

Sunoco Pipeline, LP
525 Fritztown Road
Sinking Spring, Pennsylvania 19608

Subject: Twin Oaks–Newark 14-Inch-Diameter Pipeline
Upper Makefield Township, Bucks County, Pennsylvania
Remedial Action Plan

Upper Makefield Township has reviewed the June 19, 2026, Remedial Action Plan (“RAP”) for the Sunoco Pipeline LP (“SPLP”) Twin Oaks–Newark Pipeline Release, prepared by Verdantas LLC, along with the associated RAP Summary. The Township offers the following comments on those documents:

1. **Pipeline products and release characterization.** The RAP and Summary identify Jet-A fuel as the product released from the pipeline. However, SPLP’s website indicates that the pipeline also transports two grades of gasoline (87 and 93 octane) and diesel fuel. The RAP and Summary should be revised to provide a complete description of the products transported by the pipeline and the technical rationale for SPLP’s conclusion that the release was limited to Jet-A fuel.
2. **Release volume and leak duration.** The RAP states that the release was discovered on January 31, 2025. The initial volume estimate of 6,500 gallons was reported at the time of the release and has been carried forward from that date with no adjustment. According to SPLP’s website, the affected pipe section was removed and sent to an independent metallurgical laboratory for analysis. In the January 28, 2026, Federal Register, the Pipeline and Hazardous Materials Safety Administration (“PHMSA”) reported that the analysis identified a 2.5-inch axial crack caused by neutral stress corrosion cracking from water intrusion between the pipeline and the Type A sleeve. Because the analysis was not available when the release was discovered, the continued validity of the initial release-volume estimate remains unsupported. The RAP should be revised to provide the estimated leak duration and an updated release volume based on the metallurgical analysis, pipeline monitoring data, including pressure and flow data, and product accounting.
3. **Private well use and cleanup alternatives.** The RAP acknowledges that routine operation of neighborhood potable water supply wells contributes to water-table fluctuations and a downward vertical gradient. The Summary states that SPLP evaluated 16 cleanup methods for fractured-bedrock conditions and determined that 10 are poorly suited to a neighborhood served by private wells.
4. **Resident preferences and water-supply feasibility.** The Township retained Probolsky Research to conduct an independent Water Service Residential Study. Survey results posted on the Township’s website show that most Mt. Eyre neighborhood residents favor a permanent public water system to replace existing potable wells as the neighborhood’s long-term water supply. The results also indicate that most residents are not confident POET systems will provide safe drinking water over the long term.

The Township’s consulting engineer also completed a study concluding that transitioning from on-lot wells to a public water supply is feasible.



5. **Comparative evaluation.** Because SPLP has stated that neighborhood potable-well pumping screened out 60 percent of the remedial technologies considered in the RAP, the Township believes the RAP should evaluate a remedial conceptual site model that includes a public water supply. This revision would allow a more complete comparison of remedial technologies, support an optimized cleanup, minimize the time needed to achieve the attainment standard, and better protect Township residents' right to a reliable and sustainable water source. Omission of a public water source as an option to facilitate remediation is a significant deficiency in the RAP. The Township finds it unacceptable to ignore the option of a public water system that would allow for other methods to be used for remediation. A public water system would expand the remediation methods available to SPLP. We deem this critical due to the low amount of product recovered to date by SPLP.
6. **Pilot testing.** Despite the preceding comments, the Township understands that SPLP intends to conduct pilot testing of multiphase extraction for LNAPL and groundwater. The Township did not receive the final Pilot Test Work Plan until the afternoon of Sunday, August 16, 2026. Township staff, technical consultants, and counsel must review the Work Plan for consistency with Township ordinances and other requirements before the Township can issue any required permits or approvals. SPLP should be advised that its anticipated pilot-test implementation schedule may be affected by the delayed submission of the Work Plan. SPLP has had over a year and a half to explore options for remediation and the continued delays indicate an unwillingness or inability to conduct an appropriate cleanup. SPLP has been advised of the schedule of the Board of Supervisor meetings and has put themselves in a position where approvals may not be able to be obtained until September or later.

The Township expresses extreme concern that current interim remediation efforts are yielding minimal results and the delay in implementing new technologies is potentially allowing the contamination to spread. Furthermore, the residents do not appear to have faith in the ability of SPLP to appropriately remediate the release from their pipeline. A solution that needs to be explored, for both improved remediation efforts and water quality issues, is a public water supply.

The Township appreciates the opportunity to review the RAP and anticipates ongoing discussions with SPLP relative to ongoing site characterization and remedial activities resulting from the pipeline release.

Sincerely,



Gregg Schuster

Township Manager, Upper Makefield Township

