
FENCELINE PERIMETER AIR MONITORING PLAN

for

MIPC CHELSEA FACILITY 920 Cherry Tree Road Aston Township, Delaware County, PA

Prepared For:

**MIPC, LLC
920 Cherry Tree Road
Aston, PA 19014**

Prepared By:

**Langan Engineering and Environmental Services, LLC
1818 Market Street, Suite 3300
Philadelphia, PA 19103**



**Jeffrey A. Smith, P.G.
PA Professional Geologist / Senior Associate**



**Robert S. Johnston, PE
Professional Engineer License No. [PE072082]**

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220240201**

LANGAN

TABLE OF CONTENTS

1.0	INTRODUCTION	1
1.1	SITE LOCATION AND DESCRIPTION	1
2.0	PAMP OBJECTIVE AND SUMMARY OF WORK	2
3.0	PAMP PROGRAM DESIGN	2
3.1	MONITORING LOCATIONS	2
3.2	WEATHER CONDITIONS	3
3.3	MONITORING METHODS AND TECHNOLOGIES	3
3.4	LABORATORY SAMPLE ANALYSIS	5
3.5	DATA VALIDATION AND INTERPRETATION	5
3.6	SCREENING LEVELS	5
4.0	PAMP DOCUMENTATION AND REPORTING	5
5.0	REFERENCES	6

FIGURES

- Figure 1** Site Location Map
Figure 2 Fenceline Air Monitoring Locations Map

ATTACHMENTS

- Attachment 1** NuTech 2703 Automatic Air Sampling Device Brochure
Attachment 2 PADEP Indoor Air Statewide Health Standard Vapor Intrusion Screening Values

1.0 INTRODUCTION

Langan Engineering and Environmental Services, LLC (Langan) has prepared this Fenceline Perimeter Air Monitoring Sampling Plan (PAMP) on behalf of MIPC, LLC (MIPC) for the MIPC Chelsea Facility (Site) located at 920 Cherry Tree Road in Aston Township, Delaware County, Pennsylvania (Figure 1). The primary purpose of this PAMP is to document the fenceline perimeter air monitoring plan including sample locations, duration, analytical parameters, quality assurance/quality control (QA/QC) procedures, and screening criteria for the Pennsylvania Department of Environmental Protection (PADEP) review and approval, pursuant to the Order dated December 23, 2025 from PADEP to MIPC, LLC, as part of Interim Remedial Measures (IRM) necessary to respond to the gasoline release documented in the Order.

This PAMP has been developed to incorporate project organization, functional activities, analytical protocols, and QA/QC measures intended to achieve the project objectives for air monitoring activities. This PAMP will be provided for reference in the field and by the laboratory and will be updated to incorporate significant changes in sampling procedures, project organization, and data review requirements, as appropriate.

1.1 Site Location and Description

The MIPC Chelsea Facility is located on 920 Cherry Tree Road in Aston Township of Delaware County and encompasses approximately 160 acres. The site primarily consists of 12 aboveground storage tanks. The only occupied structures onsite are three small office spaces located in the southwest corner of the site. There's also one small warehouse for storage.

According to the Aston Township and Upper Chichester Zoning Maps, the site is situated within an industrial district. The site is bound to the north by Concord Road followed by residential and industrial properties and to the east by Cherry Tree Road followed by residential properties. The site is bound both to the south and to the west by residential properties.

2.0 PAMP OBJECTIVE AND SUMMARY OF WORK

The principal purpose of the PAMP is to establish a written plan for the volatile organic compounds (VOC) monitoring program that began on December 30, 2025 (midnight-to-midnight, daily), pursuant to the Order. The objectives of the PAMP include:

- Outline fenceline ambient air sampling locations and sample collection procedures;
- Establish project screening values for perimeter VOC levels;
- Summarize the protocols to be followed if VOC levels begin to approach or exceed the project screening levels; and
- Establish recordkeeping, data review, and reporting procedures.

3.0 PAMP PROGRAM DESIGN

The intent of the perimeter air monitoring locations is to capture release-area specific VOC levels along the westerly site fence line to assess potential sensitive receptors and to establish baseline conditions.

3.1 Monitoring Locations

According to the regional primary source for meteorological data at KPHL Philadelphia International Airport weather station, the prevailing wind direction in the winter season in Delaware County is consistently out of the west/northwest (260° to 310°), to the east/southeast. A review of the wind data from December 30th, 2025 through January 7th, 2026, confirmed a typical west/northwest prevailing wind direction, with a period of sustained winds (Average 13.6 mph, Max/Gust of 20/26 mph) on January 1st, 2026 followed by a period of relative calm.

Four (4) fixed ambient air monitoring locations (AA-1 through AA-4) have been established along the fence line bordering adjoining residential properties as depicted on Figure 2. The monitoring locations have been selected to monitor for the presence and concentrations of VOCs originating from the release area and moving off site. Locations AA-1 and AA-2 are upwind of the release area; location AA-3 is within the release area and potentially downwind of Tank 708 and its dike

containment area; and location AA-4 is also downwind of the release area.

The placements of the air monitoring stations are representative of the upwind, event, and downwind locations. Langan's PAMP includes local monitoring from a dedicated, on-site weather monitoring station, as well as a nearby local, publicly available weather monitoring station in Aston, PA.

Sample set-ups at locations AA-1, AA-3, and AA-4 have been and will be secured to the interior of the Site's perimeter fence line with bike locks and bungee cords. Sample set-ups at location AA-2 have been placed on a tripod approximately 20 feet from the fence line in the northwest corner of the Facility. The approximate ambient air intake heights of the sample set-ups are as followed:

- AA-1: 52 inches above ground surface (in. ags)
- AA-2: 52 in. ags
- AA-3: 53 in. ags
- AA-4: 36 in. ags of neighboring offsite property, 60 in. ags of Site property

3.2 Weather Conditions

One (1) Davis Vantage Pro 2 Weather Station is set up at the Site to monitor local weather conditions. Weather conditions are documented, at least once per day, from the on-Site weather station.

Full-day, continuous weather conditions (wind speed and direction, temperature, precipitation accumulation, humidity, atmospheric pressure, cloud coverage) are documented using a public weather station near the Site in Aston, PA, Station ID: KPAASTON20, accessed via the Weather Underground website. The station is approximately 0.75 miles northeast of the Site.

3.3 Monitoring Methods and Technologies

Beginning December 30, 2025, continuous fenceline air monitoring data has been collected daily from midnight to midnight, pursuant to the Order. Air monitoring will continue to be conducted with six-liter, stainless-steel Summa canisters equipped with NuTech 2703 Automatic Air

Sampling Devices (Attachment 1). Additionally, “gooseneck” attachments are added to the top of the NuTech 2703 devices to prevent precipitation from entering the Summa canister. The sample set-ups (i.e., Summa canister and NuTech 2703 device) are placed at four fixed locations (AA-1 through AA-4) along the fence-line on the northern section of the Site near the release location (Figure 2).

The NuTech 2703 devices are programmed to collect ambient air for 24-hours at each fixed location, starting at midnight of the sample date and closing at midnight of the following day. During programming, the devices conduct a leak check to confirm the device was properly attached to the Summa canister. Additionally, Summa canisters with initial vacuum pressure readings of less than -28 inches of mercury (in. Hg) during programming are not used for daily sampling and returned to the laboratory. Leak check measurements, initial Summa canister vacuum pressure readings, and programmed sample collection information are documented from the NuTech 2703 mobile phone application.

One sample set-up is deployed at each of the four fixed locations daily, approximately mid-day, prior to the programmed midnight start time. After deploying a new sample set-up, the completed sample set-up from the prior day is removed from the fixed location. Completed Summa canisters are prepared for laboratory analysis.

After each 24-hour sample is completed, flow rate and Summa canister vacuum pressure data in five-minute increments over the 24-hour sampling period are downloaded from each NuTech 2703 device. Then, the device and “gooseneck” attachment are removed from the Summa canister and decontaminated before being attached to a new Summa canister for the next 24-hour sample. Silicone tubing attached to the top of the “gooseneck” fitting is used to flush high-purity nitrogen gas through the NuTech 2703 device for approximately 15 minutes to decontaminate the internal piping.

Laboratory-provided flow controllers calibrated with a 24-hour flow rate are on standby and utilized in instances where unforeseeable issues arise preventing the NuTech 2703 devices from

being used. The laboratory-provided flow controllers are manually opened and closed at approximately midnight of the 24-hour sample period.

3.4 Laboratory Sample Analysis

Air samples are analyzed by the Pace Analytical Mansfield, MA Air Lab using EPA Methods TO-15 Selective Ion Monitoring (SIM) and TO-15 Low-Level (LL) for speciated volatile organic compounds, including BTEX, pursuant to the Order. Methods TO-15 SIM and TO-15 LL enable the laboratory to achieve lowered reporting limits below selected screening levels as described in Section 3.6.

3.5 Data Validation and Interpretation

Langan will perform data validation as needed on select sample analyses based on laboratory case narrative notes and professional judgment.

3.6 Screening Levels

Perimeter air monitoring data has been and will continue to be screened against the Non-Residential Indoor Air Statewide Health Standard Vapor Intrusion (VI) Screening Values under the PADEP VI Program. Table 5 (Indoor Air Statewide Health Standard Vapor Intrusion Screening Values) of the PADEP VI Screening Value Tables, Version 2.1 (October 2022), is presented in Attachment 2.

4.0 PAMP DOCUMENTATION AND REPORTING

Perimeter air monitoring is performed daily (midnight-to-midnight) to establish baseline concentrations of VOCs near the release area at the Site. Perimeter air monitoring data has been and will continue to be reported weekly to PADEP in the weekly summary progress reports for the Site, pursuant to the Order. Data related to air monitoring includes a figure of perimeter air monitoring locations, a table of daily perimeter air monitoring analytical data screened against the applicable PADEP screening value, ambient air sampling field summary sheets, daily weather

data, laboratory report packages in PDF format, and a brief narrative summary of perimeter air monitoring activities for that week.

If two consecutive days indicate exceedances of the Non-Residential Indoor Air Statewide Health Standard VI Screening Value for a PADEP-defined gasoline VOC, LNAPL recovery operations will be terminated, and an evaluation of engineering controls will be conducted prior to proceeding with operations.

Perimeter air sampling frequency will remain constant until a request is submitted to and approved by PADEP to decrease or modify the sampling frequency or approach, pursuant to the Order.

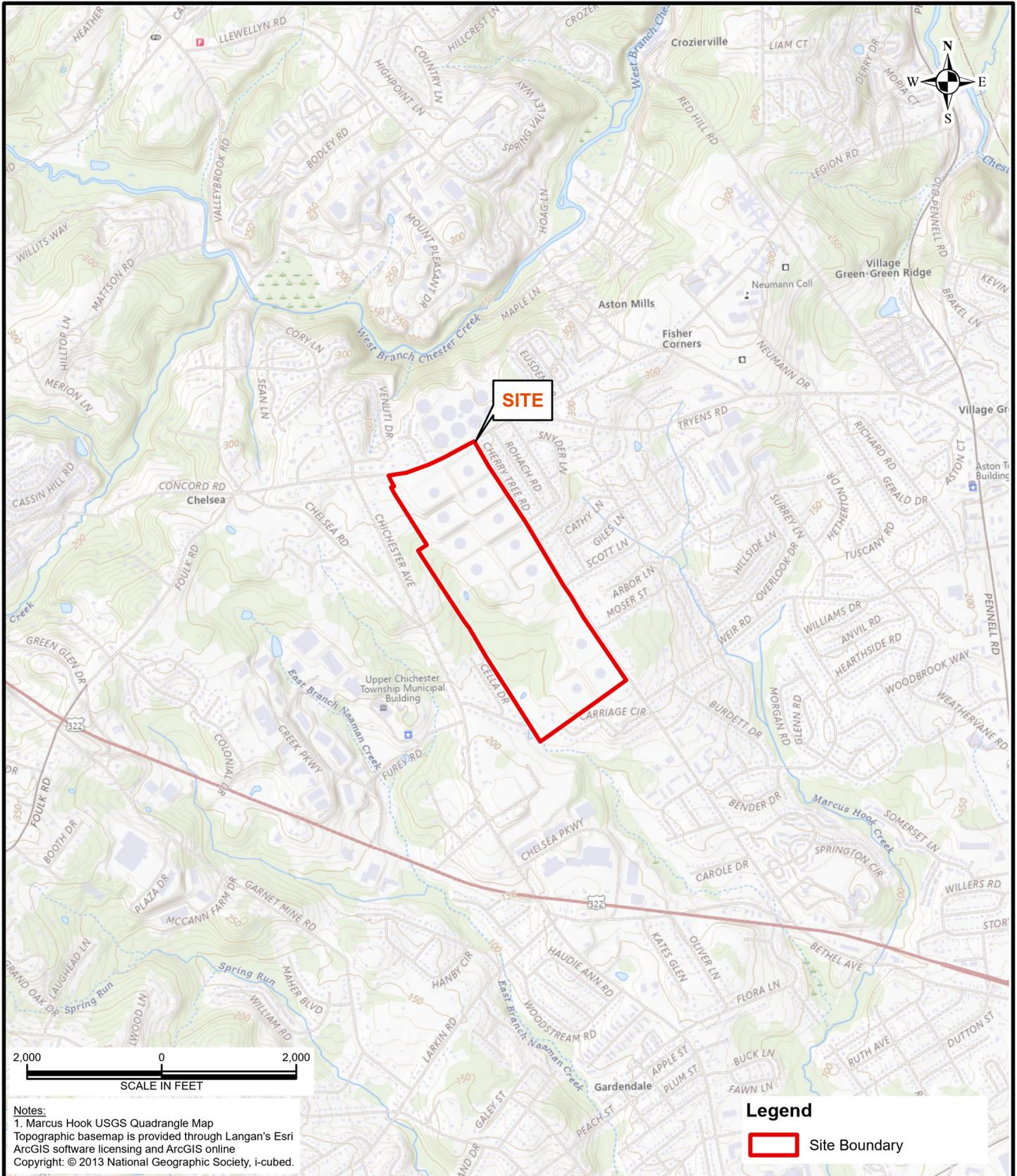
The ambient air sampling locations, sampling program duration, and frequency of sampling will be reassessed based on evaluation of data, site LNAPL recovery activities, and long-term monitoring needs.

5.0 REFERENCES

PADEP. March 27, 2021. Land Recycling Program Technical Guidance Manual Section IV: Vapor Intrusion (Document Number 261-0330-101). Revised October 13, 2022.

PADEP. May 2022. Sampling Collection, Receipt, and Handling (Document Number 150-4200-002).

FIGURES



Notes:
 1. Marcus Hook USGS Quadrangle Map
 Topographic basemap is provided through Langan's Esri
 ArcGIS software licensing and ArcGIS online
 Copyright: © 2013 National Geographic Society, i-cubed.

Legend

Site Boundary

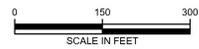
 Langan Engineering and Environmental Services, LLC 1818 Market Street, Suite 3300 Philadelphia, PA 19103-3638 T: 215.845.8946 F: 215.845.8901 www.langan.com	Project MIPC CHELSEA FACILITY 920 CHERRY TREE ROAD ASTON TOWNSHIP COUNTY STATE	Drawing Title SITE LOCATION MAP	Project No. 220240201 Date 12/12/2025 Scale 1"=2,000' Drawn By CH	Figure 1
	© 2025 Langan			



Legend

- Air Monitoring Station Location
- Approximate Soil Boring Location (Envirosure, Nov. 2025)
- + Approximate Monitoring Well Location (Envirosure, Nov-Dec 2025)
- + Approximate Private Potable Well Location Sampled by Langan in December 2025
- ▬ Site Boundary
- Structure
- Lake/Pond
- Stream

- Notes:**
1. All site feature locations are approximate.
 2. Imagery provided through Langan's subscription to Nearmap.com. Flown 10/9/2025
 3. Basemap overlay is "Figure 1 Site Drainage Plan" drafted by Weston Solutions.
 4. Parcel boundaries are provided by the Delaware County Office of Data and Mapping Innovation (ODMI).
 5. Monitoring well and soil boring locations are provided by Envirosure.
 6. Streams and waterbodies are provided by the National Hydrography Dataset (NHD).
 7. Structure outlines provided by the Federal Emergency Management Agency (FEMA) Geospatial Response Office and Oak Ridge National Laboratory (ORNL).



LANGAN
Langan Engineering and Environmental Services, LLC

1818 Market Street, Suite 3300
Philadelphia, PA 19103-3638
T: 215.845.8946 F: 215.845.8901 www.langan.com

Project

MIPC CHELSEA FACILITY

920 CHERRY TREE ROAD
ASTON TOWNSHIP

DELAWARE COUNTY PENNSYLVANIA

Drawing Title

**PERIMETER
AIR MONITORING
PROGRAM MAP**

Project No.	000000000	Figure	2
Date	12/31/2025		
Scale	1"=150'		
Drawn By	SH		

ATTACHMENTS

ATTACHMENT 1

NuTech 2703 Automatic Air Sampling Device Brochure

2703 Automatic Air Sampling Device



The 2703 is an ideal product for automated air sampling. It is useful for standard environmental testing, scientific research, and 3rd party monitoring. Features include: an integrated timer, flow control, pressure reading, leak checking, auto QA/QC, a smartphone app with access to full system control.

Features

1. Full Automation & Ease of Operation

- ① The 2703 is the latest generation controller, which includes integrated flow control, timing, and pressure reading functions.
- ② The 2703 can be controlled by the on-board PLC, as well as by PC and smartphone. The sampling parameter settings are intuitive and user friendly.
- ③ The wireless control of automated start and stop times reduces time in the field and labor costs.

Flow control

Timing

Pressure reading



2. Great Battery Performance



The 2703 features a high-capacity (8700mAh) Li-Ion rechargeable battery and has low power requirements, allowing it to last up to 7 days without recharging.

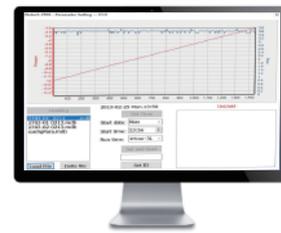
3.Strong Adaptability

- ① The 2703 has a durable plastic protective cover, and is both water proof and dust proof. It has the option of being upgraded to a stainless steel cover. It is also equipped with a filter kit, allowing for operations in all but extreme weather conditions.
- ② The unit's modular design allows it to be combined with various sampling media, including cartridges, Summa canisters, and Tedlar® bags.



4.High Precision & Minimal Limitations

- ① The 2703's precise flow control uses built-in high precision pressure and flow sensors. The unit avoids the blockage problems and limitations associated with current mechanical air samplers.
- ② Silanized paths minimize the carryover and contamination.



5.Quality Control

With automatic leak detection, the 2703 possesses real-time recording and a visual display of the sampling pressure and flow data. The real-time data and historical data can be queried.

ATTACHMENT 2

PADEP Indoor Air Statewide Health Standard Vapor
Intrusion Screening Values

Table 5. Indoor air Statewide health standard vapor intrusion screening values (SV_{IA})

Pennsylvania Department of Environmental Protection

Source: Land Recycling Program Technical Guidance Manual for Vapor Intrusion into Buildings from Groundwater and Soil under Act 2 (Document Number 261-0300-101) September 29, 2022

Regulated Substance	CAS No.	Residential SV _{IA} (µg/m ³)	Nonresidential SV _{IA} (µg/m ³)
ACETALDEHYDE	75-07-0	9.4	39
ACETONE	67-64-1	32,000	140,000
ACETONITRILE	75-05-8	63	260
ACROLEIN	107-02-8	0.021	0.088
ACRYLAMIDE	79-06-1	0.096	1.2
ACRYLIC ACID	79-10-7	1.0	4.4
ACRYLONITRILE	107-13-1	0.36	1.8
ALLYL ALCOHOL	107-18-6	0.10	0.44
AMMONIA	7664-41-7	520	2,200
ANILINE	62-53-3	1.0	4.4
BENZENE	71-43-2	3.1	16
BENZYL CHLORIDE	100-44-7	0.50	2.5
BETA PROPIOLACTONE	57-57-8	0.0061	0.031
BIPHENYL, 1,1-	92-52-4	0.42	1.8
BIS(2-CHLOROETHYL)ETHER	111-44-4	0.074	0.37
BIS(2-CHLORO-ISOPROPYL)ETHER	108-60-1	2.4	12
BIS(CHLOROMETHYL)ETHER	542-88-1	0.00039	0.0020
BROMOBENZENE	108-86-1	63	260
BROMOCHLOROMETHANE	74-97-5	42	180
BROMODICHLOROMETHANE	75-27-4	0.66	3.3
BROMOMETHANE	74-83-9	5.2	22
BUTADIENE, 1,3-	106-99-0	0.81	4.1
CARBON DISULFIDE	75-15-0	730	3,100
CARBON TETRACHLORIDE	56-23-5	4.1	20
CHLORO-1,1-DIFLUOROETHANE, 1-	75-68-3	52,000	220,000
CHLORO-1-PROPENE, 3- (ALLYL CHLORIDE)	107-05-1	1.0	4.4
CHLOROBENZENE	108-90-7	52	220
CHLORODIFLUOROMETHANE	75-45-6	52,000	220,000
CHLOROETHANE	75-00-3	10,000	44,000
CHLOROFORM	67-66-3	1.1	5.3
CHLORONITROBENZENE, P-	100-00-5	2.1	8.8
CHLOROPRENE	126-99-8	0.081	0.41
CHLOROPROPANE, 2-	75-29-6	100	440
CRESOL(S)	1319-77-3	630	2,600
CUMENE (ISOPROPYL BENZENE)	98-82-8	420	1,800
CYCLOHEXANE	110-82-7	6,300	26,000
CYCLOHEXANONE	108-94-1	730	3,100
DIBROMO-3-CHLOROPROPANE, 1,2-	96-12-8	0.0016	0.020
DIBROMOETHANE, 1,2- (ETHYLENE DIBROMIDE)	106-93-4	0.041	0.20
DIBROMOMETHANE	74-95-3	4.2	18
DICHLORO-2-BUTENE, 1,4-	764-41-0	0.0058	0.029
DICHLORO-2-BUTENE, TRANS-1,4-	110-57-6	0.0058	0.029
DICHLOROBENZENE, 1,2-	95-50-1	210	880
DICHLOROBENZENE, P-	106-46-7	2.2	11
DICHLORODIFLUOROMETHANE (FREON 12)	75-71-8	100	440
DICHLOROETHANE, 1,1-	75-34-3	15	77
DICHLOROETHANE, 1,2-	107-06-2	0.94	4.7
DICHLOROETHYLENE, 1,1-	75-35-4	210	880
DICHLOROMETHANE (METHYLENE CHLORIDE)	75-09-2	630	2,600
DICHLOROPROPANE, 1,2-	78-87-5	0.0066	0.033
DICHLOROPROPENE, 1,3-	542-75-6	6.1	31
DICYCLOPENTADIENE	77-73-6	0.31	1.3

Table 5. Indoor air Statewide health standard screening values

Regulated Substance	CAS No.	Residential SV _{IA} (µg/m ³)	Nonresidential SV _{IA} (µg/m ³)
DIOXANE, 1,4-	123-91-1	4.9	25
DIPHENYLHYDRAZINE, 1,2-	122-66-7	0.11	0.56
EPICHLOROHYDRIN	106-89-8	1.0	4.4
ETHOXYETHANOL, 2- (EGEE)	110-80-5	210	880
ETHYL ACETATE	141-78-6	73	310
ETHYL ACRYLATE	140-88-5	8.3	35
ETHYL BENZENE	100-41-4	9.7	49
ETHYL METHACRYLATE	97-63-2	310	1,300
ETHYLENE GLYCOL	107-21-1	420	1,800
FLUOROTRICHLOROMETHANE (FREON 11)	75-69-4	730	3,100
FORMALDEHYDE	50-00-0	1.9	9.4
FORMIC ACID	64-18-6	0.31	1.3
FURFURAL	98-01-1	52	220
HEXACHLOROETHANE	67-72-1	2.4	12
HEXANE	110-54-3	730	3,100
HYDRAZINE/HYDRAZINE SULFATE	302-01-2	0.0050	0.025
MERCURY	7439-97-6	0.31	1.3
METHACRYLONITRILE	126-98-7	31	130
METHANOL	67-56-1	21,000	88,000
METHOXYETHANOL, 2-	109-86-4	21	88
METHYL ACRYLATE	96-33-3	21	88
METHYL CHLORIDE	74-87-3	14	68
METHYL ETHYL KETONE	78-93-3	5,200	22,000
METHYL HYDRAZINE	60-34-4	0.021	0.088
METHYL ISOBUTYL KETONE	108-10-1	3,100	13,000
METHYL ISOCYANATE	624-83-9	1.0	4.4
METHYL METHACRYLATE	80-62-6	730	3,100
METHYL N-BUTYL KETONE (2-HEXANONE)	591-78-6	31	130
METHYL STYRENE (MIXED ISOMERS)	25013-15-4	42	180
METHYL TERT-BUTYL ETHER (MTBE)	1634-04-4	94	470
METHYLNAPHTHALENE, 2-	91-57-6	3.1	13
NAPHTHALENE	91-20-3	0.72	3.6
NITROANILINE, O-	88-74-4	0.052	0.22
NITROBENZENE	98-95-3	0.61	3.1
NITROPROPANE, 2-	79-46-9	0.0090	0.045
NITROSODIETHYLAMINE, N-	55-18-5	0.00022	0.0029
NITROSODIMETHYLAMINE, N-	62-75-9	0.00069	0.0088
NITROSO-DI-N-BUTYLAMINE, N-	924-16-3	0.015	0.077
PCB-1221 (AROCLOR)	11104-28-2	0.24	1.2
PCB-1232 (AROCLOR)	11141-16-5	0.24	1.2
PHENOL	108-95-2	210	880
PHTHALIC ANHYDRIDE	85-44-9	21	88
PROPANOL, 2- (ISOPROPYL ALCOHOL)	67-63-0	210	880
PROPYLBENZENE, N-	103-65-1	1,000	4,400
PROPYLENE OXIDE	75-56-9	6.6	33
STYRENE	100-42-5	1,000	4,400
TETRACHLOROETHANE, 1,1,1,2-	630-20-6	3.3	17
TETRACHLOROETHANE, 1,1,2,2-	79-34-5	0.42	2.1
TETRACHLOROETHYLENE (PCE)	127-18-4	42	180
TETRAHYDROFURAN	109-99-9	13	63
TOLUENE	108-88-3	5,200	22,000
TRIBROMOMETHANE (BROMOFORM)	75-25-2	22	110
TRICHLORO-1,2,2-TRIFLUOROETHANE, 1,1,2-	76-13-1	5,200	22,000
TRICHLOROBENZENE, 1,2,4-	120-82-1	2.1	8.8
TRICHLOROBENZENE, 1,3,5-	108-70-3	2.1	8.8
TRICHLOROETHANE, 1,1,1-	71-55-6	5,200	22,000
TRICHLOROETHANE, 1,1,2-	79-00-5	0.21	0.88
TRICHLOROETHYLENE (TCE)	79-01-6	2.1	8.8

Table 5. Indoor air Statewide health standard screening values

Regulated Substance	CAS No.	Residential SV_{IA} (µg/m³)	Nonresidential SV_{IA} (µg/m³)
TRICHLOROPROPANE, 1,2,3-	96-18-4	0.31	1.3
TRICHLOROPROPENE, 1,2,3-	96-19-5	0.31	1.3
TRIETHYLAMINE	121-44-8	7.3	31
TRIMETHYLBENZENE, 1,3,4- (TRIMETHYLBENZENE, 1,2,4-)	95-63-6	63	260
TRIMETHYLBENZENE, 1,3,5-	108-67-8	63	260
VINYL ACETATE	108-05-4	210	880
VINYL BROMIDE (BROMOETHENE)	593-60-2	0.76	3.8
VINYL CHLORIDE	75-01-4	0.81	14
XYLENES (TOTAL)	1330-20-7	100	440