



Pennsylvania  
Department of Environmental Protection

May 13, 2025

Mr. Gus Borkland  
Energy Transfer  
100 Green Street  
Marcus Hook, PA 19061

Re: Letter of Deficiency for Site Characterization Work Plan  
SPLP Pipeline Release  
eFACTS PF No. 881609  
eFACTS Activity No. 60986  
Glenwood Drive and Walker Road  
Upper Makefield Township  
Bucks County

Dear Mr. Borkland:

The Department of Environmental Protection (DEP) has received and reviewed the April 18, 2025, document titled “Site Characterization Work Plan”, written by Verdantas LLC, for the Sunoco Pipeline, LP (SPLP) Twin Oaks – Newark 14”-diameter pipeline release response. The work plan was submitted in accordance with DEP’s March 6, 2025, administrative order.

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

1. General: For DEP and other reviewers to effectively review this and other project plans, all relevant tables, figures, and attachments should be included with the document or referenced appropriately. This includes references to previously submitted documents, where appropriate, and all relevant tables, figures, and attachments. Furthermore, SPLP provided a Figure 10 showing proposed well locations under a separate cover. Figure 10 is not referenced within the text of the Site Characterization Work Plan, so it appears to reviewers without access to this figure that proposed well locations have not been selected.
2. General: No information was included in this work plan describing how the potential migration of contaminants related to the pipeline release into residential septic systems will be evaluated. A proposed approach to characterizing this migration pathway must be described in the plan.
3. Section 2.4 Bedrock Geology and Hydrogeology: Please provide references for the geological and hydrogeological information discussed in this section.

4. Section 2.6, Extent of Separate-Phase Liquid, 2<sup>nd</sup> Paragraph: This paragraph notes that the LNAPL observed at an additional property on Spencer Road did not appear to be jet fuel, but a different petroleum product. Please briefly discuss why the product at the additional property on Spencer Road does not appear to be jet fuel.
5. Section 3.2.1, Supplemental ERI Survey: Please identify the subcontractor to be used during supplemental electrical resistivity imaging (ERI) survey activities, as well as a brief description of the equipment and procedures that will be utilized during this survey.
6. Section 3.2.2, Perform Seismic Refraction Survey: Please identify the subcontractor to be used during seismic refraction survey activities, as well as a brief description of the equipment and procedures that will be utilized during this survey.
7. Section 3, Proposed Site Characterization Tasks, 3<sup>rd</sup> Paragraph: This paragraph indicates that standard operating procedures (SOPs) were intentionally not included in the workplan, noting that existing SOPs will be used or, if new SOPs are required, they will be “provided to the PADEP prior to the performance of characterization activities.” The activities described in this work plan are common industry practice, and SPLP and/or its subcontractors should have SOPs readily available for these activities. All SOPs for work described in the work plan should be included as an attachment to the work plan, or proper references to previously submitted documents including those SOPs should be included in the work plan.
8. Section 3.3, Soil Characterization: Please provide the information and certifications for the analytical laboratory to be used for the soil sampling activities described in this section and describe the analytical methods to be used for sample analysis.
9. Section 3.3, Soil Characterization: Please identify the drilling subcontractor to be used during soil characterization activities as well as a brief description of the equipment and procedures that will be utilized during these activities.
10. Section 3.3, Soil Characterization, 1<sup>st</sup> Sentence: The residual contamination in the unsaturated zone near the release area is a potential continued source of dissolved phase groundwater contamination, not just a potential vapor intrusion source, as indicated in this sentence.
11. Section 3.4.1, Monitoring Well Installation: Given that the preliminary conceptual site model (CSM) relies heavily on the assumption that contaminants from the pipeline release are migrating through inferred water-bearing fracture sets identified in the ERI survey, as stated in Section 2.7, borehole geophysical logging, and potentially UV logging and packer testing, should be conducted at each monitoring well location to identify fractures and water bearing zones. Selected depth intervals for any permanent well materials should be based on the results of downhole logging and testing.

12. Section 3.4.1, Monitoring Well Installation: Please describe how domestic potable wells will be monitored during installation and development activities to ensure that there are no adverse effects to residents due to installation activities.
13. Section 3.4.1, Monitoring Well Installation: Please describe the containment procedures to be used during drilling and the procedures for the storage and disposal of investigation derived waste (IDW) generated during monitoring well installation activities.
14. Section 3.4.1, Monitoring Well Installation: Please identify the drilling subcontractor to be used during monitoring well installation activities as well as a brief description of the equipment and procedures that will be utilized during these activities.
15. Section 3.4.1, Monitoring Well Installation: Please denote the reference datum(s) to be used during well survey activities.
16. Section 3.4.2, Groundwater Monitoring and Sampling: This section is intended to describe the plan for groundwater sampling and indicates that two rounds of groundwater monitoring and sampling will be conducted. However, there is no information as to how the well headspace will be evaluated for the presence of VOCs, how sample depths will be determined, what method(s) will be used for the purging and sampling of monitoring wells, what laboratory will be used to conduct the analyses of groundwater samples, what analytical method(s) will be used for sample analysis, how the quality of the analytical data will be evaluated following receipt from the analytical laboratory, or how IDW generated during monitoring well sampling will be handled. Please provide a detailed plan for groundwater monitoring and sampling.
17. Section 3.5, Evaluation of Potential Vapor Intrusion Pathways: This section discusses the general steps for conducting evaluations of potential vapor intrusion pathway(s), and notes that additional sampling will be performed, if necessary, to fully evaluate the potential vapor intrusion pathway(s) to properties within the proximity distance of soil and groundwater containing concentrations of contaminants greater than vapor intrusion screening values. This section should summarize vapor intrusion pathway evaluation activities completed to date and briefly discuss planned sub-slab soil vapor sampling activities.

Pursuant to DEP's order, SPLP must correct the deficiencies and submit a revised Site Characterization Work Plan no later than June 27, 2025. Note that the Site Characterization Work Plan is also subject to public review and comment through May 18, 2025, and a revised plan must address any public comments received through that date. We are willing to work with you to develop an approvable submittal.

If you have any questions or would like to meet regarding this matter, please contact me by email at [cdbrown@pa.gov](mailto:cdbrown@pa.gov) or by telephone at 484.250.5792.

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

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

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

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

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

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

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

Sincerely,

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

cc: Mr. Gordon, Energy Transfer  
Upper Makefield Township  
Bucks County Health Department  
Mr. Langan, Esq.  
Mr. Devan, P.G.  
Mr. Lipik, P.G.  
Ms. Budnovitch