



April 16, 2025

Via Electronic Mail

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**Re: Response to Letter of Deficiency for the Interim Remedial Action Plan
eFACTS PF No. 881609
eFACTS Activity No. 60986
Twin Oaks – Newark 14”-Diameter Pipeline
Upper Makefield Township, Bucks County**

Dear David:

Sunoco Pipeline LP (“SPLP”) provides this response to the Letter of Deficiency for the Interim Remedial Action Plan, which SPLP received via email on April 9, 2025 (the “Letter”). The Interim Remedial Action Plan was submitted to the Department on March 19, 2025, in accordance with paragraph 1.h of the Department’s March 6, 2025 Administrative Order (the “Administrative Order”).

At the outset, it is worth noting that the Department’s comments were provided twenty-one (21) days after SPLP’s submission of the Interim Remedial Action Plan. While the Department acknowledges that paragraph 3 of the Administrative Order gives SPLP forty-five (45) days to respond to the alleged deficiency and submit a revised Interim Remedial Action Plan (i.e., until May 24, 2025), the Department requests that SPLP provide the revised Interim Remedial Action Plan by April 24, 2025 – which is only fifteen (15) days after SPLP’s receipt of the Letter.

SPLP shares the Department’s commitment to expediting this remediation, and therefore, SPLP is responding to and addressing the Department’s comments, and through this letter, is submitting a supplement/revision to Interim Remedial Action Plan well within the 15-day timeframe requested by the Department. Similarly, SPLP responded to the Department’s April 9, 2025 deficiency notice on the Proposed Implementation Schedule, on April 10, 2025, within one day. While SPLP respectfully continues to note the 45-day time frame established by the Order, SPLP will also continue to endeavor to comply with expedited deadlines to the extent possible.

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Please note that SPLP does not agree that its Interim Remedial Action Plan was deficient, as the Department suggests in the Letter, but SPLP is providing the Department with the following response and supplement in an effort to continue to go above and beyond what is required by the terms of the Order. The Letter provides a single comment on the Interim Remedial Action Plan, as follows:

Recovery/Monitoring Well Installation: SPLP identified the installation of a single recovery/monitoring well on Spencer Road and is evaluating locations for additional recovery and/or monitoring wells. The interim remedial action plan must describe specific plans for the recovery/monitoring wells, such as anticipated construction details, planned testing of the wells, remedial methods being considered, criteria for selecting remedial methods, and a schedule for performing remediation.

After the discovery of the pipeline release, beginning in mid-February 2025, SPLP has been actively working to identify potential locations for the installation of recovery and/or monitoring wells – which are dependent upon obtaining access to private and/or publicly-owned property. As the Department has acknowledged and is aware, to date, SPLP has been able to install one recovery well on Spencer Road.

As the Department is aware, installing additional recovery and/or monitoring wells will typically require SPLP to obtain permission from landowners. SPLP has been diligently attempting to obtain permission from the landowners for the potential additional well locations it has identified, but to date has been unable to obtain permission for the location of any additional wells. SPLP shares the Department’s desire to install additional recovery wells in the neighborhood, which are critical to performing additional product recovery. SPLP also intends to locate and install monitoring wells in the neighborhood as part of the continued efforts to perform groundwater plume delineation, and thereafter evaluate and select additional remedial measures. The ultimate goal is to perform remedial actions following completion of site characterization in accordance with Act 2.

SPLP’s diligent efforts to locate and install additional recovery and/or monitoring wells have been hampered by the filing of private litigation on behalf of certain residents in the Mt. Eyre neighborhood, and by the public disclosure of potential locations of recovery and/or monitoring wells in the neighborhood. Indeed, SPLP had prepared detailed drilling plans and specifications for the installation of additional recovery/monitoring wells to be located on private property along Glenwood Drive, and was in the process of obtaining site access to promptly install the well(s), when those efforts were thwarted as a result of the public disclosure of the potential locations.

SPLP is continuing to diligently identify and evaluate alternative locations to install recovery and/or monitoring wells, and is actively engaged with Upper Makefield Township in pursuing approvals to install wells in the public right-of-way. But, in light of the actions to attempt to prevent the installation of additional wells that has already occurred, SPLP respectfully requests

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discussing the location of any additional potential wells with the Department prior to providing written documentation.

In addition, SPLP notes that the Department’s comment on the Interim Remedial Action Plan is also inconsistent with the language of paragraph 1.h of the Order, which requested that SPLP provide a plan that “describe[s] proposed short-term measures to protect human health and the environment.” SPLP provided that information to the Department in its March 19, 2025 submission of the Interim Remedial Action Plan. The Department’s comment in the Letter, and alleged deficiency, instead requests information and details that are more typically prepared following the completion of site characterization, and that will be included in the plan that will be submitted to the Department in accordance with paragraph 2.b.iii of the Order, which will address all remedial actions to meet the residential Statewide health standard under Act 2.

Nevertheless, SPLP is providing the Department with the specific information regarding the recovery/monitoring wells requested in the Department’s comment above, as follows:

- Anticipated Construction Details:
 - On Friday, April 11, 2025, SPLP provided the Department and Upper Makefield Township with a Recovery Well Installation Work Plan for three (3) proposed recovery/monitoring of wells to be potentially installed in the public roadways along Glenwood Drive. Specific construction details are provided in the Recovery Well Installation Work Plan. To date, SPLP has not yet obtained approval from the Township for the installation of these additional recovery/monitoring wells.
 - SPLP has also prepared a Recovery Well Installation Work Plan to install an additional proposed recovery/monitoring well on a private property on Glenwood Drive. Specific construction details are provided in the Recovery Well Installation Work Plan for this location. This plan was shared with the landowner, who is now represented by counsel. To date, SPLP has not yet obtained site access or approval for the installation of this additional recovery/monitoring well.
- Planned Testing of Wells:
 - Once each well is drilled, the well is then developed in accordance with procedures described the Recovery Well Installation Work Plan.
 - After each well is developed, the well is purged and then sampled, with samples submitted for laboratory analysis.
 - The well will be gauged for the presence or absence of light non-aqueous phase liquid (“LNAPL”).

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- If the well construction allows, SPLP will perform ultraviolet (UV) borehole logging of each well(s). For example, on April 3, 2025, SPLP performed UV borehole logging of the first recovery well installed on Spencer Road, and provided a summary report regarding that testing to the Department on April 10, 2025. The UV borehole logging will assist to determine if LNAPL is migrating into the borehole of the well, and at what depth or interval.
- Depending on the testing results following the installation and development of each well, additional potential testing and remedial methods will be employed.
- Interim Remedial Methods Considered:
 - Following the installation and development of the well(s), potential interim remedial methods for addressing the presence of LNAPL in the groundwater will be evaluated, which may include LNAPL recovery (e.g., bailing, use of adsorbent socks, passive skimmers, etc.), or total phase extraction using a vacuum or other similar method.
 - Additional remedial methods to address the presence of LNAPL in soils and groundwater will be identified following completion of site characterization.
- Criteria for Selection of Interim Remedial Methods:
 - SPLP will evaluate the data obtained during and following the installation and development of each well(s), which will be utilized to determine whether LNAPL recovery or total phase extraction is most appropriate to address the presence of LNAPL in groundwater.
- Schedule for Performing Interim Remedial Methods:
 - If LNAPL is encountered, interim remedial methods will be initiated immediately.

Thank you,



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