

March 11, 2008

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

Re: 2007 Summary of Operation for

North Building 4 Soil Vapor Extraction System Harley-Davidson Motor Company Operations, Inc.

SAIC Project 01-1633-00-8629-800

#### Dear Sharon:

Science Applications International Corporation (SAIC) is providing this letter to summarize operation of the North Building 4 (NB4) soil vapor extraction (SVE) system during 2007. The NB4 SVE system is located at the York, Pennsylvania, facility of Harley-Davidson Motor Company Operations, Inc. (Harley-Davidson). Through calendar year 2007, the system has been in operation for approximately 13 years (start-up occurred in May 1994).

The purpose of the SVE system is to extract soil vapor containing volatile organic compounds (VOCs) from up to five multi-level, vapor extraction wells (VEWs) located beneath the floor at the north end of Building 4. Each of the VEWs is connected via schedule 40 polyvinyl chloride (PVC) piping to a blower unit housed in a wooden shed located on the west side of Building 4 (refer to Figure 1). The blower unit applies a vacuum to the VEWs and transmits the extracted soil vapor via a 6-inch-diameter schedule 80 PVC underground pipe to Building 41 for treatment. The soil vapor is passed through either a thermal fume oxidizer (TFO) unit or a granular activated carbon (GAC) unit for destruction/absorption of the VOCs.

During 2007, the SVE system operated for a total of 8,173 hours (or 340.5 days) of a possible 8,760 hours (365 days). These data indicate that the SVE system was functional for approximately 93 percent of the time.

During 2007, SAIC performed monthly monitoring of the SVE system that included recording air flow data (refer to Table 1) and photoionization detector (PID) readings at up to seven vapor extraction points (refer to Figure 2). The seven locations that are sampled include EW-1 gravel, EW-1D, EW-2D, EW-3S, EW-4D, the gravel pit, and the total system influent (combined, prior to the blower). The remaining extraction points were shut off in early 2000 due to their very low VOC recoveries, and to enhance VOC recovery at the remaining locations. Data for four locations (EW-1D, EW-1 gravel, EW-2D and the gravel pit) showed minimal VOC recovery in 2007.

SAIC typically collects soil vapor samples from active vacuum extraction wells on a quarterly basis. Four sampling events (January, April, July, and October) were performed in 2007. The air samples were analyzed by VaporTech Services, Inc. of Valencia, Pennsylvania, for five VOCs:

- 1,1,1–Trichloroethane (TCA)
- Trichloroethene (TCE)
- Tetrachloroethene (PCE)
- cis-1,2-Dichloroethene (cis-1,2-DCE)
- Vinyl chloride

Table 2 summarizes the laboratory analytical results, while Figures 3 through 6 graphically display the historical VOC data by sampling location. The average total influent VOC concentration measured during 2007 (3.6 parts per million [ppm]) was slightly higher than the average influent VOC concentration measured in 2006 (2.4 ppm). However, this value is lower than pre-2003 concentrations (18.0 ppm in 2002). The historical range in VOC abundance (in the vapor influent), followed by the 2007 percent by volume in the influent, is summarized for each parameter below:

- TCA: historically has ranged from 52 to 76 percent; averaging 54 percent in 2007.
- TCE: has ranged from 17 to 30 percent; averaging 28 percent in 2007.
- PCE: has ranged from 5 to 21 percent; averaging 17 percent in 2007.
- cis-1,2-DCE: has ranged from 0.1 to 2 percent; averaging 1 percent in 2007.
- Vinyl chloride: this parameter was added to the analytical suite in 2003 due to its occurrence in groundwater at collection well CW-15A (close to the NB4 SVE system). Vinyl chloride has not been detected in air samples since 2003.

Based upon a review of gas chromatograph (GC) analysis and air flow data, SAIC estimates that approximately 70 pounds of VOCs were removed by the SVE system during 2007. This value is slightly lower than the quantity removed during calendar year 2006 (approximately 78 pounds). This apparent decrease in VOC removal is primarily due to the fact that the SVE system logged less run time in 2007 compared to 2006 (8,173 versus 8,455 hours). A cumulative VOC recovery of approximately 35,156 pounds has been recorded since system start-up (refer to Figure 7 and Table 1).

If you have any questions or comments regarding this letter, please contact the undersigned.

Very truly yours,

SCIENCE APPLICATIONS INTERNATIONAL CORPORATION

Scott L. McFeaters, P.G.

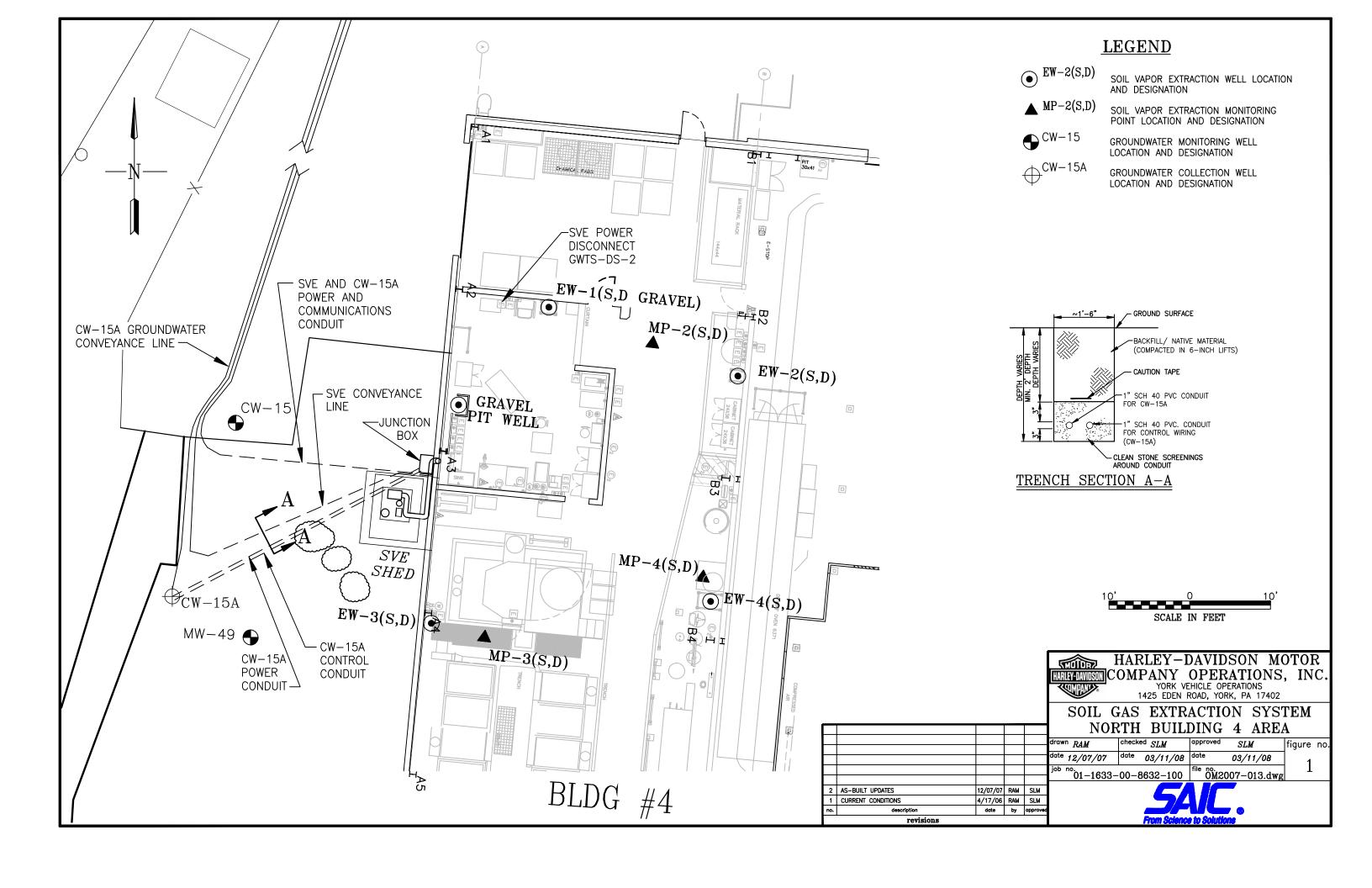
Project Manager

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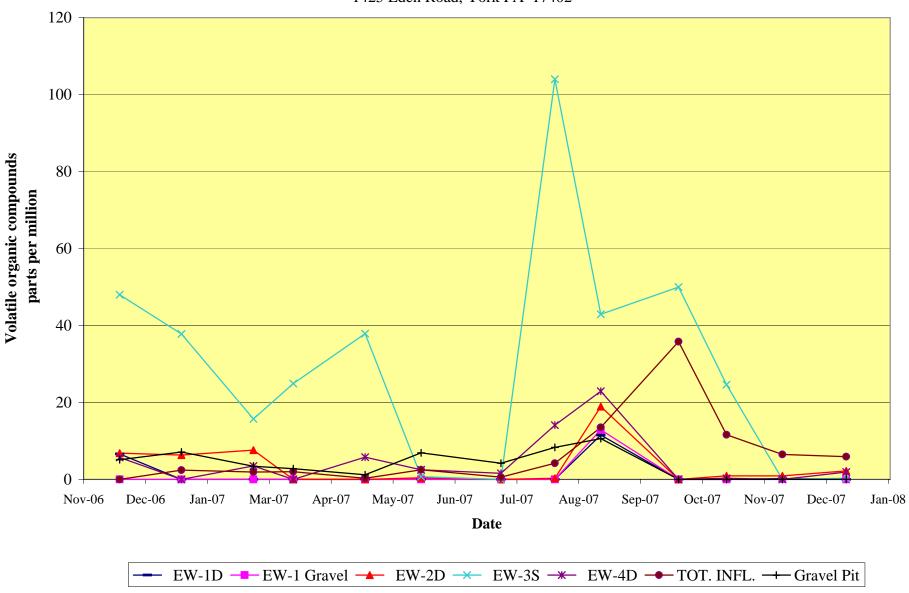
cc: Ralph T. Golia – AMO Environmental Decisions

Stephen Snyder – SAIC

# **FIGURES**

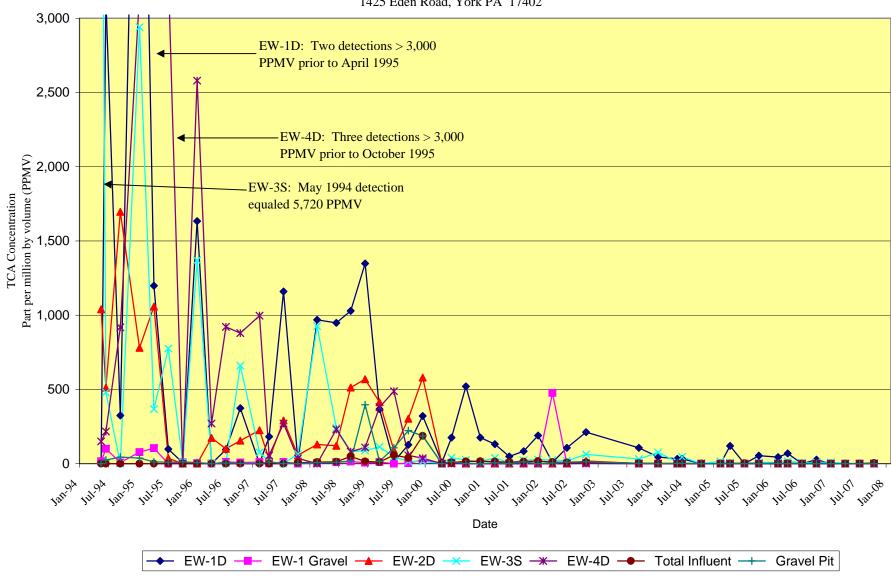


# FIGURE 2 2007 North Building 4 SVE PID Measurements

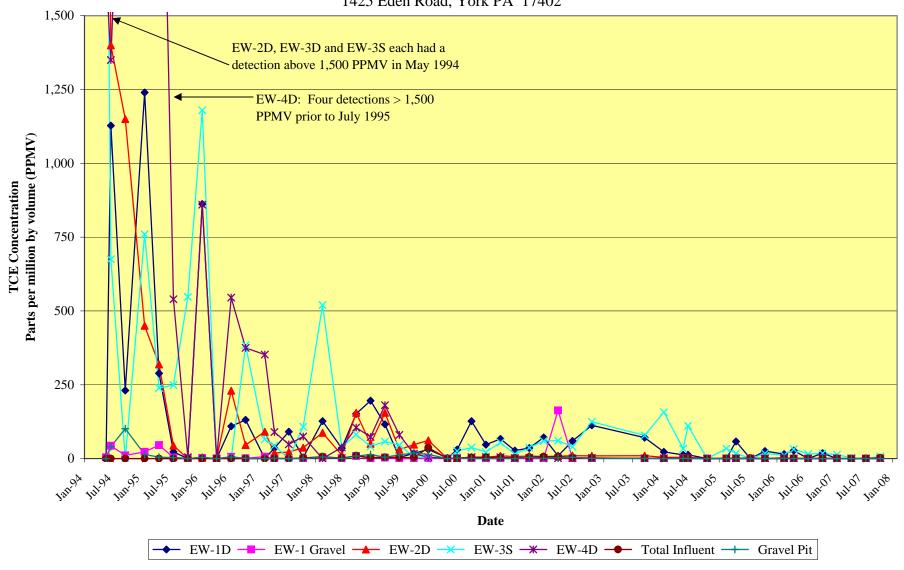


#### FIGURE 3

#### **Historical 1,1,1-Trichloroethane (TCA) Concentrations**



# FIGURE 4 Historical Trichloroethylene (TCE) Concentrations



### FIGURE 5

#### **Historical Tetrachloroethylene (PCE) Concentrations**

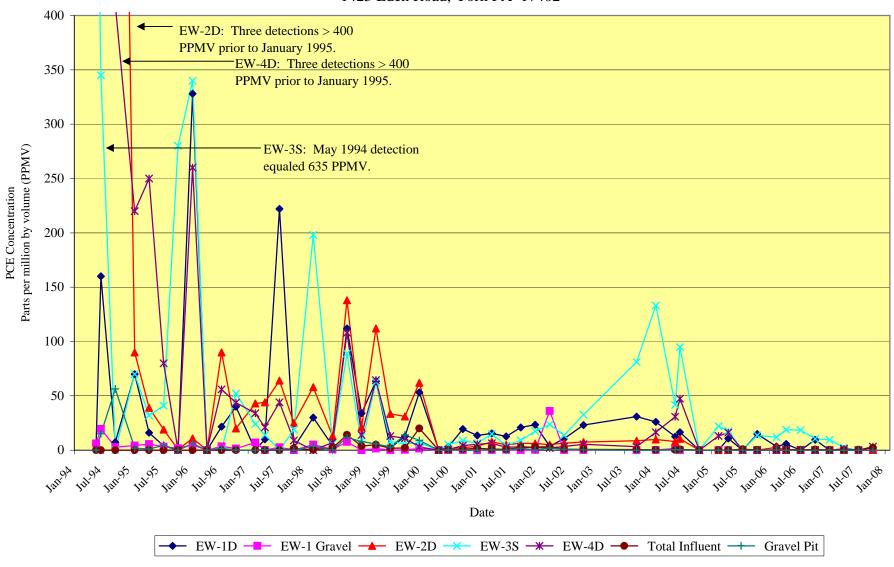


FIGURE 6
Historical cis-1,2-Dichloroethylene (DCE) Concentrations

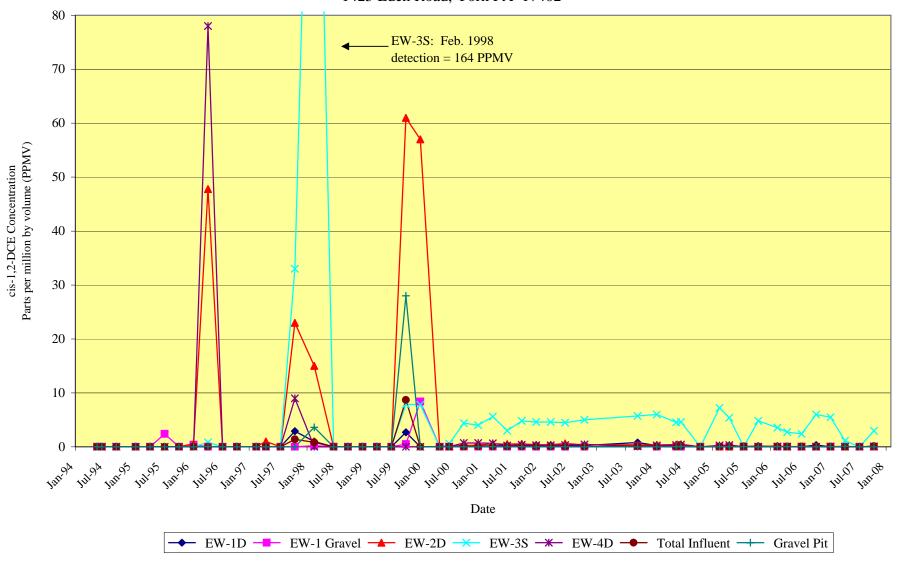
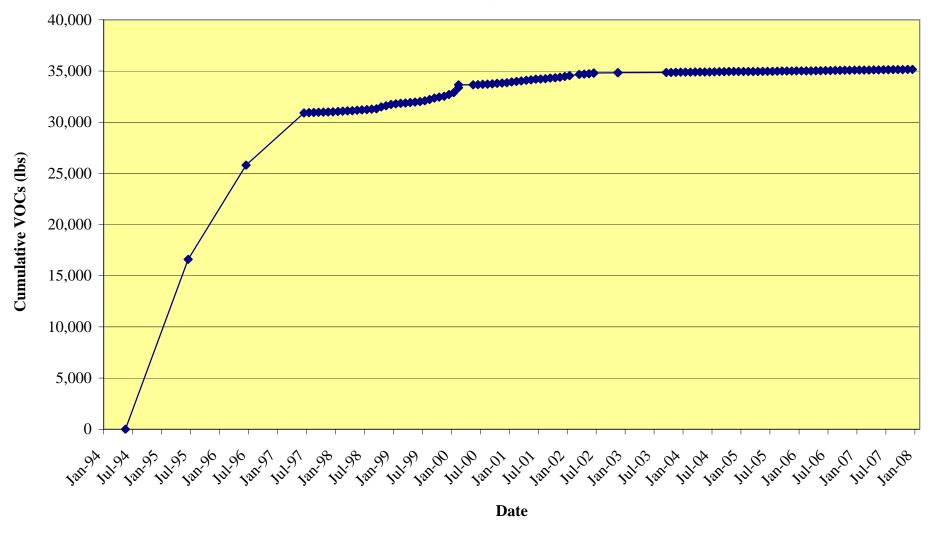


FIGURE 7
North Building 4 SVE Cumulative VOC Recovery

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



Note: Monthly VOC recovery data was not recorded from start-up through June 1997.

# **TABLES**

# TABLE 1 NORTH BUILDING 4 SVE SYSTEM AIRFLOW RATES AND VOC RECOVERY

		TOTA	L SYSTEM INFI	LUENT	
MEASUREMENT	FLOW RATE	BLOWER VAC	VOC RECOV	CUMUL RECOV	RATE
DATE	(SCFM)	(IWC)	(LBS)	(LBS)	(LBS/DAY)
Jun-95	NA	NA	16,596	16,596	NA
Jun-96	NA	NA	9,205	25,801	NA
6/5/97	126	44	5,099	30,900	NA
7/24/97	129	42	31.5	30,931.5	0.64
8/21/97	129	42	18.4	30,949.9	0.66
9/4/97	126	44	9.2	30,959.1	0.66
10/9/97	133	40	22.5	30,981.5	0.64
11/6/97	122	46	19.0	31,000.5	0.68
12/4/97	124	45	17.4	31,017.9	0.62
1/21/98	133	40	30.3	31,048.2	0.63
2/18/98	133	40	19.0	31,067.2	0.68
3/17/98	135	38	31.8	31,099.0	1.18
4/7/98	158	23	25.1	31,124.0	1.19
5/5/98	156	24	39.1	31,163.2	1.40
6/2/98	133	40	38.6	31,201.8	1.38
7/3/98	133	40	35.0	31,236.8	1.13
8/4/98	129	42	36.1	31,273.0	1.13
9/1/98	133	40	30.7	31,303.6	1.10
10/9/98	120	48	190.1	31,493.7	5.00
11/3/98	122	46	112.8	31,606.5	4.51
12/1/98	126	44	128.5	31,735.0	4.59
1/5/99	133	40	50.9	31,785.9	1.45
2/5/99	150	30	47.6	31,833.5	1.53
3/2/99	133	40	43.3	31,876.8	1.73
4/6/99	127	43	48.3	31,925.1	1.38
5/4/99	129	42	36.9	31,962.0	1.32
6/8/99	99	58	46.9	32,008.9	1.34
7/6/99	133	40	87.7	32,096.5	3.13
8/3/99 9/7/99	126	44	117.8	32,214.3	4.21
	133	40	139.5	32,353.8	3.99
10/4/99	122	46	91.2	32,445.0	3.38
11/2/99 12/22/99	124 127	45 43	89.9 157.5	32,534.9 32,692.5	3.10 3.15
1/3/00 2/4/00	124 104	45 56	189.5 493.3	32,881.9 33,375.2	15.79 15.42
2/25/00		shut down	271.5	33,646.8	12.93
4/20/00	106	79		33,646.8	12.93
5/3/00	106	79	7.0	33,653.8	0.54
6/15/00	149	62	23.3	33,677.1	0.54
7/7/00	167	54	16.8	33,693.9	0.76
8/4/00	167	54	23.9	33,717.8	0.76
9/8/00	167	54	29.9	33,747.7	0.85
10/5/00	120	73	46.2	33,793.9	1.71
11/3/00	119	74	35.6	33,829.5	1.23
12/1/00	166	55	34.1	33,863.7	1.22
1/5/01	166	55	66.3	33,930.0	1.90
2/2/01	167	54	53.1	33,983.1	1.90
3/2/01	167	54	53.4	34,036.5	1.91
4/6/01	167	54	55.8	34,092.3	1.60
5/3/01	174	52	43.1	34,135.4	1.60
6/8/01	164	56	59.8	34,195.2	1.66
7/5/01	167	54	28.2	34,223.4	1.04
8/3/01	167	54	30.8	34,254.2	1.06
9/20/01	166	55	51.0	34,305.2	1.06
10/12/01	164	56	40.5	34,345.7	1.84
11/2/01	166	55	38.2	34,383.9	1.82
12/14/01	167	54	77.4	34,461.3	1.84

#### TABLE 1

#### NORTH BUILDING 4 SVE SYSTEM AIRFLOW RATES AND VOC RECOVERY

Harley-Davidson Motor Company Operations, Inc.

**York Vehicle Operations** 

1425 Eden Road, York PA 17402

	TOTAL SYSTEM INFLUENT						
MEASUREMENT	FLOW RATE	BLOWER VAC	VOC RECOV	CUMUL RECOV	RATE		
DATE	(SCFM)	(IWC)	(LBS)	(LBS)	(LBS/DAY)		
1/18/02	164	56	80.1	34,541.3	2.29		
3/20/02	161	58	132.6	34,673.9	2.25		
4/5/02 5/3/02	167 164	54 56	26.5 27.5	34,700.4 34,727.8	1.65 1.72		
6/7/02	164	56	59.0	34,786.8	1.72		
6/23/02		shut down	16.2	34,803.0	1.01		
10/25/02	174	52		34,803.0			
11/1/02	167	54	15.9	34,818.8	1.13		
11/23/02	system s	shut down	22.9	34,841.7	1.09		
8/16/03	171	53		34,841.7			
9/5/03	164	56	9.6	34,851.3	0.48		
10/3/03	171 178	53	11.3	34,862.6	0.46		
11/10/03 12/10/03		50	16.1 13.3	34,878.8 34,892.0	0.48		
1/9/04	171	shut down 53	13.3	34,892.0			
2/6/04	167	54	3.6	34,895.6	0.13		
3/6/04	180	49	3.7	34,899.3	0.13		
4/15/04	174	52	3.7	34,903.0	0.13		
5/6/04	171	53	3.1	34,906.1	0.18		
6/3/04	167	54	4.9	34,911.0	0.38		
7/9/04	176	51	8.9	34,919.9	0.37		
8/5/04	174	52	10.6	34,930.5	0.39		
9/10/04	174	52	12.0	34,942.5	0.39		
10/7/04	171	53	1.3	34,943.8	0.05		
11/18/04	164	56	2.1	34,945.9	0.05		
12/17/04	193	43	0.9	34,946.8	0.05		
1/7/05 2/3/05	176 176	48 48	1.2	34,948.0	0.06		
3/17/05	176	54	1.9 4.1	34,949.9 34,954.0	0.11		
4/21/05	176	46	4.1	34,958.1	0.11		
5/20/05	176	48	3.2	34,961.3	0.12		
6/13/05	80	50	2.7	34,964.0	0.12		
7/25/05	80	48	8.4	34,972.5	0.22		
8/18/05	176	53	4.6	34,977.1	0.22		
9/22/05	176	48	16.6	34,993.7	0.47		
10/27/05	176	48	5.2	34,998.8	0.17		
11/21/05	184	48	3.7	35,002.5	0.17		
12/22/05	184	48	5.6	35,008.1	0.18		
1/19/06	184 184	48 48	5.0 3.1	35,013.1	0.18 0.11		
2/16/06 3/20/06	184	48	3.1	35,016.2 35,019.7	0.11		
4/20/06	184	46	5.7	35,025.4	0.11		
5/18/06	184	48	8.5	35,033.9	0.18		
6/15/06	184	48	8.1	35,042.0	0.30		
7/20/06	274	48	6.1	35,048.2	0.18		
8/21/06	184	48	8.0	35,056.1	0.26		
9/22/06	184	48	5.4	35,061.6	0.18		
10/18/06	210	48	8.0	35,069.6	0.31		
11/20/06	136	46	11.3	35,080.9	0.35		
12/18/06	194	48	5.5	35,086.4	0.23		
1/18/07	194	42	5.3	35,091.7	0.19		
2/23/07	184	48	4.2	35,095.9	0.12		
3/15/07 4/20/07	159 159	48 48	2.1 9.0	35,098.1 35,107.1	0.11 0.26		
5/17/07	172	48	6.0	35,113.1	0.26		
6/27/07	172	48	10.7	35,123.7	0.28		
7/20/07	172	48	3.2	35,126.9	0.26		
8/16/07	159	42	4.4	35,131.3	0.16		
9/24/07	159	48	5.5	35,136.8	0.15		
10/18/07	159	48	5.9	35,142.7	0.27		
11/15/07	125	48	7.2	35,149.9	0.27		
12/17/07	159	48	6.5	35,156.4	0.21		

Notes:

NA - Not available; Monthly VOC recovery data not recorded from start-up through June 1997.

Beginning in January 2005, flow rate determined from in-line pitot tube (previously from blower curve)

<sup>--</sup> Indicates a startup date, no VOC recovery is calculated until the next monitoring date

### TABLE 2 NORTH BUILDING 4 SOIL VAPOR MONITORING POINT VOC CONCENTRATIONS

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

SAMPLE				
LOCATIONS	1/18/07	4/20/07	7/24/07	10/18/07
1,1,1- TCA	1/10/07	4/20/07	1/24/07	10/10/07
EW-1D	ND	ND	ND	ND
EW-1S	NS	NS	NS	NS
EW-1 Gravel	0.010	ND	ND	0.006
EW-2D	0.021	ND	ND	ND
EW-2S	NS	NS	NS	NS
EW-3D	NS	NS	NS	NS
EW-3S	9.633	2.388	ND	4.124
EW-4D	0.012	0.006	ND	0.049
EW-4S	NS	NS	NS	NS
Gravel Pit	ND	ND	ND	0.005
Total Influent	1.441	0.502	1.186	3.976
TCE	1.771	0.302	1.100	3.910
	0.020	0.010	110	0.012
EW-1D	0.038	0.018	ND	0.012
EW-1S	NS	NS	NS	NS
EW-1 Gravel	0.050	0.023	0.021	0.008
EW-2D	0.051	0.024	0.027	0.007
EW-2S	NS	NS	NS	NS
EW-3D	NS	NS	NS	NS
EW-3S	13.223	3.244	ND	7.727
EW-4D	0.058	0.104	0.024	0.485
EW-4S	NS	NS	NS	NS
Gravel Pit	0.048	0.024	ND	0.007
Total Influent	0.674	0.226	0.650	2.504
PCE				
EW-1D	0.038	0.019	0.009	0.009
EW-1S	NS	NS	NS	NS
EW-1 Gravel	0.028	0.020	0.007	0.007
EW-2D	0.020	0.015	0.019	0.007
EW-2S	NS	NS	NS	NS
EW-3D	NS	NS	NS	NS
EW-3S	9.523	2.422	0.013	3.432
EW-4D	0.032	1.340	0.018	3.242
EW-4S	NS	NS	NS	NS
Gravel Pit	0.026	0.018	0.014	0.009
Total Influent	0.300	0.110	0.417	2.039
c-1,2- DCE				
EW-1D	ND	ND	ND	ND
EW-1S	NS	NS	NS	NS
EW-1 Gravel	0.02	ND	ND	ND
EW-2D	0.05	0.01	ND	ND
EW-2S	NS	NS	NS	NS
EW-3D	NS	NS	NS	NS
EW-3S	5.49	1.12	ND	2.98
EW-4D	0.07	0.03	ND	0.10
EW-4S	NS	NS	NS	NS
Gravel Pit	0.02	0.09	ND	ND
Total Influent	0.03	ND	0.01	0.12
Vinyl-chloride				1
EW-1D	ND	ND	ND	ND
EW-1S	NS	NS	NS	NS
EW-15 EW-1 Gravel	ND	ND	ND	ND
EW-2D	ND	ND	ND	ND
EW-2S	NS	NS	NS	NS
EW-3D	NS	NS	NS	NS
EW-3S	ND	ND	ND	ND
EW-4D	ND	ND ND	ND	ND
EW-4S	NS	NS NS	NS	NS
Gravel Pit	ND	ND ND	ND	ND
Total Influent	ND ND	ND ND	ND ND	ND ND
1 otai mmucht	I ND	ND	ND	ND

ND - Not Detected

NS - Not Sampled

NA - Not Analyzed

All concentrations are in Part per million by volume (PPMV)