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FALL 2023

News and Information about the former York Naval Ordnance Plant (fYNOP)

Cleanup Plans and Progress

Progress continues with remediation at the former York Naval Ordnance Plant (fYNOP) located in York, Pennsylvania. The fYNOP includes property currently owned by Harley-Davidson Motor Company, Inc. (Harley-Davidson) and a western parcel known as the Eden Road Logistics Center owned by NP York 58, LLC (NP York). The U.S. Government (overseen by the U.S. Army Corps of Engineers (USACE)) and Harley-Davidson (collectively, the "fYNOP Team") perform the remediation activities at the fYNOP pursuant to an agreement between the United States 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.

The reports and studies identified below are available to the public at: www.yorksiteremedy.com.

Phases of Cleanup

The cleanup of soils, groundwater, and ordnance is addressed in six major phases:

- Remedial Investigation (RI) Define and evaluate the nature and extent of the soils and groundwater contamination, and the presence of ordnance. The RI includes a Supplemental Remedial Investigation (SRI) to further evaluate site conditions. Phase completed.
- 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. Phase completed.
- 3. Remedial Alternatives Analysis (RAA) Study possible cleanup remedies and provide the basis for a final selection of the best means to clean up soils, groundwater, and ordnance using the data from the RI/SRI and RA. *Phase completed.*
- 4. Proposed Plan Final Remedy (PP-FR) Select the most appropriate remedy for fYNOP using the data from the RI/SRI, RA, and RAA. Phase completed.
- **5. Cleanup Plan -** Present details for implementing the PP-FR and RAA *(Final Remedy)* for fYNOP soils, groundwater, and ordnance. *Phase completed*.

6. Remediation Completion - Implement the approved Cleanup Plan to demonstrate attainment of the applicable cleanup standards in a Final Report. **Phase is ongoing.**

Cleanup Plans were submitted to PADEP and EPA in November 2019. EPA issued a "Final Decision and Statement of Basis" in February 2020 and PADEP approved the Cleanup Plans under the Pennsylvania Land Recycling and Environmental Remediation Standards Act (Act 2) in March 2020.

A summary of the Cleanup Plans Remediation activities for soil and groundwater and the MMRP Areas is presented below.

Site-Wide Soil and Groundwater Cleanup

The final remedy is a combination of engineering controls, institutional controls, and other remedial actions and obligations; and includes:

• Operation of the existing groundwater extraction and treatment system to remove volatile organic compounds in groundwater extracted from the NP York property and the SPBA of fYNOP as necessary to achieve cleanup standards. Chlorinated solvents are the primary constituents of concern at the fYNOP. Large concentration reductions have occurred (over 90% reductions in groundwater

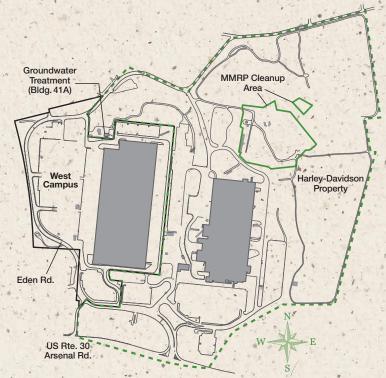
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samples from most wells) of the historically used chlorinated solvents. The significant reduction in concentrations over time demonstrates that remediation to-date is successful.

- Monitoring of surface water and groundwater quality to evaluate remediation progress and success. The fYNOP Team completed annual sampling of monitoring wells in October 2023; and the results will be reported in the 2023 Annual Groundwater Report during the first quarter of 2024.
- Monitoring and maintenance of permanent caps on the Site to eliminate the direct contact exposure pathway.
- Update and maintain the existing environmental covenant for the NP York property and off-Site industrial property (south of fYNOP) that prohibit future residential use and the use of groundwater except for environmental sampling and remediation; establish an environmental covenant for the Harley-Davidson property to prohibit future residential use and groundwater use except for environmental sampling and remediation.
- Environmental covenants on the Harley-Davidson and NP York properties will include a requirement to perform a vapor intrusion pathway evaluation and, if necessary, mitigate the potential vapor intrusion pathway prior to the construction of any new inhabitable structure, and maintain/monitor the existing vapor barrier beneath the existing building on the NP York property.
- Environmental covenants on the Harley-Davidson and NP York properties will include a requirement that a soil management plan be in place prior to digging, excavating, grading, pile driving, and/or removal of ground cover materials on these properties.
- Periodic assessment of land and groundwater uses in specified areas surrounding fYNOP to verify continued non-use of groundwater for potable purposes and non-residential land use west of the Site.
- Monitored natural attenuation will be used to meet PADEP groundwater medium specific concentrations and EPA maximum contaminant levels in the aquifer at designated portions of the fYNOP. Two Technical Impracticability waivers are part of the Site remedy. The waivers specify where groundwater resource restoration is not practicable due to the site conditions and the nature of the contaminant, but where the environment and human health are nonetheless protected.
- Implementation of a Post-Remediation Care Plan (PRCP) that identifies long-term monitoring and other activities to be performed following Final Report approval, in accordance with PADEP Act 2 Regulations, to ensure that the site remedy remains protective of human health and the environment.

Implementation of the Site-Wide Soil and Groundwater Cleanup Plan has been ongoing throughout 2023. The Act 2 Final Report was submitted to PADEP and USEPA during November 2023. During 2024, activities are expected to follow the PRCP as documented in the Final Report. The PRCP activities will continue for several years.



Former York Naval Ordnance Plant York, Pennsylvania

MMRP Areas Cleanup

The MMRP Areas are sections where munitions waste, debris, and materials exist on the site. The Final Remedy includes complete surface and subsurface ordnance clearance to achieve unlimited use and unrestricted exposure (UU/UE) for a significant portion of the MMRP Areas. Surface clearance and land use controls (LUCs) will be utilized in the remaining portion of the MMRP Areas. The Final Remedy also includes removal of process materials, munitions debris, and material potentially presenting an explosive hazard within the impacted areas of Building 14 along with demolition of Building 14 and Building 16 remnants (former firing ranges).

The LUCs of the MMRP remedy include continued maintenance of the site security force and fencing, construction support (i.e., on-call oversite/support by qualified ordnance personnel during excavation activities) for intrusive activities, and biennial ordnance awareness training for personnel entering and working in the area not remediated to UU/UE. Additional LUC components, which are shared with the Site-Wide Cleanup Plan, include prevention of future residential site use and prevention of the consumption of groundwater.

The MMRP cleanup project was initiated during the first quarter of 2022 and continued throughout 2023. The project will pause during the winter months and re-start in the spring of 2024. Project implementation should be completed by the end of 2025.

For More Information

Information Line: 717-852-6664

Websites:

www.yorksiteremedy.com (contains reports and other documents regarding remediation of the fYNOP) www.epa.gov/hwcorrectiveactionsites www.dep.state.pa.gov