



Pennsylvania
Department of Environmental Protection

January 29, 2026

VIA EMAIL: jeff.warmann@monroe-energy.com; regan.howell@monroe-energy.com; elizabeth.clapp@monroe-energy.com

Jeff Warmann
President and CEO
MIPC, LLC
920 Cherry Tree Road
Aston, PA 19014

Re: Administrative Order – Fenceline Perimeter Air Monitoring Plan
MIPC Chelsea Pipeline Station and Tank Farm Release
920 Cherry Tree Road
Aston Township
Bethel Township
Upper Chichester Township
Delaware County

Dear Jeff Warmann:

The Department of Environmental Protection (DEP) received MIPC, LLC's January 13, 2026 Fenceline Perimeter Air Monitoring Plan submitted in accordance with DEP's December 23, 2025 Order ("Order"), Interim Remedial Measures 1.i. DEP has the following comments and requests MIPC to provide a revised Fenceline Perimeter Air Monitoring Plan. Pursuant to Paragraph 3 of the Order, MIPC has 45 days to respond to any deficiencies identified by DEP. Given the importance of quickly addressing air quality concerns, DEP requests that MIPC provide a revised Fenceline Perimeter Air Monitoring Plan as soon as possible.

- **Sections 3.1:** Please provide a wind rose to support the selection of the sampling location.

Sites AA-2, 3, 4 are very close to trees or shrubs as shown in Figure 2, which could cause obstruction for airflow. Samplers should meet certain siting criteria. For example, sampling unit inlet should be ≥ 10 meters from drip line of nearest tree. Refer to NATTS Technical Assistance Document (Section 7.1)

<https://www.epa.gov/system/files/documents/2022-08/NATTS-TAD-Revision-4-Final-July-2022-508.pdf>

- **Section 3.3:** Then final pressure in the canister is critical for determining if the sample is valid. Please document equipment QA/QC checks and acceptance criteria for the canister sampling.

For data QA/QC, collection of collocated and duplicate field samples is recommended.

- **Section 3.4:** Please provide the lab SOP for VOC canister analysis and data verification.
- **Section 3.5:** Data validation is an important step in assessing the quality of the sampling data. It's unclear how data will be reviewed or what data acceptance criteria will be applied. A detailed data review procedure including quality control measures and acceptance criteria should be documented.
- **Section 3.6:** Based on DEP's understanding that remedial activities are expected to take more than a year from the initial discovery, DEP recommends using EPA's risk-based chronic screening levels for resident air ([Regional Screening Levels \(RSLs\) | US EPA](#)), with an HQ=1 for noncancer risks and a cancer risk benchmark of 1 in 100,000 using the more conservative number between the Carcinogenic and Noncarcinogenic Screening Levels ("SL"). If using the Carcinogenic SL, multiply by 10 to achieve a risk benchmark of 1 cancer case/100,000 people exposed.
- Please indicate the location of LNAPL recovery operations in Figure 2. If this is currently unknown, please provide a tentative/interim recovery location.

This ambient fence line sampling should not be used as a substitute for indoor vapor intrusion sampling if such sampling is required. If you have any questions concerning this matter, please contact me at jigallaghe@pa.gov or at 484.250.7511.

Sincerely,

Jillian Gallagher
Environmental Program Manager
Air Quality

cc: Elizabeth Clapp, MIPC
Regan Howell, MIPC
Thomas Magge
Dave Brown, P.G.
Alex Langan, Esq.
Enforcement File