

Community Update

ISSUE EIGHTEEN

FALL 2020

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

Cleanup Plans and Progress

Progress continues at the former York Naval Ordnance Plant (fYNOP) located in York, Pennsylvania. The fYNOP includes property currently owned by Harley-Davidson Motor Company Operations, Inc. (Harley-Davidson) and a western parcel now 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:

- 1. 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.
- 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.
- 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.
- 4. Proposed Plan – Final Remedy (PP-FR)** - Select the most appropriate remedy for fYNOP using the data from the RI/SRI, RA, and RAA.
- 5. Cleanup Plan** - Present details for implementing the PP-FR and RAA (**Final Remedy**) for fYNOP soils, groundwater, and ordnance.
- 6. Remediation Completion** - Implement the approved Cleanup Plan to demonstrate attainment of the applicable cleanup standards in a Final Report.

Soils

Soils have been extensively sampled. The EPA and the PADEP approved the SRI Report for Soils in March 2010. A Site-wide Soil RA Report was approved by EPA and PADEP in July 2012. Both agencies have determined that no unacceptable risk to human health related to soil currently exists at the fYNOP.

Groundwater

The findings of the Site-wide groundwater investigation and the groundwater human health RA were summarized in reports submitted to the PADEP and EPA during March 2018. PADEP and EPA issued letters of approval of the revised Groundwater SRI and Risk Assessment reports in July 2018.

The fYNOP Team has operated a groundwater capture and treatment system for more than 25 years. The system is continuously maintained to operate efficiently and reliably. A groundwater extraction system was also designed and installed for the fYNOP’s Southern Property Boundary Area (SPBA) during 2018. A final SRI report for the SPBA, along with details of the system design, construction, and startup of a groundwater extraction system, was submitted to PADEP and EPA in October 2019. Coincident with this report, EPA published updated Groundwater Environmental Indicator Determination reports, confirming that the migration of contaminated groundwater and current human exposures are under control at fYNOP.

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Chlorinated solvents are the primary constituents of concern at the fYNOP. Large concentration reductions have occurred (over 90% reductions in groundwater samples from most wells) of the historically used chlorinated solvents. The significant reduction in concentrations over time demonstrates that remediation to-date is successful. The fYNOP Team completed annual sampling of monitoring wells in October 2020; and the results will be reported in the 2020 Annual Groundwater Report during the first quarter of 2021.

Military Munitions Response Program Site Inspection

The Military Munitions Response Program (MMRP) addresses ordnance related issues at fYNOP. The Final MMRP RI report was prepared and submitted to EPA and PADEP in April 2018. The PADEP and the EPA approved the MMRP RI report in July 2018.

Remedial Alternative Analysis (RAA)/Proposed Plan – Final Remedy (PP-FR)

The RAA for MMRP Areas and the PP-FR for soil and groundwater at fYNOP were approved in March 2019 and August 2019, respectively.

Cleanup Plans

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 Act 2 Cleanup Plans in March 2020.

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

Site-Wide Soil and Groundwater

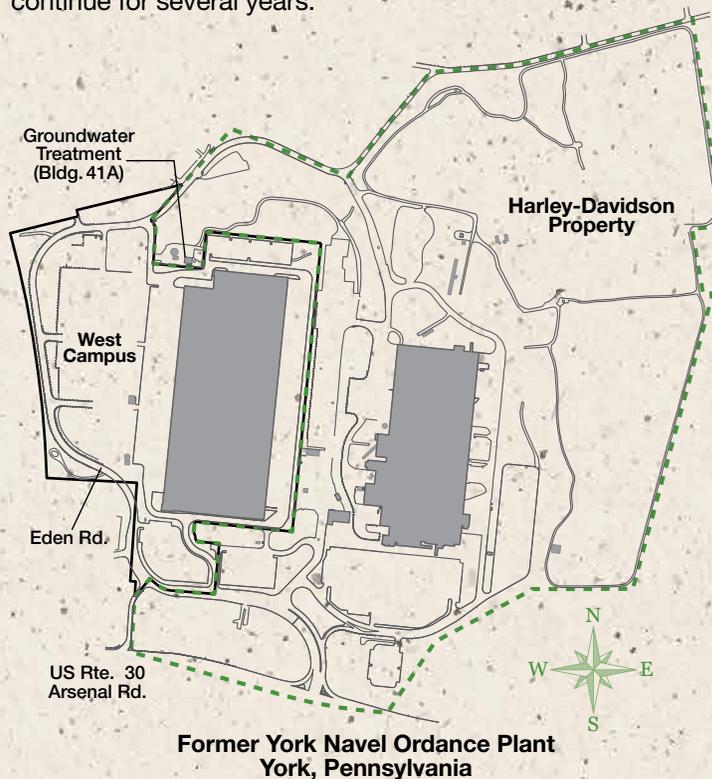
The final remedy is a combination of engineering controls, institutional controls, and other remedial actions and obligations; and includes:

- Continued operation of the existing groundwater treatment system to remove volatile organic compounds in groundwater extracted from the NP York property and the SPBA of fYNOP in accordance with existing permit requirements.
- Monitoring of surface water for compliance with PADEP surface water quality criteria.
- 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 property and NP York property 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 maintenance/monitoring of the existing vapor barrier beneath the existing building on the NP York property.
- Environmental covenants on the Harley-Davidson property and NP York property 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 approved for the Site. 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 that identifies long-term monitoring and other activities to be performed following Final Report approval, in accordance with PADEP Act 2 Regulations.

Implementation of the Site-Wide Soil and Groundwater Cleanup Plan has been ongoing throughout 2020 and will continue for several years.



MMRP Areas Cleanup

The MMRP Areas are areas 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 used 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 oversight/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.

Permitting and evaluation of contractor qualifications to implement the MMRP remedy are ongoing. Currently, the MMRP cleanup project is anticipated to start during the first quarter of 2021. Project implementation should be completed by the end of 2021.

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