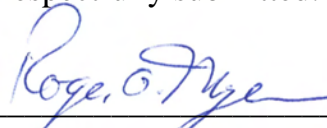
June 2012

Reviewed by:



Rodney G. Myers
Project Manager

Respectfully submitted:



Roger D. Myers, CHMM
Project Manager

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LIST OF ACRONYMS

EPA	United States Environmental Protection Agency
fYNOP	former York Naval Ordnance Plant
Harley-Davidson	Harley-Davidson Motor Company Operations, Inc.
MSC	medium specific concentrations
PADEP	Pennsylvania Department of Environmental Protection
PADER	Pennsylvania Department of Environmental Resources
PID	photoionization detector
RCRA	Resource Conservation Recovery Act
REWAI	R.E. Wright Associates, Inc.
RFA	RCRA Facility Assessment
RSL	Regional Screening Level
SAIC	SAIC Energy, Environment & Infrastructure, LLC
VOCs	volatile organic compounds
WP	Work Plan

1.0 INTRODUCTION

This report details the closure activities surrounding Building 51, the former less than (<) 90-day hazardous waste storage facility, at the Harley-Davidson Motor Company Operations, Inc. (Harley-Davidson) facility in York, Pennsylvania. This closure was conducted as part of the ongoing characterization and remediation of the former York Naval Ordnance Plant (fYNOP) being performed under the One Cleanup Program and was performed in accordance with the Pennsylvania Department of Environmental Protection (PADEP) -approved Closure Plan (SAIC Energy, Environment & Infrastructure, LLC [SAIC], 2006) and subsequent modifications agreed upon during 2010.

Harley-Davidson contracted SAIC to perform the closure activities. Background information is provided in Section 2.0 and Section 3.0. The former location of Building 51 is shown on **Figure 1**, while photographs of the building and closure activities are provided in **Appendix A**.

2.0 BACKGROUND

Building 51 was a former <90-day hazardous waste storage area located in the North Plant Area of the Harley-Davidson facility, as shown in **Figure 1**. The building was a former military-style metal Quonset hut, measuring approximately 100 feet (feet) by 40 feet, and had a bituminous concrete floor with an approximately 6-inch-perimeter berm.

A Resource Conservation and Recovery Act (RCRA) Facility Assessment (RFA) was conducted by the United States Environmental Protection Agency (EPA) of the fYNOP facility in 1988. According to the RFA (Kearney, 1989), waste paint sludge was bulked in dumpsters located within Building 51 prior to off-site disposal. The paint sludge contained hexavalent chromium, in addition to other paint constituents. Other hazardous waste liquids from various plant processes, as well as paint and metal plating-related filters, were also handled and stored in this building until the facility was relocated to Building 70 in early 2011.

An investigation and RCRA closure of the former Drum Storage Area (including Building 51) occurred between 1990 and 1992 and included the collection and analysis of soil from one soil boring beneath the building. The closure document for the Drum Storage Area was issued to the Pennsylvania Department of Environmental Resources (PADER) (currently known as the PADEP) on July 24, 1992 (R. E. Wright Associates, Inc. [REWAI], 1992). The EPA identified a RCRA Part B closure letter for the Building 51 Storage Area, which was submitted to PADER on July 24, 1992, and requested that acknowledgment from PADER be forwarded to EPA.

Closure of Building 51 was subsequently discussed with PADEP in 2006. At that time, there were plans to relocate the <90-day hazardous waste storage operations from Building 51 to Building 57. Representatives from the PADEP Southcentral Region, Waste Management Program (Don Hagerich, Pam Trowbridge, Sheryl Martin, and Linda Houseal), visited the site on March 28, 2006. At the time of their visit, the PADEP reviewed and approved a closure plan for Building 51, as described in the report titled Final Building 51 Hazardous Waste Storage Area Closure Work Plan (WP) Scoping Document (SAIC, 2006). However, the plans to relocate the

<90-day hazardous waste storage operations in Building 51 to Building 57 never materialized for reasons unrelated to environmental conditions.

Three concrete pits at the southern end of Building 51 were investigated and filled in as part of a previous interim remedial action performed by SAIC in late 2008/early 2009. In addition, a new concrete entrance ramp was installed as part of this work. These interim remedial activities at Building 51 are discussed in a separate report titled Building 51 Pit Closure Report, Former York Naval Ordnance Plant (SAIC, 2009a), which was previously submitted to PADEP in 2009.

In early 2011, as part of the closure, Harley-Davidson relocated the <90-day hazardous waste storage operations in Building 51 to Building 70, located near Gate 1. Equipment needed for the current operations in Building 70 was transferred to the new location, and all remaining wastes were removed from the site or transferred to the new location. The demolition plans were reviewed during a site visit (July 9, 2010) by the PADEP Southcentral Regional office, Waste Management Program (Mark Houser and Lisa Wilt). A follow-up inspection was conducted by PADEP (Lisa Wilt, David Richard, and Lucas Swanger) on November 23, 2010, to inspect Building 51 before the building was demolished. PADEP (Lisa Wilt) issued a letter dated December 2, 2010, acknowledging the visit and confirmed acceptance of the work plan modifications that were discussed, including gravel backfilling following removal of the flooring and soil testing.

The above-grade structure of Building 51 was demolished by Harley-Davidson in May 2011. Only the building slab (see Photos 1 and 2, **Appendix A**) remained following demolition. The building footprint measured approximately 100 feet by 40 feet wide.

3.0 BUILDING 51 CLOSURE ACTIVITIES

Closure activities began at the former Building 51 hazardous waste storage pad in August 2011. BrightFields Inc. of Wilmington, Delaware, performed the excavation and backfill activities, and EQ Environmental Inc. performed the waste transportation and disposal activities. Approximately one foot of bituminous concrete, concrete pads, and underlying gravel was removed and staged on, and covered with plastic (see Photos 3 and 4, **Appendix A**). The bituminous concrete, gravel, soil, and concrete were sampled for off-site disposal.

The soil below the bituminous concrete and concrete pads was scanned with a photoionization detector (PID) and visually inspected. No additional soil was removed since there were no elevated PID readings above background, and no staining or unusual odors were observed.

Systematic random soil sampling was conducted across the excavated building pad area at 12 locations (0 to 2 feet deep) for characterization purposes (see **Figure 2**). A series of 10-foot by 10-foot grids (100-square-foot areas) was established across the floor of the building (except for the south door area, which was sampled in 2009). Twelve of these grids were preselected for the collection of soil samples based on the PADEP random grid selection tool. Soil was collected using a two-inch-diameter bucket auger and placed into glassware for shipment to the laboratory (TestAmerica, Inc.).

Each soil sample was analyzed for priority pollutant volatile organic compounds (VOCs), priority pollutant metals, hexavalent chromium, and cyanide (total and free). A summary of the laboratory testing results and applicable regulatory medium specific concentrations (MSCs) is shown on **Table 1**. With the exception of two metals, there were no soil sample results above the PADEP Act 2 MSCs. Arsenic was found in concentrations above the EPA industrial soil Regional Screening Level (RSL) in several of the confirmation samples. The reported arsenic concentrations are considered to be within typical background levels for this site. In addition, hexavalent chromium was detected at concentrations greater than the EPA industrial soil RSL in two of the confirmation samples (B51H-CS-008 and -009), but hexavalent chromium was not

detected at concentrations greater than the PADEP direct contact or soil-to-groundwater MSCs in these samples.

Following confirmation results, the building pad was backfilled with stone to the original floor grade (see Photo 4, **Appendix A**). Subsequently, the former building area was covered with approximately six inches of additional topsoil and grass seed (see Photo 5, **Appendix A**).

4.0 OFF-SITE WASTE DISPOSAL

All wastes that were generated during remedial activity work were characterized transported and disposed in accordance with PADEP requirements, including the PADEP-approved “Contained-In” Waste Determination for Environmental Media (SAIC, 2011b and 2011c). Harley-Davidson maintains records of proper transportation and disposal and will produce or file copies in accordance with applicable regulatory requirements. If PADEP requires additional information regarding disposal of remediation wastes, Harley-Davidson will make such records available upon request.

Waste facility processing was conducted to obtain facility approvals for each of the waste streams identified. Approximately 230 tons of nonhazardous debris (asphalt and gravel subbase) were generated and shipped off-site to Modern Landfill from the removal of the former hazardous waste storage pad/floor.

5.0 SUMMARY OF REMAINING ENVIRONMENTAL CONDITIONS

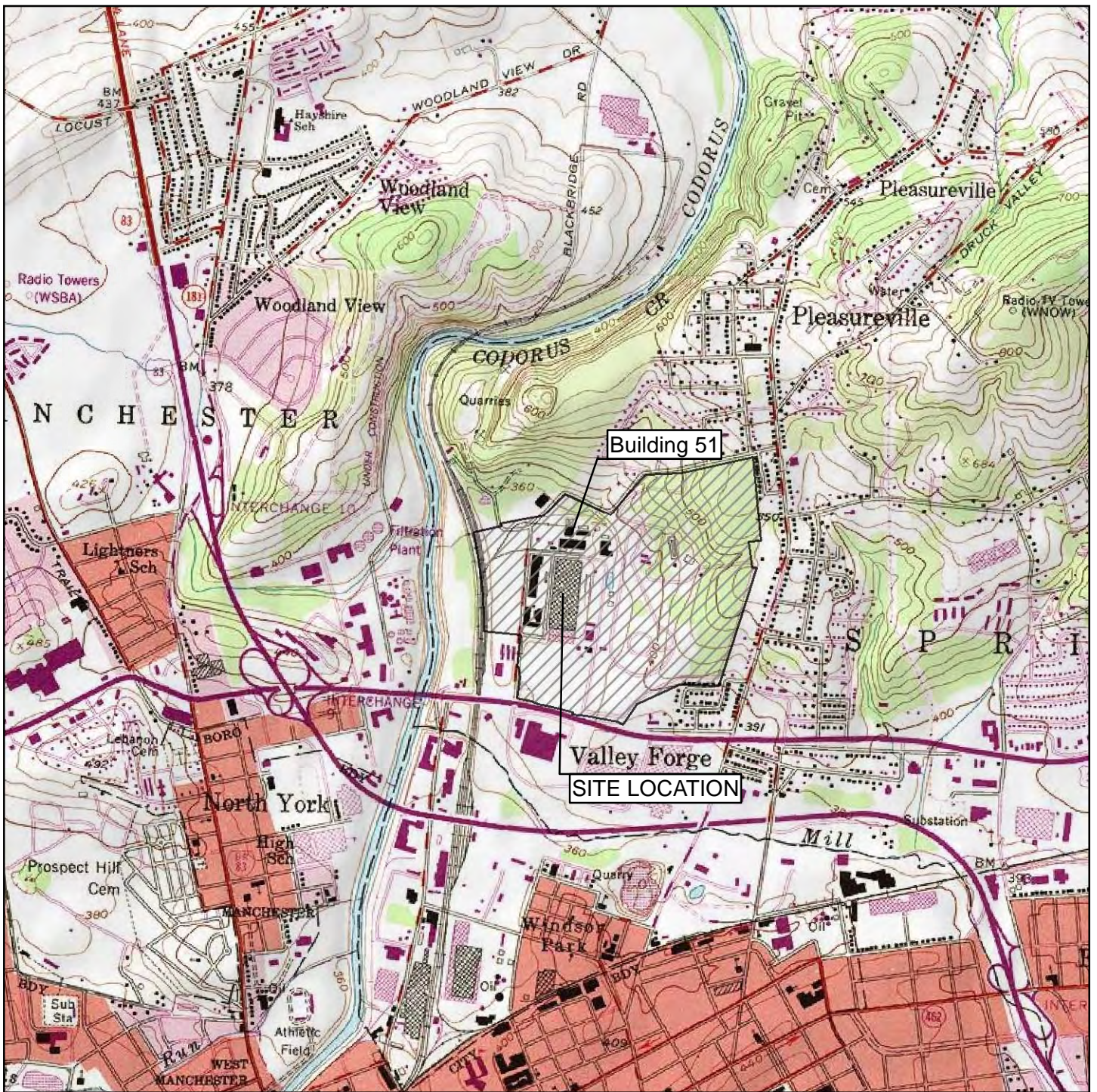
There are no known environmental impacts to soil or groundwater remaining from the removal and off-site disposal of the floor/subfloor at Building 51. The completed remedial work at Building 51 can be seen in **Appendix A** (Photo 5). The concentrations of regulated substances detected in the confirmation soil samples collected from beneath the excavation area were less than the PADEP Act 2 MSCs. Although arsenic was detected at concentrations greater than the EPA industrial soil RSL in several of the confirmation samples, it is considered within typical background levels for this site and is nonetheless in concentrations below the PADEP Act 2 MSCs. In addition, hexavalent chromium was detected at concentrations greater than the EPA industrial soil RSL in two of the confirmation samples (B51H-CS-008 and -009), but hexavalent chromium was not detected at concentrations greater than the PADEP direct contact or soil-to-groundwater MSCs in these samples. Further, the EPA RSLs constitute screening levels used to identify areas where further investigation may be warranted, and the soil investigation in the Building 51 footprint constitutes adequate further investigation that meets the applicable, required soil sampling regime established under Act 2.

Clean, compacted stone backfill has been placed over the excavation area, and Harley-Davidson has installed additional topsoil (and seeded) over the backfill material.

6.0 REFERENCES

- Harley-Davidson Motor Company Operations, Inc. (Harley-Davidson), 2011. Final, Restructuring Environmental Demolition Work Plan, March.
- Kearney, A. T., 1989. Phase II RCRA Facility Assessment of the Harley-Davidson York, Inc. Facility, York, Pennsylvania, USEPA ID No. PAD 001 643 691, USEPA Contract No. 68-01-7038, January.
- R. E. Wright Associates, Inc. (REWAI), 1992. Drum Storage Area Closure, July 24 letter to PADER.
- SAIC, 2006. Final Building 51 Hazardous Waste Storage Area Closure Work Plan (WP) Scoping Document, April.
- SAIC, 2009a. Building 51 Pit Closure Report, Former York Naval Ordnance Plant, December.
- SAIC, 2009b. Quality Assurance Project Plan for Environmental Investigations at the Former York Naval Ordnance Plant, December.
- SAIC, 2011a. Draft Final. Building 4 / Building 41 IWTP / Building 51 / Conveyance Lines, Soil Removal Work Plan Scoping Document. March.
- SAIC, 2011b. “Contained-In” Waste Determination for Environmental Media, Former York Naval Ordnance Plant Remedial Actions. June.
- SAIC, 2011c. Revised Addendum: “Contained-In” Waste Determination for Remediation Debris, Former York Naval Ordnance Plant Remedial Actions. Letter December 2.

FIGURES

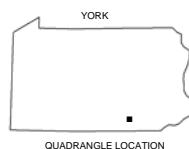


NOTE: Map based on USGS 7.5 minute series York quadrangle.

0 1,000 2,000 4,000



1 inch = 2,000 feet

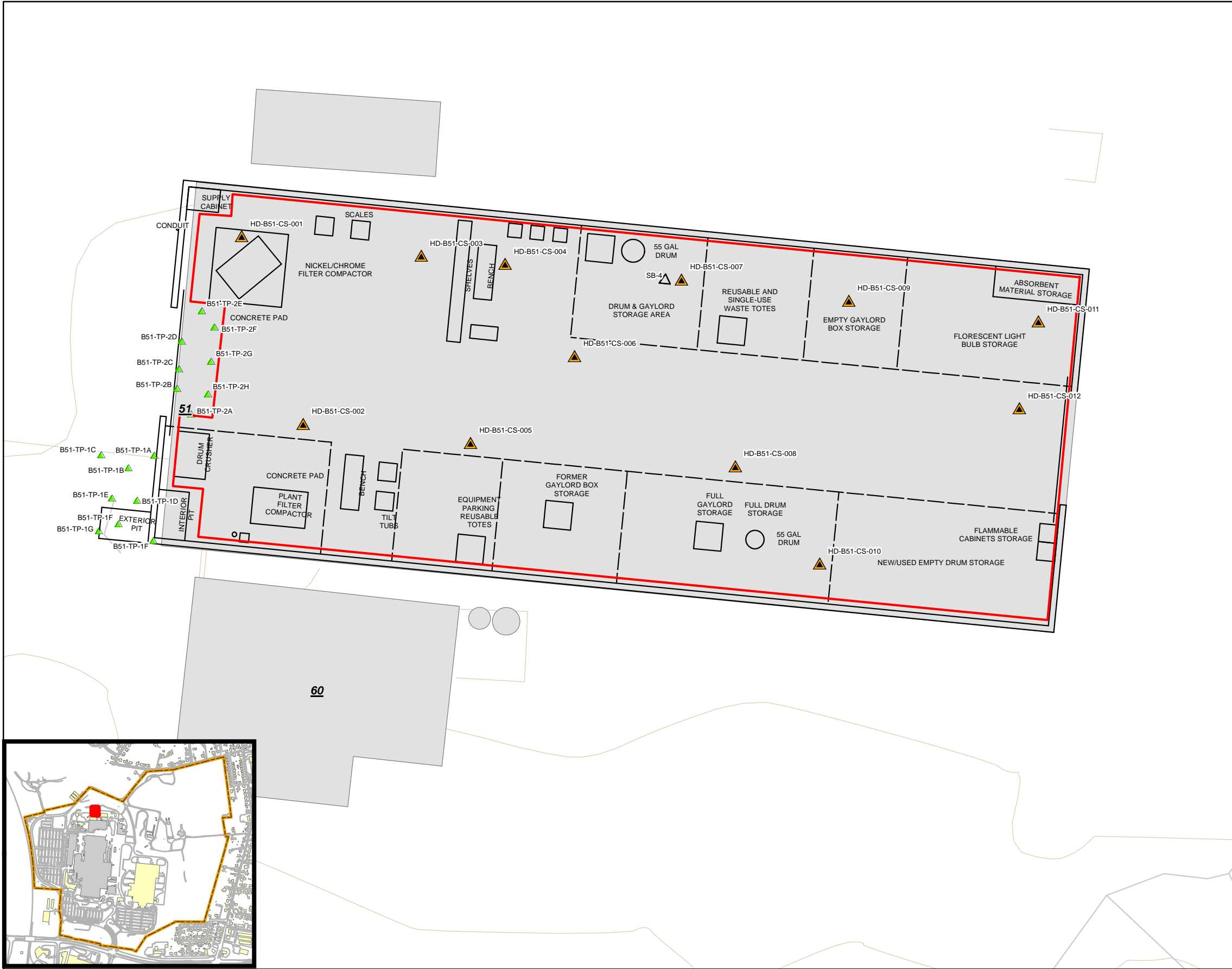


FORMER YORK NAVAL ORDNANCE PLANT
1425 EDEN ROAD, YORK, PA 17402

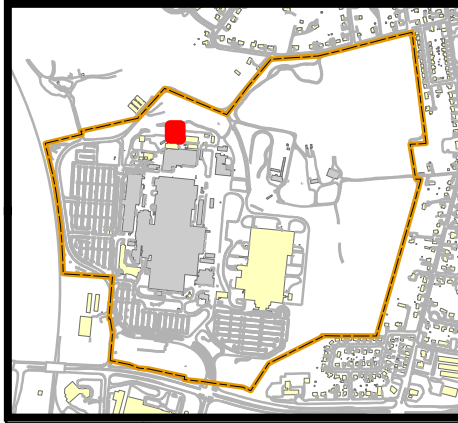
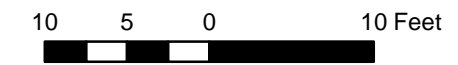
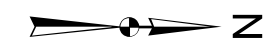
SITE LOCATION MAP

drawn JEB	checked	approved	figure no. 1
date 1/26/2012	date	date	
job no.		file no. Fig1site-loc.mxd	
initials	date	revision	





- Legend**
- Bldg_51_Locations
 - 2009 Sampling Locations
 - Exceeds Direct Contact and Soil to Groundwater MSC
 - Results > or = Direct Contact MSC (0-2' and 2'-15')
 - Results > or = Soil to Groundwater MSC
 - Soil to Groundwater or Direct Contact MSC Exceedance that has been excavated
 - Bldg_51_Ecavation_Limit
 - Existing Building
 - Removed Building
 - Roads and Curb Boundary
 - Parking
 - Contour Lines



FORMER YORK NAVAL ORDNANCE PLANT
1425 EDEN ROAD, YORK, PA 17402

Building 51
Confirmation Soil Sampling Locations

drawn	JEB	checked	approved	figure no.
date	3/16/2012	date	date	2
job no.	2603100069/1000/100			
initials	date	revision		



TABLES

APPENDIX A

Building 51 Closure Photographs



Photo 1: Building 51 (view looking west) during initial demolition (May 2011).



Photo 2: View looking north of demolition of former Building 51 (May 2011).



Photo 3: View looking north at Building 51 following demolition and removal of former hazardous waste storage pad and underlying gravel, and prior to confirmation sampling.



Photo 4: View looking north at backfilled excavation of former Building 51 area.



Photo 5: View looking west across restored area of former Building 51 (note walking path, gravel drive, and topsoil/seeded restorations).