



March 14, 2025

Via Electronic Mail

C. David Brown, P.G.
Environmental Program Manager
Environmental Cleanup and Brownfields
Pennsylvania Department of Environmental Protection
Southeast Regional Office
2 East Main Street
Norristown, PA 19401
cdbrown@pa.gov

**Re: March 6, 2025 Order
Twin Oaks – Newark 14”-Diameter Pipeline
Upper Makefield Township, Bucks County**

Dear David:

Sunoco Pipeline L.P. (“SPLP”) is providing the Department with a proposed implementation schedule in accordance with paragraph 2.b. of the Department’s March 6, 2025 Order (the “Order”) as follows:

- i. *Submission of a work plan for characterization of the nature, extent, direction, rate of movement, volume and composition of regulated substances released into the environment from the Pipeline Release in accordance with Act 2.*

Response:

SPLP will submit a work plan to the Department describing the work it will complete in accordance with Act 2 guidance to characterize the nature, extent, direction, rate of movement, volume, and composition of regulated substances released into the environment (hereinafter, the “Work Plan”) no later than April 18, 2025.

- ii. *Completing work to characterize the nature, extent, direction, rate of movement, volume and composition of regulated substances released into the environment from the Pipeline Release in accordance with Act 2 and submitting a report describing the interim characterization of the nature, extent, direction, rate of movement, volume and composition of regulated substances released into the environment from the Pipeline Release in accordance with the remediation standard(s) of Act 2.*

Response:

The Work Plan will detail the tasks that will be completed to characterize the nature, extent, direction, rate of movement, volume, and composition of regulated substances released into the environment. A comprehensive anticipated schedule of these activities, pending access from various landowners, will be included in the Work Plan that will be submitted to the Department no later than April 18, 2025. Any potential updates or modifications to the anticipated schedule will be included in the progress reports that will be submitted to the Department every 90 days, in accordance with paragraph 2.b.v of the Order (hereinafter, the “Progress Reports”). In addition, an updated list of all site characterization activities completed to date will be provided in the Daily Update that is being provided to the Department in accordance with paragraph 1.e of the Order.

In the Work Plan, SPLP will also provide an estimated schedule for the submission of an interim characterization report that will summarize of the nature, extent, direction, rate of movement, volume and composition of regulated substances released into the environment. Any updates or modification to the proposed schedule will be provided in the Progress Reports.

- iii. *Submitting a plan addressing all remedial actions to address the release of regulated substances released into the environment from the Pipeline Release to meet the remediation standard(s) of Act 2*

Response:

Upon completion of site characterization, remedial feasibility options will be evaluated and tested. SPLP anticipates that it will be in a position to submit a remedial action plan to the Department within ninety (90) days after completion of these activities. Any updates or modification to the proposed schedule will be provided in the Progress Reports.

- iv. *Submitting a final report demonstrating attainment of Act 2 cleanup standard(s) for the regulated substances released into the environment from the Pipeline Release in accordance with the requirements of Act 2*

Response:

After SPLP completes site characterization, remediation, and attainment monitoring and sampling (e.g., eight (8) quarters of groundwater monitoring demonstrating results meeting the statewide health standards), SPLP will prepare and submit to the Department for review and approval an Act 2 Final Report. SPLP anticipates that it will be in a position to submit the Act 2 Final Report within 90 days after completion of the required attainment monitoring. Any updates or modification to the proposed schedule will be provided in the Progress Reports.

- v. *Submitting to the Department remedial action progress reports once every ninety (90) days describing characterization activities and results, remedial action implementation and results, public involvement activities, planned site characterization work and remedial actions.*

Response:

SPLP will submit Progress Reports to the Department every 90 days describing characterization activities and results, remedial action implementation and results, public involvement activities, planned site characterization work and remedial actions. The initial Progress Report will be submitted on or before June 12, 2025.

Thank you,

A handwritten signature in black ink, appearing to read 'Gus Borkland', written over a horizontal line.

Gus Borkland
Sr. Director- Environmental Compliance and
Asset Security
Energy Transfer