



Pennsylvania
Department of Environmental Protection

August 7, 2026

VIA EMAIL: jeff.warmann@monroe-energy.com; regan.howell@monroe-energy.com;
elizabeth.clapp@monroe-energy.com

Jeff Warmann
President and CEO
MIPC, LLC
920 Cherry Tree Road
Aston, PA 19014

Re: Administrative Order – Response to Comments to the Fenceline Perimeter Air
Monitoring Plan and Addendum
MIPC Chelsea Pipeline Station and Tank Farm Release
920 Cherry Tree Road
Aston Township
Bethel Township
Upper Chichester Township
Delaware County

Dear Jeff Warmann:

On March 13, 2026, MIPC, LLC submitted the Fenceline Monitoring Field Sampling Plan with a proposal to use Passive Diffusive Sampling Using Thermal Desorption Tubes (“Passive Sampling Plan”) as an addendum to the originally submitted and approved Fenceline Perimeter Air Monitoring Plan required by Paragraph 3 of the December 23, 2025 Order. On April 10, 2026, the Department of Environmental Protection (“DEP”) provided comments to MIPC, LLC regarding the Passive Sampling Plan. On June 29, 2026, MIPC, LLC submitted to DEP an update to their Passive Sampling Plan (“Updated Passive Sampling Plan”).

DEP has reviewed MIPC, LLC’s June 29, 2026 Updated Passive Sampling Plan. DEP does not approve the use of this Updated Passive Sampling Plan as proposed. While DEP acknowledges the inclusion of the continuation of one 24-hour canister monitoring location, DEP has additional comments regarding the Updated Passive Sampling Plan.

1) The Standard Operating Procedure (“SOP”) for laboratory Tenax analysis is missing.

A complete SOP should be provided, including the full list of target analytes along with their limits of quantitation (LOQ), method detection limits (MDL), and any other required analytical performance criteria.

2) The total number of sampling sites is inconsistent with the previous proposal.

The earlier plan proposed eight (8) passive sites based on EPA Method 325A. In

the updated version, the number of sampling sites has been reduced to three (3). Please explain the siting criteria, decision process, and justification used to reduce the number of sampling locations.

DEP recommends adding two additional passive sampling locations based on prevailing wind patterns and potential public exposure, particularly in residential areas located near emission sources. One passive sampler would be installed at the current active sampling location AA-2. The second passive sampler would be placed between active sites AA-4 and AA-3, which are positioned downwind according to the site-specific windrose.

The windrose was developed using data from the meteorological station described in the sampling plan, which continuously measures wind speed and direction from the WV weather station. In the accompanying figure (Attachment 1, Figure 1), the star symbol represents the proposed new passive sampling locations.

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

Sincerely,



Jillian Gallagher
Environmental Program Manager
Air Quality

cc: Elizabeth Clapp, MIPC
Regan Howell, MIPC
Thomas Magge
Dave Brown, P.G.
Alex Langan, Esq.
Enforcement File

Attachment 1

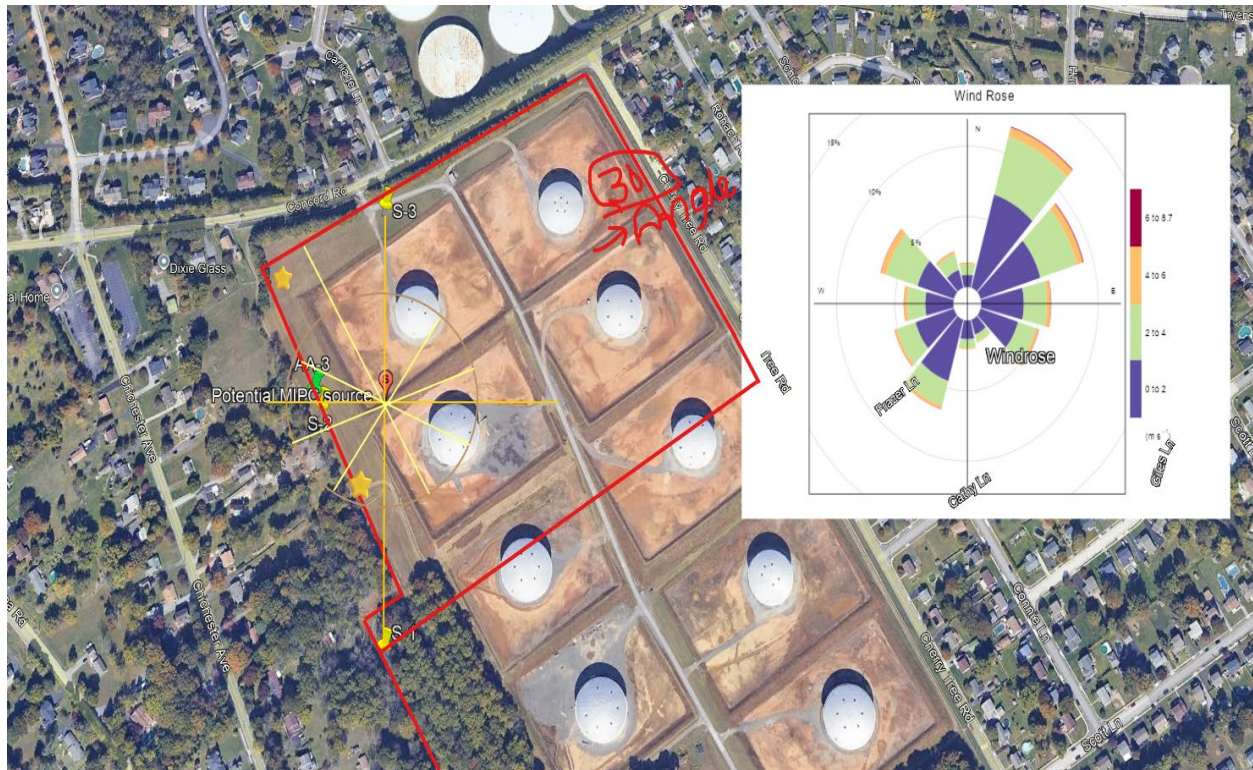


Figure 1