



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

February 28, 2020

Mr. Ralph Golia
AMO Environmental Decisions
875 North Easton Road, Suite 10
Doylestown, PA 18902

Re: EPA review of Site-Wide and Military Munitions Response Program (MMRP) Cleanup Plans for the former York Naval Ordnance Plant (fYNOP)

Dear Mr. Golia:

This letter is in response to the Site-Wide Cleanup Plan for the former York Naval Ordnance Plant, prepared by Groundwater Sciences Corporation and dated November 25, 2019 (EPA has no comments on the MMRP Cleanup Plan for the fYNOP, prepared by EA Engineering, Science, and Technology and dated November 27, 2019). EPA has reviewed this report and provides the following comment to be addressed:

1. Section 10.3.3, Point of Application for Surface Water Quality Criteria – The text states that criteria compliance times (CCTs) are effectively the points of compliance for surface water to be used in the Cleanup Plan. The text further indicates that the point of compliance would therefore be 350 feet downstream for Criteria Maximum Concentration, 2700 feet downstream for Criteria Continuous Concentration, and 5900 feet downstream for human health criteria. EPA recognizes that PADEP may approve of these points of compliance; however, they are not consistent with the RCRA Corrective Action program point of compliance for surface water, which is the point at which releases enter the surface water. Please modify (or add to, as appropriate) the text in Section 10.3.3 to indicate that, in order to comply with the RCRA Corrective Action program, the point of compliance for surface water will be at the identified areas where groundwater discharge to Codorus Creek occurs, i.e., sampling locations COD-SW-15, COD-SW-17, and COD-SW-26, and the area in the creek near the mouth of Johnsons Run. Surface water sampling locations to verify compliance with all surface water cleanup levels at these locations should be proposed.

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 call me at (215) 814-3407.

Sincerely,

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

Griff Miller
CDR, U.S. Public Health Service
RCRA Corrective Action Branch 2
Land, Chemicals, and Redevelopment Division

cc: Sharon Fisher, Harley-Davidson (via email)
Jim Rea, PADEP (via email)



Printed on 100% recycled/recyclable paper with 100% post-consumer fiber and process chlorine free.
Customer Service Hotline: 1-800-438-2474