April 17, 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 Private Drinking Water Well Sampling and Analysis Plan
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 March 31, 2026 regarding the DEP's review of the Private Drinking Water Well Sampling and Analysis Plan (SAP) submitted on February 6, 2026 in accordance with DEP's December 23, 2025 administrative order (Order). The revised Private Drinking Water Well SAP is enclosed.

Per the March 31, 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. 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.

   MIPC/Langan response: The following sentences have been added to Section 3.3 Well Gauging and Wellhead Screening.

   "It is noted that future conditions may necessitate expanding the area where wellhead screening and well gauging are completed. The wellhead gauging and screening protocol described herein is subject to change pending future conditions."

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.

MIPC/Langan response: Section 5.0 has been retitled "Cleanup Standards and Screening Levels", and the section has been revised as follows to clarify which criteria are cleanup standards and which criteria are screening values. References throughout this section have been updated to include cleanup standards and screening levels.

"Sample results are compared to both cleanup standards and screening values. The cleanup standards referenced in Sections 5.1 and 5.2 are enforceable cleanup standards, whereas the screening levels referenced in Sections 5.3 and 5.4 are used as conservative benchmarks to evaluate the presence and relative magnitude of petroleum-related constituents in drinking water and to support decisions regarding the need for additional investigation, confirmation sampling, or response actions. The screening levels referenced in Sections 5.3 and 5.4 do not represent cleanup standards or remediation goals, nor does an exceedance of a screening level, by itself, constitute a determination of unacceptable risk. Rather, these screening levels are used as health-protective reference values to guide interpretation of private well water quality data in accordance with PADEP guidance and the requirements of the Administrative Order."

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], pending access and until such a time that a sufficient monitoring well network exists.

MIPC/Langan response: MIPC agrees that, for now, it is appropriate to sample the seven properties identified by DEP on a quarterly basis rather than a semi-annual basis, pending access and until such a time that a sufficient monitoring well network exists. Section 7.3 has been updated accordingly to reflect this modification to the ongoing monitoring protocol. Figure 2 has also been updated.

Accompanying this response to comments, please find a revised version of the Private Drinking Water Well Sampling and Analysis Plan.

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

Enclosures:
Revised Private Drinking Water Well Sampling and Analysis Plan

cc: Alex M. Langan, Simon Mullen, C. David Brown, 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

REVISED PRIVATE DRINKING WATER WELL SAMPLING AND ANALYSIS PLAN

for

MIPC Chelsea Facility
PADEP Facility ID No. 634737
920 Cherry Tree Road
Bethel Township, Upper Chichester Township, Aston Township
Delaware County, Pennsylvania

Prepared For:

MIPC, LLC
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Prepared by:

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Jeffrey A. Smith, P.G.
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LANGAN

Report Date: **April 17, 2026 (Revised)**
February 6, 2026
220240201

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1.0 INTRODUCTION

Langan Engineering and Environmental Services, LLC (Langan) has prepared this Private Drinking Water Well Sampling and Analysis Plan (SAP or Plan) on behalf of MIPC, LLC to describe procedures for collecting, analyzing, and reporting groundwater samples from private drinking water wells located near the MIPC Chelsea Facility at 920 Cherry Tree Road, Bethel, Upper Chichester and Aston Townships, Delaware County, Pennsylvania (Site, see Figure 1).

This Plan is being submitted to the Pennsylvania Department of Environmental Protection (PADEP) consistent with Part 2.b.i. of the Administrative Order (Order) issued by PADEP to MIPC on December 23, 2025 and the Remedial Action Implementation Schedule submitted to the PADEP on January 20, 2026. The Order requires MIPC to sample private drinking water wells within 1,000 feet of the Site's western boundary for the potential presence of gasoline constituents.

This plan has been revised to address comments presents by PADEP in their letter dated March 31, 2026.

This Plan documents the sampling methods, equipment cleaning/rinsing procedures, quality assurance/quality control (QA/QC) measures, laboratory analytical methods, data quality and usability assessment, comparison of results to applicable standards, record keeping procedures for sampling private drinking water wells that has been conducted to date and going forward under the proposed sampling schedule that is subject to PADEP approval. As requested in the Order, groundwater samples from the private drinking water wells have been and will continue to be analyzed for the PADEP Petroleum Product List for unleaded gasoline constituents via United States Environmental Protection Agency (USEPA) Method 524.2.

2.0 BACKGROUND

Background information, including a description of the facility, a summary of historical land use, and an overview of the release and investigation findings to date are outlined in this section.

2.1 General Facility Description

The Site is an approximately 160-acre petroleum distribution facility located at 920 Cherry Tree Road in Delaware County, PA. The facility spans portions of Aston, Bethel, and Upper Chichester Townships and serves as a key intermediate tank farm connecting Monroe Energy's Trainer Refinery to various delivery pipelines and markets. The Site consists of 12 breakout tanks with a total capacity of about 1.7 million barrels of refined petroleum products. The breakout tanks are regulated by the U.S. Pipeline and Hazardous Materials Safety Administration (PHMSA) for safety and integrity standards, while air emissions are permitted under PADEP Air Quality regulations.

Supporting infrastructure at the site includes interconnecting pipelines, a pump station, and loading facilities, all dedicated to the storage and transfer of gasoline and other refined petroleum products.

2.2 Surrounding Land Use

A review of the area land use indicates that parcels adjoining the western Site boundary on Chichester Avenue are generally comprised of 1 to 1.5 acres of land with single-family dwellings located approximately 100 feet east of Chichester Avenue and 250 to 400 feet west of the Site. Most of these dwellings are 1,500 to 2,000 square feet in size and were constructed in the 1950s or 1960s. Detached garages are located east of the dwellings on some of the properties. For residences that maintain private drinking water wells, most are located west of the dwellings, as shown on Figure 2.

3.0 PRIVATE DRINKING WATER WELL SAMPLING AND ANALYSIS PLAN

The following section describes the activities performed and proposed for the identification and sampling of the private drinking water wells.

3.1 Drinking Water (Groundwater Supply) Well Search

A private drinking water well search was performed to attempt to identify potential private drinking water wells located within the Order-stipulated area of interest, defined as properties within 1,000 feet of the western Site boundary. The following data sources and methods were used to complete the well survey:

- County tax parcel records were used to identify developed and undeveloped properties within 1000 feet of the western Site boundary (target properties).
- Public water service records obtained from Chester Water Authority (CWA) to identify properties connected to the public water supply (see Table 1 and Figure 2).
- Property owner outreach and questionnaires were sent/delivered to attempt to confirm water source information, obtain well construction data and location information (see Section 3.2).
- A review of PA Groundwater Information System (GWIS) database records was conducted on December 26, 2025 to identify documented wells within the area of interest (see Appendix A).
- Right-to-Know requests for well records were submitted to Bethel and Upper Chichester Townships on December 26, 2025 (see Appendix B).

Incorporating information obtained from the above-listed sources, Langan compiled a list of developed properties located within 1,000 feet of the western Site boundary that are reportedly not connected to the public water supply. The presence and use of private drinking water wells was confirmed through follow-up outreach, questionnaires, and site access, where possible.

Private drinking water well data obtained through multiple sources were compiled for the target properties. Redundant records were reconciled, and updates were made as additional information was obtained from property owners and CWA.

Based on well search and subsequent verification efforts, 49 developed properties within 1,000 feet of the western Site boundary are not connected to the public water supply and, therefore, likely, utilize private drinking water wells.

Information regarding the 49 properties identified to have private drinking water wells is summarized in Table 1 and depicted on Figure 2.

3.2 Property Owner Contact / Well Use Determination

Using the private drinking water well inventory compiled for properties within the area of interest, the property owner of record for each of the 49 properties was contacted (see detailed information below) to verify the existence and use of a private drinking water well. If well use was verified, property owners were asked to provide additional information regarding well construction, water use, and any treatment systems associated with the private drinking water well. Requests for access and permission to collect and analyze groundwater samples were made in writing.

Contact with property owners and residents was established through the following stepwise process:

Step 1 – Certified Mailing

Initial well information request questionnaires and requests for access were sent via USPS certified mail to the 117 owners of developed property parcels within 1,000 feet of the western Site boundary. Certified mailings were conducted in multiple phases to ensure complete coverage:

- On December 10, 2025, certified mailings containing a cover letter and the "Well Information Questionnaire Form and Request for Sampling" were sent to 32 of the nearest developed properties, regardless of whether the property is connected to the public water supply (Appendix C).

- On December 26 and December 30, 2025, certified mailings were sent to the subset of 51 developed properties within 1,000 feet of the western Site boundary that were identified by CWA as *not connected* to public water[1]; these mailings included community outreach letters and bottled water offer letters (Appendix D).

[1] Note that two of these 51 properties have since been confirmed to be connected to the CWA public water supply.

- On January 2, 2026, certified mailings that included a cover letter reiterating the bottled water supply offer, the "Well Information Questionnaire Form and Request for Sampling", and a self-addressed, stamped envelope were sent to the remaining 85 developed properties within 1,000 feet of the western Site boundary, regardless of water supply source (Appendix E).

Step 2 – Follow-Up In-Person Visits / Compile Responses / Identify Non-Respondents

In addition to the certified mail outreach, MIPC personnel conducted in-person visits to all 117 properties on December 31, 2025; the community outreach letter (included as Appendix E), and a copy of the well questionnaire form were hand-delivered to residents during the in-person visits. On January 20, 2026, MIPC personnel conducted follow-up in-person visits to the properties not connected to public water that had yet to return a well questionnaire and/or had not otherwise responded to multiple requests for information and permission to test their private drinking water well (see Table 1). A letter requesting they complete and return the questionnaire and another copy of the questionnaire were left behind at each property where the resident did not answer at the door.

As detailed in Table 1, responses received following the certified mailings and in-person visits were compiled and reviewed. Information from completed well questionnaires and updated information regarding water source connections were reconciled as additional information became available.

Outcomes of these efforts, including sampling declinations, are documented in the private drinking water well inventory table (Table 1).

Step 3 – Coordinate / Schedule Sampling

Subsequent to the confirmation of access, property owners/residents were contacted to schedule private drinking water well sampling. Four samples were collected at four properties proximate to the western Site boundary in December 2025 prior to receiving the PADEP Order. Thereafter, sampling appointments were scheduled on a rolling basis beginning in early January 2026 and continued throughout January 2026, based on owner availability and access.

Upon request, sampling was also conducted for select non-potable private drinking water wells and for private drinking water wells located beyond the 1,000-foot western limit requested by PADEP (Figure 1).

Where initial analytical results indicated results above Method Detection Limits (MDLs), follow-up (re-sampling) events were coordinated with those property owners.

Upon completion of property owner contact efforts, a final list of the private drinking water wells is maintained to identify properties where access was granted, declined, or could not be secured after at least two attempts. This information will be maintained as part of the Act 2 environmental investigation record and provided to PADEP as part of progress reports.

3.3 Private Water Well Gauging, Screening, and Sampling Procedures

During sample collection activities, available well information was reviewed with the resident, if present, to confirm water distribution system configuration and identify purging and sampling locations and procedures. Samples were collected from the water distribution system upstream of known/identified treatment systems, where present and accessible.

Well Gauging and Wellhead Screening

For private drinking water wells sampled or to be sampled after issuance of the PADEP Order on December 23, 2025, Langan retained the services of a PA-licensed well driller to open and close property wells to gain access to screen and gauge the wells, to the extent practical, as stipulated in the Order. During a meeting among MIPC, Langan, and PADEP on January 7, 2026, the PADEP stated that it is appropriate to limit the initial wellhead screening and gauging requirement to only those properties closest to the facility's western property boundary and area of investigation. Therefore, as of January 7, 2026, at 2 PM, only those ten private drinking water wells located on properties west and adjacent to the site (i.e., to the east of Chichester Avenue and south of Concord Road), were or will be considered for opening, wellhead field screening and gauging prior to sampling.
It is noted that future conditions may necessitate expanding the area where wellhead screening and well gauging are completed. The wellhead gauging and screening protocol described herein is subject to change pending future conditions.

Decisions to open and remove well covers will be on a case-by-case basis after assessing the condition and integrity, accessibility, and means and methods required to remove the well cover safely. If feasible, the wellheads were and will be field-screened using a photoionization detector (PID) to evaluate for the potential presence of volatile organic vapors. Additionally, if feasible, a water interface probe was or will be deployed to gauge the measured depth to water at each opened private well. If indications of potential gasoline or PID readings of volatile organic constituents above background are or were detected in a private well, a bailer was or will be deployed to assess the potential presence of gasoline on the water surface. Note that several private drinking water wells located on properties adjoining the western Site boundary[2] could not be opened for field-screening and gauging because of denied access or wellhead conditions.

In accordance with Part 1.f.vii., the results of the private well gauging and screening are reported to PADEP in the Weekly Progress Reports submitted each Tuesday. To date, PID readings for the eight wells that have been field-screened are below 1 part per million (ppm) for volatile organic compounds, ranging from 0.0 to 0.79 ppm at the wellheads. No LNAPL has been detected in any of the private property wells using an interface probe and bailers. Depth-to-water measurements from top of well casings range from 14 to 42 feet.

During future sampling of private drinking water wells located on properties adjoining the western boundary of the Site, Langan will continue to field-screen those wellheads using a PID and gauge the wells using an interface probe and bailer, as warranted and if feasible.

Sample Collection

Private drinking water well sampling was and will be conducted using procedures consistent with the collection of unchlorinated drinking water samples for volatile organic compounds (VOCs) associated with unleaded gasoline, in accordance with USEPA Method 524.2. Sampling locations were and will be selected at an interior or exterior spigot closest

[2] These properties include: [REDACTED].

to the well and upstream of any treatment systems, where accessible. Sampling points were observed to confirm accessibility and condition, and removable attachments (e.g., hoses, aerators, or filters) were attempted to be removed prior to sampling to prevent interference with sample integrity. If accessible, the preferred sampling point is the faucet connected to the base of the well pressure tank.

Prior to sample collection, the water well or distribution line was and will be purged to remove standing water from the plumbing system and activate the well pump. Purging was and will be conducted by allowing water to flow at a moderate rate for a sufficient duration to flush the system and stabilize observable indicators such as water temperature and appearance. Where low-yield well conditions or household plumbing limitations were/are present, the purging was or will be limited to avoid dewatering the well or adversely impacting the water supply. During purging, Langan has and will continue to collect and record at least one round of water quality parameters (e.g., temperature, pH, specific conductivity, dissolved oxygen, and oxygen reduction potential (ORP)) using a calibrated water quality meter.

Following purging, samples for VOC analysis were and will be collected directly into laboratory-supplied 40-milliliter glass vials equipped with Teflon-lined septa and pre-preserved as required for Method 524.2. Samples were and will be collected using a low-flow, non-aerating technique to minimize volatilization and loss of target analytes. Vials were carefully filled to eliminate headspace and immediately capped. Each vial was and will be visually inspected to confirm the absence of air bubbles; any vial exhibiting headspace was or will be discarded and replaced.

Collected samples were and will be immediately labeled and placed in insulated coolers with ice to maintain temperatures at approximately 4°C±2°C until delivery to the analytical laboratory. Field observations, including sampling point description, purging duration, well and plumbing conditions, screening results, and any deviations from standard procedures, and photographs were and will be documented during each sampling event.

Equipment Cleaning

To prevent potential carryover of conditions between sampling locations, dedicated or disposable sampling materials were and will be used. Where reusable equipment is

required, equipment cleaning was/will be performed between sampled wells using a detergent wash, potable water rinse, and final rinse with distilled or deionized water. New nitrile gloves were/will be worn at each sampling location and changed, as necessary.

Laboratory Analysis

Water samples were and will be submitted to a Pennsylvania-certified drinking water laboratory for analysis of gasoline-related constituents using USEPA Method 524.2, as further described in Section 3.4. The analytical suite included the PADEP petroleum product short list for unleaded gasoline.

Analytical results and laboratory reports for the private drinking water well samples collected and analyzed to date have been submitted to PADEP each Tuesday as part of the Weekly Progress Reports. Detected results and laboratory detection limits have been below the most stringent applicable PA Act 2 Medium-Specific Concentrations (MSCs) for groundwater (Residential, Used Aquifer) and U.S. EPA Maximum Contaminant Levels (MCLs) for Drinking Water, as well as both state and federal vapor intrusion screening values for groundwater. Screening levels are further described in Section 5.0.

Quality Assurance / Quality Control

Quality assurance and quality control (QA/QC) measures included the collection and analysis of field duplicates, field blanks, and trip blanks. Duplicate samples are collected at a frequency of one per day with at least one duplicate sample per 20 samples. Duplicate samples are submitted to the laboratory with no indication as to the associated parent sample (e.g., no reference to parent sample in the sample ID and no time included on label or chain-of-custody). Field blank samples are collected at a frequency of one per day, and trip blanks are submitted to the laboratory at a frequency of once per sample shipment. Results of QA/QC samples have been and will continue to be reported to PADEP each Tuesday as part of the Weekly Progress Reports.

Chain-of-custody documentation was and will be maintained from sample collection through laboratory receipt. Field instruments, including the PID and interface probe, were calibrated in accordance with manufacturer specifications prior to use. During data validation, analytical data were and will be reviewed for completeness, holding times, calibration, and quality control acceptance criteria, as further described in Section 4.0.

3.4 Analytical Methods and Laboratory Analysis

Water samples collected from private drinking water wells will be analyzed for VOCs associated with unleaded gasoline using analytical methods approved for drinking water. Analyses will target the PADEP "Short List" of petroleum-related constituents for unleaded gasoline, which represents the primary compounds of concern for evaluating potential impacts to potable water supplies resulting from the gasoline release.

The target analyte list will include benzene, toluene, ethylbenzene, total xylenes (BTEX), isopropylbenzene (cumene), methyl tert-butyl ether (MTBE), naphthalene, 1,2,4-trimethylbenzene, and 1,3,5-trimethylbenzene. These constituents are characteristic of modern unleaded gasoline formulations. Lead and historical lead scavenger compounds (e.g., 1,2-dibromoethane and 1,2-dichloroethane) are not expected and will not be included in the analytical program, as the released product was new unleaded gasoline.

Drinking water samples have been and will be submitted to Pace Analytical Services, LLC (Pace), a full-service environmental laboratory certified to perform drinking water analyses in accordance with applicable federal and state regulatory programs. Pace conducts volatile organic compound analysis using U.S. EPA Method 524.2, a validated purge-and-trap gas chromatography/mass spectrometry (GC/MS) method specifically designed for the determination of unchlorinated VOCs in drinking water and groundwater. The laboratory maintains appropriate accreditations and quality systems to support regulatory acceptance of analytical data.

Upon receipt at the laboratory, samples have been and will be logged, inspected for container integrity and temperature compliance, and preserved at approximately 4°C until analysis. EPA Method 524.2 involves purging a measured aliquot of the water sample with an inert gas to volatilize target compounds, trapping the VOCs on a sorbent medium, and thermally desorbing the compounds into the GC/MS for separation and detection. Internal standards and surrogate compounds will be added to each sample to evaluate analytical performance, recovery, and instrument stability.

Laboratory quality control procedures have been and will be implemented in accordance with Method 524.2 and will include method blanks, laboratory control samples, and matrix

spike/matrix spike duplicate analyses, as applicable. Instrument calibration has been and will be performed using certified reference standards encompassing the full suite of target analytes. Reporting limits have been and are expected to be sufficiently low (generally on the order of sub-microgram per liter concentrations) to allow direct comparison to applicable drinking water criteria, as further described in Section 5.0.

Laboratory data deliverables will include complete analytical reports and associated quality assurance and quality control documentation. Analytical data produced will be suitable for inclusion in the future Act 2 environmental investigation record and for review by PADEP.

4.0 DATA QUALITY/USEABILITY EVALUATION

Data validation has been and will be performed in accordance with the applicable USEPA data quality standard operating procedures (SOPs) for data validation and USEPA's National Functional Guidelines for Organic and Inorganic Data Review. Tier 1 data validation (the equivalent of MDE's Tier III validation and USEPA's Stage 2A validation) was and will be performed to evaluate data quality.

Langan Tier 1 data validation is based on completeness and compliance checks of sample-related QA results including:

- Holding times;
- Sample preservation;
- Blank results (method, trip, and field blanks);
- Surrogate recovery compounds and extracted internal standards (as applicable);
- Laboratory Control Sample (LCS) and LCS Duplicate (LCSD) recoveries and Relative Percent Differences (RPDs);
- Field duplicate RPDs

Data Usability Assessments (DUAs) have been and will be prepared by a Langan data validator and reviewed by the Langan Quality Assurance Manager (QAM) before issuance. Copies of the DUAs completed to date are provided as Appendix F. The DUA presents the results of data validation, including a summary assessment of laboratory data packages, sample preservation and chain-of-custody procedures, and a summary assessment of precision, accuracy, representativeness, comparability, and completeness for each

analytical method. The DUAs for samples collected as part of the December 2025 and January 2026 sampling activities conclude that all data are considered usable, as qualified. In addition, completeness, defined as the percentage of analytical results that are judged to be valid, is 100%.

5.0 CLEANUP STANDARDS AND SCREENING LEVELS

Analytical results obtained from private drinking water well sampling will be evaluated by comparison to applicable federal and state drinking water and groundwater criteria to assess potential impacts to potable water supplies and determine whether follow-up actions are warranted.

Sample results are compared to both cleanup standards and screening values. The cleanup standards referenced in Sections 5.1 and 5.2 are enforceable cleanup standards, whereas the screening levels referenced in Sections 5.3 and 5.4 are used as conservative benchmarks to evaluate the presence and relative magnitude of petroleum-related constituents in drinking water and to support decisions regarding the need for additional investigation, confirmation sampling, or response actions. The screening levels referenced in Sections 5.3 and 5.4 do not represent cleanup standards or remediation goals, nor does an exceedance of a screening level, by itself, constitute a determination of unacceptable risk. Rather, these screening levels are used as health-protective reference values to guide interpretation of private well water quality data in accordance with PADEP guidance and the requirements of the Administrative Order.

5.1 U.S. EPA Safe Drinking Water Act Maximum Contaminant Levels

Primary screening of private well analytical results will be conducted using U.S. EPA Safe Drinking Water Act (SDWA) Maximum Contaminant Levels (MCLs) for regulated volatile organic compounds, where such values have been established. MCLs are enforceable standards for public water systems; however, PADEP routinely applies these criteria as conservative benchmarks for evaluating private drinking water supplies.

Applicable MCLs include, but are not limited to:

- Benzene: 5 microgram per liter (µg/L)
- Toluene: 1,000 µg/L

- Ethylbenzene: 700 µg/L
- Total xylenes: 10,000 µg/L

These values represent concentrations protective of human health for lifetime consumption and will serve as the primary screening criteria for constituents with established MCLs.

5.2 Pennsylvania Act 2 Statewide Health Standards

For petroleum-related constituents that do not have federal MCLs (e.g., MTBE, naphthalene, isopropylbenzene, trimethylbenzenes), analytical results will be compared to Pennsylvania Act 2 Residential Statewide Health Standards for groundwater used as drinking water (Medium-Specific Concentrations, MSCs), as published in 25 Pa. Code Chapter 250. Act 2 MSCs are risk-based cleanup standards developed to protect residential potable groundwater use and are appropriate for evaluating private drinking water well data.

Where both an EPA MCL and an Act 2 MSC are available for a given compound, the more stringent value will be used as the screening benchmark. Langan notes that the EPA MCLs and Act 2 MSCs are the same for the four compounds that have EPA MCLs established.

Applicable Act 2 MSCs include, but are not limited to:

- Isopropylbenzene (Cumene): 840 µg/L
- MTBE: 20 µg/L
- Naphthalene: 100 µg/L
- 1,2,4-Trimethylbenzene: 130 µg/L
- 1,3,5-Trimethylbenzene: 130 µg/L

5.3 U.S. EPA Risk Screening Levels for Resident Tap Water

As a conservative measure for initial screening assessment, Langan has and will continue to additionally compare drinking water sample results to the U.S. EPA Resident Tap Water Risk Screening Levels (RSLs) using a target risk level of one per 1,000,000 (TR=1E-06) and a target hazard quotient of 0.1 (THQ=0.1). The more conservative (i.e., lower) of the carcinogenic and non-carcinogenic screening values was selected as the RSL screening value. These RSLs are based on the default parameters for a resident and account for

potential inhalation and dermal contact exposure pathways. The U.S. EPA Resident Tap Water RSLs also consider incidental ingestion and both child and adult potential receptors.

The U.S. EPA Resident Tap Water RSLs (TR=1E-06, THQ=0.1) for the VOCs of interest are:

- Benzene: 0.46 µg/L
- Toluene: 110 µg/L
- Ethylbenzene: 1.5 µg/L
- Xylene (total): 19 µg/L
- Isopropylbenzene (Cumene): 45 µg/L
- MTBE: 14 µg/L
- Naphthalene: 0.12 µg/L
- 1,2,4-Trimethylbenzene: 5.6 µg/L
- 1,3,5-Trimethylbenzene: 6.0 µg/L

5.4 Vapor Intrusion Screening Values

Langan has and will continue to additionally compare drinking water sample results to both the U.S. EPA and PADEP vapor intrusion (VI) screening values for groundwater.

The U.S. EPA Target Groundwater Concentrations for VI Screening, which were determined using the U.S. EPA Vapor Intrusion Screening Level (VISL) calculator for a residential scenario with a target risk level of one per 1,000,000 (TR=1E-06) and a target hazard quotient of 0.1 (THQ=0.1) and default parameters. The more conservative (i.e., lower) of the carcinogenic and non-carcinogenic screening values was selected as the U.S. EPA VISL.

The U.S. EPA Resident Groundwater VISLs (TR=1E-06, THQ=0.1) for the VOCs of interest are:

- Benzene: 1.59 µg/L
- Toluene: 1,920 µg/L
- Ethylbenzene: 3.49 µg/L
- Xylene (total): 38.5 µg/L
- Isopropylbenzene (Cumene): 88.7 µg/L
- MTBE: 450 µg/L

- Naphthalene: 4.59 µg/L
- 1,2,4-Trimethylbenzene: 24.8 µg/L
- 1,3,5-Trimethylbenzene: 17.5 µg/L

Langan has and will continue to compare drinking water results to the PADEP Residential Statewide Health Standard VI Screening Values for Groundwater (SV_{GW}) in accordance with the PADEP Act 2 Land Recycling Program Technical Guidance Manual for Vapor Intrusion.

The PADEP Residential VI SV_{GW} are:

- Benzene: 23 µg/L
- Toluene: 34,000 µg/L
- Ethylbenzene: 700 µg/L
- Xylene (total): 10,000 µg/L
- Isopropylbenzene (Cumene): 1,900 µg/L
- MTBE: 6,300 µg/L
- Naphthalene: 100 µg/L
- 1,2,4-Trimethylbenzene: 510 µg/L
- 1,3,5-Trimethylbenzene: 360 µg/L

5.5 Treatment of Non-Detects and Reporting Limits

Results reported as non-detect (ND) will be considered compliant with cleanup standards and screening criteria provided that the associated laboratory method detection limits or reporting limits are below the applicable cleanup standards and screening levels. EPA Method 524.2 reporting limits have been and are expected to be sufficiently low to allow meaningful comparison to drinking water standards for all target analytes.

Qualified detections (e.g., estimated values reported with laboratory qualifiers) will be evaluated on a case-by-case basis, considering the magnitude of the concentration relative to applicable screening levels and the associated quality control information.

5.6 Interpretation and Response Considerations

Analytical results below applicable cleanup standards and screening levels will be considered indicative of potable water quality with respect to petroleum-related

constituents. Detections below cleanup standards screening criteria may be noted for trend evaluation but will not, by themselves, trigger response actions.

If any constituent is detected at a concentration exceeding an applicable cleanup standard or screening level, the result will be further evaluated in coordination with PADEP to determine appropriate next steps. Such steps may include confirmation sampling, provision of interim protective measures (e.g., bottled water), or evaluation of longer-term mitigation options, such as installation of a Point-of-Entry Treatment (POET) system or connection to the public water supply, as warranted.

6.0 ALTERNATIVE DRINKING WATER SUPPLY PROVISIONS

Consistent with the requirements of PADEP's Administrative Order (Part 1.b.) and as part of the broader community outreach and property owner contact efforts described in Section 3.2, bottled water supply notification letters were distributed beginning in December 2025 to residents within the area of interest to inform them of the availability of interim bottled water service during the ongoing investigation.

Currently, 29 residences are receiving bottled water service. Bottled water service is being provided on an interim basis and will continue to be made available to residents upon request while investigation and follow-up activities are ongoing.

The distribution of bottled water letters and coordination of bottled water service were conducted in conjunction with certified mailings, follow-up communications, and door-to-door outreach efforts described in Section 3.2 and are intended to ensure that residents are informed of available protective measures during the investigation. Additional residents within the area of interest may request bottled water service at any time, and such requests will be accommodated in coordination with PADEP.

To date, two owners of properties that adjoin the western boundary of the Site have expressed interest in possibly connecting to the public water supply. MIPC has consulted CWA and local plumbers to plan for potential installation of service laterals to connect these properties, and potentially others, to the water main within Chichester Avenue. Proceeding with public water

connection and abandonment of private wells is dependent on the owners' agreement for property access, which is pending.

7.0 PRIVATE DRINKING WATER WELL MONITORING PLAN

As required by the December 2025 Administrative Order (Part 1.a, 1.c, and 2.b.i.), MIPC has developed this plan for monitoring private drinking water wells for properties that are located within 1,000 feet of the western boundary of the Site. This plan is designed to monitor potable water quality over time for potential impacts from the gasoline release and to allow for a timely response to detected contamination, if any, and to ensure continued protection of private drinking water wells.

7.1 Baseline Private Drinking Water Well Sampling Summary

To date, a total of 48 private water wells have been sampled as part of the baseline drinking water investigation (see Figure 2). Of these, 39 are used potable wells located within the 1,000-foot area of interest (AOI), as defined in the PADEP Order (Figure 2). Five used potable wells were sampled outside of the PADEP-stipulated sampling area at the request of property owners, including four to the east of the Site and one beyond 1,000 feet to the west. The remaining four wells include two non-potable irrigation wells within 1,000 feet of the western Site boundary, one inactive secondary well sampled in addition to the active primary potable supply well, and one non-potable, unused well located north of the site. In addition to the 48 wells sampled, 12 private drinking water wells have been re-sampled (nine have been sampled three or more times), as enumerated in Table 1. Langan notes that property owners for three of the properties within 1,000 feet of the western Site boundary have declined private well testing (see Table 1).

In total, initial sampling was completed for 39 of the 49 properties that have provided access and are located within 1,000 feet of the western Site boundary and not connected to the public water supply. Considering the three properties where access was denied, MIPC and Langan are continuing to attempt to coordinate private well sampling access with the owners of the nine remaining properties that are located within 1,000 feet of the western Site boundary and not connected to the public water supply.

Baseline private well sample collection procedures have followed and will follow the protocols outlined in Section 3.3.

7.2 Results Summary

As required by Parts 1.f.vii. and 1.h. of the December 2025 Administrative Order, analytical results summary tables and laboratory analytical reports from baseline and follow-up drinking water well sampling are provided to PADEP each Tuesday as part of the Weekly Progress Reports.

Following data validation (see Section 4.0), results are screened to the applicable state and federal criteria (see Section 5.0). To date, samples collected during the initial and/or follow-up rounds of sampling from three of the 48 tested private wells (including one unused, non-potable well) had low-level detection(s) of one or more petroleum-related constituent(s). The detections are at least an order of magnitude below the most stringent PA Act 2 MSCs for groundwater.

One of the used, potable wells with low-level, non-exceeding detections of VOCs is located over 700 feet west-southwest of the Site. The other used, potable well, which had a low concentration of xylenes detected during the second round of sampling in the parent sample only, is located on a property that adjoins the site to the west. Xylenes were not detected in the initial groundwater sample or the duplicate sample collected from this well during the second round of sampling. Both residences previously requested and are already receiving bottled water service, and results from the most recent (third) round of sampling for both residences were non-detect for all analyzed compounds.

The third private well is an unused non-potable well with a low-level detection of xylenes. This property is connected to and uses the public water supply, but the homeowner requested sampling of their unused private well.

As private well results, including data summary tables and copies of laboratory reports, are maintained through the weekly reporting process, the data are not duplicated herein.

7.3 Ongoing Monitoring Frequency

MIPC has developed this continuing groundwater monitoring program to assess potential changes in water quality over time that may or not be affected by potential migration of gasoline-related constituents. Monitoring frequencies are based on the proximity of the groundwater supply well to the western boundary of the Site, the baseline sampling results, and DEP recommendation. At this time, we propose monthly sampling for certain designations of drinking water wells deemed to face a higher potential risk and quarterly or semi-annual sampling for other drinking water wells that are deemed to face a lesser potential risk. Analytical data and results for drinking water wells will be interpreted in context with the conceptual site model and as more data are gathered from site investigation and remediation efforts to continuously assess the designations of drinking water wells and their relative level of potential risk.

Private well sampling is dependent upon access and the protocol outlined in this section is subject to change based on future conditions.

Monthly Sampling: Used drinking water wells located on properties that adjoin the western boundary of the Site will be sampled monthly because of their immediate proximity to the Site and the potential for gasoline constituent migration. Ten (10) properties fall into this category, as summarized in the table below and depicted on Figure 2. Additionally, groundwater samples from one private supply well (RW-23) located on a property that does not adjoin the Site had VOC detections below the applicable state and federal screening criteria. As we continue to evaluate the results from this property's well which is inconsistent with the current understanding of the available data and is quite distant from the Tank 708 release area, this well will continue to be included in the monthly sampling program (see inset table below and Figure 2).

Ongoing well sampling is dependent on the owner's consent for access and sample collection. As noted in the summary table below, the owner of one property has declined further access and will be excluded from future sampling unless access is re-established. One other property owner denied a request to re-sample their well; however, additional attempts will be made to sample this well as part of ongoing monitoring. As discussed in Section 3.3, two of the private wells slated for monthly monitoring are not accessible for

field-screening and gauging either because of denied wellhead access or wellhead condition.

Private Wells for Ongoing Monthly Sampling

Well ID	Address	Parcel ID	Access Notes
[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	Does not grant access
[REDACTED]	[REDACTED]	[REDACTED]	Denied wellhead access for field-screening/gauging
[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	Wellhead condition not amenable to opening for field-screening/gauging
[REDACTED]	[REDACTED]	[REDACTED]	Denied request for re-sampling in January 2026
[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	Obtained legal counsel, access pending
[REDACTED]	[REDACTED]	[REDACTED]	

Quarterly Sampling: Used drinking water wells located on select properties west of Chichester Avenue will be sampled on a quarterly basis because of their location relative to the release and the potential for gasoline constituent migration. In accordance with DEP's recommendation in their March 31, 2026 letter, seven (7) properties are proposed to be sampled quarterly, as summarized in the table below and depicted on Figure 2.

Ongoing well sampling is dependent on the owner's consent for access and sample collection. As noted in the summary table below and in Table 1, the owners of three properties have been non-responsive to repeated outreach attempts. Additionally, one of the residences has two private wells, as indicated in Table 1 and the inset table below. The newer, deeper well is the primary well that is used for water supply. The older well is unused and secondary. Both wells were sampled initially in January 2026; however, only the primary, used well is proposed for ongoing quarterly sampling.

Private Wells for Ongoing Quarterly Sampling

Well ID	Address	Parcel ID	Access Notes
[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	Non-Responsive
[REDACTED]	[REDACTED]	[REDACTED]	Non-Responsive
[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]*	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	Non-Responsive

* - This property has two private wells. The newer, deeper well is the primary well that is used for water supply. The older well is unused and secondary. Both wells were sampled initially in January 2026; however, only the primary used well is proposed for quarterly sampling.

Semi-Annual Sampling: The remaining water supply wells located within 1,000 feet of the western Site boundary will be sampled on a semi-annual basis (every 6 months). This includes used potable wells for which access has been granted (see Table 1 and Figure 2).

Monitoring frequency and well selection may be adjusted over time based on cumulative results, plume stability, and access status. Any modifications to the monitoring program will be documented and submitted to PADEP for review and concurrence.

8.0 REPORTING - OWNERS & PADEP

Following data validation (see Section 4.0), letters transmitting the results of the drinking water samples collected by MIPC/Langan have been and will continue to be prepared and mailed via USPS certified or priority mail to each property owner within two weeks of sample collection. An excerpt of the laboratory analytical report containing the results for that owner's well sample is appended to each results transmittal letter. Additionally, MIPC has been and intends to continue calling each property owner to verbally convey the results of their private well sample.

As required by the Order, MIPC has been and will continue to submit to PADEP weekly progress reports (per Part 1.f.) and groundwater supply well laboratory analytical results received during each seven-day period (per Part 1.h.). In addition, quarterly remedial action progress reports have been and will continue to be submitted beginning 90 days after the Order's issuance, in accordance with Part 2.b.xi of the Order. The weekly and quarterly progress reports have and will

continue to summarize private well identification efforts, sampling activities, analytical results including data comparison to applicable screening criteria, and alternate drinking water supply provisions.

Laboratory results for samples collected from groundwater supply wells received to date, including those from the baseline private well sampling, have been and will continue to be reported to PADEP as part of the weekly progress reports.

A remedial investigation report (RIR) pursuant to the Pennsylvania Land Recycling and Environmental Remediation Standards Act (Act 2) will also be submitted to PADEP under separate cover in accordance with the implementation schedule submitted to the PADEP on January 20, 2026 and pending revision to address PADEP comments received on February 3, 2026. The Act 2 RIR will also include relevant information and updates regarding the supply well sampling and analysis program described herein.

9.0 REFERENCES

Langan Engineering and Environmental Services, LLC. December 30, 2025. Weekly Progress Report #1. MIPC Chelse Facility, Aston, PA. *[Previously Submitted to PADEP]*

Langan Engineering and Environmental Services, LLC. January 6, 2026. Weekly Progress Report #2. MIPC Chelse Facility, Aston, PA. *[Previously Submitted to PADEP]*

Langan Engineering and Environmental Services, LLC. January 13, 2026. Weekly Progress Report #3. MIPC Chelse Facility, Aston, PA. *[Previously Submitted to PADEP]*

Langan Engineering and Environmental Services, LLC. January 20, 2026. Weekly Progress Report #4. MIPC Chelse Facility, Aston, PA. *[Previously Submitted to PADEP]*

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Langan Engineering and Environmental Services, LLC. January 27, 2026. Weekly Progress Report #5. MIPC Chelse Facility, Aston, PA. *[Previously Submitted to PADEP]*

Langan Engineering and Environmental Services, LLC. February 3, 2026. Weekly Progress Report #6. MIPC Chelse Facility, Aston, PA. *[Previously Submitted to PADEP]*

MIPC, LLC. December 10, 2025. Community Outreach Letter and Well Information Questionnaire Form and Request for Sampling.

MIPC, LLC. December 26, 2025. Community Outreach Letter for Bottled Water Supply Offer.

MIPC, LLC. December 30, 2025. Community Outreach Letter for Bottled Water Supply Offer.

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PADEP. May 2020. Guidelines for Sample Collection, Receipt, and Handling (Document Number 150-4200-002).

PADEP. December 23, 2025. Administrative Order Issued to MIPC, LLC – Chelsea Tank Farm.

PADEP. March 27, 2021. Land Recycling Program Technical Guidance Manual (TGM), Document No. 261-0300-101.

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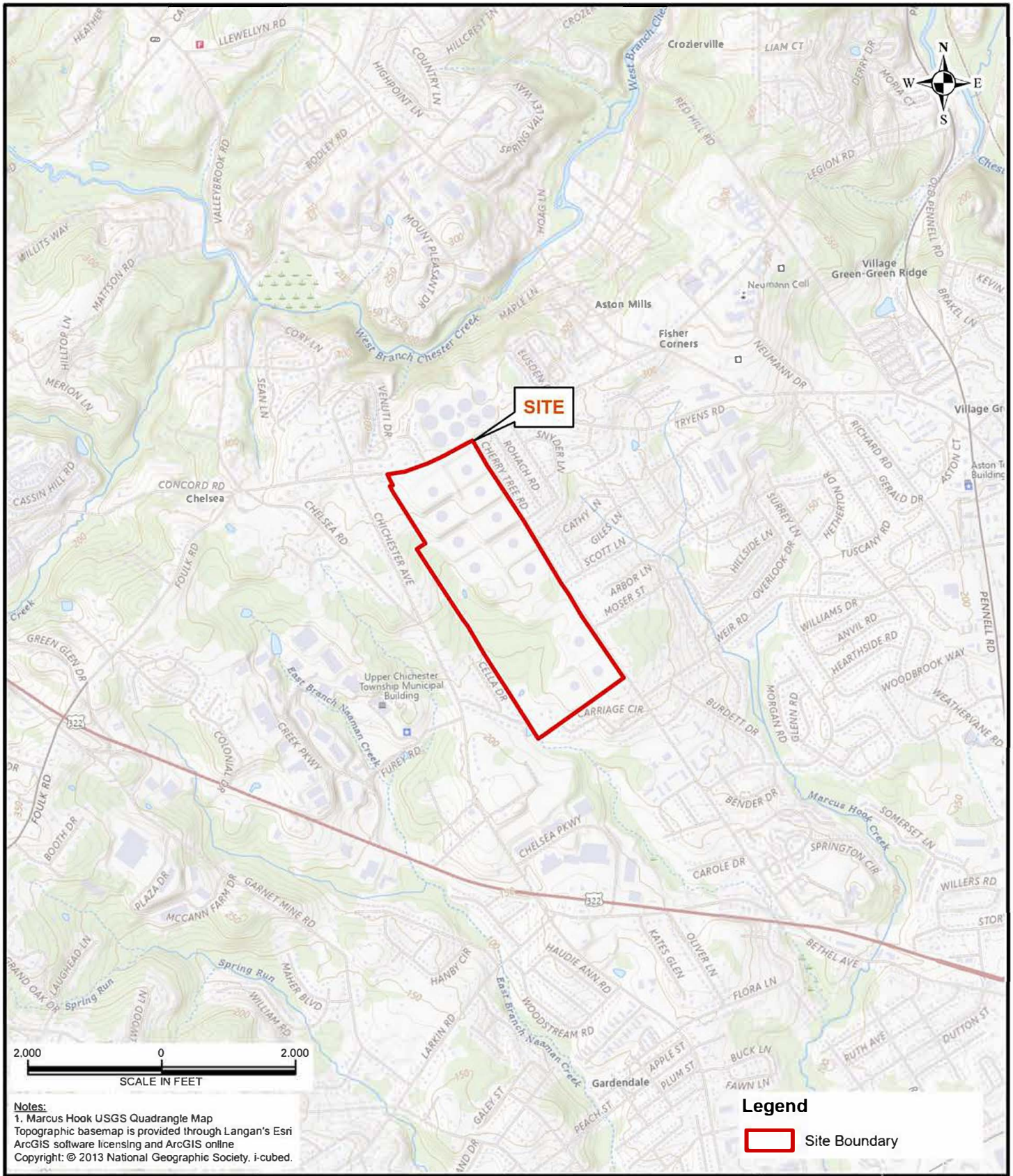
U.S. EPA. November 2024. Regional Screening Levels – Generic Tables. https://www.epa.gov/risk/regional-screening-levels-rsls-generic-tables.

U.S. EPA. Vapor Intrusion Screening Level Calculator. https://www.epa.gov/vaporintrusion/vapor-intrusion-screening-level-calculator.

FIGURES



Notes:
1. Marcus Hook USGS Quadrangle Map Topographic basemap is provided through Langan's Esri ArcGIS software licensing and ArcGIS online Copyright: © 2013 National Geographic Society, i-cubed.

Legend

Site Boundary

LANGAN

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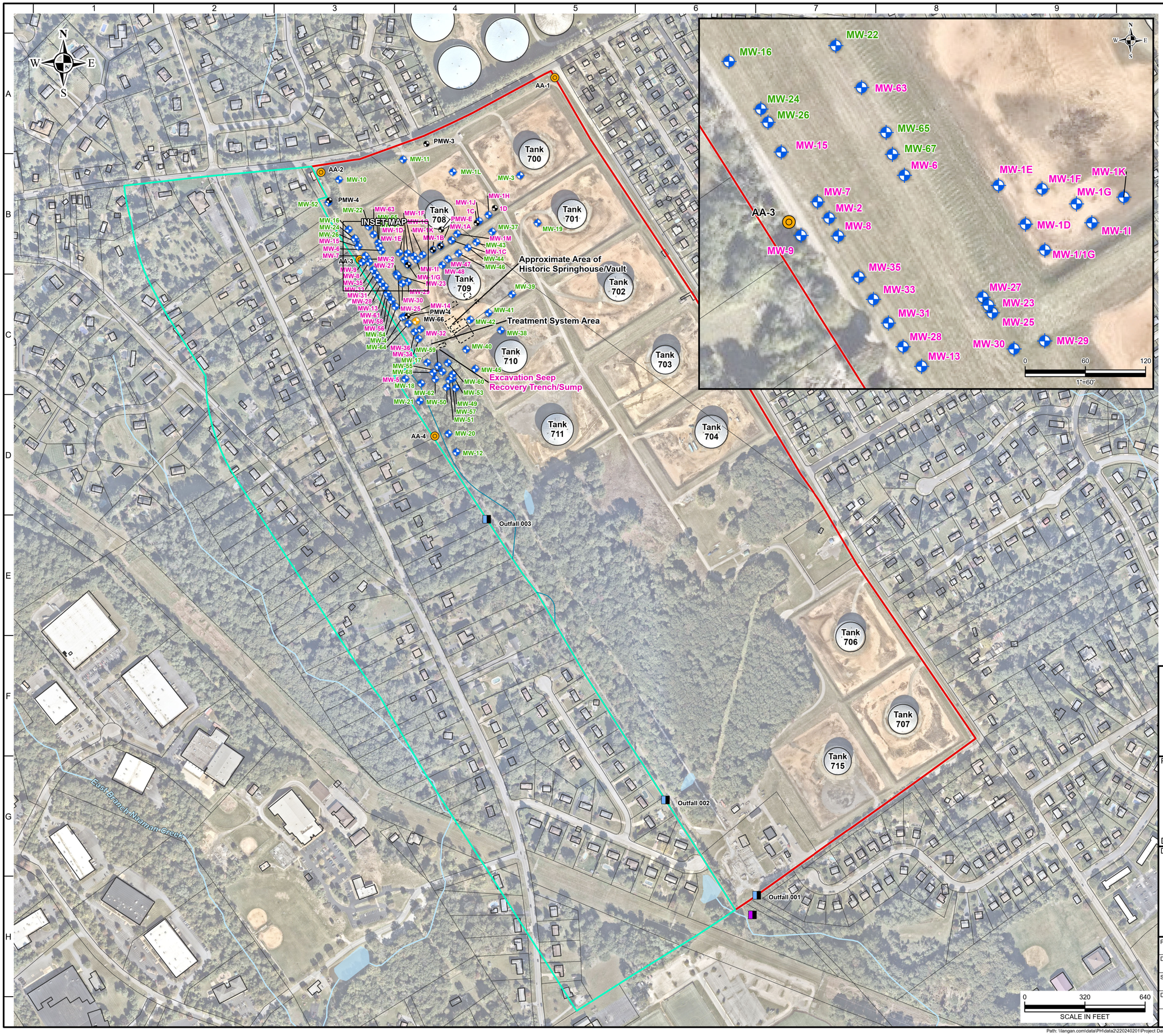
Project	MIPC CHELSEA FACILITY
	920 CHERRY TREE ROAD ASTON TOWNSHIP
	COUNTY STATE
Drawing Title	SITE LOCATION MAP
Project No.	220240201
Date	1/12/2026
Scale	1"=2,000'
Drawn By	CH
Figure	1



Legend

- Approximate Soil Boring Location
- Proposed Monitoring Well Location
- Approximate Monitoring Well Location
- Air Monitoring Station Location
- Stormwater Outfall Approximate Location
- Approximate Location of Routine MIPC Surface Water Inspection
- Approximate Onsite Portion of Bezer's Run (subject to routine MIPC surface water inspection)
- Historic Site Feature
- 1000-Foot Buffer along Western Property Boundary (Properties Targeted for Semiannual Private Well Testing if not Connected to Public Water (Access Dependent))
- Site Boundary
- Structure
- Lake/Pond
- Stream

Notes:
Green Sample ID – No LNAPL Encountered in Well/Boring
Pink Sample ID – LNAPL Encountered in Well/Boring

1. All site feature locations are approximate.
2. Imagery provided through Langan's subscription to Nearmap.com. Flown 10/9/2025.
3. Parcel boundaries are provided by the Delaware County Office of Data and Mapping Innovation (ODMI).
4. Monitoring well and soil boring locations per survey data provided by Envirosure.
5. Streams and waterbodies are provided by the National Hydrography Dataset (NHD).
6. Structure outlines provided by the Federal Emergency Management Agency (FEMA) Geospatial Response Office and Oak Ridge National Laboratory (ORNL).
7. Sources of information for properties not serviced by CWA are CWA correspondence in December 2025 and responses from property owner water use questionnaires.

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Project

MIPC CHELSEA FACILITY

920 CHERRY TREE ROAD
ASTON TOWNSHIP

DELAWARE COUNTY PENNSYLVANIA

Drawing Title

MIPC CHELSEA FACILITY

Project No. 220240201	Figure 2
Date 4/13/2026	
Scale 1"=320'	
Drawn By CH	

TABLES

Table 1

Private Well Inventory and Statuses for Properties Within 1000 Feet of Western Site Boundary Without Public Water Connection

MIPC Chelsea Facility, Aston, PA 19014

Updated April 17, 2026

	Well Identification No.	Address (All Addresses are Aston, PA 19014)	Map No.	Parcel No.	Municipality	CWA Connection? (Yes/No)	Well Survey Completed/ Received?	Requested Well Testing (No Survey Rcv'd)	Initial Well Sample Date	Scheduled Sampling Date	Door Visit & Leave Behind Letter with Request to Sample	Declined Testing	2nd Round Well Sample Date	3rd Round Well Sample Date	4th Round Well Sample Date	Requested/ Receiving Bottled Water
Monthly Sampling Program	REDACTED				Bethel	No		Yes	12/16/2025	← Sampled	N/A	Yes	Declined	Declined	Declined	
					Bethel	No		Yes	12/8/2025	← Sampled	N/A	N/A	1/29/2026	4/14/2026		Yes
					Bethel	No	Yes		12/8/2025	← Sampled	N/A	N/A	2/9/2026	3/16/2026	4/13/2026	Yes
					Bethel	No	Yes		12/8/2025	← Sampled	N/A	N/A	1/23/2026	3/9/2026	4/15/2026	Yes
					Upper Chichester	No		Yes	1/9/2026	← Sampled	N/A	N/A	3/27/2026	4/13/2026		Yes
					Upper Chichester	No	Yes		1/13/2026	← Sampled	N/A	N/A	3/4/2026	4/24/2026		Yes
					Upper Chichester	No	Yes		1/7/2026	← Sampled	N/A	N/A	1/29/2026	3/10/2026	4/16/2026	Yes
					Upper Chichester	No		Yes	1/9/2026	← Sampled	N/A	N/A	3/3/2026	4/16/2026		Yes
					Upper Chichester	No	Yes			Pending Return Call	1/20/2026					Yes
					Bethel	No	Yes		1/8/2026	← Sampled	N/A	N/A	2/11/2026	3/13/2026	4/13/2026	Yes
					Upper Chichester	No	Yes		1/14/2026	← Sampled	N/A	N/A	1/28/2026	3/10/2026	4/13/2026	Yes
Quarterly Sampling Program					Bethel	No	Yes		1/7/2026	← Sampled	N/A	N/A	1/29/2026	N/A	N/A	Yes
					Bethel	No	Asked to Return	Yes	1/15/2026	← Sampled	N/A	N/A	1/29/2026	N/A	N/A	Yes
					Bethel	No					1/20/2026		N/A	N/A	N/A	
					Bethel	No	Yes			Pending Return Call	1/20/2026	N/A	N/A	N/A	N/A	
					Bethel Township	No	Asked to Return	Yes	2/17/2026	← Sampled	1/20/2026	N/A	N/A	N/A	N/A	Yes
					Bethel Township	No	Yes		1/12/2026	← Sampled	N/A	N/A	4/16/2026	N/A	N/A	Yes
					Bethel Township	No					1/20/2026		N/A	N/A	N/A	
Semi-Annual Sampling Program					Bethel	No	Yes		2/17/2026	← Sampled	1/20/2026	N/A	N/A	N/A	N/A	Yes
					Upper Chichester	No	Yes		1/14/2026	← Sampled	N/A	N/A	N/A	N/A	N/A	
					Upper Chichester	No	Yes		2/11/2026	← Sampled	1/20/2026	N/A	N/A	N/A	N/A	
					Upper Chichester	No			Declined		1/20/2026	Yes	N/A	N/A	N/A	
					Upper Chichester	No	Yes		1/21/2026	← Sampled	N/A	N/A	N/A	N/A	N/A	Yes
					Upper Chichester	No					1/20/2026		N/A	N/A	N/A	
					Upper Chichester	No	Asked to Return	Yes	1/16/2026	← Sampled	N/A	N/A	N/A	N/A	N/A	Yes
					Upper Chichester	No					1/20/2026		N/A	N/A	N/A	
					Upper Chichester	No	Asked to Return	Yes	1/16/2026	← Sampled	N/A	N/A	N/A	N/A	N/A	Yes
					Upper Chichester	No	Yes		1/21/2026	← Sampled	N/A	N/A	N/A	N/A	N/A	
					Upper Chichester	No			Declined		1/20/2026	Yes	N/A	N/A	N/A	
					Upper Chichester	No					1/20/2026		N/A	N/A	N/A	
					Upper Chichester	No	Yes		1/8/2026	← Sampled	N/A	N/A	N/A	N/A	N/A	Yes
					Upper Chichester	No	Yes		1/7/2026	← Sampled	N/A	N/A	N/A	N/A	N/A	Yes
					Upper Chichester	No	Yes		1/13/2026	← Sampled	N/A	N/A	N/A	N/A	N/A	Yes
					Bethel Township	No					1/20/2026		N/A	N/A	N/A	
					Bethel Township	No	Yes		1/21/2026	← Sampled	N/A	N/A	N/A	N/A	N/A	Yes
					Bethel Township	No	Yes		1/28/2026	← Sampled	1/20/2026	N/A	N/A	N/A	N/A	
					Bethel Township	No	Yes		1/12/2026	← Sampled	N/A	N/A	N/A	N/A	N/A	Yes
					Bethel Township	No	Yes		1/13/2026	← Sampled	N/A	N/A	N/A	N/A	N/A	Yes
					Bethel Township	No	Yes		1/12/2026	← Sampled	N/A	N/A	N/A	N/A	N/A	Yes
					Upper Chichester	No	Yes		1/9/2026	← Sampled	N/A	N/A	N/A	N/A	N/A	Yes
					Bethel Township	No	Yes		1/7/2026	← Sampled	N/A	N/A	N/A	N/A	N/A	
					Bethel Township	No	Yes		1/12/2026	← Sampled	N/A	N/A	N/A	N/A	N/A	Canceled
					Upper Chichester	No	Yes		1/15/2026	← Sampled	N/A	N/A	N/A	N/A	N/A	
					Upper Chichester	No	Yes		1/14/2026	← Sampled	N/A	N/A	N/A	N/A	N/A	Yes
					Upper Chichester	No	Yes		1/9/2026	← Sampled	N/A	N/A	N/A	N/A	N/A	Yes
					Upper Chichester	No	Yes		1/15/2026	← Sampled	N/A	N/A	N/A	N/A	N/A	
					Upper Chichester	No	Asked to Return	Yes	3/3/2026	← Sampled	1/20/2026	N/A	N/A	N/A	N/A	Yes
					Upper Chichester	No	Yes		1/28/2026	← Sampled	N/A	N/A	N/A	N/A	N/A	
					Upper Chichester	No					1/20/2026		N/A	N/A	N/A	
					Upper Chichester	No	Yes		1/16/2026	← Sampled	N/A	N/A	N/A	N/A	N/A	
					Upper Chichester	No	Yes		1/9/2026	← Sampled	N/A	N/A	N/A	N/A	N/A	Yes
					Total Count:	**49**	**33**	**8**	**39**	**0**	**15**	**3**	**12**	**9**	**5**	**29**

Notes:

List includes parcels located within 1,000 feet of the western site boundary that are not connected to the CWA public water supply, per correspondence with CWA in December 2025.

The above-listed properties were hand-delivered well survey questionnaires on December 31, 2025 and mailed questionnaires with SASE on December 10, 2025 or January 2, 2026.

The above-listed properties were offered bottled water during in-person visits on December 31, 2025 and via written letters mailed December 26, 2025 or January 2, 2026.

* - This property has two private wells. The newer, deeper well is the primary well that is used for water supply. The older well is unused and secondary. Both wells were sampled on January 12, 2026.

APPENDICES

Appendix A

PA GWIS Database Records Search Table & Map – December 26, 2025

Appendix A
PA GWIS Database Search Records - December 26, 2025
MIPC Chelsea Facility
920 Cherry Tree Road, Aston, PA 19014
Project No. 220240201

Approximate Distance from Site Boundary (feet)	PA Well ID	Original Owner	Well Address	Date Drilled	Latitude (DD)	Longitude (DD)	County	Municipality	Well Zip Code	Activity Type	Driller	Well Use	Water Use	Well Depth (ft)	Casing Top (ft)	Casing Bottom (ft)	Casing Diameter (in)	Bedrock Depth (ft)	Bedrock Reached	Well Yield (gpm)	Static Water Level (ft)	Production Water level (ft)	Test Duration (mins)	Well Yield Method	Formation	Remarks
1475 (West)	18078	[REDACTED]	[REDACTED]	1/1/1983	RD	RD	DELAWARE	BETHEL			THOMAS KEYES, INC.	WITHDRAWAL	IRRIGATION	198	0	50	6		No	100				VOLUMETRIC, WATCH & BUCKET	OLIGOCLASE MICA SCHIST-WISSAHICKON FORMATION	
1475 (West)	18079	[REDACTED]	[REDACTED]	3/1/1983	RD	RD	DELAWARE	BETHEL			THOMAS KEYES, INC.	WITHDRAWAL	IRRIGATION	198	0	40	6		No	30				VOLUMETRIC, WATCH & BUCKET	OLIGOCLASE MICA SCHIST-WISSAHICKON FORMATION	
1475 (West)	99957	[REDACTED]	[REDACTED]	1/1/1983	RD	RD	DELAWARE	BETHEL		New Well	THOMAS KEYES, INC.	WITHDRAWAL	IRRIGATION	198	0	50			No	100				VOLUMETRIC, WATCH & BUCKET	OLIGOCLASE MICA SCHIST-WISSAHICKON FORMATION	
1475 (West)	99958	[REDACTED]	[REDACTED]	3/1/1983	RD	RD	DELAWARE	BETHEL		New Well	THOMAS KEYES, INC.	WITHDRAWAL	IRRIGATION	198	0	40			No	30				VOLUMETRIC, WATCH & BUCKET	OLIGOCLASE MICA SCHIST-WISSAHICKON FORMATION	4TH WBZ - 55
850 (West)	99988	[REDACTED]	[REDACTED]	1/1/1967	RD	RD	DELAWARE	BETHEL		New Well	GEORGE R. BROOKOVER WELL DRLG	WITHDRAWAL	DOMESTIC	95	0	63	6	56	No	6	12		4	UNKNOWN	GABBRO/GABBROIC GNEISS	
50 (East)	474056	[REDACTED]	[REDACTED]	11/9/2010	RD	RD	DELAWARE	ASTON	19014	Well Abandonment	ODYSSEY ENVIRONMENTAL SERVICES, INC.	WITHDRAWAL	DOMESTIC	42					No							
0 (Site, P66 Case)	489439	Buckeye Chelsea Station	920 Cherry Tree Way, Aston, PA.	1/4/2010	39.86734	-75.4536	DELAWARE	ASTON		New Well	ODYSSEY ENVIRONMENTAL SERVICES, INC.	MONITORING		25	0	5	4		No							
0 (Site, P66 Case)	489441	Buckeye Chelsea Station	920 Cherry Tree Way, Aston, PA.	2010-01	39.86734	-75.4536	DELAWARE	ASTON		New Well	ODYSSEY ENVIRONMENTAL SERVICES, INC.	MONITORING		23	0	5	4		No							
0 (Site, P66 Case)	489442	Buckeye Chelsea Station	920 Cherry Tree Way, Aston, PA.	1/6/2010	39.86734	-75.4536	DELAWARE	ASTON		New Well	ODYSSEY ENVIRONMENTAL SERVICES, INC.	MONITORING		25	0	5	4		No							
0 (Site, P66 Case)	490218	Buckeye Chelsea Station	920 Cherry Tree Way, Aston, PA.	1/5/2010	39.86734	-75.4536	DELAWARE	ASTON		New Well	ODYSSEY ENVIRONMENTAL SERVICES, INC.	MONITORING		25	0	10	4		No							
0 (Site, P66 Case)	490221	Buckeye Chelsea Station	920 Cherry Tree Rd.	12/31/2009	39.86734	-75.4536	DELAWARE	ASTON		New Well	ODYSSEY ENVIRONMENTAL SERVICES, INC.	MONITORING		11	0	5	2		No							
0 (Site, P66 Case)	490222	Buckeye Chelsea Station	920 Cherry Tree Way, Aston, PA.	1/5/2010	39.86734	-75.4536	DELAWARE	ASTON		New Well	ODYSSEY ENVIRONMENTAL SERVICES, INC.	MONITORING		25	0	10	4		No							
0 (Site, P66 Case)	490254	Buckeye Chelsea Station	920 Cherry Tree Rd.	12/31/2009	39.86734	-75.4536	DELAWARE	ASTON		New Well	ODYSSEY ENVIRONMENTAL SERVICES, INC.	MONITORING		15	0	5	2		No							
0 (Site, P66 Case)	490666	Buckeye Chelsea Station	920 Cherry Tree Way, Aston, PA.	1/7/2010	39.86734	-75.4536	DELAWARE	ASTON		New Well	ODYSSEY ENVIRONMENTAL SERVICES, INC.	MONITORING		25	0	5	4		No							
0 (Site, P66 Case)	490668	Buckeye Chelsea Station	920 Cherry Tree Way, Aston, PA.	1/11/2010	39.86734	-75.4536	DELAWARE	ASTON		New Well	ODYSSEY ENVIRONMENTAL SERVICES, INC.	MONITORING		25	0	5	4		No							
0 (Site, P66 Case)	490669	Buckeye Chelsea Station	920 Cherry Tree Way, Aston, PA.	1/11/2010	39.86734	-75.4536	DELAWARE	ASTON		New Well	ODYSSEY ENVIRONMENTAL SERVICES, INC.	MONITORING		23	0	5	4		No							
0 (Site, P66 Case)	490673	Buckeye Chelsea Station	920 Cherry Tree Way, Aston, PA.	1/12/2010	39.86734	-75.4536	DELAWARE	ASTON		New Well	ODYSSEY ENVIRONMENTAL SERVICES, INC.	MONITORING		25	0	5	4		No							
0 (Site, P66 Case)	490675	Buckeye Chelsea Station	920 Cherry Tree Way, Aston, PA.	1/15/2010	39.86734	-75.4536	DELAWARE	ASTON		New Well	ODYSSEY ENVIRONMENTAL SERVICES, INC.	MONITORING		10	0	3	2		No							
0 (Site, P66 Case)	490677	Buckeye Chelsea Station	920 Cherry Tree Way, Aston, PA.	1/15/2010	39.86734	-75.4536	DELAWARE	ASTON		New Well	ODYSSEY ENVIRONMENTAL SERVICES, INC.	MONITORING		23	0	6	4		No							
0 (Site, P66 Case)	491182	Buckeye Chelsea Station	920 Cherry Tree Way, Aston, PA.	1/7/2010	39.86734	-75.4536	DELAWARE	ASTON		New Well	ODYSSEY ENVIRONMENTAL SERVICES, INC.	MONITORING		25	0	5	4		No							
0 (Site, P66 Case)	491183	Buckeye Chelsea Station	920 Cherry Tree Way, Aston, PA.	1/7/2010	39.86734	-75.4536	DELAWARE	ASTON		New Well	ODYSSEY ENVIRONMENTAL SERVICES, INC.	MONITORING		25	0	5	4		No							
0 (Site, P66 Case)	491185	Buckeye Chelsea Station	920 Cherry Tree Way, Aston, PA.	1/8/2010	39.86734	-75.4536	DELAWARE	ASTON		New Well	ODYSSEY ENVIRONMENTAL SERVICES, INC.	MONITORING		24	0	6	4		No							
0 (Site, P66 Case)	491189	Buckeye Chelsea Station	920 Cherry Tree Way, Aston, PA.	1/12/2010	39.86734	-75.4536	DELAWARE	ASTON		New Well	ODYSSEY ENVIRONMENTAL SERVICES, INC.	MONITORING		25	0	5	4		No							
0 (Site, P66 Case)	491190	Buckeye Chelsea Station	920 Cherry Tree Way, Aston, PA.	1/12/2010	39.86734	-75.4536	DELAWARE	ASTON		New Well	ODYSSEY ENVIRONMENTAL SERVICES, INC.	MONITORING		23	0	6	4		No							
0 (Site, P66 Case)	491191	Buckeye Chelsea Station	920 Cherry Tree Way, Aston, PA.	1/13/2010	39.86734	-75.4536	DELAWARE	ASTON		New Well	ODYSSEY ENVIRONMENTAL SERVICES, INC.	MONITORING		25	0	5	4		No							
0 (Site, P66 Case)	491192	Buckeye Chelsea Station	920 Cherry Tree Way, Aston, PA.	1/13/2010	39.86734	-75.4536	DELAWARE	ASTON		New Well	ODYSSEY ENVIRONMENTAL SERVICES, INC.	MONITORING		25	0	5	4		No							
0 (Site, P66 Case)	491193	Buckeye Chelsea Station	920 Cherry Tree Way, Aston, PA.	1/15/2010	39.86734	-75.4536	DELAWARE	ASTON		New Well	ODYSSEY ENVIRONMENTAL SERVICES, INC.	MONITORING		10	0	3	2		No							
0 (Site, P66 Case)	492234	Buckeye Chelsea Station	920 Cherry Tree Way, Aston, PA.	12/31/2009	39.86734	-75.4536	DELAWARE	ASTON		New Well	ODYSSEY ENVIRONMENTAL SERVICES, INC.	MONITORING		15	0	5	2		No							
170 (East)	501331	[REDACTED]	[REDACTED]	8/21/2012	RD	RD	DELAWARE	ASTON	19014	New Well	K.L. MADRON WELL DRILLING, LLC	GEOTHERMAL - CLOSED LOOP	GEOTHERMAL	240				45	No							2 GEO Boreholes 240 ft each
4300 (WSW)	705523	[REDACTED]	[REDACTED]	6/9/2022	RD	RD	DELAWARE	BETHEL	19342	New Well	ODYSSEY ENVIRONMENTAL SERVICES, INC.	MONITORING		20	0	4	4		No							Installation of a monitoring well.
3900 (WSW)	705524	[REDACTED]	[REDACTED]	6/9/2022	RD	RD	DELAWARE	BETHEL	19342	New Well	ODYSSEY ENVIRONMENTAL SERVICES, INC.	MONITORING		16	0	5	4		No							Installation of a monitoring well.
5000 (North)	747415		[REDACTED]	3/30/2014	RD	RD	DELAWARE	ASTON		New Well	JOHN RAINEY	GEOTHERMAL	UNUSED	600				45	No	15	5		60			
5000 (North)	747415		[REDACTED]	3/30/2014	RD	RD	DELAWARE	ASTON		New Well	JOHN RAINEY	GEOTHERMAL	UNUSED	600				45	No	15	5		60			

Notes:
[ADDRESS] Address Identified Using Lat/Long Coordinates (Address Not Provided in GWIS Database Export)
[RD] Redacted

PA GWIS Well Search - 12/26/2025

12/26/2025

County Boundaries

1:28,024

0 0.17 0.35 0.7 mi

0 0.28 0.55 1.1 km

Appendix B

Right-to-Know Requests to Bethel and Upper Chichester Townships

Cortney Savidge

From: Code Secretary <code.secretary@betheltwp.com>
Sent: Thursday, January 8, 2026 11:52 AM
To: Cortney Savidge
Cc: Jeff Smith
Subject: RE: Right-to-Know Request - Private Well Records for Parcels - Bethel Township

Good morning,

Some of the parcels you provided are not in Bethel Township. We do not keep records of public water connections. I would suggest reaching out to both Chester Water Authority and Veolia Water Company as both supply to Bethel Township.

Thank you,
Jaclyn Borcky

Right-to-Know Officer
Bethel Township
1092 Bethel Road
Garnet Valley, PA 19060
610-459-5140

From: Cortney Savidge <csavidge@Langan.com>
Sent: Friday, December 26, 2025 10:00 AM
To: Code Secretary <code.secretary@betheltwp.com>
Cc: Jeff Smith <jsmith@Langan.com>
Subject: Right-to-Know Request - Private Well Records for Parcels - Bethel Township

Dear Jaclyn Borcky:

Please find attached a Right-to-Know form requesting records pertaining to groundwater withdrawal wells and public water connection for a list of 33 parcels located within Bethel Township.

We appreciate your assistance providing any records responsive to this request.

Please don't hesitate to reach out with any questions.

Thank you!

Cortney Savidge, CHMM
Senior Project Manager

LANGAN

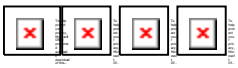
Direct: 215.845.8944

Mobile: 610.202.9523
File Sharing Link

Phone: 215.845.8900 Fax: 215.845.8901
1818 Market Street
Suite 3300
Philadelphia, PA 19103-3638
www.langan.com

Technical Excellence ● Practical Experience ● Client Responsiveness

PENNSYLVANIA NEW JERSEY NEW YORK CONNECTICUT MASSACHUSETTS VIRGINIA WASHINGTON, DC OHIO ILLINOIS NORTH CAROLINA TENNESSEE FLORIDA TEXAS ARIZONA COLORADO UTAH WASHINGTON OREGON NEVADA CALIFORNIA ATHENS CALGARY DUBAI LONDON PANAMA



Cortney Savidge

From: Cortney Savidge
Sent: Friday, December 26, 2025 10:00 AM
To: code.secretary@betheltwp.com
Cc: Jeff Smith
Subject: Right-to-Know Request - Private Well Records for Parcels - Bethel Township
Attachments: BETHEL TWP RTK FORM_Private Well Information_2025.12.26.pdf

Dear Jaclyn Borcky:

Please find attached a Right-to-Know form requesting records pertaining to groundwater withdrawal wells and public water connection for a list of 33 parcels located within Bethel Township.

We appreciate your assistance providing any records responsive to this request.

Please don't hesitate to reach out with any questions.

Thank you!

Cortney Savidge, CHMM
Senior Project Manager

LANGAN

Direct: 215.845.8944
Mobile: 610.202.9523
File Sharing Link

Phone: 215.845.8900 Fax: 215.845.8901
1818 Market Street
Suite 3300
Philadelphia, PA 19103-3638
www.langan.com

Pennsylvania
Office of Open Records

Standard Right-to-Know Law Request Form

*Please read carefully. Complete this form and retain a copy of **both** pages; this copy may be required if an appeal is filed. You have 15 business days to appeal after a request is denied or deemed denied. More information about the RTKL is available at https://www.openrecords.pa.gov. In most cases, a completed RTKL request form is a public record.*

SUBMITTED TO AGENCY NAME: Bethel Township, Delaware County (Attn: AORO)

Date Request Submitted: 12/26/2025 Submitted via: ■ Email □ U.S. Mail □ Fax □ In Person

PERSON MAKING REQUEST:

Full Name: Cortney Savidge

Company (if applicable): Langan Engineering & Environmental Services, LLC

Please send response via: ■ Email □ U.S. Mail

If you wish to obtain records that only exist in hard copy, or must be provided on an electronic storage device, you may be required to provide a mailing address to the agency. See Section 703.

Email: csavidge@langan.com

Mailing Address: 1818 Market Street, Suite 3300

City: Philadelphia State: PA Zip: 19103 Telephone: 215-845-8944

How do you prefer to be contacted if the agency has questions? □ Telephone ■ Email □ U.S. Mail

■ **By checking this box, I affirm that my full name and contact information is true and correct, and that I am a legal resident of the United States. *I understand that failure to check this box may result in the denial of my request and the dismissal of any appeal filed with the Office of Open Records.***

RECORDS REQUESTED: *Provide as much detail as possible, including subject matter, time frame, and type of record sought. RTKL requests must seek records, not ask questions. Use additional pages if necessary.*

Langan is seeking permits and records pertaining to the drilling, installation, construction, maintenance, or decommissioning of private water supply wells for 33 parcels of land located within Bethel Township (see attached parcel summary table with Parcel ID Numbers, Tax Map Numbers, Street Addresses, and Owners for the parcels of interest).
We are also seeking permits and records pertaining to public water utility connection (e.g., service lateral installation) for these same properties.

Form continues on page 2. Retain a copy of both pages.

RECORDS REQUESTED (continued):

DO YOU WANT COPIES? ☐ Yes, printed ■ Yes, electronic ☐ No, in-person inspection

Records shall be provided in the medium requested if they exist in that medium; otherwise, they shall be provided in the medium in which they exist. See Section 701. Your request may require payment or prepayment of fees. View the Official RTKL Fee Schedule for more details.

I understand that my request may incur fees. Notify me before further processing if fees will be more than ■ $100 (or) ☐ $_____.

Do you want certified copies? ☐ Yes (*may be subject to additional costs*) ■ No

ITEMS BELOW THIS LINE FOR AGENCY USE ONLY

Tracking: _____ Date Received: _____ Response Due (5 bus. days): _____

30-Day Ext.? ☐ Yes ☐ No (If Yes, Final Due Date: _____) Actual Response Date: _____

Request was: ☐ Granted ☐ Partially Granted & Denied ☐ Denied Cost to Requester: $_____

☐ Appropriate third parties notified and given an opportunity to object to the release of requested records.

Retain a copy of both pages of this Form.

Township of Upper Chichester
County of Delaware
P. O. Box 2187
Upper Chichester, Pennsylvania 19061-8187
PHONE: 610-485-5881 FAX:610-485-8643

Via Email Only
csavidge@langan.com
Cortney Savidge
Langan Engineering and Environmental Services, LLC
1818 Market Street, Suite 3300
Philadelphia, PA 19103

Dear Ms. Savidge:

I serve as the Open Records Officer for Upper Chichester Township, which is in receipt of your December 26, 2025 request for records. On December 26, 2025, the Township received your request. Per the Pennsylvania Right-to-Know Law ("RTKL"), 65 P.S. §§ 67.101, *et seq.*, an extension was issued in response to your request on January 5, 2026. Your request is as follows:

> Langan is seeking permits and records pertaining to the drilling, installation, construction, maintenance, or decommissioning of private water supply wells for 93 parcels of land located within Bethel Township (see attached parcel summary table with Parcel ID Numbers, Tax Map Numbers, Street Addresses, and Owners for the parcels of interest). We are also seeking permits and records pertaining to public water utility connection (e.g., service lateral installation) for these same properties.

Your request is denied inasmuch as it references lands within Bethel Township. With respect to any properties within Upper Chichester Township, no records responsive to your request could be located after a good faith search (and your requests are denied as such). Permits for drilling, installation, construction or maintenance or decommissioning of private water supply wells would be handled by the County and/or other agencies. The Township does not have any records associated with the same. With respect to the request for permits and records of public water utility connections for those properties, you should contact the Chester Water Authority, which is the entity that may have any responsive records.

You have a right to appeal this determination in writing to: Office of Open Records, 555 Walnut Street, Suite 605, Harrisburg, PA 17101. Appeals can also be filed online at the Office of Open Records website, https://www.openrecords.pa.gov. Please note that a copy of your original request(s), the agency's extension notice (if applicable) and this letter should be included when

filing an appeal. More information about how to file an appeal under the Right-to-Know Law is available at the Office of Open Records website, https://www.openrecords.pa.gov. If you choose to file an appeal, you must do so within 15 business days of the mailing date of the agency's response. *See* 65 P.S. § 67.1101.

This correspondence will serve to close this record with our office as permitted by law.

Respectfully,

George L. Needles, III, MBA
Open Records Officer
Upper Chichester Township
8400 Furey Road
Upper Chichester, PA 19014

Township of Upper Chichester
County of Delaware
P. O. Box 2187
Upper Chichester, Pennsylvania 19061-8187

PHONE: 610-485-5881 FAX:610-485-8643

Via Email Only
csavidge@langan.com
Cortney Savidge
Langan Engineering and Environmental Services, LLC
1818 Market Street, Suite 3300
Philadelphia, PA 19103

Dear Ms. Savidge:

Thank you for writing to Upper Chichester Township to request records pursuant to Pennsylvania's Right-to-Know Law ("RTKL"), 65 P.S. §§ 67.101, et seq. On December 26, 2025, the Township received the following request:

Langan is seeking permits and records pertaining to the drilling, installation, construction, maintenance, or decommissioning of private water supply wells for 93 parcels of land located within Bethel Township (see attached parcel summary table with Parcel ID Numbers, Tax Map Numbers, Street Addresses, and Owners for the parcels of interest). We are also seeking permits and records pertaining to public water utility connection (e.g., service lateral installation) for these same properties.

Pursuant to Section 902(a) of the RTKL, 65 P.S. § 67.902, an additional thirty (30) days are required to respond because:

- ☐ The request requires redaction in accordance with Section 706 of the RTKL.
- ☐ The request requires the retrieval of a record stored in a remote location.
- ☐ A timely response cannot be accomplished due to bona fide staffing limitations.
- ☒ A legal review is needed to determine whether the record is subject to access.
- ☐ The requester has not complied with the Agency's policies regarding access to records.
- ☐ The requester refuses to pay applicable fees authorized by the RTKL.
- ☒ The extent or nature of the request precludes a response within the required time period.

The Township expects to respond to your requests on or before February 4, 2026.

Respectfully,

George L. Needles, III, MBA, Open Records Officer
Upper Chichester Township
8500 Furey Road
Upper Chichester, PA 19014

Upper Chichester Township

PO Box 2187

Boothwyn, PA 19061

(610) 485-5881 – Office

(610 485-8643 – Fax

OPEN RECORDS REQUEST FORM

Name of Requester

Savidge, Cortney - Langan Engineering and Environmental Services, LLC

(Please Print) Last, First MI

Signature: _____ Date: December 26, 2025

Mailing Address: 1818 Market Street, Suite 3300

Street/ PO Box

Philadelphia PA 19103

City State Zip Code

Telephone Number: 215-845-8944 Fax Number: 215-845-8901

Email Address: csavidge@langan.com

Please identify each of the documents that are subject to this request. You must identify these documents with sufficient specificity so we may ascertain whether we have these documents and how to locate them.

Langan is seeking permits and records pertaining to the drilling, installation, construction, maintenance, or decommissioning of private water supply wells for 93 parcels of land located within Bethel Township (see attached parcel summary table with Parcel ID Numbers, Tax Map Numbers, Street Addresses, and Owners for the parcels of interest).
We are also seeking permits and records pertaining to public water utility connection (e.g., service lateral installation) for these same properties.

Please check one of the following boxes:

- ☐ I am only requesting access to the documents identified above
- ☒ I am only requesting a copy of the documents identified above
- ☐ I am requesting access to the documents identified above **and** a copy of those documents.

If you are requesting a copy of the documents identified above, please check one of the following boxes:

- ☐ I want a paper copy of the documents
- ☒ Other format (please specify): Electronic (E-mail, if possible)

Appendix C

December 10, 2025 Community Outreach Letter and Well Questionnaire (Round 1)

MIPC, LLC
920 Cherry Tree Road
Aston, PA 19014

December 10, 2025

Dear Neighbor,

This letter is a follow-up to our initial outreach to you on December 5, 2025, about a matter that we are addressing at our Chelsea tank farm. Briefly, we are requesting your assistance to provide additional information as to the source of drinking water used on your property: whether you have a private water well or you are connected to a public water source.

If you do have a well on your property, we may request authorization to sample your well if we believe that such sampling is warranted. MIPC will provide an independent testing consultant to arrange and collect the sample and will pay for the required testing at no cost to you.

We are asking you to complete the attached questionnaire, as soon as possible, using either the enclosed self-addressed stamped envelope or the other means provided. Based on your response, we will determine if testing your water well is appropriate as we continue to investigate the impacted water at the tank farm, and the test results will be provided to you for your review. It is important that you complete and return the questionnaire even if you do not maintain a well on your property so that our records are updated, and to ensure that you will not be unnecessarily contacted in the future.

Again, we wish to underscore that your safety and health is a priority to MIPC, and we value and appreciate your cooperation and trust. We continue to work closely with all agencies and first responders, and we will keep you informed as we work to address this matter. We understand that you may have additional questions, and we are available to speak with you at your convenience either on a call or in person at your home, if you prefer.

Please contact us at 610-364-8426 if you would like to discuss this further. Thank you, and we appreciate your understanding and cooperation.

MIPC, LLC care of
Langan Engineering and Environmental Services, LLC
1818 Market Street, Suite 3300
Philadelphia, PA 19103

Well Information Questionnaire Form and Request for Sampling

Please complete this form by providing the requested information in the spaces provided or by circling the most appropriate response and return the completed form to us within 10 days of receipt either by using the enclosed pre-paid self-addressed envelope, by emailing the form to MIPC@monroe-energy.com, or by calling 610-364-8426 to request that form be picked up.

Date: _____

Property Street Address:_____

1. Indicate your relationship to this property. (Circle one)

   Property Owner Renter/Lessee Other (Please explain) _____

Please provide your contact information/mail address and indicate if it is permissible for us to contact you.

NAME:_____

ADDRESS:_____

PHONE #:_____(home)_____(work)_____(cell)
E-MAIL ADDRESS: _____

Please circle the phone number or email above that you prefer we use to contact you.

If you are a renter or tenant, please provide the owner's contact information.

NAME:_____

ADDRESS:_____

PHONE #:_____(home)_____(work)_____(cell)

2. Is there a private water well located on the referenced property? **YES** **NO**
   (If **NO**, please stop here and return the form)

3. Regarding the water well on the property, if known:
   a. What is the depth of the well? _____ feet
   b. What is the depth of the well casing? _____ feet

c. What is the depth of the well pump? _____ feet
d. What is the pump capacity? _____ gallons per minute

4. Does the well supply water for any other residences? **YES** **NO** **unknown**
If **YES**, how many, and what are the addresses of those residences?

_____

_____

5. Do you use the well water for drinking and/or cooking? **YES** **NO**
(If **NO**, what is the source of your drinking/cooking water? _____

6. Do you use the well water for:

bathing?	**YES**	**NO**
washing clothes	**YES**	**NO**
lawn/irrigation	**YES**	**NO**
watering food garden?	**YES**	**NO**
filling swimming pool/ recreation	**YES**	**NO**

7. Has this well been tested recently?

If **YES**, please enclose a copy of the results if possible.

a) What date was it most recently tested? _____

b) Who tested the well water? _____

c) What was the well tested for? (circle all that apply)

Bacteria
Volatile Organics
Metals
Other (please explain) _____

d) Did the sampling detect any contaminants? **YES** **NO**
If **YES**, please specify

_____

8. Do you have any treatment system(s) on the well? **YES** **NO**

If **YES**,

a) What type of water treatment system(s) do you have? (circle all that apply)

Softener
Iron removal
Sediment filter
Carbon filter
Turbidity removal
pH adjustment
Disinfection
Chlorinators
Acid neutralizer
Other (please specify): _____

b) Can the treatment system be bypassed to collect an untreated water sample? **YES** **NO** **NOT SURE**

If **YES**, how can the system be bypassed? (Circle all that apply)

Outside spigot bypasses treatment
Faucet in basement
Faucet on holding tank
Treatment system can be shut off

If **NO**,

Is there an outside spigot **YES** **NO**

Where is the spigot located? _____

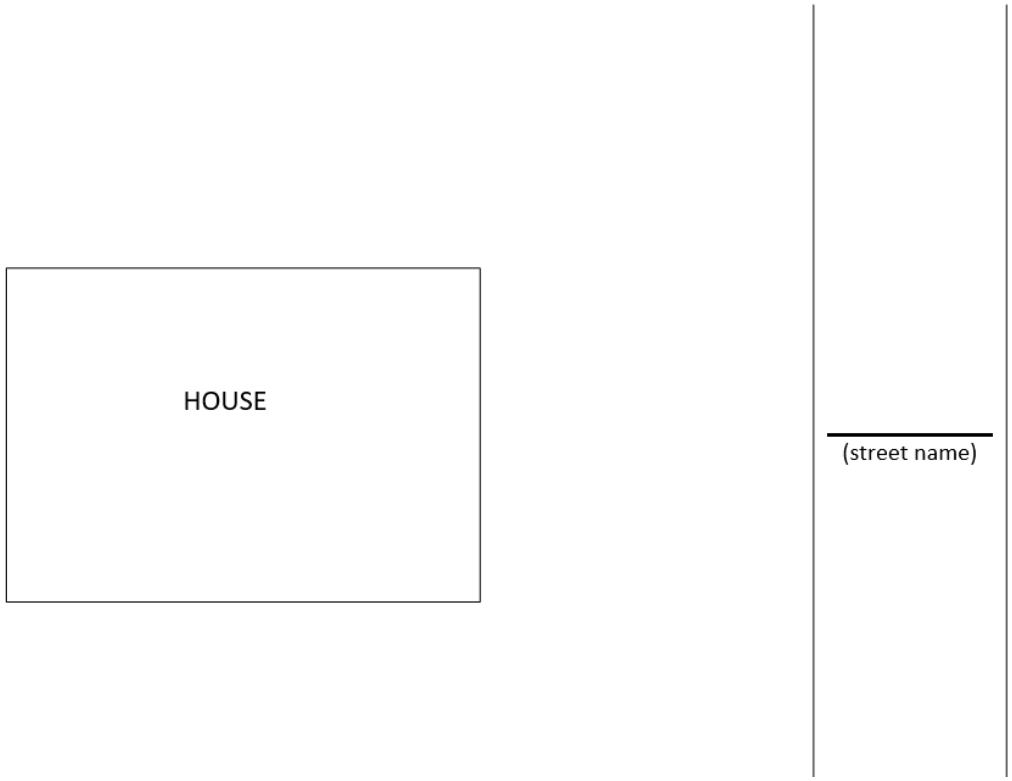
9. Would you allow us to collect a water sample from your well for analysis? **YES** **NO**

10. Please provide any other information that you feel would be helpful for us to know about your well.

Please sign at the space provided below and return a signed copy of this Questionnaire either by using the enclosed self-addressed stamped envelope, by emailing the form to MIPC@monroe-energy.com, or by calling 610-364-8426 to request that form be picked up.

Signature _____ Date _____

Please locate your well, septic system, and any underground tank (if applicable) relative to your house and the street. If there are any landmarks that help locate these features, please draw them in. Also, please indicate the street name in the blank provided.



Property Owner/Resident's Name _____

Appendix D

December 26 and 30, 2025 Bottled Water Service Offer Letters

MIPC, LLC
920 Cherry Tree Road
Aston, PA 19014

December 26, 2025

Dear Neighbor,

This letter is a follow-up to our initial outreach efforts, including our request for your assistance to provide additional information as to the source of drinking water used on your property: whether you have a private water well or you are connected to a public water source. If you have not already returned that questionnaire, we ask that you please take the time to fill that out and return it in the previously provided self-addressed, stamped envelope.

Additionally, **we are offering to supply your property with bottled water service**. If you would like us to provide such service, please contact us at 610-364-8426 or via email at MIPC1@monroe-energy.com with your name, address and number of persons in our household, and we will have the bottled water service begin at your property within 24 hours of your request.

Please know that to date, MIPC has tested the potable groundwater wells of 4 of our neighbors using a third-party, EPA-certified lab and no petroleum related compounds were found, but your safety, health, and peace of mind is a priority to MIPC and we therefore respect a decision you might make to opt in to this service.

We continue to work closely with all agencies and first responders, and we will keep you informed as we work to clean up the impacted area. We understand that you may have additional questions, and we are available to speak with you at your convenience either on a call or in person at your home, if you prefer.

We sincerely apologize for any concern that this may be causing.

Thank you.

MIPC, LLC
920 Cherry Tree Road
Aston, PA 19014

December 30, 2025

Dear Neighbor,

As you may have learned, MIPC is conducting an ongoing remediation and investigation into the release of product from one of our storage tanks at our Chelsea Tank Farm in Aston, PA. Since discovering a mixture of hydrocarbon and water emanating from an old concrete drainpipe inside the tank farm, MIPC has kept those neighbors in the immediate vicinity as well as all relevant regulatory agencies and officials apprised of our efforts.

As we continue to work with both the Pennsylvania Department of Environmental Protection and the Pipeline Hazardous Materials and Safety Administration, we are expanding the area of our outreach to those neighbors who do not immediately border the western side of our property. This includes offering bottled water services to residents who utilize private wells for potable water as well as requesting your assistance to provide additional information as to the source of drinking water on your property.

If you have a private water well and would like us to provide bottled water service to your property, please contact us at *610-364-8426* or via email at *MIPC1@monroe-energy.com* with your name, address, and number of persons in your household, and we will have the bottled water service begin at your property within 24 hours of your request.

Please know that MIPC has tested the potable groundwater wells of 4 of our neighbors immediately adjacent to our property using a third-party, EPA-certified lab, and all four results confirmed that no petroleum-related compounds were found. However, your safety, health, and peace of mind are a priority to MIPC, and we therefore look forward to hearing from you, should you decide to opt-into this service.

Additionally, in the coming days you will receive a survey asking whether you have a private water well or you are connected to a public water source. Once you receive that questionnaire, we ask that you please take the time to fill that out and return it in the self-addressed, stamped envelope provided.

In addition to working with all relevant agencies, we are also regularly reporting on our efforts to local officials, and we will keep you informed as we work to clean up the impacted area. We understand that you may have additional questions, and we are available to speak with you at your convenience either on a call or in person at your home, if you prefer, so please contact us at the number or email listed above.

We sincerely apologize for any concern that this may be causing.

Thank you.

Appendix E

January 2, 2026 Community Outreach Letter and Well Questionnaire (Round 2)

MIPC, LLC
920 Cherry Tree Road
Aston, PA 19014

January 2, 2026

Dear Neighbor,

As the work at our Chelsea Tank Farm continues, we want to provide you with an update of the incident, our investigation and remediation efforts, as well as our path forward. To that end, please find the enclosed Fact Sheet. We understand that you may have additional questions and as such, in the near future we will be scheduling a community meeting to better address those questions or concerns. However, in the meantime, we remain available to speak with you at your convenience either over the phone or at your home if you prefer. Please contact us at 610-364-8426 if you would like to discuss things in more detail.

Furthermore, we would like to highlight two additional communications that you have or will soon receive from us regarding this event: (1) a drinking water survey, and (2) if you have a potable water well on your property, an offer to provide you with bottled water service.

- **Drinking Water Survey**: this is a survey asking whether you have a private water well or you are connected to a public water source. We ask that you please take the time to fill that out with the information you have available and return it. Alternatively, if you need assistance with the survey, please contact us and we can have someone call or come to your home to discuss more thoroughly. For your convenience, and in the event you have not yet received this survey, we have enclosed it here for your review.

  If you do have a well on your property, it is our hope that you will grant us access so that we can sample your well water. MIPC will provide an independent testing consultant to arrange and collect the sample and will pay for the required testing at no cost to you. Additionally, once the test results are available, we will provide them for your review.

  We are asking you to complete the questionnaire as soon as possible, using either the enclosed self-addressed stamped envelope or the other means provided. It is important that you complete and return the questionnaire even if you do not maintain a well on your property so that our records are updated, and to ensure that you will not be unnecessarily contacted in the future.

- **Bottled Water Service**: If you have a private water well and would like us to provide bottled water service to your property, please contact us at *610-364-8426* or via email at *MIPC1@monroe-energy.com* with your name, address, and number of persons in your household, and we will have the bottled water service begin at your property within 24 hours of your request.

Your safety, health and peace of mind are a priority to MIPC, and we value and appreciate your assistance and trust. We continue to work closely with all relevant agencies, we are also regularly reporting on our efforts to local officials, and we will keep you informed as we work to clean up the impacted area.

Please contact us at 610-364-8426 if you would like to discuss this further. Thank you, and we appreciate your understanding and cooperation.

CHELSEA TANK FARM GASOLINE RELEASE

MIPC CONTACT: **610-364-8426** *OR* **MIPC1@MONROE-ENERGY.COM** DATE: **12/31/25**

DEAR NEIGHBOR,

AS YOU MAY KNOW, MIPC IS CURRENTLY WORKING TO REMEDIATE AN UNDERGROUND GASOLINE LEAK THAT WAS RECENTLY CONFIRMED AT OUR CHELSEA TANK FARM. THIS DOCUMENT SEEKS TO PROVIDE YOU WITH A GREATER LEVEL OF DETAIL ON WHAT HAPPENED AND WHAT YOU CAN EXPECT FROM US GOING FORWARD.

WHAT HAPPENED?

On August 18th, an MIPC operator noticed a faint odor while making routine checks in the northwest corner of our Chelsea Tank Farm. The source of the odor was determined to be a light gasoline and water mixture (approximately 2% gasoline to 98% water), emanating from a concrete stormwater drainage pipe. Upon discovery, MIPC immediately began implementing measures to contain and clean up the impacted water.

At the same time, MIPC notified state and county agencies, as well as municipal officials and our community emergency responders. MIPC also notified nearby neighbors in Bethel and Upper Chichester that there would be increased maintenance activity at the site. Additionally, fence line air quality readings were repeatedly taken, and results confirmed there were no impacts at the fence line of our facility.

INVESTIGATION PROCESS

After our initial mitigation efforts, MIPC began what would become a multi-month investigatory process to identify the source of the leak. Simultaneously, MIPC sought and received a PA Dep. of Environmental Protection permit to install a water treatment unit that has remained in operation to this day. Over the subsequent weeks, MIPC worked methodically to identify and rule out potential sources, which involved excavation of the concrete pipe, several soil digs (some to depths of 17 feet), numerous field tank valve and flange inspections, checking underground test stations, reviewing tank level data, and historical site data, and conducting static pressure tests and hydro tests of tanks in the impacted area. All investigatory efforts over this time did not yield a clear source or even the presence of a broader issue.

MIPC also provided regulatory agencies with updates and has complied with every request and recommendation conveyed to us.

SOURCE DISCOVERY

As we continued to investigate the area of impact, we installed soil borings (up to depths of 35 feet), and in early December, we discovered gasoline impacted soil. In some cases, we found gasoline impacted groundwater in one area of the site, including within 30 feet of our fence line. At this point, we made notifications to all Federal, State and County agencies as well as municipal officials, emergency responders, and elected officials. MIPC also conducted door-to-door community outreach, notifying our fence line neighbors living within roughly 1,000 feet of the impacted area.

On December 13th, one of our storage tanks, which was previously taken out of service and emptied as part of this investigation, was confirmed to have a 1/4-inch hole in the interior floor. This discovery then initiated a process by which we could calculate a maximum potential release total based on data and evidence. And this is how we arrived at the potential total release of 9,000 barrels of gasoline in the northwest corner of our property, which we reported to the Pipeline and Hazardous Materials Safety Administration (PHMSA).

TURN OVER

OUR PATH FORWARD

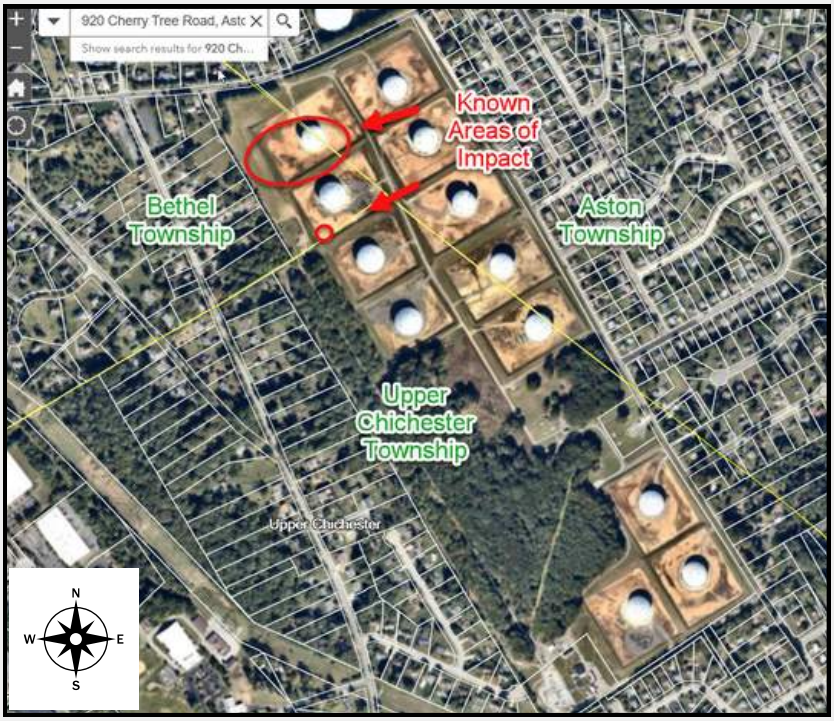
MIPC is working with Langan, a specialized engineering and environmental firm widely known for its expertise in ground contamination, investigations, and recovery, as we continue to identify the extent of the impact as well as to conduct ongoing remediation efforts. We have begun to collect product from the borings that we dug, and we are developing a plan to present to PADEP for the long-term remediation of the site. MIPC is committed to ensuring that the entire affected area is remediated and returned to its original condition, and we remain steadfast in working with regulatory agencies, elected officials, and our local municipalities throughout this process.

KEY TAKEAWAYS

- No odors have been detected offsite or sheens observed in surface water.
- Nearby residential groundwater wells that have been tested by a third-party, EPA-certified lab had no petroleum compounds detected.

Per PADEP Requirements:

- Bottled water has been offered and will be provided, if requested, to residents within 1,000 ft. of our western boundary who utilize wells for potable water.
- MIPC has increased the frequency of fence line monitoring to a daily schedule utilizing prevailing EPA methodology.
- MIPC will hold public meetings in conjunction with our local municipalities as well as with state and federal agencies to continue communicating updates with our neighbors.
- An informational website will be established which will provide important information to our neighbors.



MAP KEY

- Please note that the 'Areas of Impact' are representative, and not drawn exactly to scale.
- The yellow lines correlate to municipal boundary lines .
- White lines correlate to private property lines.

OUTREACH

We understand that you may have additional questions, and we are available to speak with you at your convenience either on a call or in person at your home, if you prefer.

Thank you, and we appreciate your understanding as we work to fully remediate our site.

CONTACT INFO

610-364-8426

MIPC1@monroe-energy.com

MIPC, LLC care of
Langan Engineering and Environmental Services, LLC
1818 Market Street, Suite 3300
Philadelphia, PA 19103

Well Information Questionnaire Form and Request for Sampling

*Please complete this form by providing the requested information in the spaces provided or by circling the most appropriate response and return the completed form to us within 10 days of receipt either by using the enclosed pre-paid self-addressed envelope, by emailing the form to **MIPC1@monroe-energy.com**, or by calling 610-364-8426 to request that form be picked up.*

Date: _____

Property Street Address:_____

1. Indicate your relationship to this property. (Circle one)

   Property Owner Renter/Lessee Other (Please explain) _____

Please provide your contact information/mail address and indicate if it is permissible for us to contact you.

NAME:_____

ADDRESS:_____

PHONE #:_____(home)_____(work)_____(cell)
E-MAIL ADDRESS: _____

Please circle the phone number or email above that you prefer we use to contact you.

If you are a renter or tenant, please provide the owner's contact information.

NAME:_____

ADDRESS:_____

PHONE #:_____(home)_____(work)_____(cell)

2. Is there a private water well located on the referenced property? **YES** **NO**
   (If **NO**, please stop here and return the form)

3. Regarding the water well on the property, if known:
   a. What is the depth of the well? _____ feet
   b. What is the depth of the well casing? _____ feet

c. What is the depth of the well pump? _____ feet
d. What is the pump capacity? _____ gallons per minute

4. Does the well supply water for any other residences? **YES** **NO** **unknown**
If **YES**, how many, and what are the addresses of those residences?

_____

_____

5. Do you use the well water for drinking and/or cooking? **YES** **NO**
(If **NO**, what is the source of your drinking/cooking water? _____

6. Do you use the well water for:

bathing?	**YES**	**NO**
washing clothes	**YES**	**NO**
lawn/irrigation	**YES**	**NO**
watering food garden?	**YES**	**NO**
filling swimming pool/ recreation	**YES**	**NO**

7. Has this well been tested recently?

If **YES**, please enclose a copy of the results if possible.

a) What date was it most recently tested? _____
b) Who tested the well water? _____
c) What was the well tested for? (circle all that apply)

Bacteria
Volatile Organics
Metals
Other (please explain) _____

d) Did the sampling detect any contaminants? **YES** **NO**
If **YES**, please specify

_____

8. Do you have any treatment system(s) on the well? **YES** **NO**

If **YES**,

a) What type of water treatment system(s) do you have? (circle all that apply)

Softener
Iron removal
Sediment filter
Carbon filter
Turbidity removal
pH adjustment
Disinfection
Chlorinators
Acid neutralizer
Other (please specify): _____

b) Can the treatment system be bypassed to collect an untreated water sample? **YES** **NO** **NOT SURE**

If **YES**, how can the system be bypassed? (Circle all that apply)

Outside spigot bypasses treatment
Faucet in basement
Faucet on holding tank
Treatment system can be shut off

If **NO**,

Is there an outside spigot **YES** **NO**

Where is the spigot located? _____

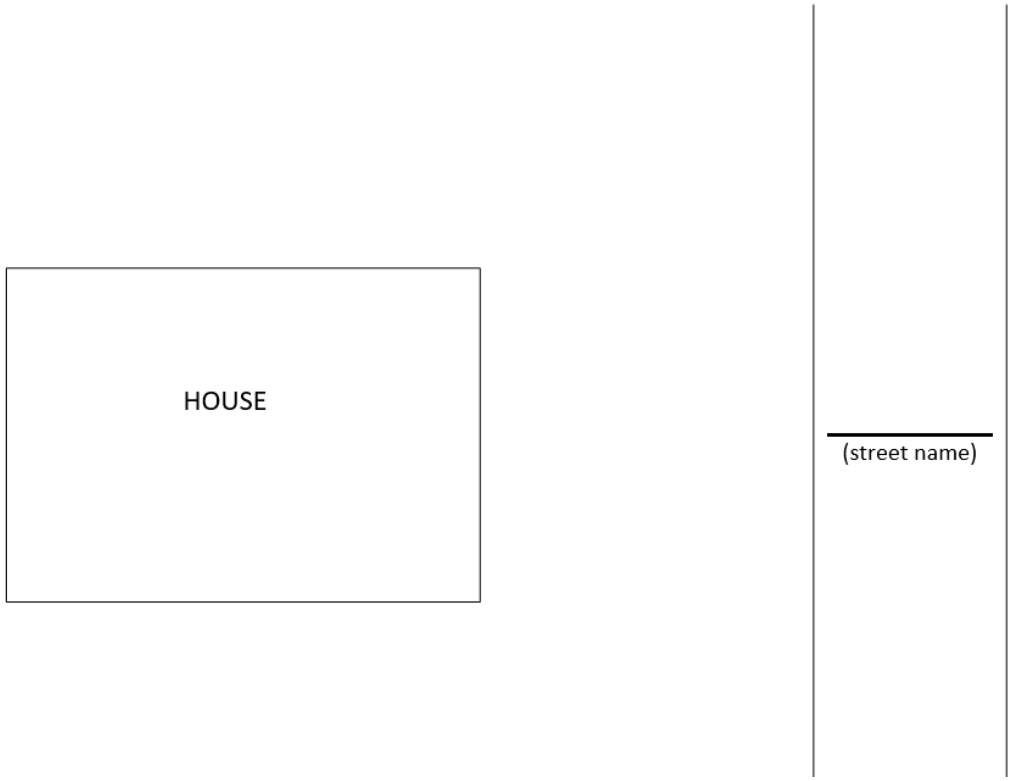
9. Would you allow us to collect a water sample from your well for analysis? **YES** **NO**

10. Please provide any other information that you feel would be helpful for us to know about your well.

Please sign at the space provided below and return a signed copy of this Questionnaire either by using the enclosed self-addressed stamped envelope, by emailing the form to MIPC1@monroe-energy.com, or by calling 610-364-8426 to request that form be picked up.

Signature _____ Date _____

Please locate your well, septic system, and any underground tank (if applicable) relative to your house and the street. If there are any landmarks that help locate these features, please draw them in. Also, please indicate the street name in the blank provided.



Property Owner/Resident's Name _____

Appendix F

Data Useability Assessments

LANGAN
ENGINEERING & ENVIRONMENTAL SERVICES

Technical Memorandum

1 University Square Drive Princeton, NJ 08540 T: 609.282.8000
Mailing Address: 1 University Square Drive Princeton, NJ 08540

To: Cortney Savidge, Langan Senior Project Scientist

From: Mariana Wissink, Langan Senior Staff Chemist

Date: December 11, 2025

Re: Data Usability Assessment
For MIPC Chelsea Facility, Aston, PA
December 2025 Drinking Water Samples
Langan Project No.: 220240201

This memorandum presents the findings of an analytical data validation from the analysis of drinking water samples collected in December 2025 by Langan Engineering and Environmental Services at the MIPC Chelsea Facility, located at 920 Cherry Tree Road, Aston, Pennsylvania. The samples were analyzed by Pace Analytical Services, Westborough, MA (PADEP Laboratory ID # 68-03671) for volatile organic compounds (VOCs) by the method specified below.

- VOCs by USEPA Method 524.2

Table 1, attached, summarizes the laboratory and client sample identification numbers, sample collection dates, and analytical parameters subject to review.

VALIDATION OVERVIEW

This data validation was performed in accordance with the following guidelines:

- USEPA Contract Laboratory Program "National Functional Guidelines for Organic Superfund Methods Data Review" (EPA 540- R-20-005, November 2020)
- USEPA Contract Laboratory Program "National Functional Guidelines for Inorganic Superfund Methods Data Review" (EPA 540- R-20-005, November 2020), and
- published analytical methodologies.

Tier 1 data validation is based on completeness and compliance checks of sample-related QC results including: sample receipt documentation; analytical holding times; sample preservation; blank results (method, field, and trip); surrogate recoveries; MS/MSD recoveries and RPDs values; field duplicate RPDs, laboratory duplicate RPDs, and LCS/LCSD recoveries and RPDs. The sample delivery group L2578002 underwent Tier 1 validation review.

As a result of the review process, the following qualifiers may be assigned to the data in accordance with the USEPA guidelines and our best professional judgment:

R – The sample results are unusable. The results are rejected because of serious deficiencies in meeting quality control criteria in accordance with the applicable validation guidelines. The analyte may or may not be present in the sample.

J – The analyte was positively identified but the associated numerical value is approximate.

UJ – The analyte was not detected at or above the method detection limit. The method detection limit may be imprecise because of potential low or indeterminate bias.

U – The analyte was not detected above the method detection limit, or the analyte detection is impacted by blank contamination and qualified as non-detect in accordance with the applicable validation guidelines.

If any validation qualifiers are assigned, these qualifiers should supersede any laboratory-applied qualifiers. Data that is not qualified because of this data validation is considered acceptable based on the items specified for review. Data that is qualified as "R" are considered invalid and are not technically usable for data interpretation. Data that is otherwise qualified because of minor data-quality anomalies are usable, as qualified in Table 2 (attached).

The following acronyms may be used in the discussion of data-quality issues:

%D	Percent Difference	MB	Method Blank
CCV	Continuing Calibration Verification	MDL	Method Detection Limit
FB	Field Blank	MS	Matrix Spike
FD	Field Duplicate	MSD	Matrix Spike Duplicate
ICAL	Initial Calibration	RF	Response Factor
ICV	Initial Calibration Verification	RL	Reporting Limit
ISTD	Internal Standard	RPD	Relative Percent Difference
LCL	Lower Control Limit	RSD	Relative Standard Deviation
LCS	Laboratory Control Sample	TB	Trip Blank
LCSD	Laboratory Control Sample Duplicate	UCL	Upper Control Limit

MAJOR DEFICIENCIES:

Major deficiencies include those that grossly impact data quality and necessitate the rejection of results. No major deficiencies were identified.

MINOR DEFICIENCIES:

Minor deficiencies include anomalies that directly impact data quality and necessitate qualification, but do not result in unusable data. No minor deficiencies were identified.

OTHER DEFICIENCIES:

Other deficiencies include anomalies that do not directly impact data quality and do not necessitate qualification. No other deficiencies were identified.

FIELD DUPLICATE:

One field duplicate and parent sample pair was collected and analyzed for all parameters. For results less than 5X the RL, analytes meet the precision criteria if the absolute difference is less than ±X the RL. For results greater than 5X the RL, analytes meet the precision criteria if the RPD is less than or equal to 30% for drinking water. The following field duplicate and parent sample pair was compared to and met the precision criteria:

- [REDACTED] and DUP-1

CONCLUSION:

Based on this evaluation, the laboratory appears to have followed the specified analytical methods except for errors discussed above. If a given fraction is not mentioned above, that means that all specified criteria were met for that parameter.

All data are considered usable, as qualified. In addition, completeness, defined as the percentage of analytical results that are judged to be valid, is 100%.

Signed:

Mariana Wissink
Senior Staff Chemist

Data Usability Assessment Summary Report
For MIPC Chelsea Facility, Aston, PA
December 2025 Drinking Water Samples
Table 1: Sample Summary

SDG	Lab Sample ID	Client Sample ID	Sample Date	Validation Level	Analytical Parameters
L2578002	L2578002-01	[REDACTED]	12/8/2025	Tier 1	VOCs by EPA 524.2
L2578002	L2578002-02	[REDACTED]	12/8/2025	Tier 1	VOCs by EPA 524.2
L2578002	L2578002-03	[REDACTED]	12/8/2025	Tier 1	VOCs by EPA 524.2
L2578002	L2578002-04	DUP-1	12/8/2025	Tier 1	VOCs by EPA 524.2
L2578002	L2578002-05	FB-1	12/8/2025	Tier 1	VOCs by EPA 524.2
L2578002	L2578002-06	TRIP BLANK	12/8/2025	Tier 1	VOCs by EPA 524.2

Data Usability Assessment Summary Report
For MIPC Chelsea Facility, Aston, PA
December 2025 Drinking Water Samples
Table 2: Validator-Applied Qualification

SDG	Client Sample ID	Analysis	CAS #	Analyte	Validator Qualifier
No Qualification Required					

LANGAN
ENGINEERING & ENVIRONMENTAL SERVICES

Technical Memorandum

368 Ninth Avenue, 8th Floor New York, NY 10001 T: 609.282.8000
Mailing Address: 368 Ninth Avenue, 8th Floor New York, NY 10001-2727

To: Cortney Savidge, Langan Senior Project Scientist

From: Krzysztof Trafalski, Langan Senior Staff Chemist

Date: December 22, 2025

Re: Data Usability Assessment
For MIPC Chelsea Facility, Aston, PA
December 2025 Drinking Water Samples
Langan Project No.: 220240201

This memorandum presents the findings of an analytical data validation from the analysis of drinking water samples collected in December 2025 by Langan Engineering and Environmental Services at the MIPC Chelsea Facility, located at 920 Cherry Tree Road, Aston, Pennsylvania. The samples were analyzed by Pace Analytical Services, Westborough, MA (PADEP Laboratory ID # 68-03671) for volatile organic compounds (VOCs) by the method specified below.

- VOCs by USEPA Method 524.2

Table 1, attached, summarizes the laboratory and client sample identification numbers, sample collection dates, and analytical parameters subject to review.

VALIDATION OVERVIEW

This data validation was performed in accordance with the following guidelines:

- USEPA Contract Laboratory Program "National Functional Guidelines for Organic Superfund Methods Data Review" (EPA 540- R-20-005, November 2020)
- USEPA Contract Laboratory Program "National Functional Guidelines for Inorganic Superfund Methods Data Review" (EPA 540- R-20-005, November 2020), and
- published analytical methodologies.

Tier 1 data validation is based on completeness and compliance checks of sample-related QC results including: sample receipt documentation; analytical holding times; sample preservation; blank results (method, field, and trip); surrogate recoveries; MS/MSD recoveries and RPDs values; field duplicate RPDs, laboratory duplicate RPDs, and LCS/LCSD recoveries and RPDs. The sample delivery group L2580369 underwent Tier 1 validation review.

As a result of the review process, the following qualifiers may be assigned to the data in accordance with the USEPA guidelines and our best professional judgment:

R – The sample results are unusable. The results are rejected because of serious deficiencies in meeting quality control criteria in accordance with the applicable validation guidelines. The analyte may or may not be present in the sample.

J – The analyte was positively identified but the associated numerical value is approximate.

UJ – The analyte was not detected at or above the method detection limit. The method detection limit may be imprecise because of potential low or indeterminate bias.

U – The analyte was not detected above the method detection limit, or the analyte detection is impacted by blank contamination and qualified as non-detect in accordance with the applicable validation guidelines.

As a result of this Tier 1 validation review, **no validation qualifiers are required for sample delivery group L2580369** (see Table 2)**.**

The following acronyms may be used in the discussion of data-quality issues:

%D	Percent Difference	MB	Method Blank
CCV	Continuing Calibration Verification	MDL	Method Detection Limit
FB	Field Blank	MS	Matrix Spike
FD	Field Duplicate	MSD	Matrix Spike Duplicate
ICAL	Initial Calibration	RF	Response Factor
ICV	Initial Calibration Verification	RL	Reporting Limit
ISTD	Internal Standard	RPD	Relative Percent Difference
LCL	Lower Control Limit	RSD	Relative Standard Deviation
LCS	Laboratory Control Sample	TB	Trip Blank
LCSD	Laboratory Control Sample Duplicate	UCL	Upper Control Limit

MAJOR DEFICIENCIES:

Major deficiencies include those that grossly impact data quality and necessitate the rejection of results. **No major deficiencies were identified.**

MINOR DEFICIENCIES:

Minor deficiencies include anomalies that directly impact data quality and necessitate qualification, but do not result in unusable data. **No minor deficiencies were identified.**

OTHER DEFICIENCIES:

Other deficiencies include anomalies that do not directly impact data quality and do not necessitate qualification. **No other deficiencies were identified.**

FIELD DUPLICATE:

One field duplicate and parent sample pair was collected and analyzed for all parameters. For results less than 5X the RL, analytes meet the precision criteria if the absolute difference is less than ±X the RL. For results greater than 5X the RL, analytes meet the precision criteria if the RPD is less than or equal to 30% for drinking water. The following field duplicate and parent sample pair was compared to and **met the precision criteria**:

- [REDACTED] and DUP_121625

CONCLUSION:

Based on this evaluation, the laboratory appears to have followed the specified analytical methods except for errors discussed above. If a given fraction is not mentioned above, that means that all specified criteria were met for that parameter.

All data are considered usable, as qualified. In addition, completeness, defined as the percentage of analytical results that are judged to be valid, is 100%.

Signed:

Krzysztof Trafalski
Senior Staff Chemist

Data Usability Assessment Summary Report
For MIPC Chelsea Facility - Aston, PA
December 2025 Drinking Water Samples
Table 1: Sample Summary

SDG	Lab Sample ID	Client Sample ID	Sample Date	Validation Level	Analytical Parameters
L2580369	L2580369-01	[REDACTED]	12/16/2025	Tier 1	VOCs by EPA 524.2
L2580369	L2580369-02	DUP_121625	12/16/2025	Tier 1	VOCs by EPA 524.2
L2580369	L2580369-03	FB_121625	12/16/2025	Tier 1	VOCs by EPA 524.2
L2580369	L2580369-04	TRIP BLANK	12/16/2025	Tier 1	VOCs by EPA 524.2

Data Usability Assessment Summary Report
For MIPC Chelsea Facility - Aston, PA
December 2025 Drinking Water Samples
Table 2: Validator-Applied Qualification

SDG	Client Sample ID	Analysis	CAS #	Analyte	Validator Qualifier
No Qualification Required					

LANGAN
ENGINEERING & ENVIRONMENTAL SERVICES

Technical Memorandum

368 Ninth Avenue, 8th Floor New York, NY 10001 T: 609.282.8000
Mailing Address: 368 Ninth Avenue, 8th Floor New York, NY 10001-2727

To: Cortney Savidge, Langan Senior Project Scientist

From: Krzysztof Trafalski, Langan Senior Staff Chemist

Date: January 12, 2025

Re: Data Usability Assessment
For MIPC Chelsea Facility, Aston, PA
January 2026 Drinking Water Samples
Langan Project No.: 220240201

This memorandum presents the findings of an analytical data validation from the analysis of drinking water samples collected in January 2026 by Langan Engineering and Environmental Services at the MIPC Chelsea Facility, located at 920 Cherry Tree Road, Aston, Pennsylvania. The samples were analyzed by Pace Analytical Services, Westborough, MA (PADEP Laboratory ID # 68-03671) for volatile organic compounds (VOCs) by the method specified below.

- VOCs by USEPA Method 524.2

Table 1, attached, summarizes the laboratory and client sample identification numbers, sample collection dates, and analytical parameters subject to review.

VALIDATION OVERVIEW

This data validation was performed in accordance with the following guidelines:

- USEPA Contract Laboratory Program "National Functional Guidelines for Organic Superfund Methods Data Review" (EPA 540- R-20-005, November 2020)
- USEPA Contract Laboratory Program "National Functional Guidelines for Inorganic Superfund Methods Data Review" (EPA 540- R-20-005, November 2020), and
- published analytical methodologies.

Tier 1 data validation is based on completeness and compliance checks of sample-related QC results including: sample receipt documentation; analytical holding times; sample preservation; blank results (method, field, and trip); surrogate recoveries; MS/MSD recoveries and RPDs values; field duplicate RPDs, laboratory duplicate RPDs, and LCS/LCSD recoveries and RPDs. Five (5) Sample Delivery Groups (SDGs) underwent Tier 1 validation review.

As a result of the review process, the following qualifiers may be assigned to the data in accordance with the USEPA guidelines and our best professional judgment:

R – The sample results are unusable. The results are rejected because of serious deficiencies in meeting quality control criteria in accordance with the applicable validation guidelines. The analyte may or may not be present in the sample.

J – The analyte was positively identified but the associated numerical value is approximate.

UJ – The analyte was not detected at or above the method detection limit. The method detection limit may be imprecise because of potential low or indeterminate bias.

U – The analyte was not detected above the method detection limit, or the analyte detection is impacted by blank contamination and qualified as non-detect in accordance with the applicable validation guidelines.

As a result of this Tier 1 validation review, **no validation qualifiers are required for sample delivery group L2600803, L2600804, L2601127, L2601128, L2601533** (see Table 2)**.**

The following acronyms may be used in the discussion of data-quality issues:

%D	Percent Difference	MB	Method Blank
CCV	Continuing Calibration Verification	MDL	Method Detection Limit
FB	Field Blank	MS	Matrix Spike
FD	Field Duplicate	MSD	Matrix Spike Duplicate
ICAL	Initial Calibration	RF	Response Factor
ICV	Initial Calibration Verification	RL	Reporting Limit
ISTD	Internal Standard	RPD	Relative Percent Difference
LCL	Lower Control Limit	RSD	Relative Standard Deviation
LCS	Laboratory Control Sample	TB	Trip Blank
LCSD	Laboratory Control Sample Duplicate	UCL	Upper Control Limit

MAJOR DEFICIENCIES:

Major deficiencies include those that grossly impact data quality and necessitate the rejection of results. **No major deficiencies were identified.**

MINOR DEFICIENCIES:

Minor deficiencies include anomalies that directly impact data quality and necessitate qualification, but do not result in unusable data. **No minor deficiencies were identified.**

OTHER DEFICIENCIES:

Other deficiencies include anomalies that do not directly impact data quality and do not necessitate qualification. **No other deficiencies were identified**.

FIELD DUPLICATE:

Three field duplicate and parent sample pairs were collected and analyzed for all parameters. For results less than 5X the RL, analytes meet the precision criteria if the absolute difference is less than ±X the RL. For results greater than 5X the RL, analytes meet the precision criteria if the RPD is less than or equal to 30% for drinking water. The following field duplicate and parent sample pair was compared to and **met the precision criteria**:

- DUP_010726 and [REDACTED]
- DUP_010826 and [REDACTED]
- DUP_010926 and [REDACTED]

CONCLUSION:

Based on this evaluation, the laboratory appears to have followed the specified analytical methods except for errors discussed above. If a given fraction is not mentioned above, that means that all specified criteria were met for that parameter.

All data are considered usable, as qualified. In addition, completeness, defined as the percentage of analytical results that are judged to be valid, is 100%.

Signed:

Krzysztof Trafalski
Senior Staff Chemist

Data Usability Assessment Summary Report
For MIPC Chelsea Facility - Aston, PA
January 2026 Drinking Water Samples
Table 1: Sample Summary

SDG	Lab Sample ID	Client Sample ID	Sample Date	Validation Level	Analytical Parameters
L2600803	L2600803-01	[REDACTED]_010726	1/7/2026	Tier 1	VOCs by EPA 524.2
L2600803	L2600803-02	DUP_010726	1/7/2026	Tier 1	VOCs by EPA 524.2
L2600803	L2600803-03	[REDACTED]_010726	1/7/2026	Tier 1	VOCs by EPA 524.2
L2600804	L2600804-01	[REDACTED]_010726	1/7/2026	Tier 1	VOCs by EPA 524.2
L2600804	L2600804-02	[REDACTED]_010726	1/7/2026	Tier 1	VOCs by EPA 524.2
L2600804	L2600804-03	TRIP BLANK	1/6/2026	Tier 1	VOCs by EPA 524.2
L2601127	L2601127-01	[REDACTED]_010826	1/8/2026	Tier 1	VOCs by EPA 524.2
L2601127	L2601127-02	[REDACTED]_010826	1/8/2026	Tier 1	VOCs by EPA 524.2
L2601128	L2601128-01	[REDACTED]_010726	1/7/2026	Tier 1	VOCs by EPA 524.2
L2601128	L2601128-02	[REDACTED]_010726	1/7/2026	Tier 1	VOCs by EPA 524.2
L2601128	L2601128-03	FB_010726	1/7/2026	Tier 1	VOCs by EPA 524.2
L2601128	L2601128-04	[REDACTED]_010826	1/8/2026	Tier 1	VOCs by EPA 524.2
L2601128	L2601128-05	DUP_010826	1/8/2026	Tier 1	VOCs by EPA 524.2
L2601128	L2601128-06	[REDACTED]_010826	1/8/2026	Tier 1	VOCs by EPA 524.2
L2601128	L2601128-07	TRIP BLANK	1/6/2026	Tier 1	VOCs by EPA 524.2
L2601533	L2601533-01	[REDACTED]_010826	1/8/2026	Tier 1	VOCs by EPA 524.2
L2601533	L2601533-02	FB_010826	1/8/2026	Tier 1	VOCs by EPA 524.2
L2601533	L2601533-03	[REDACTED]_010926	1/9/2026	Tier 1	VOCs by EPA 524.2
L2601533	L2601533-04	DUP_010926	1/9/2026	Tier 1	VOCs by EPA 524.2
L2601533	L2601533-05	[REDACTED]_010926	1/9/2026	Tier 1	VOCs by EPA 524.2
L2601533	L2601533-06	[REDACTED]_010926	1/9/2026	Tier 1	VOCs by EPA 524.2
L2601533	L2601533-07	FB_010926	1/9/2026	Tier 1	VOCs by EPA 524.2
L2601533	L2601533-08	[REDACTED]_010926	1/9/2026	Tier 1	VOCs by EPA 524.2
L2601533	L2601533-09	[REDACTED]_010926	1/9/2026	Tier 1	VOCs by EPA 524.2
L2601533	L2601533-10	TRIP BLANK	1/6/2026	Tier 1	VOCs by EPA 524.2

Data Usability Assessment Summary Report
For MIPC Chelsea Facility - Aston, PA
January 2026 Drinking Water Samples
Table 2: Validator-Applied Qualification

SDG	Client Sample ID	Analysis	CAS #	Analyte	Validator Qualifier
No Qualification Required					

LANGAN
ENGINEERING & ENVIRONMENTAL SERVICES

Technical Memorandum

368 Ninth Avenue, 8th Floor New York, NY 10001 T: 609.282.8000
Mailing Address: 368 Ninth Avenue, 8th Floor New York, NY 10001-2727

To: Cortney Savidge, Langan Senior Project Scientist

From: Krzysztof Trafalski, Langan Senior Staff Chemist

Date: January 17, 2025

Re: Data Usability Assessment
For MIPC Chelsea Facility, Aston, PA
January 2026 Drinking Water Samples
Langan Project No.: 220240201

This memorandum presents the findings of an analytical data validation from the analysis of drinking water samples collected in January 2026 by Langan Engineering and Environmental Services at the MIPC Chelsea Facility, located at 920 Cherry Tree Road, Aston, Pennsylvania. The samples were analyzed by Pace Analytical Services, Westborough, MA (PADEP Laboratory ID # 68-03671) for volatile organic compounds (VOCs) by the method specified below.

- VOCs by USEPA Method 524.2

Table 1, attached, summarizes the laboratory and client sample identification numbers, sample collection dates, and analytical parameters subject to review.

VALIDATION OVERVIEW

This data validation was performed in accordance with the following guidelines:

- USEPA Contract Laboratory Program "National Functional Guidelines for Organic Superfund Methods Data Review" (EPA 540- R-20-005, November 2020)
- USEPA Contract Laboratory Program "National Functional Guidelines for Inorganic Superfund Methods Data Review" (EPA 540- R-20-005, November 2020), and
- published analytical methodologies.

Tier 1 data validation is based on completeness and compliance checks of sample-related QC results including: sample receipt documentation; analytical holding times; sample preservation; blank results (method, field, and trip); surrogate recoveries; MS/MSD recoveries and RPDs values; field duplicate RPDs, laboratory duplicate RPDs, and LCS/LCSD recoveries and RPDs. Four (4) Sample Delivery Groups (SDGs) underwent Tier 1 validation review.

As a result of the review process, the following qualifiers may be assigned to the data in accordance with the USEPA guidelines and our best professional judgment:

R – The sample results are unusable. The results are rejected because of serious deficiencies in meeting quality control criteria in accordance with the applicable validation guidelines. The analyte may or may not be present in the sample.

J – The analyte was positively identified but the associated numerical value is approximate.

UJ – The analyte was not detected at or above the method detection limit. The method detection limit may be imprecise because of potential low or indeterminate bias.

U – The analyte was not detected above the method detection limit, or the analyte detection is impacted by blank contamination and qualified as non-detect in accordance with the applicable validation guidelines.

As a result of this Tier 1 validation review, **no validation qualifiers are required for sample delivery group L2601837, L2602135, L2602457, L2602458** (see Table 2)**.**

The following acronyms may be used in the discussion of data-quality issues:

%D	Percent Difference	MB	Method Blank
CCV	Continuing Calibration Verification	MDL	Method Detection Limit
FB	Field Blank	MS	Matrix Spike
FD	Field Duplicate	MSD	Matrix Spike Duplicate
ICAL	Initial Calibration	RF	Response Factor
ICV	Initial Calibration Verification	RL	Reporting Limit
ISTD	Internal Standard	RPD	Relative Percent Difference
LCL	Lower Control Limit	RSD	Relative Standard Deviation
LCS	Laboratory Control Sample	TB	Trip Blank
LCSD	Laboratory Control Sample Duplicate	UCL	Upper Control Limit

MAJOR DEFICIENCIES:

Major deficiencies include those that grossly impact data quality and necessitate the rejection of results. **No major deficiencies were identified.**

MINOR DEFICIENCIES:

Minor deficiencies include anomalies that directly impact data quality and necessitate qualification, but do not result in unusable data. **No minor deficiencies were identified.**

OTHER DEFICIENCIES:

Other deficiencies include anomalies that do not directly impact data quality and do not necessitate qualification. **No other deficiencies were identified.**

FIELD DUPLICATE:

Three field duplicate and parent sample pairs were collected and analyzed for all parameters. For results less than 5X the RL, analytes meet the precision criteria if the absolute difference is less than ±X the RL. For results greater than 5X the RL, analytes meet the precision criteria if the RPD is less than or equal to 30% for drinking water. The following field duplicate and parent sample pair was compared to and **met the precision criteria**:

- DUP_011226 and [REDACTED]
- DUP_011326 and [REDACTED]
- DUP_011426 and [REDACTED]

CONCLUSION:

Based on this evaluation, the laboratory appears to have followed the specified analytical methods except for errors discussed above. If a given fraction is not mentioned above, that means that all specified criteria were met for that parameter.

All data are considered usable, as qualified. In addition, completeness, defined as the percentage of analytical results that are judged to be valid, is 100%.

Signed:

Krzysztof Trafalski
Senior Staff Chemist

Data Usability Assessment Summary Report
For MIPC Chelsea Facility - Aston, PA
January 2026 Drinking Water Samples
Table 1: Sample Summary

SDG	Lab Sample ID	Client Sample ID	Sample Date	Validation Level	Analytical Parameters
L2601837	L2601837-01	[REDACTED]_011226	1/12/2026	Tier 1	VOCs by EPA 524.2
L2601837	L2601837-02	DUP_011226	1/12/2026	Tier 1	VOCs by EPA 524.2
L2601837	L2601837-03	[REDACTED]_011226	1/12/2026	Tier 1	VOCs by EPA 524.2
L2601837	L2601837-04	[REDACTED]_011226	1/12/2026	Tier 1	VOCs by EPA 524.2
L2601837	L2601837-05	[REDACTED]_011226	1/12/2026	Tier 1	VOCs by EPA 524.2
L2601837	L2601837-06	[REDACTED]_011226	1/12/2026	Tier 1	VOCs by EPA 524.2
L2601837	L2601837-07	FB_011226	1/12/2026	Tier 1	VOCs by EPA 524.2
L2601837	L2601837-08	TRIP BLANK	1/9/2026	Tier 1	VOCs by EPA 524.2
L2602135	L2602135-01	TRIP BLANK	1/9/2026	Tier 1	VOCs by EPA 524.2
L2602135	L2602135-02	[REDACTED]_011326	1/13/2026	Tier 1	VOCs by EPA 524.2
L2602135	L2602135-03	[REDACTED]_011326	1/13/2026	Tier 1	VOCs by EPA 524.2
L2602135	L2602135-04	DUP_011326	1/13/2026	Tier 1	VOCs by EPA 524.2
L2602135	L2602135-05	[REDACTED]_011326	1/13/2026	Tier 1	VOCs by EPA 524.2
L2602457	L2602457-01	[REDACTED]_011326	1/13/2026	Tier 1	VOCs by EPA 524.2
L2602458	L2602458-01	[REDACTED]_011326	1/13/2026	Tier 1	VOCs by EPA 524.2
L2602458	L2602458-02	FB_011326	1/13/2026	Tier 1	VOCs by EPA 524.2
L2602458	L2602458-03	[REDACTED]_011426	1/14/2026	Tier 1	VOCs by EPA 524.2
L2602458	L2602458-04	DUP_011426	1/14/2026	Tier 1	VOCs by EPA 524.2
L2602458	L2602458-05	[REDACTED]_011426	1/14/2026	Tier 1	VOCs by EPA 524.2
L2602458	L2602458-06	TRIP BLANK	1/9/2026	Tier 1	VOCs by EPA 524.2

Data Usability Assessment Summary Report
For MIPC Chelsea Facility - Aston, PA
January 2026 Drinking Water Samples
Table 2: Validator-Applied Qualification

SDG	Client Sample ID	Analysis	CAS #	Analyte	Validator Qualifier
No Qualification Required					

LANGAN
ENGINEERING & ENVIRONMENTAL SERVICES

Technical Memorandum

1 University Square Drive Princeton, NJ 08540 T: 609.282.8000
Mailing Address: 1 University Square Drive Princeton, NJ 08540

To: Cortney Savidge, Langan Senior Project Scientist

From: Joe Conboy, Langan Project Chemist

Date: January 17, 2025

Re: Data Usability Assessment
For MIPC Chelsea Facility, Aston, PA
January 2026 Drinking Water Samples
Langan Project No.: 220240201

This memorandum presents the findings of analytical data validation from the analysis of drinking water samples collected in January 2026 by Langan Engineering and Environmental Services at the MIPC Chelsea Facility, located at 920 Cherry Tree Road, Aston, Pennsylvania. The samples were analyzed by Pace Analytical Services, Westborough, MA (PADEP Laboratory ID # 68-03671) for volatile organic compounds (VOCs) by the method specified below.

- VOCs by USEPA Method 524.2

Table 1, attached, summarizes the laboratory and client sample identification numbers, sample collection dates, and analytical parameters subject to review.

VALIDATION OVERVIEW

This data validation was performed in accordance with the following guidelines:

- USEPA Contract Laboratory Program "National Functional Guidelines for Organic Superfund Methods Data Review" (EPA 540- R-20-005, November 2020)
- USEPA Contract Laboratory Program "National Functional Guidelines for Inorganic Superfund Methods Data Review" (EPA 540- R-20-005, November 2020), and
- published analytical methodologies.

Tier 1 data validation is based on completeness and compliance checks of sample-related QC results including: sample receipt documentation; analytical holding times; sample preservation; blank results (method, field, and trip); surrogate recoveries; MS/MSD recoveries and RPDs values; field duplicate RPDs, laboratory duplicate RPDs, and LCS/LCSD recoveries and RPDs. Two (2) Sample Delivery Groups (SDGs) underwent Tier 1 validation review.

As a result of the review process, the following qualifiers may be assigned to the data in accordance with the USEPA guidelines and our best professional judgment:

R – The sample results are unusable. The results are rejected because of serious deficiencies in meeting quality control criteria in accordance with the applicable validation guidelines. The analyte may or may not be present in the sample.

J – The analyte was positively identified but the associated numerical value is approximate.

UJ – The analyte was not detected at or above the method detection limit. The method detection limit may be imprecise because of potential low or indeterminate bias.

U – The analyte was not detected above the method detection limit, or the analyte detection is impacted by blank contamination and qualified as non-detect in accordance with the applicable validation guidelines.

As a result of this Tier 1 validation review, **no validation qualifiers are required for sample delivery group L2602833, L2603217** (see Table 2)**.**

The following acronyms may be used in the discussion of data-quality issues:

%D	Percent Difference	MB	Method Blank
CCV	Continuing Calibration Verification	MDL	Method Detection Limit
FB	Field Blank	MS	Matrix Spike
FD	Field Duplicate	MSD	Matrix Spike Duplicate
ICAL	Initial Calibration	RF	Response Factor
ICV	Initial Calibration Verification	RL	Reporting Limit
ISTD	Internal Standard	RPD	Relative Percent Difference
LCL	Lower Control Limit	RSD	Relative Standard Deviation
LCS	Laboratory Control Sample	TB	Trip Blank
LCSD	Laboratory Control Sample Duplicate	UCL	Upper Control Limit

MAJOR DEFICIENCIES:

Major deficiencies include those that grossly impact data quality and necessitate the rejection of results. **No major deficiencies were identified**.

MINOR DEFICIENCIES:

Minor deficiencies include anomalies that directly impact data quality and necessitate qualification, but do not result in unusable data. **No minor deficiencies were identified**.

OTHER DEFICIENCIES:

Other deficiencies include anomalies that do not directly impact data quality and do not necessitate qualification. **No other deficiencies were identified**.

FIELD DUPLICATE:

Two field duplicate and parent sample pairs were collected and analyzed for all parameters. For results less than 5X the RL, analytes meet the precision criteria if the absolute difference is less than ±X the RL. For results greater than 5X the RL, analytes meet the precision criteria if the RPD is less than or equal to 30% for drinking water. The following field duplicate and parent sample pairs were compared to and **met the precision criteria**:

- DUP_011526 and [REDACTED]
- DUP_011626 and [REDACTED]

CONCLUSION:

Based on this evaluation, the laboratory appears to have followed the specified analytical methods except for errors discussed above. If a given fraction is not mentioned above, that means that all specified criteria were met for that parameter.

All data are considered usable, as qualified. In addition, completeness, defined as the percentage of analytical results that are judged to be valid, is 100%.

Signed:

Joe Conboy
Project Chemist

Data Usability Assessment Summary Report
For MIPC Chelsea Facility - Aston, PA
January 2026 Drinking Water Samples
Table 1: Sample Summary

SDG	Lab Sample ID	Client Sample ID	Sample Date	Validation Level	Analytical Parameters
L2602833	L2602833-01	TRIP BLANK	1/9/2026	Tier 1	VOCs by EPA 524.2
L2602833	L2602833-02	FB_011426	1/14/2026	Tier 1	VOCs by EPA 524.2
L2602833	L2602833-03	[REDACTED]_011426	1/14/2026	Tier 1	VOCs by EPA 524.2
L2602833	L2602833-04	[REDACTED]_011526	1/15/2026	Tier 1	VOCs by EPA 524.2
L2602833	L2602833-05	[REDACTED]_011526	1/15/2026	Tier 1	VOCs by EPA 524.2
L2602833	L2602833-06	DUP_011526	1/15/2026	Tier 1	VOCs by EPA 524.2
L2603217	L2603217-01	[REDACTED]_011526	1/15/2026	Tier 1	VOCs by EPA 524.2
L2603217	L2603217-02	FB_011526	1/15/2026	Tier 1	VOCs by EPA 524.2
L2603217	L2603217-03	[REDACTED]_011626	1/16/2026	Tier 1	VOCs by EPA 524.2
L2603217	L2603217-04	[REDACTED]_011626	1/16/2026	Tier 1	VOCs by EPA 524.2
L2603217	L2603217-05	DUP_011626	1/16/2026	Tier 1	VOCs by EPA 524.2
L2603217	L2603217-06	FB_011626	1/16/2026	Tier 1	VOCs by EPA 524.2

Data Usability Assessment Summary Report
For MIPC Chelsea Facility - Aston, PA
January 2026 Drinking Water Samples
Table 2: Validator-Applied Qualification

SDG	Client Sample ID	Analysis	CAS #	Analyte	Validator Qualifier
No Qualification Required					

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ENGINEERING & ENVIRONMENTAL SERVICES

Technical Memorandum

1 University Square Drive Princeton, NJ 08540 T: 609.282.8000
Mailing Address: 1 University Square Drive Princeton, NJ 08540

To: Cortney Savidge, Langan Senior Project Scientist

From: Joe Conboy, Langan Project Chemist

Date: January 27, 2026

Re: Data Usability Assessment
For MIPC Chelsea Facility, Aston, PA
January 2026 Drinking Water Samples
Langan Project No.: 220240201

This memorandum presents the findings of an analytical data validation from the analysis of drinking water samples collected in January 2026 by Langan Engineering and Environmental Services at the MIPC Chelsea Facility, located at 920 Cherry Tree Road, Aston, Pennsylvania. The samples were analyzed by Pace Analytical Services, Westborough, MA (PADEP Laboratory ID # 68-03671) for volatile organic compounds (VOCs) by the method specified below.

- VOCs by USEPA Method 524.2

Table 1, attached, summarizes the laboratory and client sample identification numbers, sample collection dates, and analytical parameters subject to review.

VALIDATION OVERVIEW

This data validation was performed in accordance with the following guidelines:

- USEPA Contract Laboratory Program "National Functional Guidelines for Organic Superfund Methods Data Review" (EPA 540- R-20-005, November 2020)
- USEPA Contract Laboratory Program "National Functional Guidelines for Inorganic Superfund Methods Data Review" (EPA 540- R-20-005, November 2020), and
- published analytical methodologies.

Tier 1 data validation is based on completeness and compliance checks of sample-related QC results including: sample receipt documentation; analytical holding times; sample preservation; blank results (method, field, and trip); surrogate recoveries; MS/MSD recoveries and RPDs values; field duplicate RPDs, laboratory duplicate RPDs, and LCS/LCSD recoveries and RPDs. Two (2) Sample Delivery Groups (SDGs) underwent Tier 1 validation review.

As a result of the review process, the following qualifiers may be assigned to the data in accordance with the USEPA guidelines and our best professional judgment:

R – The sample results are unusable. The results are rejected because of serious deficiencies in meeting quality control criteria in accordance with the applicable validation guidelines. The analyte may or may not be present in the sample.

J – The analyte was positively identified but the associated numerical value is approximate.

UJ – The analyte was not detected at or above the method detection limit. The method detection limit may be imprecise because of potential low or indeterminate bias.

U – The analyte was not detected above the method detection limit, or the analyte detection is impacted by blank contamination and qualified as non-detect in accordance with the applicable validation guidelines.

As a result of this Tier 1 validation review, **no validation qualifiers are required for sample delivery group L2603848, L2604508** (see Table 2)**.**

The following acronyms may be used in the discussion of data-quality issues:

%D	Percent Difference	MB	Method Blank
CCV	Continuing Calibration Verification	MDL	Method Detection Limit
FB	Field Blank	MS	Matrix Spike
FD	Field Duplicate	MSD	Matrix Spike Duplicate
ICAL	Initial Calibration	RF	Response Factor
ICV	Initial Calibration Verification	RL	Reporting Limit
ISTD	Internal Standard	RPD	Relative Percent Difference
LCL	Lower Control Limit	RSD	Relative Standard Deviation
LCS	Laboratory Control Sample	TB	Trip Blank
LCSD	Laboratory Control Sample Duplicate	UCL	Upper Control Limit

MAJOR DEFICIENCIES:

Major deficiencies include those that grossly impact data quality and necessitate the rejection of results. **No major deficiencies were identified.**

MINOR DEFICIENCIES:

Minor deficiencies include anomalies that directly impact data quality and necessitate qualification, but do not result in unusable data. **No minor deficiencies were identified.**

OTHER DEFICIENCIES:

Other deficiencies include anomalies that do not directly impact data quality and do not necessitate qualification. **No other deficiencies were identified**.

FIELD DUPLICATE:

Two field duplicate and parent sample pairs were collected and analyzed for all parameters. For results less than 5X the RL, analytes meet the precision criteria if the absolute difference is less than ±X the RL. For results greater than 5X the RL, analytes meet the precision criteria if the RPD is less than or equal to 30% for drinking water. The following field duplicate and parent sample pairs were compared to and **met the precision criteria**:

- DUP_012126 and [REDACTED]
- DUP_012326 and [REDACTED]

CONCLUSION:

Based on this evaluation, the laboratory appears to have followed the specified analytical methods except for errors discussed above. If a given fraction is not mentioned above, that means that all specified criteria were met for that parameter.

All data are considered usable, as qualified. In addition, completeness, defined as the percentage of analytical results that are judged to be valid, is 100%.

Signed:

Joe Conboy
Project Chemist

Data Usability Assessment Summary Report
For MIPC Chelsea Facility - Aston, PA
January 2026 Drinking Water Samples
Table 1: Sample Summary

SDG	Lab Sample ID	Client Sample ID	Sample Date	Validation Level	Analytical Parameters
L2603848	L2603848-01	[REDACTED]_012126	1/21/2026	Tier 1	VOCs by EPA 524.2
L2603848	L2603848-02	DUP_012126	1/21/2026	Tier 1	VOCs by EPA 524.2
L2603848	L2603848-03	[REDACTED]_012126	1/21/2026	Tier 1	VOCs by EPA 524.2
L2603848	L2603848-04	[REDACTED]_012126	1/21/2026	Tier 1	VOCs by EPA 524.2
L2603848	L2603848-05	FB_012126	1/21/2026	Tier 1	VOCs by EPA 524.2
L2603848	L2603848-06	TRIP BLANK	1/21/2026	Tier 1	VOCs by EPA 524.2
L2604508	L2604508-01	[REDACTED]_012326	1/23/2026	Tier 1	VOCs by EPA 524.2
L2604508	L2604508-02	DUP_012326	1/23/2026	Tier 1	VOCs by EPA 524.2
L2604508	L2604508-03	FB_012326	1/23/2026	Tier 1	VOCs by EPA 524.2
L2604508	L2604508-04	TRIP BLANK	1/23/2026	Tier 1	VOCs by EPA 524.2

Data Usability Assessment Summary Report
For MIPC Chelsea Facility - Aston, PA
January 2026 Drinking Water Samples
Table 2: Validator-Applied Qualification

SDG	Client Sample ID	Analysis	CAS #	Analyte	Validator Qualifier
No Qualification Required					

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ENGINEERING & ENVIRONMENTAL SERVICES

Technical Memorandum

368 Ninth Avenue, 8th Floor New York, NY 10001 T: 609.282.8000
Mailing Address: 368 Ninth Avenue, 8th Floor New York, NY 10001-2727

To: Cortney Savidge, Langan Senior Project Scientist

From: Krzysztof Trafalski, Langan Senior Staff Chemist

Date: February 3, 2026

Re: Data Usability Assessment
For MIPC Chelsea Facility, Aston, PA
January 2026 Drinking Water Samples
Langan Project No.: 220240201

This memorandum presents the findings of an analytical data validation from the analysis of drinking water samples collected in January 2026 by Langan Engineering and Environmental Services at the MIPC Chelsea Facility, located at 920 Cherry Tree Road, Aston, Pennsylvania. The samples were analyzed by Pace Analytical Services, Westborough, MA (PADEP Laboratory ID # 68-03671) for volatile organic compounds (VOCs) by the method specified below.

- VOCs by USEPA Method 524.2

Table 1, attached, summarizes the laboratory and client sample identification numbers, sample collection dates, and analytical parameters subject to review.

VALIDATION OVERVIEW

This data validation was performed in accordance with the following guidelines:

- USEPA Contract Laboratory Program "National Functional Guidelines for Organic Superfund Methods Data Review" (EPA 540- R-20-005, November 2020)
- USEPA Contract Laboratory Program "National Functional Guidelines for Inorganic Superfund Methods Data Review" (EPA 540- R-20-005, November 2020), and
- published analytical methodologies.

Tier 1 data validation is based on completeness and compliance checks of sample-related QC results including: sample receipt documentation; analytical holding times; sample preservation; blank results (method, field, and trip); surrogate recoveries; MS/MSD recoveries and RPDs values; field duplicate RPDs, laboratory duplicate RPDs, and LCS/LCSD recoveries and RPDs. Three (3) Sample Delivery Groups (SDGs) underwent Tier 1 validation review.

As a result of the review process, the following qualifiers may be assigned to the data in accordance with the USEPA guidelines and our best professional judgment:

R – The sample results are unusable. The results are rejected because of serious deficiencies in meeting quality control criteria in accordance with the applicable validation guidelines. The analyte may or may not be present in the sample.

J – The analyte was positively identified but the associated numerical value is approximate.

UJ – The analyte was not detected at or above the method detection limit. The method detection limit may be imprecise because of potential low or indeterminate bias.

U – The analyte was not detected above the method detection limit, or the analyte detection is impacted by blank contamination and qualified as non-detect in accordance with the applicable validation guidelines.

As a result of this Tier 1 validation review, **no validation qualifiers are required for sample delivery group L2604979, L2605249, L2605358** (see Table 2)**.**

The following acronyms may be used in the discussion of data-quality issues:

%D	Percent Difference	MB	Method Blank
CCV	Continuing Calibration Verification	MDL	Method Detection Limit
FB	Field Blank	MS	Matrix Spike
FD	Field Duplicate	MSD	Matrix Spike Duplicate
ICAL	Initial Calibration	RF	Response Factor
ICV	Initial Calibration Verification	RL	Reporting Limit
ISTD	Internal Standard	RPD	Relative Percent Difference
LCL	Lower Control Limit	RSD	Relative Standard Deviation
LCS	Laboratory Control Sample	TB	Trip Blank
LCSD	Laboratory Control Sample Duplicate	UCL	Upper Control Limit

MAJOR DEFICIENCIES:

Major deficiencies include those that grossly impact data quality and necessitate the rejection of results. **No major deficiencies were identified.**

MINOR DEFICIENCIES:

Minor deficiencies include anomalies that directly impact data quality and necessitate qualification, but do not result in unusable data. **No minor deficiencies were identified.**

OTHER DEFICIENCIES:

Other deficiencies include anomalies that do not directly impact data quality and do not necessitate qualification. The section below describes the other deficiencies that were identified.

VOCs by USEPA Method 524.2

L2604979

The MB for batch WG2170372 exhibited a detection of naphthalene (0.44 ug/L). The associated results are non-detect. No qualification is necessary.

FIELD DUPLICATE:

Two field duplicate and parent sample pairs were collected and analyzed for all parameters. For results less than 5X the RL, analytes meet the precision criteria if the absolute difference is less than ±X the RL. For results greater than 5X the RL, analytes meet the precision criteria if the RPD is less than or equal to 30% for drinking water. The following field duplicate and parent sample pairs were compared to and **met the precision criteria**:

- DUP_012826 and [REDACTED]
- DUP_012926 and [REDACTED]

CONCLUSION:

Based on this evaluation, the laboratory appears to have followed the specified analytical methods except for errors discussed above. If a given fraction is not mentioned above, that means that all specified criteria were met for that parameter.

All data are considered usable, as qualified. In addition, completeness, defined as the percentage of analytical results that are judged to be valid, is 100%.

Signed:

Krzysztof Trafalski
Senior Staff Chemist

Data Usability Assessment Summary Report
For MIPC Chelsea Facility - Aston, PA
January 2026 Drinking Water Samples
Table 1: Sample Summary

SDG	Lab Sample ID	Client Sample ID	Sample Date	Validation Level	Analytical Parameters
L2604979	L2604979-01	[REDACTED]_012826	1/28/2026	Tier 1	VOCs by EPA 524.2
L2604979	L2604979-02	[REDACTED]_012826	1/28/2026	Tier 1	VOCs by EPA 524.2
L2604979	L2604979-03	TRIP BLANK	1/27/2026	Tier 1	VOCs by EPA 524.2
L2605249	L2605249-01	[REDACTED]_012826	1/28/2026	Tier 1	VOCs by EPA 524.2
L2605249	L2605249-02	DUP_012826	1/28/2026	Tier 1	VOCs by EPA 524.2
L2605249	L2605249-03	FB_012826	1/28/2026	Tier 1	VOCs by EPA 524.2
L2605249	L2605249-04	TRIP BLANK	1/27/2026	Tier 1	VOCs by EPA 524.2
L2605249	L2605249-05	[REDACTED]_012926	1/29/2026	Tier 1	VOCs by EPA 524.2
L2605249	L2605249-06	FB_012926	1/29/2026	Tier 1	VOCs by EPA 524.2
L2605249	L2605249-07	[REDACTED]_012926	1/29/2026	Tier 1	VOCs by EPA 524.2
L2605249	L2605249-08	[REDACTED]_012926	1/29/2026	Tier 1	VOCs by EPA 524.2
L2605249	L2605249-09	DUP_012926	1/29/2026	Tier 1	VOCs by EPA 524.2
L2605358	L2605358-01	TRIP BLANK	1/29/2026	Tier 1	VOCs by EPA 524.2
L2605358	L2605358-02	[REDACTED]_012926	1/29/2026	Tier 1	VOCs by EPA 524.2

Data Usability Assessment Summary Report
For MIPC Chelsea Facility - Aston, PA
January 2026 Drinking Water Samples
Table 2: Validator-Applied Qualification

SDG	Client Sample ID	Analysis	CAS #	Analyte	Validator Qualifier
No Qualification Required					

LANGAN
ENGINEERING & ENVIRONMENTAL SERVICES

Technical Memorandum

368 Ninth Avenue, 8th Floor New York, NY 10001 T: 609.282.8000
Mailing Address: 368 Ninth Avenue, 8th Floor New York, NY 10001-2727

To: Cortney Savidge, Langan Senior Project Scientist

From: Krzysztof Trafalski, Langan Senior Staff Chemist

Date: February 13, 2026

Re: Data Usability Assessment
For MIPC Chelsea Facility, Aston, PA
February 2026 Drinking Water Samples
Langan Project No.: 220240201

This memorandum presents the findings of an analytical data validation from the analysis of drinking water samples collected in February 2026 by Langan Engineering and Environmental Services at the MIPC Chelsea Facility, located at 920 Cherry Tree Road, Aston, Pennsylvania. The samples were analyzed by Pace Analytical Services, Westborough, MA (PADEP Laboratory ID # 68-03671) for volatile organic compounds (VOCs) by the method specified below.

- VOCs by USEPA Method 524.2

Table 1, attached, summarizes the laboratory and client sample identification numbers, sample collection dates, and analytical parameters subject to review.

VALIDATION OVERVIEW

This data validation was performed in accordance with the following guidelines:

- USEPA Contract Laboratory Program "National Functional Guidelines for Organic Superfund Methods Data Review" (EPA 540- R-20-005, November 2020)
- USEPA Contract Laboratory Program "National Functional Guidelines for Inorganic Superfund Methods Data Review" (EPA 540- R-20-005, November 2020), and
- published analytical methodologies.

Tier 1 data validation is based on completeness and compliance checks of sample-related QC results including: sample receipt documentation; analytical holding times; sample preservation; blank results (method, field, and trip); surrogate recoveries; MS/MSD recoveries and RPDs values; field duplicate RPDs, laboratory duplicate RPDs, and LCS/LCSD recoveries and RPDs. Two (2) Sample Delivery Groups (SDGs) underwent Tier 1 validation review.

As a result of the review process, the following qualifiers may be assigned to the data in accordance with the USEPA guidelines and our best professional judgment:

R – The sample results are unusable. The results are rejected because of serious deficiencies in meeting quality control criteria in accordance with the applicable validation guidelines. The analyte may or may not be present in the sample.

J – The analyte was positively identified above the quantitation limit, and the associated numerical value is the approximate concentration of the analyte in the sample.

UJ – The analyte was not detected at or above the quantitation limit. The reported quantitation limit may be imprecise because of potential low or indeterminate bias.

U – The analyte was not detected at or above the quantitation limit, or the analyte detection is impacted by blank contamination and qualified as non-detect in accordance with the applicable validation guidelines.

As a result of this Tier 1 validation review, **no validation qualifiers are required for sample delivery group L2607146, L2607581** (see Table 2).

The following acronyms may be used in the discussion of data-quality issues:

%D	Percent Difference	MB	Method Blank
CCV	Continuing Calibration Verification	MDL	Method Detection Limit
FB	Field Blank	MS	Matrix Spike
FD	Field Duplicate	MSD	Matrix Spike Duplicate
ICAL	Initial Calibration	RF	Response Factor
ICV	Initial Calibration Verification	RL	Reporting Limit
ISTD	Internal Standard	RPD	Relative Percent Difference
LCL	Lower Control Limit	RSD	Relative Standard Deviation
LCS	Laboratory Control Sample	TB	Trip Blank
LCSD	Laboratory Control Sample Duplicate	UCL	Upper Control Limit

MAJOR DEFICIENCIES:

Major deficiencies include those that grossly impact data quality and necessitate the rejection of results. **No major deficiencies were identified.**

MINOR DEFICIENCIES:

Minor deficiencies include anomalies that directly impact data quality and necessitate qualification, but do not result in unusable data. **No minor deficiencies were identified.**

OTHER DEFICIENCIES:

Other deficiencies include anomalies that do not directly impact data quality and do not necessitate qualification. **No other deficiencies were identified.**

FIELD DUPLICATE:

One field duplicate and parent sample pair was collected and analyzed for all parameters. For results less than 5X the RL, analytes meet the precision criteria if the absolute difference is less than ±X the RL. For results greater than 5X the RL, analytes meet the precision criteria if the RPD is less than or equal to 30% for drinking water. The following field duplicate and parent sample pair was compared to and **met the precision criteria:**

- DUP_021126 and [REDACTED]

CONCLUSION:

Based on this evaluation, the laboratory appears to have followed the specified analytical methods except for errors discussed above. If a given fraction is not mentioned above, that means that all specified criteria were met for that parameter.

All data are considered usable, as qualified. In addition, completeness, defined as the percentage of analytical results that are judged to be valid, is 100%.

Signed:

Krzysztof Trafalski
Senior Staff Chemist

Data Usability Assessment Summary Report
For MIPC Chelsea Facility - Aston, PA
February 2026 Drinking Water Samples
Table 1: Sample Summary

SDG	Lab Sample ID	Client Sample ID	Sample Date	Validation Level	Analytical Parameters
L2607146	L2607146-01	[REDACTED]	2/9/2026	Tier 1	VOCs by EPA 524.2
L2607146	L2607146-02	FB_020926	2/9/2026	Tier 1	VOCs by EPA 524.2
L2607146	L2607146-03	TRIP BLANK	1/29/2026	Tier 1	VOCs by EPA 524.2
L2607581	L2607581-01	[REDACTED]	2/11/2026	Tier 1	VOCs by EPA 524.2
L2607581	L2607581-02	DUP_021126	2/11/2026	Tier 1	VOCs by EPA 524.2
L2607581	L2607581-03	FB_021126	2/11/2026	Tier 1	VOCs by EPA 524.2
L2607581	L2607581-04	[REDACTED]	2/11/2026	Tier 1	VOCs by EPA 524.2
L2607581	L2607581-05	TRIP BLANK	2/11/2026	Tier 1	VOCs by EPA 524.2

Data Usability Assessment Summary Report
For MIPC Chelsea Facility - Aston, PA
February 2026 Drinking Water Samples
Table 2: Validator-Applied Qualification

SDG	Client Sample ID	Analysis	CAS #	Analyte	Validator Qualifier
No Qualification Required					

LANGAN
ENGINEERING & ENVIRONMENTAL SERVICES

Technical Memorandum

1 University Square Drive Princeton, NJ 08540 T: 609.282.8000
Mailing Address: 1 University Square Drive Princeton, NJ 08540

To: Cortney Savidge, Langan Senior Project Scientist

From: Joe Conboy, Langan Project Chemist

Date: February 20, 2026

Re: Data Usability Assessment
For MIPC Chelsea Facility, Aston, PA
February 2026 Drinking Water Samples
Langan Project No.: 220240201

This memorandum presents the findings of an analytical data validation from the analysis of drinking water samples collected in February 2026 by Langan Engineering and Environmental Services at the MIPC Chelsea Facility, located at 920 Cherry Tree Road, Aston, Pennsylvania. The samples were analyzed by Pace Analytical Services, Westborough, MA (PADEP Laboratory ID # 68-03671) for volatile organic compounds (VOCs) by the method specified below.

- VOCs by USEPA Method 524.2

Table 1, attached, summarizes the laboratory and client sample identification numbers, sample collection dates, and analytical parameters subject to review.

VALIDATION OVERVIEW

This data validation was performed in accordance with the following guidelines:

- USEPA Contract Laboratory Program "National Functional Guidelines for Organic Superfund Methods Data Review" (EPA 540- R-20-005, November 2020)
- USEPA Contract Laboratory Program "National Functional Guidelines for Inorganic Superfund Methods Data Review" (EPA 540- R-20-005, November 2020), and
- published analytical methodologies.

Tier 1 data validation is based on completeness and compliance checks of sample-related QC results including: sample receipt documentation; analytical holding times; sample preservation; blank results (method, field, and trip); surrogate recoveries; MS/MSD recoveries and RPDs values; field duplicate RPDs, laboratory duplicate RPDs, and LCS/LCSD recoveries and RPDs. Two (2) Sample Delivery Groups (SDGs) underwent Tier 1 validation review.

As a result of the review process, the following qualifiers may be assigned to the data in accordance with the USEPA guidelines and our best professional judgment:

R – The sample results are unusable. The results are rejected because of serious deficiencies in meeting quality control criteria in accordance with the applicable validation guidelines. The analyte may or may not be present in the sample.

J – The analyte was positively identified above the quantitation limit, and the associated numerical value is the approximate concentration of the analyte in the sample.

UJ – The analyte was not detected at or above the quantitation limit. The reported quantitation limit may be imprecise because of potential low or indeterminate bias.

U – The analyte was not detected at or above the quantitation limit, or the analyte detection is impacted by blank contamination and qualified as non-detect in accordance with the applicable validation guidelines.

As a result of this Tier 1 validation review, **no validation qualifiers are required for sample delivery group L2608626, L2608898** (see Table 2).

The following acronyms may be used in the discussion of data-quality issues:

%D	Percent Difference	MB	Method Blank
CCV	Continuing Calibration Verification	MDL	Method Detection Limit
FB	Field Blank	MS	Matrix Spike
FD	Field Duplicate	MSD	Matrix Spike Duplicate
ICAL	Initial Calibration	RF	Response Factor
ICV	Initial Calibration Verification	RL	Reporting Limit
ISTD	Internal Standard	RPD	Relative Percent Difference
LCL	Lower Control Limit	RSD	Relative Standard Deviation
LCS	Laboratory Control Sample	TB	Trip Blank
LCSD	Laboratory Control Sample Duplicate	UCL	Upper Control Limit

MAJOR DEFICIENCIES:

Major deficiencies include those that grossly impact data quality and necessitate the rejection of results. **No major deficiencies were identified.**

MINOR DEFICIENCIES:

Minor deficiencies include anomalies that directly impact data quality and necessitate qualification, but do not result in unusable data. **No minor deficiencies were identified**.

OTHER DEFICIENCIES:

Other deficiencies include anomalies that do not directly impact data quality and do not necessitate qualification. **No other deficiencies were identified**.

FIELD DUPLICATE:

Two field duplicate and parent sample pairs were collected and analyzed for all parameters. For results less than 5X the RL, analytes meet the precision criteria if the absolute difference is less than ±X the RL. For results greater than 5X the RL, analytes meet the precision criteria if the RPD is less than or equal to 30% for drinking water. The following field duplicate and parent sample pairs were compared to and **met the precision criteria:**

- DUP_021726 and [REDACTED]
- DUP_021826 and [REDACTED]

CONCLUSION:

Based on this evaluation, the laboratory appears to have followed the specified analytical methods except for errors discussed above. If a given fraction is not mentioned above, that means that all specified criteria were met for that parameter.

All data are considered usable, as qualified. In addition, completeness, defined as the percentage of analytical results that are judged to be valid, is 100%.

Signed:

Joe Conboy
Project Chemist

Data Usability Assessment Summary Report
For MIPC Chelsea Facility - Aston, PA
February 2026 Drinking Water Samples
Table 1: Sample Summary

SDG	Lab Sample ID	Client Sample ID	Sample Date	Validation Level	Analytical Parameters
L2608626	L2608626-01	[REDACTED]	2/17/2026	Tier 1	VOCs by EPA 524.2
L2608626	L2608626-02	DUP_021726	2/17/2026	Tier 1	VOCs by EPA 524.2
L2608626	L2608626-03	[REDACTED]	2/17/2026	Tier 1	VOCs by EPA 524.2
L2608626	L2608626-04	FB_021726	2/17/2026	Tier 1	VOCs by EPA 524.2
L2608626	L2608626-05	TRIP BLANK	2/17/2026	Tier 1	VOCs by EPA 524.2
L2608898	L2608898-01	[REDACTED]	2/18/2026	Tier 1	VOCs by EPA 524.2
L2608898	L2608898-02	DUP_021826	2/18/2026	Tier 1	VOCs by EPA 524.2
L2608898	L2608898-03	FB_021826	2/18/2026	Tier 1	VOCs by EPA 524.2
L2608898	L2608898-04	EB_021826	2/18/2026	Tier 1	VOCs by EPA 524.2
L2608898	L2608898-05	TRIP BLANK	2/18/2026	Tier 1	VOCs by EPA 524.2

Data Usability Assessment Summary Report
For MIPC Chelsea Facility - Aston, PA
February 2026 Drinking Water Samples
Table 2: Validator-Applied Qualification

SDG	Client Sample ID	Analysis	CAS #	Analyte	Validator Qualifier
No Qualification Required					

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ENGINEERING & ENVIRONMENTAL SERVICES

Technical Memorandum

368 Ninth Avenue, 8th Floor New York, NY 10001 T: 609.282.8000
Mailing Address: 368 Ninth Avenue, 8th Floor New York, NY 10001-2727

To: Cortney Savidge, Langan Senior Project Scientist

From: Krzysztof Trafalski, Langan Senior Staff Chemist

Date: March 9, 2026

Re: Data Usability Assessment
For MIPC Chelsea Facility, Aston, PA
March 2026 Drinking Water Samples
Langan Project No.: 220240201

This memorandum presents the findings of an analytical data validation from the analysis of drinking water samples collected in March 2026 by Langan Engineering and Environmental Services at the MIPC Chelsea Facility, located at 920 Cherry Tree Road, Aston, Pennsylvania. The samples were analyzed by Pace Analytical Services, Westborough, MA (PADEP Laboratory ID # 68-03671) for volatile organic compounds (VOCs) by the method specified below.

- VOCs by USEPA Method 524.2

Table 1, attached, summarizes the laboratory and client sample identification numbers, sample collection dates, and analytical parameters subject to review.

VALIDATION OVERVIEW

This data validation was performed in accordance with the following guidelines:

- USEPA Contract Laboratory Program "National Functional Guidelines for Organic Superfund Methods Data Review" (EPA 540- R-20-005, November 2020)
- USEPA Contract Laboratory Program "National Functional Guidelines for Inorganic Superfund Methods Data Review" (EPA 540- R-20-005, November 2020), and
- published analytical methodologies.

Tier 1 data validation is based on completeness and compliance checks of sample-related QC results including: sample receipt documentation; analytical holding times; sample preservation; blank results (method, field, and trip); surrogate recoveries; MS/MSD recoveries and RPDs values; field duplicate RPDs, laboratory duplicate RPDs, and LCS/LCSD recoveries and RPDs. Two (2) Sample Delivery Groups (SDGs) underwent Tier 1 validation review.

As a result of the review process, the following qualifiers may be assigned to the data in accordance with the USEPA guidelines and our best professional judgment:

R – The sample results are unusable. The results are rejected because of serious deficiencies in meeting quality control criteria in accordance with the applicable validation guidelines. The analyte may or may not be present in the sample.

J – The analyte was positively identified but the associated numerical value is approximate.

UJ – The analyte was not detected at or above the method detection limit. The method detection limit may be imprecise because of potential low or indeterminate bias.

U – The analyte was not detected above the method detection limit, or the analyte detection is impacted by blank contamination and qualified as non-detect in accordance with the applicable validation guidelines.

As a result of this Tier 1 validation review, **no validation qualifiers are required for sample delivery group L2611157, L2611663** (see Table 2).

The following acronyms may be used in the discussion of data-quality issues:

%D	Percent Difference	MB	Method Blank
CCV	Continuing Calibration Verification	MDL	Method Detection Limit
FB	Field Blank	MS	Matrix Spike
FD	Field Duplicate	MSD	Matrix Spike Duplicate
ICAL	Initial Calibration	RF	Response Factor
ICV	Initial Calibration Verification	RL	Reporting Limit
ISTD	Internal Standard	RPD	Relative Percent Difference
LCL	Lower Control Limit	RSD	Relative Standard Deviation
LCS	Laboratory Control Sample	TB	Trip Blank
LCSD	Laboratory Control Sample Duplicate	UCL	Upper Control Limit

MAJOR DEFICIENCIES:

Major deficiencies include those that grossly impact data quality and necessitate the rejection of results. **No major deficiencies were identified.**

MINOR DEFICIENCIES:

Minor deficiencies include anomalies that directly impact data quality and necessitate qualification, but do not result in unusable data. **No minor deficiencies were identified**.

OTHER DEFICIENCIES:

Other deficiencies include anomalies that do not directly impact data quality and do not necessitate qualification. **No other deficiencies were identified.**

FIELD DUPLICATE:

One field duplicate and parent sample pair was collected and analyzed for all parameters. For results less than 5X the RL, analytes meet the precision criteria if the absolute difference is less than ±X the RL. For results greater than 5X the RL, analytes meet the precision criteria if the RPD is less than or equal to 30% for drinking water. The following field duplicate and parent sample pair was compared to and **met the precision criteria:**

- DUP_030326 and [REDACTED]

CONCLUSION:

Based on this evaluation, the laboratory appears to have followed the specified analytical methods except for errors discussed above. If a given fraction is not mentioned above, that means that all specified criteria were met for that parameter.

All data are considered usable, as qualified. In addition, completeness, defined as the percentage of analytical results that are judged to be valid, is 100%.

Signed:

Krzysztof Trafalski
Senior Staff Chemist

Data Usability Assessment Summary Report
For MIPC Chelsea Facility - Aston, PA
March 2026 Drinking Water Samples
Table 1: Sample Summary

SDG	Lab Sample ID	Client Sample ID	Sample Date	Validation Level	Analytical Parameters
L2611157	L2611157-01	[REDACTED]	3/3/2026	Tier 1	VOCs by EPA 524.2
L2611157	L2611157-02	DUP_030326	3/3/2026	Tier 1	VOCs by EPA 524.2
L2611157	L2611157-03	[REDACTED]	3/3/2026	Tier 1	VOCs by EPA 524.2
L2611157	L2611157-04	FB_030326	3/3/2026	Tier 1	VOCs by EPA 524.2
L2611157	L2611157-05	TRIP BLANK	2/13/2026	Tier 1	VOCs by EPA 524.2
L2611663	L2611663-01	[REDACTED]	3/4/2026	Tier 1	VOCs by EPA 524.2
L2611663	L2611663-02	FB_030426	3/4/2026	Tier 1	VOCs by EPA 524.2
L2611663	L2611663-03	TRIP BLANK	1/20/2026	Tier 1	VOCs by EPA 524.2

Data Usability Assessment Summary Report
For MIPC Chelsea Facility - Aston, PA
March 2026 Drinking Water Samples
Table 2: Validator-Applied Qualification

SDG	Client Sample ID	Analysis	CAS #	Analyte	Validator Qualifier
No Qualification Required					

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ENGINEERING & ENVIRONMENTAL SERVICES

Technical Memorandum

368 Ninth Avenue, 8th Floor New York, NY 10001 T: 609.282.8000
Mailing Address: 368 Ninth Avenue, 8th Floor New York, NY 10001-2727

To: Cortney Savidge, Langan Senior Project Scientist

From: Joe Conboy, Langan Project Chemist

Date: March 19, 2026

Re: Data Usability Assessment
For MIPC Chelsea Facility, Aston, PA
March 2026 Drinking Water Samples
Langan Project No.: 220240201

This memorandum presents the findings of an analytical data validation from the analysis of drinking water samples collected in March 2026 by Langan Engineering and Environmental Services at the MIPC Chelsea Facility, located at 920 Cherry Tree Road, Aston, Pennsylvania. The samples were analyzed by Pace Analytical Services, Westborough, MA (PADEP Laboratory ID # 68-03671) for volatile organic compounds (VOCs) by the method specified below.

- VOCs by USEPA Method 524.2

Table 1, attached, summarizes the laboratory and client sample identification numbers, sample collection dates, and analytical parameters subject to review.

VALIDATION OVERVIEW

This data validation was performed in accordance with the following guidelines:

- USEPA Contract Laboratory Program "National Functional Guidelines for Organic Superfund Methods Data Review" (EPA 540- R-20-005, November 2020)
- USEPA Contract Laboratory Program "National Functional Guidelines for Inorganic Superfund Methods Data Review" (EPA 540- R-20-005, November 2020), and
- published analytical methodologies.

Tier 1 data validation is based on completeness and compliance checks of sample-related QC results including: sample receipt documentation; analytical holding times; sample preservation; blank results (method, field, and trip); surrogate recoveries; MS/MSD recoveries and RPDs values; field duplicate RPDs, laboratory duplicate RPDs, and LCS/LCSD recoveries and RPDs. Three (3) Sample Delivery Groups (SDGs) underwent Tier 1 validation review.

As a result of the review process, the following qualifiers may be assigned to the data in accordance with the USEPA guidelines and our best professional judgment:

R – The sample results are unusable. The results are rejected because of serious deficiencies in meeting quality control criteria in accordance with the applicable validation guidelines. The analyte may or may not be present in the sample.

J – The analyte was positively identified but the associated numerical value is approximate.

UJ – The analyte was not detected at or above the method detection limit. The method detection limit may be imprecise because of potential low or indeterminate bias.

U – The analyte was not detected above the method detection limit, or the analyte detection is impacted by blank contamination and qualified as non-detect in accordance with the applicable validation guidelines.

As a result of this Tier 1 validation review, **no validation qualifiers are required for sample delivery group L2612463, L2612799, L2613829** (see Table 2).

The following acronyms may be used in the discussion of data-quality issues:

%D	Percent Difference	MB	Method Blank
CCV	Continuing Calibration Verification	MDL	Method Detection Limit
FB	Field Blank	MS	Matrix Spike
FD	Field Duplicate	MSD	Matrix Spike Duplicate
ICAL	Initial Calibration	RF	Response Factor
ICV	Initial Calibration Verification	RL	Reporting Limit
ISTD	Internal Standard	RPD	Relative Percent Difference
LCL	Lower Control Limit	RSD	Relative Standard Deviation
LCS	Laboratory Control Sample	TB	Trip Blank
LCSD	Laboratory Control Sample Duplicate	UCL	Upper Control Limit

MAJOR DEFICIENCIES:

Major deficiencies include those that grossly impact data quality and necessitate the rejection of results. **No major deficiencies were identified**.

MINOR DEFICIENCIES:

Minor deficiencies include anomalies that directly impact data quality and necessitate qualification, but do not result in unusable data. **No minor deficiencies were identified.**

OTHER DEFICIENCIES:

Other deficiencies include anomalies that do not directly impact data quality and do not necessitate qualification. **No other deficiencies were identified**.

FIELD DUPLICATE:

Two field duplicate and parent sample pair was collected and analyzed for all parameters. For results less than 5X the RL, analytes meet the precision criteria if the absolute difference is less than ±X the RL. For results greater than 5X the RL, analytes meet the precision criteria if the RPD is less than or equal to 30% for drinking water. The following field duplicate and parent sample pair was compared to and **met the precision criteria**:

- DUP_030926 and [REDACTED]
- DUP_031026 and [REDACTED]

CONCLUSION:

Based on this evaluation, the laboratory appears to have followed the specified analytical methods except for errors discussed above. If a given fraction is not mentioned above, that means that all specified criteria were met for that parameter.

All data are considered usable, as qualified. In addition, completeness, defined as the percentage of analytical results that are judged to be valid, is 100%.

Signed:

Joe Conboy
Project Chemist

Data Usability Assessment Summary Report
For MIPC Chelsea Facility - Aston, PA
March 2026 Drinking Water Samples
Table 1: Sample Summary

SDG	Lab Sample ID	Client Sample ID	Sample Date	Validation Level	Analytical Parameters
L2611157	L2612463-01	[REDACTED]	3/3/2026	Tier 1	VOCs by EPA 524.2
L2611157	L2612463-02	DUP_030926	3/3/2026	Tier 1	VOCs by EPA 524.2
L2611157	L2612463-03	FB_030926	3/3/2026	Tier 1	VOCs by EPA 524.2
L2611157	L2612463-04	TRIP BLANK	3/3/2026	Tier 1	VOCs by EPA 524.2
L2612799	L2612799-01	[REDACTED]	3/10/2026	Tier 1	VOCs by EPA 524.2
L2612799	L2612799-02	[REDACTED]	3/10/2026	Tier 1	VOCs by EPA 524.2
L2612799	L2612799-03	DUP_031026	3/10/2026	Tier 1	VOCs by EPA 524.2
L2612799	L2612799-04	FB_031026	3/10/2026	Tier 1	VOCs by EPA 524.2
L2612799	L2612799-05	TRIP BLANK	3/10/2026	Tier 1	VOCs by EPA 524.2
L2613829	L2613829-01	[REDACTED]	3/13/2026	Tier 1	VOCs by EPA 524.2
L2613829	L2613829-02	FB_031326	3/13/2026	Tier 1	VOCs by EPA 524.2
L2613829	L2613829-03	TRIP BLANK	3/13/2026	Tier 1	VOCs by EPA 524.2

Data Usability Assessment Summary Report
For MIPC Chelsea Facility - Aston, PA
March 2026 Drinking Water Samples
Table 2: Validator-Applied Qualification

SDG	Client Sample ID	Analysis	CAS #	Analyte	Validator Qualifier
No Qualification Required					

LANGAN
ENGINEERING & ENVIRONMENTAL SERVICES

Technical Memorandum

368 Ninth Avenue, 8th Floor New York, NY 10001 T: 609.282.8000
Mailing Address: 368 Ninth Avenue, 8th Floor New York, NY 10001-2727

To: Cortney Savidge, Langan Senior Project Scientist

From: Krzysztof Trafalski, Langan Senior Staff Chemist

Date: March 23, 2026

Re: Data Usability Assessment
For MIPC Chelsea Facility, Aston, PA
March 2026 Drinking Water Samples
Langan Project No.: 220240201

This memorandum presents the findings of an analytical data validation from the analysis of drinking water samples collected in March 2026 by Langan Engineering and Environmental Services at the MIPC Chelsea Facility, located at 920 Cherry Tree Road, Aston, Pennsylvania. The samples were analyzed by Pace Analytical Services, Westborough, MA (PADEP Laboratory ID # 68-03671) for volatile organic compounds (VOCs) by the method specified below.

- VOCs by USEPA Method 524.2

Table 1, attached, summarizes the laboratory and client sample identification numbers, sample collection dates, and analytical parameters subject to review.

VALIDATION OVERVIEW

This data validation was performed in accordance with the following guidelines:

- USEPA Contract Laboratory Program "National Functional Guidelines for Organic Superfund Methods Data Review" (EPA 540- R-20-005, November 2020)
- USEPA Contract Laboratory Program "National Functional Guidelines for Inorganic Superfund Methods Data Review" (EPA 540- R-20-005, November 2020), and
- published analytical methodologies.

Tier 1 data validation is based on completeness and compliance checks of sample-related QC results including: sample receipt documentation; analytical holding times; sample preservation; blank results (method, field, and trip); surrogate recoveries; MS/MSD recoveries and RPDs values; field duplicate RPDs, laboratory duplicate RPDs, and LCS/LCSD recoveries and RPDs. One (1) Sample Delivery Group (SDG) underwent Tier 1 validation review.

As a result of the review process, the following qualifiers may be assigned to the data in accordance with the USEPA guidelines and our best professional judgment:

R – The sample results are unusable. The results are rejected because of serious deficiencies in meeting quality control criteria in accordance with the applicable validation guidelines. The analyte may or may not be present in the sample.

J – The analyte was positively identified above the quantitation limit, and the associated numerical value is the approximate concentration of the analyte in the sample.

UJ – The analyte was not detected at or above the quantitation limit. The reported quantitation limit may be imprecise because of potential low or indeterminate bias.

U – The analyte was not detected at or above the quantitation limit, or the analyte detection is impacted by blank contamination and qualified as non-detect in accordance with the applicable validation guidelines.

As a result of this Tier 1 validation review, **no validation qualifiers are required for sample delivery group L2614328** (see Table 2).

The following acronyms may be used in the discussion of data-quality issues:

%D	Percent Difference	MB	Method Blank
CCV	Continuing Calibration Verification	MDL	Method Detection Limit
FB	Field Blank	MS	Matrix Spike
FD	Field Duplicate	MSD	Matrix Spike Duplicate
ICAL	Initial Calibration	RF	Response Factor
ICV	Initial Calibration Verification	RL	Reporting Limit
ISTD	Internal Standard	RPD	Relative Percent Difference
LCL	Lower Control Limit	RSD	Relative Standard Deviation
LCS	Laboratory Control Sample	TB	Trip Blank
LCSD	Laboratory Control Sample Duplicate	UCL	Upper Control Limit

MAJOR DEFICIENCIES:

Major deficiencies include those that grossly impact data quality and necessitate the rejection of results. **No major deficiencies were identified.**

MINOR DEFICIENCIES:

Minor deficiencies include anomalies that directly impact data quality and necessitate qualification, but do not result in unusable data. **No minor deficiencies were identified.**

OTHER DEFICIENCIES:

Other deficiencies include anomalies that do not directly impact data quality and do not necessitate qualification. **No other deficiencies were identified.**

FIELD DUPLICATE:

One field duplicate and parent sample pair was collected and analyzed for all parameters. For results less than 5X the RL, analytes meet the precision criteria if the absolute difference is less than ±X the RL. For results greater than 5X the RL, analytes meet the precision criteria if the RPD is less than or equal to 30% for drinking water. The following field duplicate and parent sample pair was compared to and **met the precision criteria**:

- DUP_031626 and [REDACTED]

CONCLUSION:

Based on this evaluation, the laboratory appears to have followed the specified analytical methods except for errors discussed above. If a given fraction is not mentioned above, that means that all specified criteria were met for that parameter.

All data are considered usable, as qualified. In addition, completeness, defined as the percentage of analytical results that are judged to be valid, is 100%.

Signed:

Krzysztof Trafalski
Senior Staff Chemist

Data Usability Assessment Summary Report
For MIPC Chelsea Facility - Aston, PA
March 2026 Drinking Water Samples
Table 1: Sample Summary

SDG	Lab Sample ID	Client Sample ID	Sample Date	Validation Level	Analytical Parameters
L2614328	L2614328-01	[REDACTED]	3/16/2026	Tier 1	VOCs by EPA 524.2
L2614328	L2614328-02	DUP_031626	3/16/2026	Tier 1	VOCs by EPA 524.2
L2614328	L2614328-03	FB_031626	3/16/2026	Tier 1	VOCs by EPA 524.2
L2614328	L2614328-04	TRIP BLANK	3/16/2026	Tier 1	VOCs by EPA 524.2

Data Usability Assessment Summary Report
For MIPC Chelsea Facility - Aston, PA
March 2026 Drinking Water Samples
Table 2: Validator-Applied Qualification

SDG	Client Sample ID	Analysis	CAS #	Analyte	Validator Qualifier
No Qualification Required					

LANGAN
ENGINEERING & ENVIRONMENTAL SERVICES

Technical Memorandum

368 Ninth Avenue, 8th Floor New York, NY 10001 T: 609.282.8000
Mailing Address: 368 Ninth Avenue, 8th Floor New York, NY 10001-2727

To: Cortney Savidge, Langan Senior Project Scientist

From: Krzysztof Trafalski, Langan Senior Staff Chemist

Date: April 1, 2026

Re: Data Usability Assessment
For MIPC Chelsea Facility, Aston, PA
March 2026 Drinking Water Samples
Langan Project No.: 220240201

This memorandum presents the findings of an analytical data validation from the analysis of drinking water samples collected in March 2026 by Langan Engineering and Environmental Services at the MIPC Chelsea Facility, located at 920 Cherry Tree Road, Aston, Pennsylvania. The samples were analyzed by Pace Analytical Services, Westborough, MA (PADEP Laboratory ID # 68-03671) for volatile organic compounds (VOCs) by the method specified below.

- VOCs by USEPA Method 524.2

Table 1, attached, summarizes the laboratory and client sample identification numbers, sample collection dates, and analytical parameters subject to review.

VALIDATION OVERVIEW

This data validation was performed in accordance with the following guidelines:

- USEPA Contract Laboratory Program "National Functional Guidelines for Organic Superfund Methods Data Review" (EPA 540- R-20-005, November 2020)
- USEPA Contract Laboratory Program "National Functional Guidelines for Inorganic Superfund Methods Data Review" (EPA 540- R-20-005, November 2020), and
- published analytical methodologies.

Tier 1 data validation is based on completeness and compliance checks of sample-related QC results including: sample receipt documentation; analytical holding times; sample preservation; blank results (method, field, and trip); surrogate recoveries; MS/MSD recoveries and RPDs values; field duplicate RPDs, laboratory duplicate RPDs, and LCS/LCSD recoveries and RPDs. One (1) Sample Delivery Group (SDG) underwent Tier 1 validation review.

As a result of the review process, the following qualifiers may be assigned to the data in accordance with the USEPA guidelines and our best professional judgment:

R – The sample results are unusable. The results are rejected because of serious deficiencies in meeting quality control criteria in accordance with the applicable validation guidelines. The analyte may or may not be present in the sample.

J – The analyte was positively identified above the quantitation limit, and the associated numerical value is the approximate concentration of the analyte in the sample.

UJ – The analyte was not detected at or above the quantitation limit. The reported quantitation limit may be imprecise because of potential low or indeterminate bias.

U – The analyte was not detected at or above the quantitation limit, or the analyte detection is impacted by blank contamination and qualified as non-detect in accordance with the applicable validation guidelines.

As a result of this Tier 1 validation review, **no validation qualifiers are required for sample delivery group L2617281** (see Table 2).

The following acronyms may be used in the discussion of data-quality issues:

%D	Percent Difference	MB	Method Blank
CCV	Continuing Calibration Verification	MDL	Method Detection Limit
FB	Field Blank	MS	Matrix Spike
FD	Field Duplicate	MSD	Matrix Spike Duplicate
ICAL	Initial Calibration	RF	Response Factor
ICV	Initial Calibration Verification	RL	Reporting Limit
ISTD	Internal Standard	RPD	Relative Percent Difference
LCL	Lower Control Limit	RSD	Relative Standard Deviation
LCS	Laboratory Control Sample	TB	Trip Blank
LCSD	Laboratory Control Sample Duplicate	UCL	Upper Control Limit

MAJOR DEFICIENCIES:

Major deficiencies include those that grossly impact data quality and necessitate the rejection of results. **No major deficiencies were identified**.

MINOR DEFICIENCIES:

Minor deficiencies include anomalies that directly impact data quality and necessitate qualification, but do not result in unusable data. **No minor deficiencies were identified**.

OTHER DEFICIENCIES:

Other deficiencies include anomalies that do not directly impact data quality and do not necessitate qualification. The section below describes the other deficiencies that were identified.

VOCs by USEPA Method 524.2

L2617281

The sample [REDACTED] exhibited a percent recovery above the UCL for the surrogate 1,2-dichlorobenzene-d4 (126%). The associated results are non-detect. No qualification is necessary.

The sample DUP_032726 exhibited a percent recovery above the UCL for the surrogate 1,2-dichlorobenzene-d4 (125%). The associated results are non-detect. No qualification is necessary.

FIELD DUPLICATE:

One field duplicate and parent sample pair was collected and analyzed for all parameters. For results less than 5X the RL, analytes meet the precision criteria if the absolute difference is less than ±X the RL. For results greater than 5X the RL, analytes meet the precision criteria if the RPD is less than or equal to 30% for drinking water. The following field duplicate and parent sample pair was compared to and **met the precision criteria**:

- DUP_031626 and [REDACTED]

CONCLUSION:

Based on this evaluation, the laboratory appears to have followed the specified analytical methods except for errors discussed above. If a given fraction is not mentioned above, that means that all specified criteria were met for that parameter.

All data are considered usable, as qualified. In addition, completeness, defined as the percentage of analytical results that are judged to be valid, is 100%.

Signed:

Krzysztof Trafalski
Senior Staff Chemist

Data Usability Assessment Summary Report
For MIPC Chelsea Facility - Aston, PA
March 2026 Drinking Water Samples
Table 1: Sample Summary

SDG	Lab Sample ID	Client Sample ID	Sample Date	Validation Level	Analytical Parameters
L2617281	L2617281-01	[REDACTED]	3/27/2026	Tier 1	VOCs by EPA 524.2
L2617281	L2617281-02	DUP_032726	3/27/2026	Tier 1	VOCs by EPA 524.2
L2617281	L2617281-03	FB_032726	3/27/2026	Tier 1	VOCs by EPA 524.2
L2617281	L2617281-04	TRIP BLANK	3/27/2026	Tier 1	VOCs by EPA 524.2

Data Usability Assessment Summary Report
For MIPC Chelsea Facility - Aston, PA
March 2026 Drinking Water Samples
Table 2: Validator-Applied Qualification

SDG	Client Sample ID	Analysis	CAS #	Analyte	Validator Qualifier
No Qualification Required					