

State of North Carolina
Department of Environment,
Health and Natural Resources
Winston-Salem Regional Office

James B. Hunt, Jr., Governor
Jonathan B. Howes, Secretary



April 16, 1996

CERTIFIED MAIL NUMBER P 512 543 003
RETURN RECEIPT REQUESTED

Sun Company, Incorporated
Attn: Mr. Daniel Shine
4041 Market Street
Aston, PA 19014

SUBJECT: Elm Street Sunoco, 2903 South Elm Street, Greensboro, Guilford County,
Incidents Number 10076 (REGUST) and 14203 (NONREG)

Dear Mr. Shine:

Our office has reviewed the **Revised Comprehensive Site Assessment (CSA)** dated January 19, 1996, prepared by Groundwater Technology for the subject site. We offer the following comments:

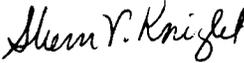
1. Since groundwater contamination has been confirmed at the subject site the Site Sensitivity Evaluation (SSE) is not applicable at this site. Therefore, final cleanup levels for soil contamination at this site will be 10 ppm (EPA Method 5030) and 40 ppm (EPA Method 3550). As stated in the CSA the horizontal and vertical extent of soil contamination at this site has not been defined in accordance with the **Groundwater Section Guidelines For Investigation and Remediation of Soils and Groundwater.**
2. The closure report required by 15A NCAC 2N for the five (5) underground storage tanks removed at this site on July 27, 1993, with complete and proper sampling and analysis, has not been received by this office. Therefore, all areas of possible contamination have not been properly assessed at this site.
3. The CSA must include a site base map showing the locations of all subsurface utilities, lines, conduits, etc., with a discussion of the potential impacts that they may have on contaminant migration.
4. Cross-sections through contaminated soil must show at least two (2) profiles

crossing at or near right angles. The cross-sections must delineate vertical extent of contamination and indicate subsurface conduits and structures.

5. The CSA must contain isoconcentration contour maps of soil contamination showing horizontal and vertical extent of contamination in the unsaturated zone and delineating concentrations above action levels for soil remediation with bold contours.
6. The CSA must include contaminant isoconcentration contour maps showing total volatile, most concentrated, and most widespread contaminants along with a 15A NCAC 2L standard contour for each.
7. The CSA must include contaminant isoconcentration contour cross-sections using at least two (2) orthogonal sections that transect the contaminated zone. The deep well or well cluster must demonstrate contaminant levels at or below the appropriate 2L standards.
8. The CSA must give a history of property ownership and use from immediately prior to 1/1/74 through the present.
9. The CSA must include a table of adjacent property owners including names, addresses and telephone numbers along with the properties located on the site base map.

This list of discrepancies may not be all-inclusive. Until such time as these deficiencies are corrected and complete and proper information is included, the CSA is incomplete and, therefore, unaccepted. We recommend that you wait until the assessment and closure of the five USTs removed July 27, 1993, required by 15A NCAC 2N, is properly completed and accepted by this office before proceeding with additional assessment and revisions to the CSA. Again, we are enclosing guidelines for preparation of a CSA to assist you. If you have any questions please contact John C. Nantz, Jr. at 910-373-3771.

Sincerely,


Sherri V. Knight
Groundwater Supervisor

cc: WSRO
GCHD

P 512 543 003

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ATTN: MR. DANIEL SHINE
4041 MARKET STREET
ASTON, PA 19014

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P 512 543 003

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