



Pennsylvania  
Department of Environmental Protection

March 31, 2026

Ms. Elizabeth Clapp  
MIPC, LLC  
4101 Post Road  
Trainer, PA 19061

Re: Letter of Deficiency for the Private Drinking Water Well Sampling and Analysis Plan  
MIPC Chelsea Facility  
eFACTS PF No. 634737  
eFACTS Activity No. 61956 and 61957  
920 Cherry Tree Road  
Bethel Township, Aston Township, and Upper Chichester Township  
Delaware County

Dear Ms. Clapp:

The Department of Environmental Protection (DEP) has received and reviewed the February 6, 2026, document titled “Private Drinking Water Well Sampling and Analysis Plan” for the MIPC Chelsea Facility gasoline release response. The supply well sampling and analysis plan was submitted in accordance with DEP’s December 23, 2025, administrative order (Paragraph 2.b.i). The document was prepared by Langan Engineering and Environmental Services, LLC.

Upon initial review, DEP finds the submission is deficient and offers the following comments:

1. DEP notes that future conditions may necessitate expanding the area where wellhead screening and well gauging are completed. The document must acknowledge that this protocol is subject to change pending future conditions. **This is a deficiency.**
2. Section 5.0, titled “Screening Levels” states that “screening levels... are not intended to represent cleanup standards or remediation goals”; however, this section references both enforceable cleanup standards (i.e., MSCs/MCLs) and screening values. MIPC must revise this section to clarify which criteria are screening values and which are cleanup standards. **This is a deficiency.**
3. The remediator states that properties within 1,000 feet of the Facility’s western property boundary that do not adjoin the Facility will be sampled on a semi-annual basis. DEP recommends that MIPC conduct quarterly sampling events from potable wells located at [REDACTED] and [REDACTED] and [REDACTED] and [REDACTED] pending access and until such a time that a sufficient monitoring well network exists.

Under DEP’s order, MIPC has 45 days to respond to the above deficiencies. We are willing to work with you to develop an approvable submittal. If you have any questions or would like to

meet regarding this matter, please contact me by email at [cdbrown@pa.gov](mailto:cdbrown@pa.gov) or by telephone at 484.250.5792.

Any person aggrieved by this action may appeal the action to the Environmental Hearing Board (Board), pursuant to Section 4 of the Environmental Hearing Board Act, 35 P.S. § 7514, and the Administrative Agency Law, 2 Pa.C.S. Chapter 5A. The Board's address is:

Environmental Hearing Board  
Rachel Carson State Office Building, Second Floor  
400 Market Street  
P.O. Box 8457  
Harrisburg, PA 17105-8457

TDD users may contact the Environmental Hearing Board through the Pennsylvania Relay Service, 800.654.5984.

Appeals must be filed with the Board within 30 days of receipt of notice of this action unless the appropriate statute provides a different time. This paragraph does not, in and of itself, create any right of appeal beyond that permitted by applicable statutes and decisional law.

A Notice of Appeal form and the Board's rules of practice and procedure may be obtained online at <http://www.ehb.pa.gov> or by contacting the Secretary to the Board at 717.787.3483. The Notice of Appeal form and the Board's rules are also available in braille and on audiotape from the Secretary to the Board.

**IMPORTANT LEGAL RIGHTS ARE AT STAKE. YOU SHOULD SHOW THIS DOCUMENT TO A LAWYER AT ONCE. IF YOU CANNOT AFFORD A LAWYER, YOU MAY QUALIFY FOR FREE PRO BONO REPRESENTATION. CALL THE SECRETARY TO THE BOARD AT 717.787.3483 FOR MORE INFORMATION. YOU DO NOT NEED A LAWYER TO FILE A NOTICE OF APPEAL WITH THE BOARD.**

**IF YOU WANT TO CHALLENGE THIS ACTION, YOUR APPEAL MUST BE FILED WITH AND RECEIVED BY THE BOARD WITHIN 30 DAYS OF RECEIPT OF NOTICE OF THIS ACTION.**

Sincerely,

C. David Brown, P.G.  
Regional Manager  
Environmental Cleanup and Brownfields

cc: Mr. Smith, P.G., Langan  
Aston Township  
Bethel Township  
Upper Chichester Township  
Delaware County Health Department  
Mr. Langan, Esq.  
Mr. Devan, P.G.  
Mr. Mullen, P.G.