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Senate of Pennsylvania

October 17, 2025

Honorable Jessica Shirley, Secretary
Pennsylvania Department of Environmental Protection
Rachel Carson State Office Building
400 Market Street
Harrisburg, PA 17101

Re: Sunoco Twin Oaks-Newark Pipeline Release, Interim Site Characterization Report

Dear Secretary Shirley,

We are submitting this letter as our public comment on Sunoco Pipeline, LP (SPLP)'s Interim Site Characterization Report (the Report). We request that DEP make every effort to hold SPLP to the highest standard when reviewing the Report to ensure the final site characterization work is complete and properly assesses the scale and scope of the release, as well as its impact on the environment and the health and safety of this community.

Section 3.4.1 Recovery Well Installation

- 1) There are four recovery wells installed to date at depths between 60 and 72 feet; however, product has been detected in residential wells at depths that exceed 300 feet. Product has been in the ground between nine and 25 months. It is not reasonable to expect that the contamination has not migrated below 72 feet.
- 2) Recovery Wells 2, 3, and 4 are in close proximity to one another. These wells are closest to the release location; however, there are properties that are farther from the release location that have had exceedances in their water testing. Additional recovery wells should be installed to attempt to recover product that has traveled to these properties.

Section 3.6.3 Monitoring Well Installation

- 1) At the time of the Report drafting, ten pairs of monitoring wells (shallow and deep) had been installed, and since the issuance of the Report three additional pairs have been installed for a total of 26 monitoring wells. The shallow wells are approximately

40-feet deep, and the deep wells are approximately 74-feet deep. Again, if product has been identified in supply wells deeper than 300 feet, how is SPLP confident that 75 feet is deep enough to accurately identify the extent of the plume?

- 2) Additionally, after the issuance of the Report, MW9D has had two tests where benzene levels exceeded the MCL. MC9D is the well second farthest from the release location. If this is the only monitoring well that has identified product at high levels, we do not understand why there have not been additional monitoring wells deeper than 75 feet and farther from the release location. We are requesting that additional wells be installed to verify that the product has not travelled outside of the current population of monitoring wells.
- 3) Finally, throughout this investigation we have been told that the expected path of product migration is northeast towards the Delaware River. However, no monitoring wells have been installed to verify that hypothesis.

Section 4.3 Extent of LNAPL (Light non-aqueous phase liquid)

- 1) SPLP has not updated their initial estimates for the quantity of product released since the first report in February 2025. More than eight months have passed and in that time additional data has become available; however, no updated analysis or calculations have been shared with the public. The Report suggests that the “lateral extent of LNAPL is shrinking”, despite the fact that there has been no delineation of the plume. This should have been one of the primary focuses from the first moment the release was identified. Without this, there is no way to assess the impact of this release on ground water and residential wells.
- 2) As mentioned above, if neither the recovery wells nor the monitoring wells are at sufficient depths to identify the released product, there is a risk that we will never accurately identify the plume.

Section 4.6 Potential Vapor Intrusion Evaluation

- 1) Delays in completing vapor intrusion testing resulted in insufficient data. Complete data sets are needed in the final site characterization.

Site Characterization is a critical step in understanding the impact of this spill on the environment and the residents in the Mt. Eyre neighborhood and beyond. It is troubling that this work has not been completed more than eight months after the release was acknowledged. It is also deeply concerning that key information was redacted throughout the Report. It is critical that the final site characterization is complete and transparent, and that it provides this community with the assurance that all contamination will be cleaned up.

Jessica Shirley
Secretary, PA DEP
October 17, 2025
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Thank you for the opportunity to provide comment. We appreciate your attention to these and all concerns.

Very truly yours,



Steven J. Santarsiero
10th Senate District



Perry S. Warren Jr.
31st House District

Cc (via email only):
Sunoco Pipeline, LP
Patrick Patterson, Southeast Regional Director, DEP
Upper Makefield Board of Supervisors
Mt. Eyre Neighborhood Residents Task Force