



Pennsylvania  
Department of Environmental Protection

April 10, 2026

VIA EMAIL: [jeff.warmann@monroe-energy.com](mailto:jeff.warmann@monroe-energy.com); [regan.howell@monroe-energy.com](mailto:regan.howell@monroe-energy.com);  
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Jeff Warmann  
President and CEO  
MIPC, LLC  
920 Cherry Tree Road  
Aston, PA 19014

Re: Administrative Order – Response to Comments to the Fenceline Perimeter Air  
Monitoring Plan and Addendum  
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 March 13, 2026 Response to Comments to the Fenceline Perimeter Air Monitoring Plan submitted in response to DEP’s letter dated January 29, 2026 and pursuant to Paragraph 3 of the December 23, 2025 Order (“Order”). DEP reviewed and approves MIPC, LLC’s January 13 Fenceline Perimeter Air Monitoring Plan in combination with the March 13, 2026 Response to Comments to the Fenceline Perimeter Air Monitoring Plan. DEP also approves MIPC, LLC’s request to pause air monitoring during weekend days when active gasoline recovery activities are not occurring.

DEP also reviewed MIPC, LLC’s March 13, 2026 proposed Fenceline Monitoring Field Sampling Plan using Passive Diffusive Sampling Using Thermal Desorption Tubes (“Passive Sampling Plan”). DEP does not approve the use of this Passive Sampling Plan as proposed. The Passive Sampling Plan only provides a 14-day average concentration and can obscure high short-term benzene concentrations. Timely knowledge of high benzene readings is critical for addressing site activities which may have caused these high readings and assessing potential acute toxicity risks for workers and the surrounding community.

To address this gap, DEP recommends supplementing passive sampling with at least one continuous monitor. Below is DEP’s prioritized list of preferred methods.

**1. Continuous BTEX monitoring**

Implement continuous BTEX monitoring using either:

- Open-path UV-DOAS analyzers or equivalent analyzers for benzene and BTEX, providing low-ppb detection limits and path-integrated, measurements over hundreds of meters.
- Micro-GC/online GC system: designed for environmental and fence line BTEX monitoring, capable of sub-ppb detection and automated, unattended operation.

### **2. Continuous Non-methane VOC sensor with automated triggered canister sampling**

Install a continuous non-methane VOC sensor (for example, PID sensor) at key locations and configure it to trigger a canister sample whenever VOC levels exceed a predefined threshold (for example, Spod monitoring system). The canister samples are then analyzed by GC-MS (TO-15) to obtain compound specific speciation.

### **3. Daily 24-hour integrated canister sampling at a fixed location**

Maintain a continuous 24-hour integrated canister sampling program at one strategically selected station.

DEP has the following additional comments regarding the proposed Passive Sampling Plan.

#### **1. Sections 2.0 and 2.2 - Clarify Monitoring objectives**

The current language suggests that benzene and other VOCs will be analyzed. If the program includes VOCs beyond benzene, please provide a complete list of all compounds. Section 2.2 and Figure 2-1 only describe benzene sampling locations.

#### **2. Section 6.0 - Sample collection and Redeployment Procedures**

This section should be expanded to include:

- Inspection of sample conditions upon retrieval (e.g., damage, abnormal conditions).
- Required actions if unusual or compromised sample conditions are observed.
- Procedures to prevent cross-contamination, such as wearing clean gloves during sample removal and changing gloves before deploying new media.

#### **3. Section 6.4 - Laboratory Accreditation Statement**

The current statement regarding laboratory accreditation “analytical lab shall maintain current lab accreditation” is incomplete. Please specify the laboratory’s accreditation status.

#### **4. Laboratory Analysis Section - Missing**

A dedicated laboratory analysis section is required. Please include the analytical method and SOP for benzene (any other VOCs) collected using diffusive tube.

#### **5. Reporting Requirements - Not Addressed**

Please add a section describing reporting requirements, including:

- Expected turnaround time for validated data
- Data availability and format
- Data retention requirements
- Notification procedures for exceedances or abnormal results

#### **6. Corrective Action Plan for Exceedances**

Include a corrective action protocol describing the steps to be taken when monitoring results exceeding action levels or regulatory threshold.

#### **7. Plan Modification Protocol**

Add a section outlining the process for modifying the sampling plan, including documentation, review and approval procedures.

If you have any questions concerning this matter or would like a meeting to discuss this issue, please contact me at [jgallaghe@pa.gov](mailto:jgallaghe@pa.gov) or at 484.250.7511. DEP is willing to review a revised sampling plan if MIPC, LLC is interested in continuing to pursue an alternate plan.

Sincerely,

A handwritten signature in black ink, appearing to read "Jillian Gallagher". The signature is fluid and cursive, with a large initial "J" and "G".

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