



July 25, 2025

Via Electronic Mail

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Environmental Cleanup and Brownfields Program
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Southeast Regional Office
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Re: Response to Department's 7/10/25 Email Regarding SPLP's Potable Water Sampling and Analysis Plan
eFACTS PF No. 881609
eFACTS Activity No. 60986
Twin Oaks – Newark 14"-Diameter Pipeline
Upper Makefield Township, Bucks County

Dustin:

Sunoco Pipeline LP ("SPLP") acknowledges receipt of the Department's comments that were sent via email on July 10, 2025, regarding SPLP's Potable Water Sampling and Analysis Plan. Please note that SPLP disputes that its Potable Water Sampling and Analysis Plan was deficient, as the Department suggests in its email, 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 email, together with a revised Potable Water Sampling and Analysis Plan (*see Attachment "1"*), as follows:

Section 4.2.1, 1st Sentence:

This sentence indicates that field personnel will flush resident's water system for a minimum of five minutes with a fully open faucet or valve to allow water lines to flush and the system water pump to engage. This may be insufficient to flush the water system and draw in "fresh" water from the aquifer through the potable well pump based on the design of the well water system. Field personnel should first determine the storage capacity of the well water holding tank at the residence, determine an estimated flow rate of the fully open faucet, and allow enough purging time to ensure that the water collected from each water sampling location is representative of current aquifer conditions.

SPLP Response: As noted in Section 3.0 of the Potable Water Sampling and Analysis Plan, the purpose of the potable water monitoring and sampling activities is to "assess potential impacts to potable water related to refined petroleum products" and "to evaluate the potential

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impacts to human health" from constituents in those products. More specifically, the purpose of the potable water sampling is to determine whether that water is creating an exposure pathway to petroleum impacts, and SPLP respectfully disagrees with the suggestion in the Department's comment that the sample collected must be "representative of current aquifer conditions." As the Department is aware, SPLP is conducting separate sampling of monitoring wells to assess current aquifer conditions pursuant to its Site Characterization Work Plan. SPLP also notes that the potable water sampling activities will be collected from potable water supply wells that are actively used on a daily basis such that "purging" will be ongoing through active water use. Accordingly, the additional purging that will be achieved with the five minutes of flushing required in the Potable Water Sampling and Analysis Plan before collecting each sample is appropriate and conservative. For these reasons, SPLP does not believe that any change is needed to the proposed protocol for purging but has updated the language in the Potable Water Sampling and Analysis Plan. *See Attachment 1.*

Section 4.2.2, 2nd Paragraph:

If observations of product and/or odor indicate the presence of product in well, field personnel should gauge the well with an oil-water interface probe to determine the thickness of light non-aqueous liquid (LNAPL) within the well.

SPLP Response: SPLP acknowledges the Department's comment and the language in the Potable Water Sampling and Analysis Plan has been updated accordingly. *See Attachment 1.*

Section 4.3, 1st Paragraph, 2nd Sentence:

This sentence notes that, if a home has a filtration component installed, field personnel will collect a pre-treatment water sample at the influent valve and a post-treatment water sample at the effluent source. Paragraph 1.d. of the March 6, 2025, Administrative Order (the Order) states that maintenance of point-of-entry treatment (POET) systems "will include quarterly sampling of the inlet, midport and outlet of the POET to determine whether breakthrough of the POET has been detected and, if warranted, the replacement of a carbon filter, until the Department determines that a POET is no longer needed." Please revise this section to include details regarding the collection of samples from the midport of any POET systems maintained by Sunoco Pipeline, L.P. (SPLP).

SPLP Response: SPLP acknowledges the Department's comment but notes that the sampling requirements in Paragraph 1.d of the Order only apply to the POET systems installed pursuant to Paragraphs 1.b and 1.c of the Order. In turn, Paragraphs 1.b and 1.c of the Order only require the installation of POET systems on wells with volatile organic compounds ("VOCs") exceeding the applicable Maximum Contaminant Levels ("MCLs"). Accordingly, the requirement to collect midport samples from POET systems only applies to wells with VOCs exceeding the applicable MCLs. However, SPLP also notes that it has been collecting midport samples from POET systems (as reflected in the sampling results that it has been providing to

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the Department) and will continue to do so wherever possible.¹ The language in the Potable Water Sampling and Analysis Plan has been updated accordingly. *See Attachment 1.*

Section 4.3, 1st Paragraph, last Sentence:

If a sample is collected from a faucet, field personal should first remove the faucet aerator to reduce turbulence and off-gassing and minimize the chance for the sample results to be biased low. Additionally, flow in the faucet should be reduced to as slow a flow rate as possible without dripping to reduce volatilization during sample collection.

SPLP Response: The language in the Potable Water Sampling and Analysis Plan has been updated to include those procedural steps during sampling activities. *See Attachment 1.*

Section 4.3, 2nd Paragraph:

Please see Comment #1 regarding water system purge time prior to sample collection.

SPLP Response: *See the response above to the Department's comment regarding the first sentence of Section 4.2.1.*

Section 6.1, 2nd Sentence:

Please identify the type of calibration gas used for photoionization detector calibration.

SPLP Response: SPLP acknowledges the Department's comment, and the language in the Potable Water Sampling and Analysis Plan has been updated to include this information. *See Attachment 1.*

Section 9.0, Table 4, Row 1:

SPLP proposes that the frequency of sampling for residences on Glenwood Drive, Walker Road, Spencer Road, or Crestwood Road that had POET systems installed be modified from monthly to bimonthly. DEP disagrees with part of this proposed modification. Any residences on these roads that have had measurable thicknesses of LNAPL since the release was first identified should continue to be monitored monthly. Bimonthly sampling of other residences on these roads that have POET systems installed and have not had measurable LNAPL since the release was identified is appropriate, if SPLP continues to monitor the POET systems in accordance with the Order as discussed in Comment #3.

SPLP Response: SPLP acknowledges the Department's comment, but respectfully reminds the Department that Paragraph 1.d of the Order only requires quarterly sampling of POET systems. Accordingly, the monthly sampling that SPLP has been performing

¹ Certain systems that were installed by property owners instead of SPLP do not have a midpoint tap from which a sample can be collected. For those particular systems, SPLP is only able to collect influent and effluent samples.

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and the bimonthly sampling that SPLP proposed both are both more frequent than what is required by the Order. Nevertheless, SPLP is willing to continue monthly sampling at residences that have had measurable thicknesses of LNAPL since the release was first identified, and Table 4 has been revised accordingly in the Potable Water Sampling and Analysis Plan. *See Attachment 1.*

Section 9.0, Table 5, Row 2:

SPLP proposes that the frequency of sampling for residences that have potable water wells, no POET system installed, and where previous sampling event(s) indicate detections of volatile organic compounds (VOCs) greater than medium-specific concentrations (MSCs) be modified from monthly to bimonthly. If any residences meet this criterion, then there is an immediate risk to the resident(s) through the ingestion of dissolved-phase VOCs in their drinking water from their potable well and SPLP should take immediate action to address this exposure pathway in accordance with Paragraph 1.c.ii. of the Order.

SPLP Response: SPLP acknowledges the Department's comment and notes that it has, and will continue, to meet the requirements in the Order, including those of Paragraph 1.c.ii. There are currently no properties where previous sampling event(s) indicate detections of VOCs greater than MSCs that do not have an operating POET system, but nevertheless, Table 5 has been updated in accordance with the Department's comment in the revised Potable Water Sampling and Analysis Plan. *See Attachment 1.*

Thank you,



Brad Fish
Senior Environmental Specialist
Energy Transfer

Attachment:

1. Potable Water Sampling and Analysis Plan (ver. 1.4, July 24, 2025)