

February 18, 2026

Transmitted via e-mail to: cdbrown@pa.gov

C. David Brown, P.G.
Environmental Program Manager
Environmental Cleanup and Brownfields
Department of Environmental Protection, Southeast Regional Office
2 East Main Street
Norristown, PA 19401

**RE: Response to Comments and Transmittal of Revised Remedial Action Implementation Schedule
MIPC Chelsea Facility
PADEP Facility ID No. 634737
920 Cherry Tree Road, Aston, PA 19014
Bethel Township, Upper Chichester Township, Aston Township, Delaware County
Langan Project No. 220240201**

Dear Mr. Brown:

On behalf of MIPC, LLC (MIPC), Langan Engineering and Environmental Services, LLC (Langan) is submitting the below responses to comments received from the Department of Environmental Protection (the Department or DEP) by letter dated February 3, 2026 regarding the DEP's review of the implementation schedule submitted on January 20, 2026 in accordance with DEP's December 23, 2025 administrative order (order). The revised, proposed Remedial Action Implementation Schedule is enclosed.

Per the February 3, 2026 letter from the Department to MIPC, DEP offered the following comments; responses from MIPC/Langan follow each of the Department's comments in italicized text:

1. MIPC, LLC (MIPC) stated that "As the remedial action advances and new information and data are compiled, any necessary updates or modifications to the schedule will be communicated to the Department and included in weekly and quarterly progress reports issued under the Order."

DEP response: Any modifications to the schedule must be requested and are subject to DEP approval under Paragraph 5 of the order.

MIPC/Langan response: The referenced statement has been revised to state that, "any requests for modifications to this schedule will be submitted to PADEP for approval."

2. MIPC proposes submitting the Supply Well Sampling & Analysis Plan by February 6, 2026, the Site Characterization Work Plan by February 21, 2026 and the Interim Site Characterization Report (Interim SCR) by June 21, 2026.

DEP response: DEP accepts the schedule for the submittal of these documents.

MIPC/Langan response: None.

3. MIPC uses the term “target date” for the implementation schedule.

DEP response: These deadlines need to be certain and enforceable, per paragraph 2.c of the order and should be labeled as “deadlines.”

MIPC/Langan response: References to “target date” have been removed and replaced with “deadline date” in the revised implementation schedule.

4. MIPC proposes submitting the Remedial Action Plan (RAP) by November 18, 2026, which is indicated to be 60 days after approval of the Interim SCR and assumes that DEP will complete review of the Interim SCR in 90 days.

DEP response: The Interim SCR is not a statutory or regulatory Act 2 submission, and DEP is not limited to a 90-day review of the Interim SCR. The Interim SCR will also have public and municipal reviews. If the report contains deficiencies, revisions and further review will be required. The RAP should be submitted within 60 days of DEP’s written approval of the Interim SCR.

MIPC/Langan response: Understood and agreed regarding the DEP review period and allowance for public and municipal reviews for the Interim SCR. The deadline date for the RAP has been revised to “60 days after DEP’s approval of the Interim SCR”.

5. MIPC proposes to submit the Remedial Investigation Report (RIR) by May 17, 2027.

DEP response: Based on the current status of the characterization of the release, DEP believes that full characterization and delineation can be completed before that date. DEP requests that MIPC submit the RIR within 180 days of DEP’s written approval of the Interim SCR.

MIPC/Langan response: The deadline date for the RIR has been revised to “180 days after DEP’s approval of the Interim SCR”.

6. MIPC proposes to submit the Risk Assessment Report (RAR) by November 13, 2027.

DEP response: The RAR should be submitted within 90 days of DEP’s written approval of the RIR.

MIPC/Langan response: The deadline date for the RAR has been revised to “90 days after DEP’s approval of the RIR”.

7. MIPC proposes to submit the Cleanup Plan (CP) by May 11, 2028.

DEP response: The CP should be submitted within 90 days of DEP's written approval of the RAR.

MIPC/Langan response: The deadline date for the CP has been revised to "90 days after DEP's approval of the RAR".

8. MIPC proposes starting 90-day status reports after approval of the RAP.

DEP response: The first quarterly status report must be submitted by March 23, 2026, and quarterly progress reports must continue to be submitted until an Act 2 Final Report is submitted and approved.

MIPC/Langan response: The deadline dates for the quarterly remedial action progress reports have been revised to "every 90 days beginning December 23, 2025 and continuing until an Act 2 Final Report is submitted and approved by DEP."

9. MIPC stated that the frequency of progress reports will reduce from weekly to monthly in April 2026.

DEP response: It is unknown what the conditions of the release, investigation, and remediation will be at that time. MIPC must submit a request for frequency change subject to DEP approval prior to implementing that change.

MIPC/Langan response: The deadline dates for the weekly progress reports have been revised to "started December 30, 2025 and to continue on a weekly basis until DEP approves a frequency change."

Accompanying this response to comments, please find a revised implementation schedule that incorporates changes made to the January 20, 2026 version to address DEP comments and is included here as a final (clean) version of the schedule.

If you should have any questions or comments, please feel free to contact Jeffrey Smith directly at 215-694-7549.

Sincerely,

Langan Engineering and Environmental Services, LLC



Jeffrey A. Smith, P.G.
Senior Associate



Robert S. (Rory) Johnston, PE, GE, BCEE
Managing Principal

cc: Alex M. Langan, Simon Mullen, Lisa Strobridge – PADEP Southeast Regional Office
Township Managers - Aston Township, Bethel Township (+ Ray Stiles), Upper Chichester Township
Elizabeth Clapp, Melissa Turchi, Jeffrey Brockett, Adam Gattuso, Regan Howell, Sharon Watkins –
MIPC, LLC
Margaret Hill - Blank Rome, LLP
Cortney Savidge, CHMM, John Loeffel – Langan

ATTACHMENT A

Revised Remedial Action Implementation Schedule

January 20, 2026
Revised February 18, 2026

Transmitted via e-mail to: cdbrown@pa.gov

C. David Brown, P.G.
Environmental Program Manager
Environmental Cleanup and Brownfields
Department of Environmental Protection, Southeast Regional Office
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MIPC Chelsea Facility
PADEP Facility ID No. 634737
920 Cherry Tree Road, Aston, PA 19014
Bethel Township, Upper Chichester Township, Aston Township, Delaware County
Langan Project No. 220240201**

Dear Mr. Brown:

On behalf of MIPC, LLC (MIPC) and in accordance with Part 2.b. of the Order issued by the Department of Environmental Protection (DEP or the Department) to MIPC on December 23, 2025, Langan Engineering and Environmental Services, LLC (Langan) is submitting this revised, proposed Remedial Action Implementation Schedule. This schedule is for conducting remedial action and cleanup in accordance with the Pennsylvania Land Recycling and Environmental Remediation Standards Act, P.L. 4,35 P.S. §§6026.101-6026.909 (Act 2) and the Order. The following outlines the proposed remedial action schedule, a basis for the deadline date for each item, and a description of requirements for each item as described in Part 2.b. of the Order. As the remedial action advances and new information and data are compiled, updates will be included in weekly and quarterly progress reports issued under the Order, and any requests for modifications to this schedule will be submitted to PADEP for approval.

Remedial Action Implementation Schedule

Required Item/ Deliverable	Deadline Date	Basis for Deadline Date
Notice of Intent to Remediate & Notices (2.b.ii)	12/30/25	Completed
Supply Well Sampling & Analysis Plan (2.b.i)	02/06/26	45 days from Date of Order
Site Characterization Workplan (2.b.iii)	02/21/26	60 days from Date of Order
Interim Site Characterization Report (2.b.v)	06/21/26	180 days from Date of Order
Remedial Action Plan (2.b.vi)		60 days after PADEP's approval of the Interim Site Characterization Report
Site Characterization Work (2.b.iv)		Coincident with the date for submittal of the Remedial Investigation Report.

Remedial Investigation Report (2.b.vii)		180 days after PADEP’s approval of the Interim Site Characterization Report
Site-Specific Risk Assessment Report (2.b.viii)		90 days after PADEP’s approval of the Remedial Investigation Report
Site-Specific Cleanup Plan (2.b.ix)		90 days after PADEP’s approval of the Site-Specific Risk Assessment Report
Act 2 Final Report and Demonstration of Attainment (2.b.x)	8/31/2030	Within 90 days of completion of required monitoring for demonstration of attainment. Proposed deadline date is 8/31/2030, which is 5 years after the confirmed release date in August 2025.**
Remedial Action Progress Reports (2.b.xi)	Quarterly Beginning March 23, 2026	Every 90 days beginning December 23, 2025 and continuing until an Act 2 Final Report is submitted and approved by DEP
Weekly Progress Reports (1.f)	Weekly	Started 12/30/25 and to continue on a weekly basis until DEP approves a frequency change

**Assumes more than two years of performance monitoring, data collection and analysis after approved remedial action plan and start-up on or before January 2028.

Descriptions of each milestone deliverable in accordance with the Order are provided below with noted limitations, constraints, and assumptions for each, where warranted.

Notice of Intent to Remediate & Public Notices (2.b.ii)

An Act 2 Notice of Intent to Remediate (NIR) and required public and municipal notices for the release were filed and the NIR was submitted to the PADEP via the public upload portal on December 30, 2025. Requirement 2.b.ii of the Order is complete.

Supply Well Sampling & Analysis Plan (2.b.i)

The submittal date for the Supply Well Sampling and Analysis Plan (SAP) is February 6, 2026. This Plan will be prepared and describe sampling methods and procedures including sample collection, decontamination, quality assurance/quality control measures, lab analytical methods, data quality/usability assessments, data evaluation, and comparison to selected standards, and reporting and documentation of results. All private water samples are analyzed for the PADEP petroleum product list for unleaded gasoline constituents using EPA Method 524.2.

To date, 50 properties located within 1,000 feet of the western site boundary have been identified as maintaining a private drinking water well, and 32 of them have been sampled or are scheduled to be sampled. MIPC continues to conduct community outreach, seek access agreements, and address potential downgradient receptors with emphasis on those properties that use private drinking water wells and are proximate to the western plume margin within the Order-designated area 1,000 feet west of the MIPC western property boundary.

The Supply Well SAP will include an anticipated schedule for sampling remaining wells, pending responses, coordination, and scheduling with homeowners. The SAP will also include a schedule and frequency for monitoring select supply wells over a defined period and the rationale for the duration of monitoring based on sample results and future characterization data.

Site Characterization Workplan (2.b.iii)

The submittal date for the Site Characterization Workplan is February 21, 2026. A Site Characterization Workplan will be prepared and submitted to detail planned tasks and data collection/analysis for characterizing the nature, extent, and volume of released gasoline constituents, their fate and transport, potential receptors, and migration and exposure pathways in the environment affected by the release. The Site Characterization Workplan will be based on the information and data that are available at the time of its preparation. It will support the preparation of the Interim Site Characterization Report submittal. The Workplan will also be prepared toward satisfying data needs to support the eventual preparation and submittal of the Remedial Investigation Report (RIR) prescribed by the Order. MIPC expects that the scope of the Workplan may be refined and supplemented as new data are obtained and interpreted to meet the requirements and objectives of the Act 2 investigation and cleanup submittals.

Site characterization activities are necessary to support the requirements for and preparation of the Interim Site Characterization Report; the Remedial Investigation Report; the Site-Specific Risk Assessment Report; and the Site-Specific Cleanup Plan and the eventual Act 2 Final Report. Site characterization activities are also critical for refining and enhancing ongoing interim measures and supporting remedial action decision making and implementation. Accordingly, the site characterization work is expected to continue leading up to at least the submission of the Remedial Investigation Report, but supplemental efforts may be warranted as additional information and performance monitoring data are obtained. The Department will be notified of the schedule updates and supplemental site characterization activities if they are needed.

Interim Site Characterization Report (2.b.v)

The deadline date for the interim site characterization report is June 21, 2026. The Order requires submission of an interim site characterization report, describing the nature, extent, and volume of released gasoline constituents, their fate and transport, potential receptors, and migration and exposure pathways in the environment affected by the release. Based on the interim site characterization available at the time, the report will present a conceptual site model (CSM) that provides physical site conditions (e.g., geology and hydrogeology) and considers potential

releases and potential migration pathways to receptors. The processes that determine contaminant releases, contaminant migration, and environmental receptor exposure to contaminants will be described and incorporated into the CSM. The CSM will be used to integrate Site information and to identify remaining data collection needs.

Uncertainties associated with the CSM will be clearly identified so that efforts can be made to reduce these uncertainties and resolve critical data gaps. As more data is collected the CSM will be refined in the ensuing milestone deliverables and the uncertainty minimized to the extent practicable. The CSM will also be relied on to facilitate the selection of interim and long-term remedial action alternatives and to evaluate the effectiveness of implemented remedial actions.

Remedial Action Plan (2.b.vi)

The deadline date for the remedial action plan is 60 days after the Interim Site Characterization Report is approved. The Order requires submittal of a remedial action plan, describing actions taken to address the release of regulated substances into the environment toward attaining the remedial action objectives and demonstrating attainment of the remediation standards of Act 2. The selection of a final remedial action is a dynamic process highly dependent on the findings and outcome of site characterization and interim remedial measures that are ongoing and planned to be implemented. For these reasons, the actual schedule for providing the selected remedial approach, details, and specifications is flexible and subject to updates and modifications as the site characterization information/data becomes available and is interpreted.

Site Characterization Work (2.b.iv)

The deadline date for the site characterization work coincides with the RIR submittal date, which is 180 days after DEP's approval of the Interim Site Characterization Report. The Order prescribes completing necessary work for the characterization of the site, including the nature, extent, and volume of released gasoline constituents, their fate and transport, potential receptors, and migration and exposure pathways in the environment affected by the release. The MIPC site characterization was initiated immediately after the confirmed release on August 18, 2025 and is ongoing. Site characterization activities will continue until completion. In accordance with Act 2 regulations and technical guidance, the site characterization activities conducted will result in a thorough investigation which meets the requirements of Pa. Code §250.204 and which provides information in sufficient detail to support remediation decisions and for documenting attainment using of the selected Act 2 standard(s). A thorough and defensible site characterization, including fate and transport analysis, baseline risk evaluation and their documentation in report submittals is essential, as they form the basis for making remediation decisions, accomplishing remedial objectives, and the development of the appropriate final demonstration of attainment.

Remedial Investigation Report (2.b.vii)

The deadline for the RIR is 180 days after PADEP's approval of the Interim Site Characterization Report, coincident with completion of the site characterization work. As applicable, the order requires submission of an RIR under the site-specific standard in accordance with Act 2 (25 Pa.

Code § 250.408). The RIR will include documentation and a description of the methods, procedures, findings, and conclusions from the Site characterization, including a refined CSM. The refined CSM involves detailed understanding of the contaminant source(s), including the locations, nature, volumes and ages of the releases, the vertical and horizontal extent of contamination within each medium of concern (e.g., soil, groundwater, soil vapor, sediment, surface water), contaminant characteristics (e.g., physical, chemical and toxicological properties of contaminants of concern), and site-specific hydrogeological conditions that influence contaminant occurrence, fate and transport.

The RIR will describe the methodologies and results of the investigations completed as part of Site characterization and remedial investigation activities, including well installations and collection and analysis of soil, groundwater, sediment, and surface water samples, as warranted. The report will include a description of the management and fate of the waste generated from the investigation activities. The combined report will include data summary tables with soil, groundwater, and surface water results, as appropriate, compared to PADEP Act 2 standards. Additionally, the RIR will include figures, such as a Site plan, an area of interest map, sample location maps, sample results figures, LNAPL occurrence and dissolved gasoline constituents' distribution maps, groundwater elevation and LNAPL elevation maps, and figures to summarize the receptor evaluations, as applicable.

Site Specific Risk Assessment Report (2.b.viii)

The deadline for the site-specific Risk Assessment Report is 90 days after DEP's approval of the Remedial Investigation Report. It is assumed that a site-specific risk assessment (25 Pa. Code § 250.409) will be necessary as an integral part of the approved and final cleanup. The information within a risk assessment report relies on site characterization information from an approved remedial investigation report to describe the potential adverse effects, including the evaluation of human and ecological receptors, caused by the presence of target regulated substances (gasoline constituents) in the absence of any further control, remediation, or mitigation measures.

Site Specific Cleanup Plan (2.b.ix)

The deadline date for the site-specific cleanup plan is 90 days after DEP's approval of the Risk Assessment Report. A cleanup plan is required to be submitted to the Department for approval when the site-specific standard is selected as the remediation goal. The site-specific cleanup plan will evaluate the relative abilities of the alternative remedies to achieve the site-specific standard and lead to selection of a remedial action approach that will achieve the Act 2 remediation standards. The site-specific cleanup plan will describe the remedial action objectives and approach to attaining a combination of Statewide Health Standards and Site-Specific Standards via active remedial measures, demonstration of incomplete exposure pathways (i.e., pathway elimination), and institutional/engineering controls for identified site related soil and groundwater constituents of concern. The Cleanup Plan will include an overview of RIR, the human health risk assessment, ecological evaluation, vapor intrusion assessment, and a potable well search and drinking well water supply sampling and results, as applicable.

Act 2 Final Report and Demonstration of Attainment (2.b.x)

Approved remedial action plan and start-up are planned to be active on or before January 2028. The proposed deadline of August 2030 for technical demonstration attainment of Act 2 remediation standards is 5 years after the confirmed release from the 708 Tank. This completion date reflects MIPC's aggressive approach and overarching desire to direct focused cleanup efforts to expedite project closure. The proposed 5-year completion schedule, although aggressive, is reasonable and achievable and remedial action progress and performance will be monitored and adjustments to the approach will be implemented, as warranted.

The objective of the Act 2 Final Report is to demonstrate attainment of a combination of the PADEP Statewide Health Standards and Site-Specific Standards for the contaminants analyzed in soil and groundwater, and other affected media, as appropriate. It is assumed that attainment of the PADEP standards will require active remediation and rely on demonstration of exposure pathway elimination, either by existing conditions, risk assessment, institutional/engineering controls, and as achieved as a by-product of and integrated with interim measures and approved remedial action. The actual timeline for meeting the desired remedial action objectives and to be in a technically defensible position to demonstrate final attainment of Act 2 remediation standards is dependent on many factors including, but not limited to, data and information still to be collected, and remedial action performance.

Remedial Action Progress Reports (Quarterly) (2.b.xi)

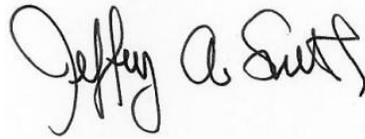
Quarterly remedial action progress reports will commence 90 days after DEP's issuance of the Order on December 23, 2025 (i.e., March 23, 2026) and continue until an Act 2 Final Report is submitted and approved. The Order requires submissions of remedial action progress reports once every ninety calendar days (quarterly) that describe characterization activities and results, remedial action implementation results, public involvement activities, planned site characterization work and remedial actions.

Weekly Progress Reports (1.f)

Beginning on December 30, 2025, and continuing each Tuesday until the Department approves a request from MIPC for a different frequency, MIPC will submit to the Department and Townships of Bethel, Aston, and Upper Chichester a weekly written summary progress report of all activities performed by MIPC related to the release.

If you should have any questions or comments, please feel free to contact Jeffrey Smith directly at 215-694-7549.

Sincerely,
Langan Engineering and Environmental Services, LLC



Jeffrey A. Smith, P.G.
Senior Associate



Robert S. (Rory) Johnston, PE, GE, BCEE
Managing Principal

cc: Alex M. Langan, Simon Mullen, Lisa Strobridge – PADEP Southeast Regional Office
Township Managers - Aston Township, Bethel Township (+ Ray Stiles), Upper Chichester Township
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