



June 27, 2025

Via Electronic Mail

C. David Brown, P.G.
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**Re: Response to Letter of Deficiency for the Site Characterization Work 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 that SPLP received via email on May 13, 2025 (the “Letter”) for the Site Characterization Work Plan that SPLP submitted to the Department on April 18, 2025, in accordance with paragraph 2.b.i of the Department’s March 6, 2025 Administrative Order (the “Order”).

Please note that SPLP disputes that its Site Characterization Work Plan was deficient, as the Department suggests in the Letter, and nothing in this letter should be construed as an admission of any such deficiencies. Nevertheless, SPLP is providing a response to each of the comments provided in the Department’s Letter, together with a revised Site Characterization Work Plan (*see* **Attachment “1”**), and a comment-response document (*see* **Attachment “2”**), as follows:

Department Comment:

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.

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SPLP Response: SPLP acknowledges the Department’s comment and respectfully reminds the Department that SPLP is in active litigation that makes certain aspects of its remedial design activities particularly sensitive and not appropriate for general public dissemination. However, SPLP has worked with the Department to ensure that the Department has all of the information that it needs and requests to conduct complete and thorough reviews of all of SPLP’s submittals. An updated Figure 10 showing the proposed well locations is now referenced in Section 3.4.1 and has been included with the revised version of the Site Characterization Work Plan that is being submitted with this letter. *See Attachment 1.*

Department Comment:

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.

SPLP Response: SPLP has evaluated this potential migration pathway with its environmental consultants and has concluded that characterization activities regarding this scenario are not warranted. More specifically, there is no evidence that separate phase liquids were pumped from the wells, and any contaminants in a dissolved phase that could have hypothetically been pumped from wells prior to the installation of POET systems and flowed into the septic system would have adsorbed to the organic material in the septic tank. The contaminants adsorbed to the organic material in the septic tank would have been (or will be) pumped out and sent for offsite disposal as part of the routine septic system maintenance activities. Accordingly, this potential pathway does not warrant further characterization activities.

Department Comment:

3. Section 2.4 Bedrock Geology and Hydrogeology – Please provide references for the geological and hydrogeological information discussed in this section.

SPLP Response: Section 2.4 referenced Pennsylvania Geologic Survey mapping of the area, and that text has been revised to specifically reference the geological and hydrogeological information used to develop that text. *See Attachment 1.*

Department Comment:

4. Section 2.6, Extent of Separate-Phase Liquid, 2nd 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.

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SPLP Response: The text of Section 2.6 has been revised to briefly discuss why the product observed at this property does not appear to be jet fuel. *See Attachment 1.*

Department Comment:

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.

SPLP Response: While SPLP feels that it is premature to identify specific contractors before the Site Characterization Work Plan and resulting specific scope of work has been approved, SPLP used RETTEW Associates, Inc., for the supplemental ERI survey activities that were recently completed. The text of Section 3.2.1 has been revised to describe the equipment and procedures that were used for that work. *See Attachment 1.*

Department Comment:

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.

SPLP Response: As noted above, SPLP feels that it is premature to identify specific contractors before the Site Characterization Work Plan and resulting specific scope of work has been approved. However, SPLP is using RETTEW Associates, Inc., for the seismic refraction survey activities that are underway. The text of Section 3.2.1 has been revised to briefly describe the equipment and procedures that are being used for this work. *See Attachment 1.*

Department Comment:

7. Section 3, Proposed Site Characterization Tasks, 3rd 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.

SPLP Response: As noted in the text that has been added to this paragraph, it is not possible to include specific SOPs for all tasks described in the work plan because the

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specific procedures that will be used are being reviewed and refined as new data is obtained and analyzed. *See **Attachment 1.***

Department Comment:

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.

SPLP Response: SPLP is using Pace Analytical Laboratory for the analytical laboratory work and is using analytical methods specified in the Department’s Technical Guidance Manual. The text of Section 3.3 has been revised accordingly and the laboratory certifications will be provided with a subsequent submittal. *See **Attachment 1.***

Department Comment:

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.

SPLP Response: As noted above, SPLP feels that it is premature to identify specific contractors before the Site Characterization Work Plan and resulting specific scope of work has been approved. However, SPLP used Parratt-Wolff, Inc., for the drilling associated with soil characterization activities that were recently conducted. The text of Section 3.3 has been revised to briefly describe the equipment and procedures that were used for this work. *See **Attachment 1.***

Department Comment:

10. Section 3.3, Soil Characterization, 1st 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.

SPLP Response: SPLP acknowledges the Department’s comment and has revised this text in Section 3.3. *See **Attachment 1.***

Department Comment:

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.

SPLP Response: SPLP acknowledges the Department’s comment and has revised this text in Section 3.4.1. *See Attachment 1.*

Department Comment:

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

SPLP Response: SPLP acknowledges the Department’s comment and has revised this text in Section 3.4.1 to indicate that it will utilize the same domestic potable well monitoring activities that were successfully used during the recent installation of recovery wells. *See Attachment 1.*

Department Comment:

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.

SPLP Response: SPLP acknowledges the Department’s comment and has revised this text in Section 3.4.1. *See Attachment 1.*

Department Comment:

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.

SPLP Response: As noted above, SPLP feels that it is premature to identify specific contractors before the Site Characterization Work Plan and resulting specific scope of work has been approved. However, SPLP is planning to use Parratt-Wolff, Inc., for the drilling associated with monitoring well installation activities. The text of Section 3.4.1 has been revised to briefly describe the equipment and procedures that will be used for this work. *See Attachment 1.*

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Department Comment:

15. Section 3.4.1, Monitoring Well Installation – Please denote the reference datum(s) to be used during well survey activities.

SPLP Response: SPLP acknowledges the Department’s comment and has revised this text in Section 3.4.1. See **Attachment 1**.

Department Comment:

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.

SPLP Response: SPLP will incorporate the appropriate detail requested as part of the SOPs that will govern this work and will be provided to the Department prior to performance of the characterization activities. In addition, the text of this Section 3.4.2 has been revised pursuant to the Department’s comment. See **Attachment 1**.

Department Comment:

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.

SPLP Response: SPLP acknowledges the Department’s comment but notes that the requested information is being provided in separate submittals to the Department. In particular, for information about the vapor intrusion pathway evaluation activities completed to date, please refer to the April 2, 2025 Vapor Intrusion Progress Report, as revised and re-submitted to the Department on June 14, 2025 in response to the Department’s April 30, 2025 Letter of Deficiency. Please also refer to the Sub-Slab Soil

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Vapor Sampling and Analysis Plan that was submitted to the Department on June 2, 2025, and an initial round of sampling during the week of June 9-13, 2025, with a second round of sampling preliminarily scheduled to occur in late July. In addition, the text of this Section 3.5 has been revised pursuant to the Department’s comment. *See **Attachment 1.***

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

Attachments

1. Site Characterization Work Plan (rev. June 27, 2025)
2. Comment-Response Document