



MIPC, LLC
920 Cherry Tree Road
Aston, PA 19014

February 17, 2026

Mr. C. David Brown
Regional Manager
Environmental Cleanup & Brownfields
2 East Main Street
Norristown, PA 19401

RE: Letter of Deficiency for the Public Involvement Plan
MIPC Chelsea Facility
eFACTS PF No. 634737
eFACTS Activity No. 61956 and 61957
Bethel Township, Aston Township, and Upper Chichester Township
Delaware County

Dear Mr. Brown:

MIPC, LLC (MIPC) has received and reviewed the Department of Environmental Protection's February 9, 2026 Letter of Deficiency for the Public Involvement Plan. This letter responds to the Department's comments.

PADEP comments are listed below as received. MIPC's responses follow each comment in blue, italic font.

1. MIPC, LLC (MIPC) proposes a 5-day public notice period for public meetings.
DEP response: This is insufficient notice. Public meetings should be noticed a minimum of 15 days before the meetings with 30 days preferred.

MIPC agrees to providing a minimum of 15 days public notice period for public meetings, and MIPC will aim for 30 days, if practicable.

2. MIPC describes a public communications plan which includes various forms of outreach.
DEP response: Many residents and other interested parties will be most efficiently and quickly contacted by email. DEP asks that MIPC create an email distribution list that includes participants who signed in at the February 4, 2026 public meeting, representatives of each of the three municipalities, DEP, the office of each state representative and state senator whose district includes either the facility or the 1000-foot area of concern, and anyone who requests to be added to the list. This distribution list, in addition to the other methods described in the PIP, will be used for all notifications.

MIPC has already created and is utilizing an email distribution list that includes participants who signed in at the February 4, 2026 public meeting, representatives of each of the three municipalities, DEP, the office of each state representative and state senator whose district includes the facility, 1000-foot area as described in the Department's order, and individuals who have requested to be added to the email distribution list. The email distribution list is, and will continue to be used for all notifications.

3. DEP recommends that the PIP include advance public notifications for disruptive activities, including, but not limited to, well drilling in or near public areas, work that could close or block streets, and noise that could affect residential or public areas. Such notifications should be made at least 1 week before the activity and describe the nature and duration of the activity.

With respect to work that could occur along the public areas, MIPC acknowledges that public notifications one-week prior to work commencing is warranted.

However, in order for MIPC to effectively and expeditiously delineate and remediate any impacted area, MIPC believes the one-week notification prior to the activities described above either on MIPC's property or adjoining private properties is not practical.

Therefore, MIPC proposes:

- *Mailing a letter to neighbors within the 1000-foot area as described in the Department's order. This letter will outline that work activities will be continuing on MIPC's property, and our continued efforts to mitigate noise. Furthermore, MIPC will encourage neighbors to contact MIPC directly with questions or concerns.*
- *Directing work activities to occur between the hours of 8:00AM – 5:00PM.*
- *If MIPC conducts work on a neighboring property, MIPC will provide 48-hour notice to the property owner and the adjacent property owners.*

4. MIPC's PIP does not propose any future public meetings following the February 4, 2026 meeting as required by paragraph 2.d.iii. of the order. DEP recommends that, at a minimum, public meeting should be held coincident with Act 2 milestones and upon the request of Aston, Bethel, or Upper Chichester Township or of DEP.

MIPC will schedule future public meetings to be held in concert with Act-2 milestones and also upon request of Aston Township, Bethel Township, Upper Chichester Township, or PADEP.

5. MIPC's PIP does not describe the public comment process as required by paragraph 2.d.v. of the order. MIPC must identify which reports are subject to public comment, how the public will be notified of comment opportunities, how reports will be made available for public review and comment, the duration of the comment periods (DEP recommends at least 30 days), how long MIPC will take to prepare responses to comments (e.g., 15

days), and submittal of comments/responses to DEP for consideration in reviewing the reports.

MIPC has identified the following reports to be subject to public comment:

- *Site Characterization Work Plan*
- *Interim Site Characterization Report*
- *Remedial Action Plan*
- *Remedial Investigation Report*
- *Site Specific Risk Assessment Report*
- *Site Specific Cleanup Plan*
- *Act-2 Final Report and Demonstration of Attainment*

The public comment period will be open for 30 days. MIPC will prepare and submit responses to comments within 15 days. MIPC will then provide the Department with the comments and responses at the closing of the 45-day process.

MIPC will:

- *Post all documents subject to public comment on the “Public Input” section of the www.ChelseaTankUpdates.com website and outline the dates by which public comments are due.*
- *Provide a method and explanation of the process to submit public comment through the “Public Input” section of the website.*

Public notifications of comment opportunities will occur via:

- *Email everyone on the email distribution list which includes:*
 - *Participants who signed in at the February 4, 2026 public meeting, representatives of each of the three municipalities, DEP, the office of each state representative and state senator whose district includes the facility, the 1000-foot area as described in the Department’s order, and individuals who have requested to be added to the email distribution list.*
- *Newspaper advertisement shortly before comment period opens.*
- *Notification to each of the three municipalities, and request that they publicize the comment opportunity.*
- *Notification to each of the aforementioned state representatives and state senator, and request that they publicize the comment opportunity.*

6. DEP requests that each report or plan submitted pursuant to the order and Act 2 include a plain language summary, consistent with Act 2 (35 P.S. Section 6026.901).

MIPC will provide plain language summaries to accompany each report or plan published on our website, consistent with Act-2.