



Summary of Events

On August 18, 2025, at approximately 3:30 PM, an MIPC Operator reported an odor to MIPC leadership following their daily rounds of the Chelsea Tank Farm. The source of the odor was determined to be a light hydrocarbon product, believed to be gasoline, coming out of a previously unknown open-ended concrete pipe in the ground near the southwest corner of Tank 709.

Emergency Response

MIPC personnel immediately implemented measures to contain any impacts to the Chelsea Tank Farm and mitigate any potential risks to the surrounding community, including

- activating the Emergency Operations Center (EOC),
- placing soft booms at the end of the concrete pipe and within the drainage swale leading away from the pipe,
- 24/7 vacuum truck operations to collect any water and hydrocarbon discharge for processing at the Monroe Energy refinery's wastewater treatment plant,
- excavation and disposal of impacted soils,
- inspection and ongoing monitoring the Chelsea outfalls and Chester Creek for any releases - no releases were detected,
- fence line air monitoring for various LEL and VOC levels (all within accepted ranges),
- fence line noise monitoring,
- began neighbor outreach to property owners living close to the concrete pipe, and
- making all required agency/official notifications.

Initial Investigation

Concurrently, with the initial containment steps, MIPC initiated an investigation as to identify the source of the hydrocarbons, that is, efforts to determine if the source was offsite and migrating onto MIPC property, historical contamination from prior owners that suddenly became obvious as a result of changing groundwater flow/distribution, or a recent discharge from MIPC-operated and maintained equipment. Most of the following actions were taken between August 18 – 22, 2025, but some longer-term testing and the cause analysis continued through September 8, 2025:

- Multiple excavations next to and upstream of the concrete pipe,
- Multiple excavations within Tank 709 dike – one as deep as 15 feet and there were **no impacted soils detected**,
- A detailed PADEP file review for information on the previously unknown concrete pipe, results of historic file review completed by a third-party engineering company the week of October 20, 2025, **did not show the presence of historical releases in the vicinity of Tanks 708 and 709**
- Past site investigations did not reveal impacted groundwater in these tank dikes
- The concrete pipe was hydro-washed and a pipeline crawler camera was inserted for inspection of approximately 150 feet into the concrete pipe - identifying the origination point of a concrete spring

house inside of Tank 709 dike. It is believed that the concrete pipe was constructed to convey groundwater emanating from the spring house that was present prior to the installation of Tank 709 and the associated containment dike

- Tank 709 feed/discharge line – Static hold for service test and pressure held – **ALL Clear**
- Tank 702 – 5 potholes dug – **ALL Clear**
- Tank 702 – FLIR camera utilized, checking for fugitive emissions - **ALL Clear**
- Gas Testing performed on underground test stations at the following tank dikes: 702, 709 and 708 – **ALL Clear**
- Tank 708 – Potholes were dug in the location where a previous repair and inspection occurred in 2024/25 – **ALL Clear**
- Gas Testing performed and visual checks on multiple tank field valves: 702, 703, 704 and 711 – **ALL Clear**
- Attempted excavation of 1950’s concrete drainage sump along roadway – box no longer exists – **ALL Clear**
- Fire Water line – Isolated and drained fire water system and flow rate did not change at the concrete pipe – **leak from fire water system ruled out**
- Multiple reviews of Chelsea’s tank levels were performed with **no indication of out-of-balance**
- Multiple tank level reviews were performed between the three Conventional Blendstock for Oxygenate Blending (CBOB) gasoline tanks (701, 702, 708), which are connected by a shared pipeline system, with **no indication that the system was out-of-balance**
- Multiple reviews of Chelsea tank water levels with **no evidence of compromise**
- Inspected similar concrete pipe at Tank 710 dike noting consistent water flow and **no visible hydrocarbon impacts**
- Performed in-field groundwater table measurements
- Performed causal analysis over multiple weeks

Investigation, Remediation and Mitigation

Following these response actions, MIPC began longer term investigations and mitigation of the hydrocarbon impacted groundwater to identify the source and delineate the extent of subsurface impact:

- Multiple samples of hydrocarbon were sent to a forensic laboratory for “fingerprint analysis” to determine the age of the product. Analysis confirmed the hydrocarbon to be unleaded gasoline, but dating and source information were inconclusive.
- A Temporary Water Treatment Unit was designed and MIPC requested a Temporary Discharge Authorization from PADEP on September 4, 2025. PADEP issued the authorization on September 9, 2025 and the system was commissioned on September 11, 2025. Treated effluent discharge commenced on September 13, 2025.
 - Water samples are collected and analyzed per permit requirements and reports submitted to PADEP monthly
- Tank 709, week of October 20, 2025:
 - Tank line isolated and DOT hydro-test performed – Pressure held – **NO leaks**
 - Tank line excavated inside of tank dike for observation and inspection during hydro- test; Ultrasonic Tests were performed and piping is at full thickness (0.688”) – **NO leaks**

- Tank 708, October 22 – December 2, 2025:
 - Tank isolated (removed from service) since October 22, 2025 and static volume monitored. After 40 days (November 30, 2025), approximately 1,039 barrels total volume loss in tank.

Environmental Subsurface Investigation

On Tuesday, November 18, 2025, an environmental subsurface investigation commenced in the Tank 708 dike area to identify the source and the scope of the product.

- Soil borings began on November 18, 2025
- The first 7 borings were completed by November 21, 2025, with the following results:
 - Borings went to a depth of 35' below ground surface (bgs) and consistently found groundwater at about 32' bgs
 - Product was encountered in all of the borings in the Tank 708 dike area within the saturated soils where groundwater was located. One boring located in Tank 700 dike, which is northeast of Tank 708 did not have any observable hydrocarbon impacts.
- On November 21, 2025, based on the static testing and after the first 7 soil borings, Tank 708 was taken out of service and a plan was implemented to de-inventory the Tank
- On November 25, 2025, MIPC contacted PADEP to provide details obtained to date. Followed up on December 3, 2025 with a phone call to provide a supplemental notification regarding the removal of Tank 708 from service and the results of the initial subsurface investigation.
- Also on December 3, 2025, contracted with Langan Engineering and Environmental Services, a nationally recognized environmental consultant and engineering firm with large scale LNAPL (Light Non-Aqueous Phase Liquid) plume remediation experience and specifically free product removal
 - As of January 31st, at least 8 soil borings and 21 groundwater monitoring wells have been installed on-site.
 - Petroleum impacts were observed in 12 wells completed to date; primarily near the Tank 708 dike and areas west on-site.
 - Vacuum Enhanced Fluid Recovery (VEFR) methods began on December 8, 2025 and will continue into 2026
 - Initial groundwater survey data shows water flow to the south/ southwest. Localized mounding and preferential pathways are being evaluated.
- Additional notifications were made to state and federal agencies, local, county and state elected officials, municipal first responders, and the community. Regular communication with these parties continues through the present.
- Langan evaluated the potential for impacts to residential water supplies:
 - Identified properties with potential groundwater well use
 - Contacted Chester Water Authority to determine properties connected to municipal water
 - Sent well information request questionnaire on December 10, 2025 to 34 properties located east of Chichester Ave and south of Concord Road
- No sheens or odors have been observed in offsite surface water that continues to be monitored by MIPC
- Hosted local, county, and PA DEP emergency response officials on December 29, 2025 for a site visit and tour

Planned Future Environmental Response Actions

Investigations are ongoing pursuant to a PADEP Consent Order. The conceptual plan outlined below will be continuously assessed and refined, as warranted by additional data and information, that will be obtained and interpreted under the ongoing response action. Response actions planned include:

- Continued subsurface investigations and VEFR with a focused integrated well recovery approach
- Evaluation of current and supplemental data obtained, including LNAPL distribution/ occurrence/ recovery, dissolved plume concentrations, and soil vapor
- Compilation of monitoring well and site survey data to determine groundwater flow direction, subsurface hydrogeologic conditions, and continually assess and refine the Conceptual Site Model
- Supplemental investigations, both onsite and offsite, to better delineate LNAPL and dissolved impacts to groundwater and develop an informed soil vapor survey, pathway assessment, and mitigation program, as warranted
- Remedial design, equipment procurement, permitting, construction, and remedial system operations and maintenance, with long-term monitoring

Tank 708 Investigation

- Tank 708 was subject to an API Inspection during 2024-2025 to ensure its integrity **and no issues were identified as to any releases**. Tank 708 was also blocked in October 23 – December 2, 2025 when stripping began for out of service work
- Acoustic testing was performed on December 1, 2025 and **results were negative for identification of a leak**
- Initial visual inspections on December 5, 2025, prior to tank cleaning and helium testing, had no findings
- Tank cleaning and helium test concluded on December 13, 2025
 - On December 13, 2025, visual inspection identified a ¼” hole in bottom of the tank – roughly the size of a pencil eraser
 - This finding led MIPC to estimate the potential amount of material released
- Submitted a PHMSA supplemental report on December 16, 2025 as a result of finding the hole in the tank. The report included an estimated volume released of 9,000 barrels, which is based on the volume of product lost during the time period of 30-40 days when the tank was isolated and not in use (approx. 1,000 barrels), multiplied by the 9-month period the tank was in service since the last inspection. Estimate will be refined as the investigation continues and information becomes available.
- PHMSA Accident Investigators onsite December 18, 2025
- PHMSA issued Corrective Action Order to MIPC on December 19, 2025