



Pennsylvania
Department of Environmental Protection

July 9, 2025

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

Re: Vapor Intrusion Investigation and Monitoring Well Installation
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) received the June 13, 2025, document titled “Sunoco Pipeline LP Vapor Intrusion Progress Report,” prepared by CTEH, and the June 27, 2025 document titled “Site Characterization Work Plan,” prepared by Verdantas, for the Sunoco Pipeline, LP (SPLP) Twin Oaks – Newark 14”-diameter pipeline release response. The vapor intrusion progress report and the site characterization work plan were submitted in accordance with DEP’s March 6, 2025, administrative order. These documents had been revised in response to previous DEP deficiency letters dated April 30, 2025 (vapor intrusion) and May 13, 2025 (site characterization).

DEP’s reviews of the vapor intrusion progress report and the site characterization work plan are still in progress. The site characterization work plan is currently open for public comment, and DEP will not issue a decision until SPLP has responded to any comments.

However, from our initial review, following recent discussions with SPLP, and accounting for comments from residents and Upper Makefield Township, DEP is concerned by the lack of progress on two critical aspects of the site characterization work: vapor intrusion investigations at homes and installation of monitoring wells in the area of known groundwater contamination. This work is required by the March 6, 2025, order, and it must be completed before the interim site characterization report is prepared and submitted. The interim site characterization report is due under the order by September 2, 2025.

In an effort to quicken the characterization process and address concerns in the community, DEP is requesting that SPLP perform the following actions on the proposed schedule indicated below.

1. Collect sub-slab soil gas and/or indoor air samples at the 13 properties identified as “Residences Eligible for Phase 2 Indoor Air Sampling” (provided with the vapor intrusion progress report), subject to obtaining access agreements, by July 25, 2025. These 13 properties are all within the “core area” that has exhibited supply well groundwater contamination. Because of the lack of groundwater characterization in this area, DEP has insufficient information to determine that the vapor intrusion exposure pathway is incomplete. DEP favors performing sub-slab sampling at these residences.
 - a. Provide DEP with progress status reports on Wednesday of each week, beginning on July 16, 2025, and ending when a first round of samples has been collected at the 13 properties or DEP agrees that further progress reports are not needed.
 - b. Provide DEP with the tabulated sample results and the lab reports within 7 days of receipt by SPLP.
 - c. Provide DEP with inhalation risk calculations for each sampled property within 30 days of receipt of the sample results by SPLP.
2. Install a minimum of three additional monitoring wells by July 31, 2025. These wells should be among the seven proposed wells identified in the site characterization work plan (Figure 10), subject to modification based on new characterization data, obtaining access agreements, and securing required permits.
 - a. Provide DEP with progress status reports on Wednesday of each week, beginning on July 16, 2025, and ending when the three wells have been installed or DEP agrees that further progress reports are not needed.
 - b. Identify the locations and provide the construction details of the three wells in the first progress report.
 - c. Explain any modifications to locations or delays in each progress report.
3. Install a minimum of four additional monitoring wells by August 15, 2025. These wells should be among the seven proposed wells identified in the site characterization work plan (Figure 10), subject to modification based on new characterization data, obtaining access agreements, and securing required permits. These four wells are in addition to the three wells requested in paragraph 2.
 - a. Provide DEP with progress status reports on Wednesday of each week, beginning on July 16, 2025, and ending when the three wells have been installed or DEP agrees that further progress reports are not needed.
 - b. Identify the locations and provide the construction details of the four wells no later than July 30, 2025.
 - c. Explain any modifications to locations or delays in each progress report.

If you believe these requests, or the proposed schedule, are not necessary or achievable, or if you intend on declining DEP's requests, please contact me by email at cdbrown@pa.gov or by telephone at 484.250.5792 to discuss alternatives. DEP is open to continuing to work with you towards achieving a swift and complete remediation, and we are willing to hear any concerns or recommendations you may have on the above requests. If you have any questions or would like to meet regarding this matter, please let me know.

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. Patterson
Mr. Langan, Esq.
Mr. Devan, P.G.
Mr. Staron, P.G.
Mr. Lipik, P.G.
Ms. Budnovitch