

July 30, 2026

Transmitted via e-mail to: cdbrown@pa.gov and published on Chelseatankupdates.com

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: Responses to Public Comments and Questions
Interim Site Characterization Report
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 to the Department of Environmental Protection (DEP) the below responses to comments received from the public during the public comment period for the Interim Site Characterization Report (ISCR) that was submitted on June 19, 2026 in accordance with DEP's December 23, 2025 administrative order (Order). We will also share these with the public, as their comment period opened on June 19, 2026 and closed on July 19, 2026, as advertised in a legal ad published in the June 19, 2026 edition of the Delaware County Daily Times newspaper.

Public comments include two that were directly submitted for the ISCR and collective comments and questions from the virtual public meeting held by MIPC and DEP on July 7, 2026. Some of the public meeting questions are deemed not relevant to the ISCR and are not included herein; only comments and questions relevant to the ISCR are included herein. A complete recording of the July 2026 public meeting, including the public question-and-answer session, is available on the chelseatankupdates.com website.

The public comments and questions are presented below, followed by responses from MIPC/Langan in italicized text:

1. Review boring logs. Noted on boring logs MW-1D, MW-1E, and MW-1F, soil descriptions of "Silty lean clay" and "Gravelly poorly graded sand" are not to USCS standards. Please revise boring logs.

The overburden encountered at the Site consists of varying proportions of clay, silt, sand, along with basal cobbles and gravel. Boring logs prepared for the Site investigation mostly follow the Unified Soil Classification System (USCS). The commenter notes that boring logs for MW-1D, MW-1E, and MW-1F with soil descriptions of "Silty lean clay" and "Gravelly poorly graded sand" are not to USCS standards. Technically by USCS standards, a "silty lean clay" would be designated

as CL (lean clay with silt) and “gravelly poorly graded sand” would be designated as SP (poorly graded sand with gravel). In our opinion, the soil descriptions generally follow USCS conventions with some occasional slight variation in descriptions and modifiers used. While the comment about the USCS standard is technically accurate, we view the comment to be subtle and not of significance that warrant revisions of the boring logs. The boring log descriptions are an accurate representation of the characteristics and soil type(s) encountered.

2. CSM does not include a discussion of bedrock Formation and composition, known strike and dip of said Formation. Strike and dip can affect saprolite structure and groundwater fate and transport.

Overall, this is a good interim report and appears to be on track to identify data gaps. Drilling in the underlying geology of the area can be challenging. (as observed in the boring logs!) The use of seismic surveys to assist in the correlation of the saprolite-bedrock interface is good. Recommend passive samplers to collect dissolved-phase groundwater samples.

Delaware County is underlain by crystalline metamorphic rocks that are mainly comprised of gneisses and schists. Interim response actions and investigations conducted to date focus on the overburden and the upper parts of weathered bedrock where the gasoline related impacts are observed. Installed wells are completed between depths of about 15 feet below ground surface and 60 feet below ground surface and are above competent bedrock. Weathered bedrock and saprolite (weathered bedrock that retains its original texture and structure of the bedrock from which it develops, affecting the chemical and physical properties) are encountered at variable depths investigated at the Site.

Published geologic mapping shows that the Site overburden is underlain by the Brandywine Blue Gneiss (Obbg). The Brandywine Blue Gneiss is described as intermediate to felsic gneiss and interlayered intermediate, felsic, and mafic gneiss, composed of plagioclase, quartz, hornblende, biotite with garnet and/or epidote present at some localities. Mafic gneiss occurs as discontinuous layers and lenses ranging in thickness from about 4 inches to about 3.3 feet, and as larger amphibolite layers.

The Brandywine Blue Gneiss formation is described as having very low primary porosity, secondary (fracture) porosity, and low permeability. Reported lineations in bedrock trend north-west. Published strike (measured compass direction of a horizontal line formed by the intersection of a tilted geologic surface (such as a rock layer or other planar feature) and an imagined horizontal plane) of minor foliations and layering (repetitive, sheet-like or planar fabric found in many rocks) vary between N20°W and N55°E. Dips (inclination of bedrock features measured perpendicular to strike) are generally greater than 45°.

Groundwater flow in the overburden is generally towards the west and southwest. Subsurface conditions include a mix of silty/sandy lenses or 'fingers' and weathered bedrock/saprolite topography with properties that may preferentially influence flow and movement of gasoline product and dissolved fractions in groundwater. Migration of gasoline product and dissolved-phase impacts are expected to be variable under the influence of the local differences in soil type/lithology, weathered bedrock/saprolite surface relief and their associated¹ physical characteristics and properties.

The forthcoming Remedial Investigation Report will include the above discussion regarding bedrock geology.

As for the recommendation to use passive samplers, there are advantages and disadvantages for every sampling device/technique. The conventional method of low-flow sampling using bladder pumps was selected, as this method provides a reliable means for highly representative samples (per PADEP Groundwater Monitoring Guidance, Document No. 261-0300-101). The low-flow purging and sampling method uses stabilization of indicator parameters to determine when to sample the well, as encouraged by PADEP. Minimizing purge water is one advantage of passive samplers but is not a factor for sampling on the site because there are onsite means of handling and managing purge water. As site characterization and cleanup advances, MIPC/Langan may consider potential advantages associated with passive sampling.

3. What is the current estimated release volume, and what methodology was used to calculate that estimate?

The current estimated maximum release volume is 7,779 barrels. This calculation was derived from reviewing the inbound and outbound flows to Tank 708 between the tank's re-entry into service in March 2025 and the tank being removed from service in December 2025. The methodology was applied under PHMSA's oversight, and this calculation represents the maximum worst case release volume.

4. What is the current understanding of the groundwater flow direction from the Chelsea Tank Farm, and have recent periods of elevated groundwater levels and above-average precipitation influenced plume migration?

¹ Open-File Report OFBM-05-06.0 Bedrock Geologic Map of the Pennsylvania Portion of the Marcus Hook Quadrangle, Delaware County, Pennsylvania by Howell Bosbyshell (2005) and Report of Investigations No. 59 - Bedrock Geology of the Piedmont of Delaware and Adjacent Pennsylvania by Margaret O. Plank et. al., (2000)

² Bosbyshell, H., 2005, Bedrock geologic map of the Pennsylvania portion of the Marcus Hook quadrangle, Delaware County, Pennsylvania: Pennsylvania Geological Survey, 4th ser., Open-File Report OFBM 05-06.0, 11 p., Portable Document Format (PDF) file.

Groundwater flow is consistently to the west-southwest in the area of Tank 708 based on data collected to date. MIPC's current understanding of the groundwater flow is based on topographical and seismic data as well as a network of over 100 drilled monitoring wells. MIPC conducts routine focused water level and gasoline product gauging of these wells, and has conducted site-wide gauging on several occasions. Elevation contour maps using these data are presented in the 1st and 2nd Quarterly Remedial Action Progress Reports.

5. Can you provide updated maps showing the current groundwater plume, monitoring well locations, and areas where residential investigations are ongoing?

Maps are available in the weekly reports that MIPC submits to PADEP. Additionally, MIPC publishes these reports on the ChelseaTankUpdates.com website. The weekly maps show monitoring well locations, and the most current plume boundary is reflected via the delineation map shown in Fact Sheet #5.

MIPC does not publish maps showing residential investigations, in order to protect our neighbors' privacy.

6. How many residential properties have received indoor air testing, groundwater testing, or vapor intrusion evaluations, and how many homes have required additional monitoring or mitigation?

Fourteen offsite properties have had vapor intrusion assessments and/or groundwater assessments. Vapor intrusion mitigation systems have been installed beneath homes on three of those properties. MIPC will continue monitoring efforts at all of these properties, and should conditions change, MIPC will take the appropriate measures to ensure the health and safety of our neighbors.

7. What contaminants are currently being monitored (for example benzene, toluene, ethylbenzene, xylenes, MTBE, and total petroleum hydrocarbons), and how do current concentrations compare with Pennsylvania DEP residential screening values?

Per the PADEP Order, the defined compounds to be investigated for releases of unleaded gasoline include benzene, toluene, ethylbenzene, xylenes, cumene, MTBE, naphthalene, 1,2,4-trimethylbenzene and 1,3,5-trimethylbenzene. These are the 9 compounds that MIPC has been monitoring. Please note, MTBE is no longer used in gasoline in the United States and was completely phased out in 2006.

MIPC adheres to the screening values set forth by PADEP.

None of these compounds have been detected above even the most stringent PADEP residential screening criteria in any of the private drinking water well samples collected to date.

The three properties with one or more gasoline-related compounds detected in sub-slab soil gas at concentrations above the PADEP residential screening values have had vapor intrusion mitigation systems installed, and these systems are operating as intended. In other homes, the detection levels have been found to be below the residential screening values when tested for vapor intrusion.

Contaminants in soil and groundwater are also being monitored onsite with results communicated in the weekly progress reports MIPC submits to PADEP.

8. Has Monroe or DEP evaluated whether prolonged periods of elevated groundwater over the past one to two years may have affected contaminant migration or vapor intrusion potential?

The subsurface investigation into this release began in November 2025. As such, MIPC does not have site-specific groundwater data for the past few years.

9. What is the anticipated timeline for remediation, groundwater monitoring, and long-term environmental oversight?

In accordance with the PADEP Order, MIPC developed an implementation schedule which is posted on the ChelseaTankUpdates.com website, and MIPC is following the Order until PADEP's cleanup standards have been met. PADEP provides oversight throughout the process and will be final authority in determining when everything is complete.

10. Under what circumstances would Monroe install vapor mitigation systems in nearby residences, and what criteria would trigger that decision?

Sub-slab soil gas sample results are compared against the PADEP Residential Vapor Intrusion Screening Values, reduced by a factor of 10 (1/10th of the published values, which is a conservative screening value). Exceedances of those values for gasoline-related compounds would trigger additional assessment to confirm the results and indoor air quality. The results of these assessments would determine whether a vapor mitigation system is warranted.

11. Will the Interim Site Characterization Report, supporting groundwater data, laboratory results, and future monitoring reports be made readily available to the public as the investigation progresses?

Yes, the Interim Site Characterization Report and all other reports are uploaded to the ChelseaTankUpdates.com website for public review.

12. Is tank 708 back in service? What other tanks are out of service?

No, Tank 708 remains out-of-service. Tank 708 will only return to service with PHMSA approval. Currently, there is one additional tank that is out-of-service and pending maintenance.

This Response to Public Questions and Comments document is being shared with the public on the Chelseatankupdates.com website.

If you should have any questions or comments, please feel free to contact Langan at 215.845.8915 or MIPC at 610-364-8426.

Sincerely,

Langan Engineering and Environmental Services, LLC



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Senior Associate



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

cc: Alex M. Langan, Simon Mullen, C. David Brown, Lisa Strobridge – PADEP Southeast Regional Office
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Comments\MIPC Chelsea Aston_Responses to Public Comments and Questions_Interim SCR_2026.07.30_Final.docx