



National Historical Park Pennsylvania



Proposed Plan for Clean-up of the Asbestos Release Site

September 2006

Dates to remember:

Mark Your Calendar

Public Comment Period: September 22, 2006 - October 23, 2006.

NPS will accept written comments on the Proposed Plan during the public comment period. See "Community Participation" on page 12 for relevant information.

Public Meeting:

Thursday, September 28, 2006 / 6 pm to 8 pm

NPS will hold a public meeting to explain the Preferred Alternative, as well as the other alternatives presented in the Feasibility Study. Oral and written comments also will be accepted at the meeting. The meeting will be held at the VFNHP Education Center (adjacent to the Welcome Center), Montgomery County, Pennsylvania, located within Valley Forge National Historical Park.

For more information, see the Asbestos Release Site Administrative Record at the following locations:

National Park Service 1050 Walnut Street Suite 220 Boulder, CO 80302 (303) 415-9316 Hours: Mon-Fri 9 AM to 4 PM



Proposed Plan for Clean-up of the Asbestos Release Site

September 2006

Welcome Center Desk 1400 North Outer Line Dr. King of Prussia, PA 19406 (610) 783-1034 Hours: Mon-Fri 9 AM to 5 PM

Valley Forge NHP

NPS Announces Proposed Plan

This Proposed Plan identifies and provides the rationale for the Preferred Alternative for cleaning up contaminated soils at the Asbestos Release Site (Site) pursuant to the Comprehensive Environmental Response Compensation, and Liability Act (CERCLA), also known as Superfund. The Site is located in Montgomery County, Pennsylvania, within Valley Forge National Historical Park (VFNHP). See Figure 1 on page 3. The Site is managed by the National Park Service (NPS).

The Preferred Alternative is Alternative 4, Shallow Excavation with Off-Site Disposal, which would remove from the Site all soils containing levels of contaminants that pose unacceptable risks to humans and the environment. This Proposed Plan also includes summaries of other cleanup alternatives evaluated for use at this Site.

This document is issued by NPS, the CERCLA lead agency for Site response actions. NPS will select for the Site a final CERCLA cleanup plan, known as the remedial action, after reviewing and considering all information submitted during the 30-day public comment period. NPS may modify the Preferred Alternative or select another response action presented in this Proposed Plan based on new information or public comments. Therefore, the public is encouraged to review and comment on all the alternatives presented in this Proposed Plan.

NPS is issuing this Proposed Plan as part of its public participation responsibilities under CERCLA Section 117(a) and 40 C.F.R. Section 300.430(f) (2) of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). This Proposed Plan summarizes information that can be found in greater detail in the Remedial Investigation/Feasibility Study (RI/FS) reports and other documents contained in the Administrative Record for this Site. NPS encourages the public to review these documents to gain a more comprehensive understanding of the Site and cleanup activities that have been conducted at the Site.

Site Description

BACKGROUND AND HISTORY

In the early 1800s, the limestone industry developed with the guarrying of limestone and construction of kilns in portions of what is today VFNHP. The limestone was used in agriculture. From the early 1890s to the 1970s, Ehret Magnesia Company (Ehret) and its successor, Keene Corporation, manufactured asbestos insulation at a plant located in the Asbestos Release Site. The pipe insulation was manufactured by pouring a slurry mix of asbestos fibers and magnesium carbonate (from the readily available dolostone present within the local limestone deposits) into molds. Ehret disposed of waste asbestos slurry by either pumping it through pipelines into the former limestone quarries, in what was then a state park, or by directing the slurry waste to a constructed waste channel that parallels a former railbed and ultimately discharges to the Schuylkill River. The waste slurry deposits in the abandoned guarries were subsequently covered with soil.

In the 1960s, Ehret sold the plant and property to Keene Corporation (Keene). Keene continued to manufacture asbestos products until the plant was closed in the early 1970s. On October 13, 1976, NPS purchased the 46 acre Keene property and asbestos manufacturing plant.

On November 24, 1982, following official transfer of title for the state park land to NPS, the Secretary of the Interior issued official notice establishing Valley Forge National Historical Park as a unit of the National Park System.

The past waste disposal practices (prior to the establishment of VFNHP as a National Historical Park) resulted in a portion (approximately 112 acres) of VFNHP being designated as an Asbestos Release Site (ARS, or the Site). The Site has been divided into 15 Areas of Concern (AOCs). Those AOCs that are part of the proposed clean-up are shown on Figure 2.

The asbestos contamination at VFNHP was first identified in January 1997 during the excavation of a trench for a fiber optic cable through the Amphitheater Quarry AOC. Asbestos was detected in soil samples with concentrations as high as 70 percent.

The presence of high concentrations of asbestos caused the U.S. Environmental Protection Agency (EPA) and NPS to conduct response actions that included: removal of asbestos contamination in some areas; covering other areas with clean soil or a cement-like soil binding agent and revegetating; and installing warning fencing and signs to control public access to contaminated areas. Air sampling indicated no airborne releases of asbestos during these activities.

Following implementation of these response actions, the RI Report was issued in February 2005. The purpose of the RI is to determine the nature and extent of contamination at the Site. The results of the RI are summarized below under "Site Contamination" and under "Summary of the Site Risks" on page 4 of this Proposed Plan. NPS issued the FS Report in September 2006. The purpose of the FS is to evaluate alternatives for cleaning up contamination at the Site. The results of the FS are summarized below under "Summary of Remedial Alternatives" and "Evaluation of the Alternatives" on pages 8-11 of this Proposed Plan.

SITE CONTAMINATION

The RI identified the types, quantities, and locations of contamination at the Site. During the RI, over 1,600 surface and subsurface soil samples were collected from the Site and analyzed for asbestos, and over 200 samples were analyzed for other contaminants (volatile organic compounds [VOCs], semi-volatile organic compounds [SVOCs], metals, pesticides, and polychlorinated biphenyls [PCBs]). Asbestos was detected in the majority of soil samples collected between 0.5 feet and 1.5 feet below ground surface with concentrations ranging from 1% to greater than 10%.

Although some VOCs, pesticides, and PCBs were detected in soil samples from a few locations, the concentrations were too low to pose unacceptable human health or ecological risks.



National Historical Park



A subset of the SVOCs, called polycyclic aromatic hydrocarbons (PAHs), and three metals (lead, mercury, and arsenic) were measured in some soil samples at levels that may cause unacceptable risks to humans and/or ecological receptors (see the risk discussion below).

Groundwater

Eight groundwater monitoring wells were installed and sampled several times during the RI. No contaminants at levels of concern were detected.

Sediments and Surface Water

Analytical results from the Site indicate the presence of asbestos, VOCs, SVOCs, pesticides, and PCBs in the sediments of the Schuylkill River and an unnamed tributary, the primary surface water drainage outlet from the Site. The data indicate that sediment contamination in the Schuylkill River is more significantly impacted by upstream sources than discharges from the unnamed tributary. Results of sediment macroinvertebrate community analyses performed during the RI indicated no significant adverse effects to the macroinvertebrate community from the sediments. Sediments in the unnamed tributary, however, were found to be a potential source of human health risk.

No contaminants at levels of concern were detected in surface water samples from the Schuykill River or the unnamed tributary.

SUMMARY OF THE SITE RISKS

As part of the RI, NPS conducted a baseline risk assessment to determine the current and future effects of contaminants on human health and the environment.

Human Health Risks

Since the Site is owned by the United States and managed by NPS, park open space can be reasonably anticipated as the post-remediation and future land use for the Site. In addition, several residences for park workers are located near the Waste Channel and Railbed North AOC. Therefore, the human health baseline risk assessment focused on health effects for both children and adults in an on-site recreational scenario (Park Visitors), for Park maintenance and construction workers, and for Park residents for the Waste Channel and Railbed North AOC. Risks that could result from direct contact, ingestion, or inhalation of the contaminants were assessed. Asbestos, PAHs, lead, and arsenic in soil and sediments posed unacceptable human health risk for various receptor groups in different AOCs.

Valley Forge

National Historical Park

Proposed Plan for Clean-up of the Asbestos Release Site September 2006 Air, surface water, and groundwater exposure pathways did not result in unacceptable risk to humans.

Ecological Risks

The ecological risk assessment examined risks to animal and plant life at the Site including risks from direct contact with and ingestion of contaminated soil, as well as ingestion of prey with assimilated contamination. An ecological risk assessment evaluates population-level effects (as opposed to effects on an individual animal) except in the case of threatened or endangered species where effects on individuals are evaluated. Threatened and endangered species were not found to be affected at the Site. Asbestos, mercury, lead, and pesticides were found to pose unacceptable risks to the populations of various ecological receptors (soil invertebrates, small mammals, and insectivorous birds) in different AOCs.

Risk Conclusions

It is NPS' current judgment that the Preferred Alternative identified in this Proposed Plan, or one of the other active measures considered in the Proposed Plan, is necessary to protect public health, welfare, and the environment from actual or threatened releases of hazardous substances into the environment.

Remedial Action Objectives

Remedial action objectives (RAOs) were formulated to guide the development of remedial alternatives. The three primary RAOs include:

1. Prevent exposure to contaminated soils for both human and ecological receptors above acceptable risk levels. More specifically

for soil/sediment 0-2 feet below the ground surface:

- Prevent human exposure to friable asbestos at levels creating excess cancer risk.
- > Prevent human exposure to lead and arsenic at levels creating health hazards.
- Prevent human exposure to carcinogenic PAHs at levels creating excess cancer risk.

for subsurface soil (deeper than 2 feet):

> Prevent exposure to lead at unacceptable levels of risk via direct contact for Construction/Utility Workers.

for soil/sediment 0-0.5 feet below the ground surface:

- > Prevent exposure to lead via ingestion of soil invertebrates and incidental ingestion of soil by the American Robin at risk levels unacceptable to the Site population.
- > Prevent exposure to friable asbestos and lead via incidental ingestion of soil by soil invertebrates at risk levels unacceptable to the Site population.
- 2. Eliminate or minimize contaminant-related constraints to the full utilization of park resources for all appropriate purposes consistent with NPS mandates.
- 3. Meet applicable federal and state regulations.



SUMMARY OF REMEDIAL ALTERNATIVES

Remedial alternatives evaluated in the FS Report are summarized below. Alternative 4, Shallow Excavation with Off-Site Disposal, is the Preferred Alternative. It will meet the RAOs by removing from the Site all contaminated soils that pose unacceptable risks. Costs for each alternative are presented below that include the estimated capital and annual operation and maintenance (O&M) costs and the present worth of the combined capital and O&M costs based on a 30 year time period and 7% discount rate.

Alternative 1: No Action

Estimated Capital Cost: \$0

Estimated Five-year Review Cost: \$50,000

Estimated Present Worth Cost: \$125,000

Estimated Construction Timeframe: None

The No Action alternative provides a baseline for evaluation of the alternatives and is required for inclusion in the FS by the NCP. Under this alternative, no additional measures regarding Site contamination would be taken.

Alternative 2: Capping with Limited Excavation and Off-site Disposal

Estimated Capital Cost: \$6.1M Estimated Five-year Review Cost: \$280,000 Estimated Present Worth Cost: \$9.6M

Estimated Construction Timeframe: 2 to 3 years

The Capping alternative involves containment/isolation of contaminated soil through placement of a 1.5 foot thick soil cap covered with 0.5 feet of topsoil. Following cap construction, the area would be planted similar to surrounding areas.

Capping would not be feasible in portions of the Waste Channel and Railbed AOC due to wetlands, the need to maintain flow capacity of the existing drainage channel, and being in a floodplain. Therefore, in those areas excavation of the contaminated soils (and replacement with clean soil) and disposal at a permitted off-site facility was assumed.

Alternative 3a: Soil Stabilization with Limited Capping and Excavation Estimated Capital Cost: \$8.1M

Estimated Five-year Review Cost: \$320,000 Estimated Present Worth Cost: \$12.1M Estimated Construction Timeframe: 3 to 4 years

Soil stabilization involves injection and mixing of reagents in the contaminated soil to create a stable, cement-like matrix in which the contaminants are bound and become immobilized. The stabilized soil is then covered with 0.5 feet of topsoil and revegetated. Stabilization is not feasible where steep slopes are present in portions of the Former Keene Plant and Amphitheatre Quarry AOCs due to implementation difficulties. It is also not appropriate where there are numerous mature trees, such as in portions of the Waste Channel and Railbed and Historic Bridge AOCs, since much of the contaminated soil to be stabilized would come out with the stumps of the trees that must be removed prior to stabilization. Capping, however, would be feasible in these areas and is assumed there under this alternative instead of stabilization.

As with capping, stabilization is not feasible in portions of the Waste Channel and Railbed AOC due to wetlands and floodplain issues, and the need to maintain the flow capacity of the channel (the soil volume increases when the soil is stabilized). Therefore, excavation of the contaminated soils in the drainage channel, wetlands, and floodplain portions of this AOC (and off-site disposal at a permitted facility) is assumed instead of stabilization.

Alternative 3b: Soil Stabilization with Limited Excavation

Estimated Capital Cost: \$10.8M Estimated Five-year Review Cost: \$180,000 Estimated Present Worth Cost: \$13.1M Estimated Construction Timeframe: 3 to 4 years

As with Alternative 3a, this alternative relies on soil stabilization in most AOCs to bind and immobilize the contaminants. However, in all AOCs where stabilization is not feasible (as described under Alternative 3a above), excavation with off-site disposal is assumed rather than utilizing capping in selected areas as in Alternative 3a.

Alternative 4: Shallow Excavation with Off-site Disposal

Estimated Capital Cost: \$11.1M

Estimated Five-year Review Cost: \$40,000

Estimated Present Worth Cost: \$11.6M

Estimated Construction Timeframe: 3 to 4 years (depending on the availability of off-site facilities to receive the waste)

Shallow excavation with off-site disposal includes excavation of between 1.5 and 3 feet of soil that exceeds the clean-up standards. (Only the shallow soils pose unacceptable risks to visitors and residents.) Excavated soil would be transported and disposed of in an appropriately permitted landfill. Clean soil covered with topsoil would be used as backfill, and disturbed surfaces would be restored through seeding and replacement of shrubs and trees, replacement of pavement, etc.

The variability of the proposed depths of excavation under this alternative (i.e., 1.5 to 3 feet) is due to the differences in the depths of contamination between the AOCs as measured during the RI. In many areas, the proposed excavation depths are expected to remove all of the contaminated soil in



National Historical Park

those locations since the RI data indicate that contaminants are only present in the shallow soils there. For example, where contaminants were only detected in the top 6 inches, a 1.5 foot depth of excavation was assumed (an additional 12 inches of excavation depth was added to be conservative), which would result in the removal of all of the contaminated soil at that location. Similarly, in areas where contaminants were detected to a depth of 24 inches, a 3-foot depth of excavation was assumed to completely remove the contaminants.

In other locations contaminants were detected at depths much greater than 24 inches. For example, in the Amphitheater AOC asbestos was detected at depths up to 35 feet as a result of historical dumping of waste materials that were subsequently covered with clean soil. The RI demonstrated that the contamination at these depths does not pose a risk unless excavated, and is not leaching or migrating. Therefore, this alternative assumes that deep contamination will be left in place and institutional controls will be implemented to ensure the protection of Park maintenance and construction workers, visitors and residents if temporary construction- or utility-related excavations in these soils are required in the future.

The areas and depths of soils to be excavated under this alternative will be refined based on additional pre-design testing done prior to implementation of the remedy.

Alternative 5: Complete Excavation with Off-site Disposal

Estimated Capital Cost: \$350 M Estimated Five-year Review Cost: \$0

Estimated Present Worth Cost: \$355 M

Estimated Construction Timeframe: over 10 years (depending on the availability of off-site facilities to receive the waste)

Complete excavation with off-site disposal includes excavation of *all* contaminated soil and disposal at an appropriately permitted landfill. This alternative involves excavation in more areas of the park and in many places to much greater depths than in Alternative 4 (Shallow Excavation).

NINE EVALUATION CRITERIA FOR SUPERFUND REMEDIAL ALTERNATIVES

- 1. Overall Protection of Human Health and the Environment determines whether the alternative eliminates, reduces, or controls threats to human health and the environment.
- 2. Compliance with Applicable or Relevant and Appropriate Requirements (ARARs) evaluates whether the alternative meets Federal and State environmental statutes, regulations, and other requirements that pertain to the Site, or whether a waiver of such requirements is justified.
- 3. Long-Term Effectiveness and Performance considers the ability of the alternative to protect human health and the environment over time.
- 4. Reduction of Contaminant Toxicity, Mobility, or Volume through Treatment evaluates the alternative's effectiveness in the reduction of the harmful effects of principle contaminants, their ability to move in the environment, and the amount of contamination present.
- 5. Short-Term Effectiveness considers the length of time needed to implement the alternative and the risks the alternative poses to workers, residents, and the environment during implementation.
- 6. Implementability considers the technical and administrative feasibility of implementing the alternative, including factors such as the relative availability of goods and services.
- 7. Cost includes estimated capital and annual operations and maintenance costs, as well as present worth cost. Present worth cost is the total cost of an alternative over time in terms of today's dollar value. Cost estimates are expected to be accurate within a range of +50 to -30 percent.
- 8. State Acceptance considers whether the State agrees with NPS' analyses and recommendations, as described in the RI/FS and Proposed Plan.
- Community Acceptance considers whether the local community agrees with NPS' analyses and preferred alternative. Comments received on the Proposed Plan are an important indicator of community acceptance.

Evaluation of the Alternatives

Under CERCLA, nine criteria are used to evaluate the different remedial alternatives individually and against each other in order to select a remedial action. The nine criteria, summarized in the above box, are evaluated in this section. The first two criteria, Overall Protection of Human Health and the Environment and Compliance with ARARs, are considered "threshold criteria." An alternative must meet these requirements in order to be eligible for selection as the Preferred Alternative. The last two criteria, state and community acceptance, are considered following state and community comments on the FS and Proposed Plan. The detailed evaluation of the remedial alternatives considered for the Site using the nine criteria can be found in the FS Report. The results of this evaluation are summarized in Table 1. The complete excavation alternative (Alternative 5) was not included in the final analysis shown on Table 1 due to its cost (relative to the other alternatives), its implementation problems, and its significant short-term impacts to park operations and the environment. As shown on Table 1, the No Action Alternative (Alternative 1) does not meet the threshold criteria; therefore, it is not eligible for selection as the Preferred Alternative.

A brief summary comparing the first seven criteria to the three viable options, capping (Alternative 2), in-situ stabilization (Alternatives 3a & 3b), and shallow excavation (Alternative 4), is provided on page 10 in this Proposed Plan.



National Historical Park

Threshold and Balancing Criteria	No Action (Alternative1)	Capping (Alternative 2)	Stabilization (Alternatives 3a & 3b)	Shallow Excavation and Off-site Disposal (Alternative 4) ¹
Protects Human Health and Environment	×	~~	~~	~~
Meets Federal and State Requirements	×	~~	~~	VV
Provides Long-term Protection	×	~	~	VV
Reduces Mobility, Toxicity and Volume through Treatment	×	~	~	~
Provides Short-term Protection	×	~~	VV	VV
Implementability	VV	~~	V	VV
Cost (present worth in millions)	\$ 0.1	\$ 9.6	\$ 12.1 - 13.1	\$ 11.6
Time to Reach Cleanup Goal	Unknown	2-3 Years	3-4 Years	3-4 Years
Would Include Site Use Restrictions	Yes	Limited ²	Limited ²	Limited ²

Table 1: Comparison of Cleanup Alternatives

Key: X Does not meet criterion 🗸 Partially meets criterion 🗸 Meets or exceeds criterion

1 NPS's preferred alternative

2 Although there will be no site use restrictions for Park visitors under these alternatives, waste will be left in place in the subsurface, therefore institutional controls will be required to ensure protection of health of Park maintenance and construction workers when working on subsurface projects in the future.

1. Overall Protection of Human Health and the Environment

Alternatives 2, 3a & 3b, and 4 would all provide a high degree of overall protectiveness of human health and the environment.

2. Compliance with ARARs

Alternatives 2, 3a & 3b, and 4 are all expected to meet all identified ARARs.

3. Long-term Effectiveness and Permanence

Capping and Soil Stabilization rely on maintenance and institutional controls to ensure long-term integrity and effectiveness of the remedy, while shallow excavation does not. Additionally, shallow excavation with off-site disposal permanently removes hazardous substances from the Site. Consequently, Alternative 4 (Shallow Excavation) is ranked higher than the other alternatives under this criterion.

4. Reduction of Toxicity, Mobility, or Volume Through Treatment

Shallow Excavation with Off-Site Disposal (Alternative 4) would remove the contaminants in the top several feet of the remediation areas, thereby achieving reduction of volume of the waste. Capping (Alternative 2) would indirectly reduce toxicity by eliminating the exposure pathway. Soil Stabilization (Alternatives 3a & 3b) immobilizes the contaminants (making them less bioavailable), thereby reducing the toxicity of the contaminants. Since each alternative satisfies this criterion in different ways, they are ranked equally.

5. Short-term Effectiveness

Short term impacts associated with either Capping, In-situ Stabilization, or Shallow Excavation could be readily controlled and/or restored in a reasonable period of time. Therefore, the alternatives are ranked equally under this criterion.

6. Implementability

There are no implementability issues associated with Shallow Excavation or Capping. Soil Stabilization requires some specialized mixing equipment and will require bench/pilot testing to determine the effectiveness of stabilization, the best additives, and the optimum doses. Therefore, stabilization is ranked lower than the other alternatives under this criterion.

7. Cost

Capping has the lowest cost (of which about 35% is associated with long term O&M), shallow excavation is in the middle (with most of its cost (96%) being capital costs for construction), and stabilization has the highest cost (with the O&M portion ranging from 33% for Alternative 3a to 17% for Alternative 3b). However, within the limits of the accuracy of FS-level cost estimating (+50%/-30% per the EPA FS Guidance) these three alternatives are all relatively similar in cost (see Figure 3).

8. State Agency Acceptance

The Site is located in the Commonwealth of Pennsylvania and the Commonwealth's concurrence will be sought.

9. Community Acceptance

Community acceptance of the preferred alternative will be evaluated after the public comment period ends and will be described in the Record of Decision (ROD) for the Site.

SUMMARY OF THE Preferred Alternative

The Preferred Alternative for cleaning up the Site is the Shallow Excavation and Off-Site Disposal of all contaminated soils that pose unacceptable risks (Alternative 4). This alternative was selected over the other alternatives because it is expected to maximize long-term protectiveness of human health and the environment, complies with all ARARs, provides an acceptable degree of shortterm effectiveness, reduces the volume of hazardous substances present at the Site, is fully implementable, and can be implemented in a costeffective manner. In addition, it is the alternative most consistent with the management and goals of a national park. It will enable the Site to be fully utilized for all appropriate park purposes, does not require on-site treatment, and limits the continued. permanent presence of hazardous substances on NPS-managed lands.

Based on the information currently available, NPS believes the Preferred Alternative meets the threshold criteria, provides the best balance of tradeoffs among the alternatives with respect to the other evaluation criteria, and satisfies the statutory requirements of CERCLA.



National Historical Park



COMMUNITY PARTICIPATION

NPS encourages your participation and will consider public comments received during the public comment period before final selection of the remedial action for the Site. Substantive comments received during the public comment period will be addressed in a Responsiveness Summary, which will be made available with the Record of Decision (ROD). The ROD documents the final selection of the Site remedial action.

Anyone interested in learning more about the Proposed Plan for the Site is encouraged to review the Site Administrative Record, which contains detailed information that forms the basis for the selection of the Site remedial action. The Administrative Record is available for public review at the locations identified on the inside cover of the Proposed Plan.

Oral and written comments will be accepted at the upcoming public meeting. Additional written comments should be addressed to NPS by mail or fax no later than October 23, 2006. Comments also may be submitted electronically by visiting *http://parkplanning.nps.gov/* and selecting "Valley Forge National Historical Park" from the drop-down menu. For further information about this Proposed Plan or the Site, or to submit written comments, please contact:

Barbara Pollarine Deputy Superintendent Valley Forge NHP 1400 North Outer Line Drive King of Prussia, PA 19406-1009 (610) 783-1032 (phone) (610) 783-1038 (fax)

Or

Shawn P. Mulligan National Park Service 1050 Walnut St., Suite 220 Boulder, CO 80302 (303) 415-9014 (phone) (303) 417-1343 (fax) Our practice is to make comments, including names, home addresses, home phone numbers, and email addresses of respondents available for public review. Individual respondents may request that we withhold their names and/or home addresses, etc., but if you wish us to consider withholding this information you must state this prominently at the beginning of your comments. In addition, you must present a rationale for withholding this information. This rationale must demonstrate that disclosure would constitute a clearly unwarranted invasion of privacy. Unsupported assertions will not meet this burden. In the absence of exceptional, documentable circumstances, this information will be released. We will always make submissions from organizations or businesses, and from individuals identifying themselves as representatives of or officials of organizations or businesses, available for public inspection in their entirety.



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