



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

July 9, 2012

Ms. Sharon Fisher  
Harley-Davidson Motor Company  
1425 Eden Road  
York, PA 17402

Re: Approval of Soils Risk Assessment for the former York Naval Ordnance Plant

Dear Ms. Fisher:

This letter is in response to the Soils Risk Assessment for the former York Naval Ordnance Plant (fYNOP), prepared by Groundwater Sciences Corporation and dated March 2012. The report was prepared and submitted in accordance with the One Cleanup Program established by EPA Region 3 and the Pennsylvania Department of Environmental Protection (PADEP).

EPA has reviewed and hereby approves the Soils Risk Assessment in accordance with the provisions of the One Cleanup Program; however, in order to ensure that all potential contaminant risks are addressed at the fYNOP, EPA asks that the following comment be addressed:

Please explain the rationale behind the screening process used in the risk assessment (i.e. using MSCs as a preliminary screen and RSLs as a secondary screen). Since several constituents have on-site concentrations above RSLs but below MSCs, this screening process fails to carry these constituents into the risk assessment process, which could potentially misrepresent the estimated level of risk at the fYNOP.

Thank you for your cooperation in working with EPA and PADEP in the remediation of this site. If you have any questions, please don't hesitate to contact me at (215) 814-3407 or [miller.griff@epa.gov](mailto:miller.griff@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Griff Miller".

Griff Miller  
LT, U.S. Public Health Service  
Office of Pennsylvania Remediation  
EPA Region 3

cc: Pamela Trowbridge, PADEP  
Steve Snyder, GSC