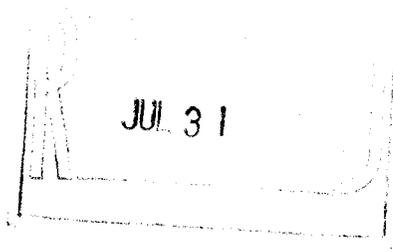




FLUOR DANIEL GTI



July 19, 1996

Ms. Sherri Knight
North Carolina Department of Environment, Health, and Natural Resources
Winston-Salem Regional Office
585 Waughtown Street
Winston-Salem, North Carolina 27107

Subject: Comprehensive Site Assessment Addendum
2903 South Elm Street
Greensboro, North Carolina
DUNS #0275-7516
NCDEHNR Incident # 10076

Dear Ms. Knight:

Fluor Daniel GTI, Inc. (Fluor Daniel GTI), on behalf of Sun Company, Inc. (Sun), submitted a Comprehensive Site Assessment (CSA) Report for the above referenced site on July 20, 1993. In November 1995, the North Carolina Division of Environmental Management (NCDEM) responded to the CSA Report with a request for additional information. Fluor Daniel GTI submitted the Revised Comprehensive Site Assessment to the NCDEM in January 1996. On April 16, 1996, the NCDEM sent Mr. Daniel Shine of Sun a letter summarizing the preliminary review of the Revised CSA Report including several additional comments. This CSA Report Addendum addresses the NCDEM's recent comments.

NCDEM COMMENTS & FLUOR DANIEL GTI RESPONSES

Comment 1

Since groundwater contamination has been confirmed at the subject site the Site Sensitivity (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.

Response 1

Soil samples SB-1 through SB-4 were collected from the former gasoline UST basin at depths ranging from 8 to 16 feet below ground surface (bgs). Soil samples were collected during the installation of wells MW-2 through MW-4 and VMW-5 at depths ranging from 12 to 16 feet bgs. These samples were analyzed for TPH by EPA Methods 5030 and 3550, respectively. Results of the laboratory analysis of the samples are summarized on Table 1.

Total petroleum hydrocarbons as gasoline (TPHG) were detected in the soil samples obtained from borings MW-2 and SB-4, however, the reported concentrations were below the state action levels. Total petroleum hydrocarbons as diesel (TPH D) were detected in the soil sample obtained from boring MW-4, however, the reported concentration was below the state action levels. Total petroleum hydrocarbons were not detected above laboratory detection limits in wells MW-3 and VMW-5 and in soil borings SB-1, SB-2 and SB-3.

Soil samples SS-1, SS-2, TB-3 through TB-7, and TB-BG were collected in the vicinity of the former fuel oil UST. This UST was adjacent to an underground sanitary sewer. These samples were laboratory analyzed for TPH by EPA Methods 3550 and 5030. The results of laboratory analysis of these samples are summarized on Table 1.

TPH as gasoline was reported in samples SS-1 and SS-2 at concentrations of 217 mg/Kg and 171 mg/Kg, respectively. TPH as diesel was reported in samples SS-1, SS-2, and TB-2 at concentrations of 547 mg/Kg, 383 mg/Kg, and 110 mg/Kg, respectively. TPH as gasoline and /or diesel were not reported in other samples collected from this area, however, "unknown" high distillation range hydrocarbons were reported in the samples collected adjacent to and/or downgradient of the sanitary sewer. Experience has demonstrated that naturally occurring oils, etc. found in sewage can interfere with TPH analysis by yielding "false positives" for high end hydrocarbons. We feel this may be the reason for the detection of these "unknowns", and that samples TB-3 through TB-7 and TB-BG do not contain regulated hydrocarbons. In order to prove or disprove this conclusion, additional soil samples must be collected and analyzed following a silica gel "clean-up" to remove the naturally occurring oils. The estimated area of petroleum impacted soil in the vicinity of the former fuel oil UST has been tentatively identified on Figure 7, which is included in Attachment A.

Comment 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.

Response 2

The five underground storage tanks were closed by removal by Mid-State Petroleum Company (Mid-State) on July 27, 1993. A May 8, 1996 letter from Dan Shine of Sun to Ms. Sherri Knight of the NCDEM stated that at the time the UST closure by removal the USTs were registered to Mid-State (Attachment A). Mid-State is preparing the UST closure report.

Comment 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.

Response 3

The most probable routes for vapor phase and dissolved phase hydrocarbon migration are via underground utilities. Locations of the subsurface utilities associated with the subject site are shown on **Figure 3**. The underground water supply line is located on the western side of the site. The water line extends from the water meter adjacent to Seneca Road to the western side of the station building. The underground electric lines are located on the northern side of the site. The lines extend from an electric pole adjacent to Seneca Road to the northeast side of the station building. An underground sanitary sewer line is located adjacent to the station building and the former fuel oil UST and extends from the northeastern end to the southern end of the site. The sanitary sewer line is approximately 8 to 10 feet below ground surface.

The underground water supply line and the underground electric line are not located within contaminant plumes on-site. Therefore, low risk is associated with possible vapor and/or dissolved phase hydrocarbon migration along these pathways.

As discussed in **Response 1**, TPH were detected in soil borings SS-1, SS-2, and TB-2. The potential exists for this unit to act as a potential pathway for the migration of vapors. Benzene was detected at concentrations slightly above the State groundwater quality standards (GQS) as defined in 15A NCAC 2L in the groundwater sample obtained from well MW-6 on December 20, 1995 (**Table 4**). The water table in the vicinity of the former fuel oil UST is approximately 12 feet bgs (**Table 3**), therefore, the potential for this unit to act as a preferential pathway for dissolved phase migration. Low risk is associated with possible dissolved phase hydrocarbon migration along the underground sanitary sewer line.

Comment 4

Cross-sections through contaminant 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.

Response 4

A north-south subsurface profile and a southwest-northeast subsurface profile (profile line A-A' and B-B' on **Figure 4**) are included as **Figures 5** and **6**, respectively. The profile illustrates subsurface materials encountered at selected monitoring well locations. Also included on the subsurface profiles are groundwater elevations and soil and groundwater analytical results at the selected monitoring well locations.

Comment 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.

Response 5

The horizontal and vertical extent of the unsaturated zone of contamination and isoplaths are presented on Total Petroleum Hydrocarbons in Soil (**Figures 7** and **8**). Due to detected concentrations, the generation of isoconcentration lines was not possible. Instead, the estimated area of impact at concentrations in excess of State action levels was delineated.

As discussed in **Response 1**, soil samples TB-3 through TP-7 and TB-BG are located in the vicinity of the underground sanitary sewer line. The underground line may be leaching naturally occurring organic compound into the surrounding soil, resulting in the reported concentrations of "unknown" (high distillation range) hydrocarbons.

Comment 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.

Response 6

While several petroleum hydrocarbon compounds were detected in the groundwater, only benzene was detected at concentrations in excess of the State groundwater quality standards (GQS) as defined in 15A

NCAC 2L. The dissolved volatile organic compounds concentration map is presented as **Figure 9**. On this diagram, the estimated extent of dissolved benzene concentrations in excess of the State GQS is depicted.

Comment 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.

Response 7

The estimated extent of dissolved benzene concentrations in excess of the State GQS is shown on cross-sections A-A' and B-B' (Figures 5 and 6). Laboratory analysis of soil and groundwater samples from deep well VMW-5 did not result in the detection of volatile organic compounds.

Comment 8

The CSA must give a history of property ownership and use from immediately prior to 1/1/74 through the present.

Response 8

Mr. A.J. Schlosser located at 104 Tatum Place, Greensboro, NC owns the subject site. From March 1, 1974 to May 7, 1993, Sun leased the property from Mr. Schlossel and operated the gasoline, diesel, used oil, and fuel oil USTs associated with a retail gasoline station at the site. From May 7, 1993 to the present, Mid-State has assumed the site lease, however, they have not operated a retail petroleum system during this time. Mid-State currently sub-leases the property to MT Used Cars.

Comment 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.

Response 9

The site is surrounded by commercial properties. The site and adjacent property are shown on **Figure 2**. A summary of property owners, addresses and phone numbers are included on **Table 2**.

Conclusions

The following conclusions have been drawn based on available site information:

- Residual adsorbed phase petroleum contamination is not present in the vicinity of the former gasoline UST basin;
- A limited area of petroleum impacted soil exists in the vicinity of the former fuel oil UST. Some of the hydrocarbons detected in the soil in this area may be reflective of sewage interference due to possible releases from the sanitary sewer lines. Additional sampling would be required to prove or disprove this theory;
- The general direction of groundwater flow is to the south-southeast (see **Figure 9** and **Table 4**);
- The most probable route for vapor phased hydrocarbon migration is via the underground sanitary sewer line adjacent to the former fuel oil UST on the eastern side of the site. This unit is not considered to be a potential preferential pathway for dissolved phase migration.
- Low concentrations of dissolved phase hydrocarbons have been detected at the site (see **Table 4**);

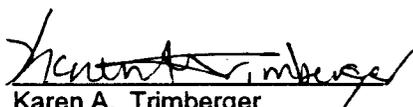
The low concentrations of dissolved phase hydrocarbons in the groundwater and residual adsorbed phase hydrocarbons are not considered to pose a threat to property and/or human health or safety. Because of this, the overall environmental risk posed by regulated constituents at this site is considered to be low.

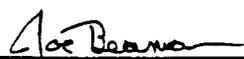
The site is currently ranked as an "E-180" by the Groundwater Section of the NCDWM. Due to the implications of Senate Bill 1317 with regards to low priority LUST fund sites, additional site assessment, monitoring, and/or remediation activities may be temporarily suspended.

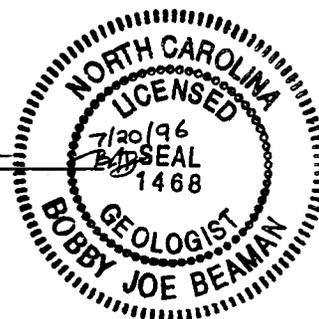
If there are any questions or comments regarding this site, please contact Joe Beaman at (919) 467-2227.

Sincerely,
Fluor Daniel GTI, Inc

Fluor Daniel GTI, Inc


Karen A. Trimberger
Geologist


Joe Beaman, PG
Lead Geologist

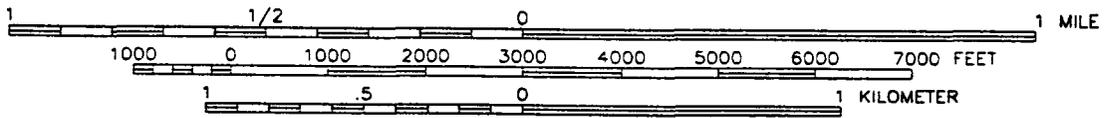
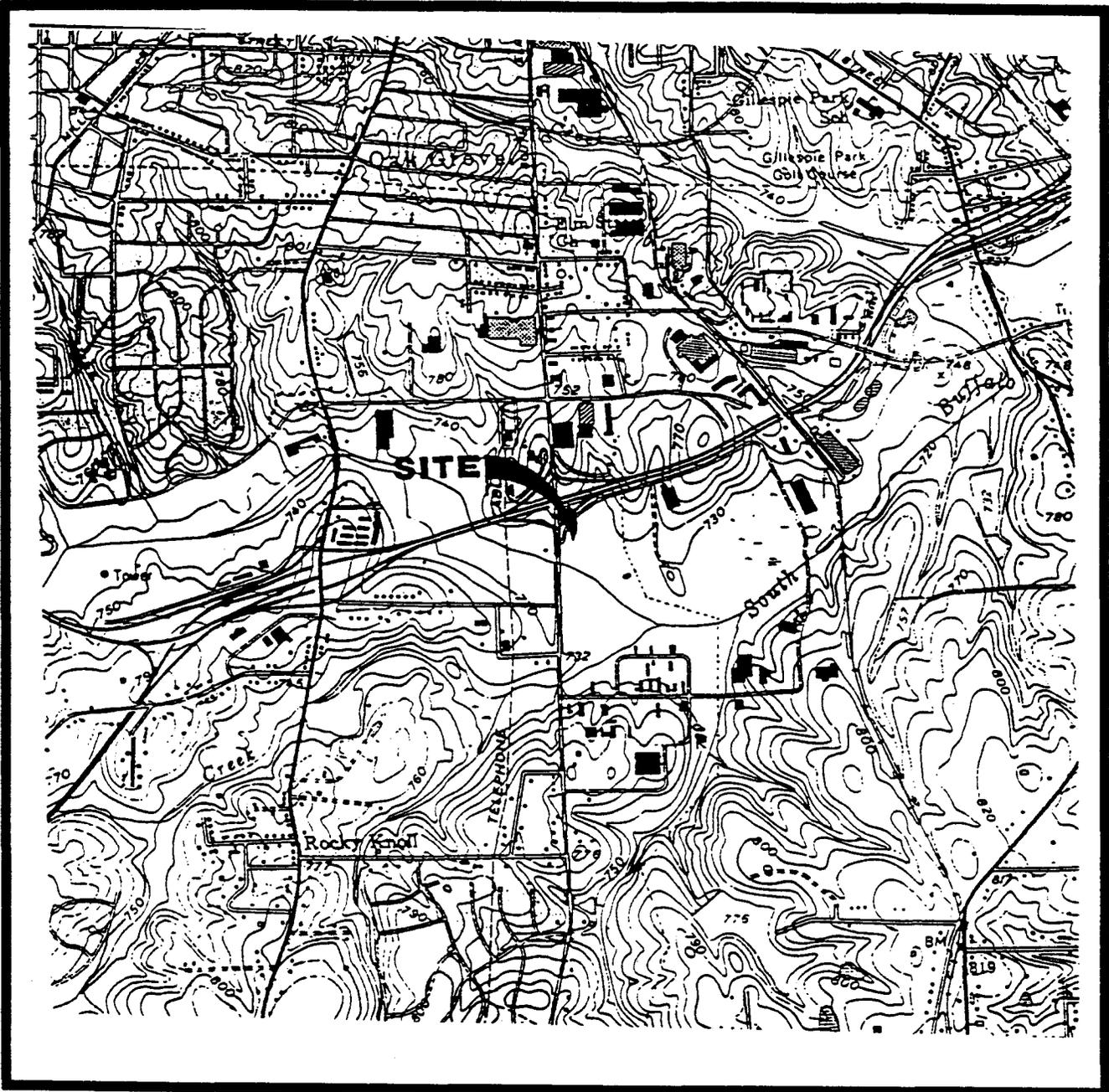


List of Figures:

- Fig. 1 Site Location Map
- Fig. 2 Area Map
- Fig. 3 Site Map
- Fig. 4 Lines of Geologic Cross-Section
- Fig. 5 Geologic Cross-Section A-A'
- Fig. 6 Geologic Cross-Section B-B'
- Fig. 7 Total Petroleum Hydrocarbons in Soil Concentration Map
- Fig. 8 Total Petroleum Hydrocarbons in Soil Concentration Map
- Fig. 9 Water Table Elevation Contour Map (Dec. 20, 1995)
- Fig. 10 Dissolved Volatile Organic Compounds Concentration Map (Dec. 20, 1995)

C: Daniel Shine (Sun Company)
John Nantz (Guilford County Health Department)
File

Figures



QUADRANGLE LOCATION

GREENSBORO, NC
 7.5' QUADRANGLE
 36079-A7-TF-024
 1968

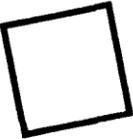
FIGURE 1
SITE LOCATION MAP
SUN COMPANY, INC.

2903 S. ELM ST.
 GREENSBORO, NC
 053240102



FLUOR DANIEL GTI

MOTHER MURPHY'S
LABORATORIES, INC.



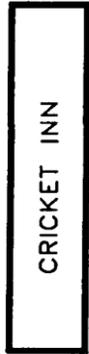
RAMADA
INN



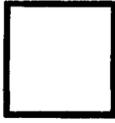
TEXACO
SERVICE
STATION



CRICKET INN



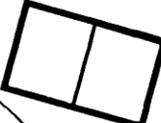
MR. STEAK RESTAURANT
(ASSOC. WITH
CRICKET INN)



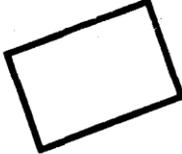
S. ELM STREET

INTERSTATE 85/40

HOWARD
JOHNSON'S
LOBBY



HOWARD
JOHNSON'S
ROOMS



HOWARD
JOHNSON'S
RESTAURANT



SITE

[M.T. USED CARS, INC.
(FORMER SUNOCO)]



SO. BUFFALO CREEK

AMOCO
SERVICE
STATION



LORILLARD FEDERAL
CREDIT UNION



■ NOT TO SCALE ■

SOURCE: WELL LOG INFORMATION



FLUOR DANIEL GTI

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**GT DESIGN
SERVICES, INC., P.C.**

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SUITE 1
MORRISVILLE, NC 27560
(919) 467-2227

REV. NO.: DRAWING DATE: 7/19/96 ACAD FILE: 0102-ARE

AREA MAP

CLIENT: SUN COMPANY, INC. PM:

LOCATION: 2903 S. ELM ST.
GREENSBORO, NC

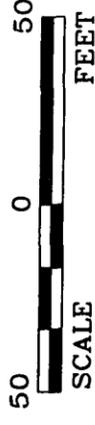
PE/RG:

DESIGNED: KAT DETAILED: RTJ PROJECT NO.: 053240102

FIGURE: **2**

LEGEND

- ◆ MONITORING WELL
- VERTICAL DEFINITION MONITORING WELL
- FH FIRE HYDRANT
- ⊙ SOIL BORINGS
- * TANK EXCAVATION SAMPLES



SOURCE: JAMES L. HAINES & ASSOC. - 6/16/93 SURVEY



FLUOR DANIEL GTI

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SERVICES, INC., P.C.

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SUITE 1
MORRISVILLE, NC 27560
(919) 467-2227

REV. NO.: DRAWING DATE: 7/19/96 ACAD FILE: 01021295

SITE MAP

CLIENT:

SUN COMPANY, INC.

PM:

LOCATION:

2903 S. ELM ST.
GREENSBORO, NC

PE/RG:

DESIGNED:

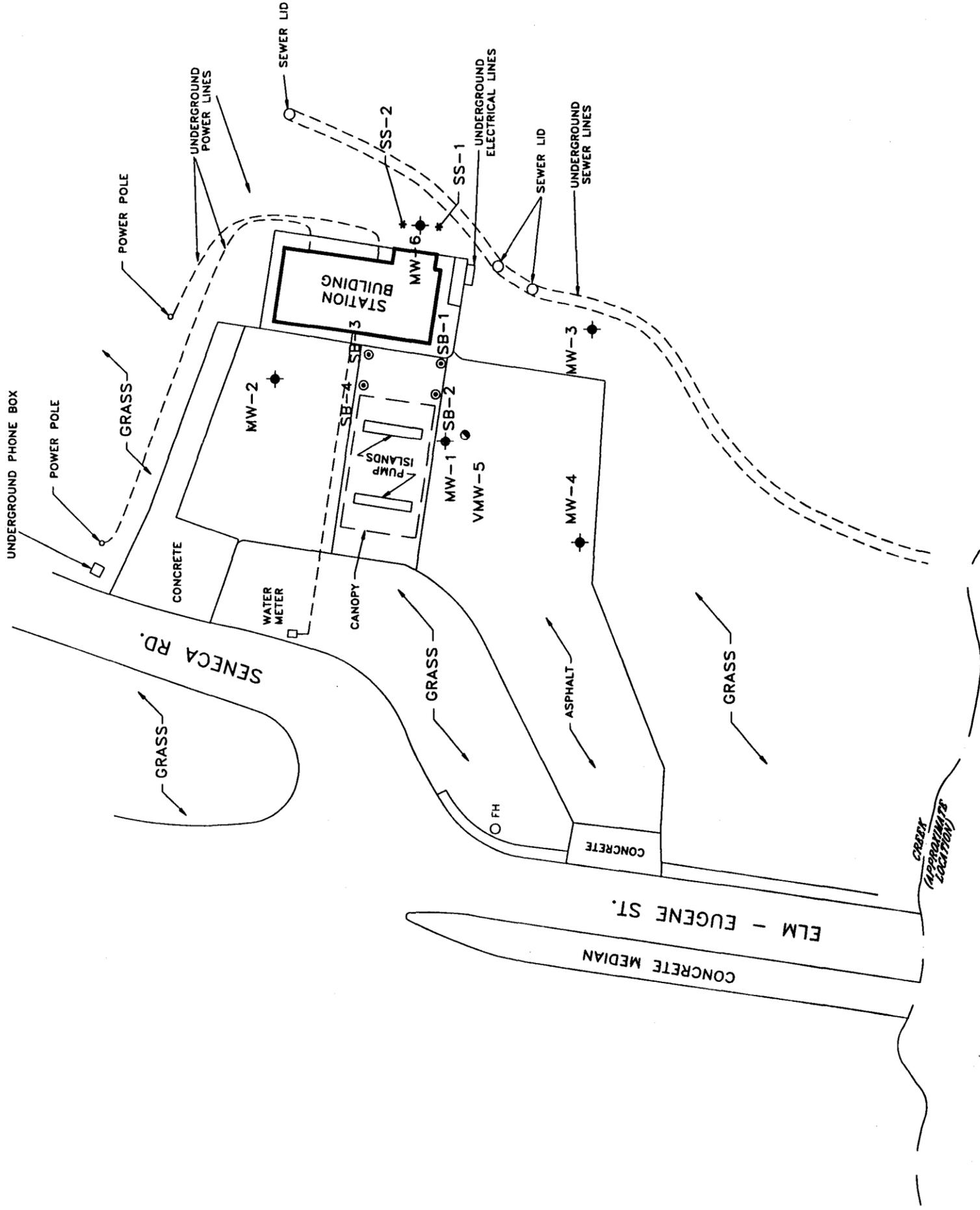
KAT

DETAILED: PROJECT NO.:

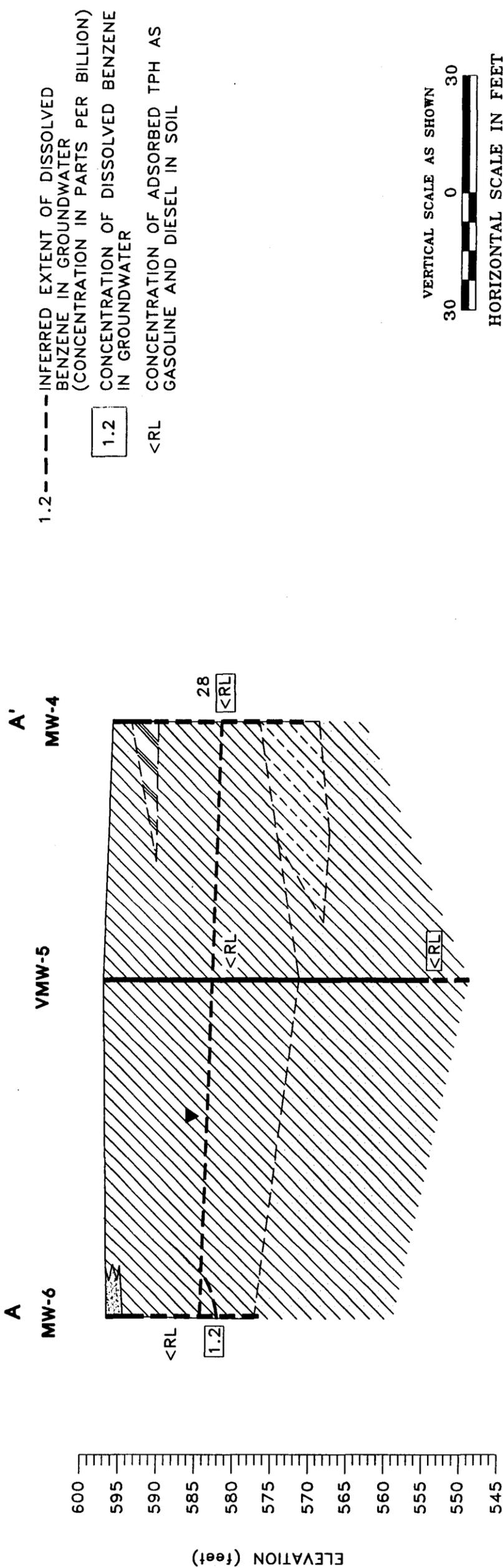
RTJ 053245455

FIGURE:

3



CURB
(APPROXIMATE LOCATION)



SOURCE: WELL LOG INFORMATION

LEGEND

-  SANDY CLAY
-  SILTY CLAY
-  SAND
-  CLAY
-  CLAYEY SAND
-  WATER-TABLE ELEVATION (feet) (12/20/95)

 FLUOR DANIEL GTI 1000 PERIMETER PARK DR. SUITE 1 MORRISVILLE, NC 27560 (919) 467-2227	REV. NO.: DRAWING DATE: 7/19/96	ACAD FILE: 0102-XAA
	GT DESIGN SERVICES, INC., P.C. 1000 PERIMETER PARK DR. SUITE 1 MORRISVILLE, NC 27560 (919) 467-2227	
GEOLOGIC CROSS-SECTION A-A'		
CLIENT: SUN COMPANY, INC.	PM:	
LOCATION: 2903 S. ELM ST. GREENSBORO, NC	PE/RG:	
DESIGNED: KAT	DETAILED: SS/RTJ	PROJECT NO.: 053240102
		FIGURE: 5

1.5 - - - - INFERRED EXTENT OF DISSOLVED BENZENE IN GROUNDWATER (CONCENTRATION IN PARTS PER BILLION)

1.5

CONCENTRATION OF DISSOLVED BENZENE IN GROUNDWATER

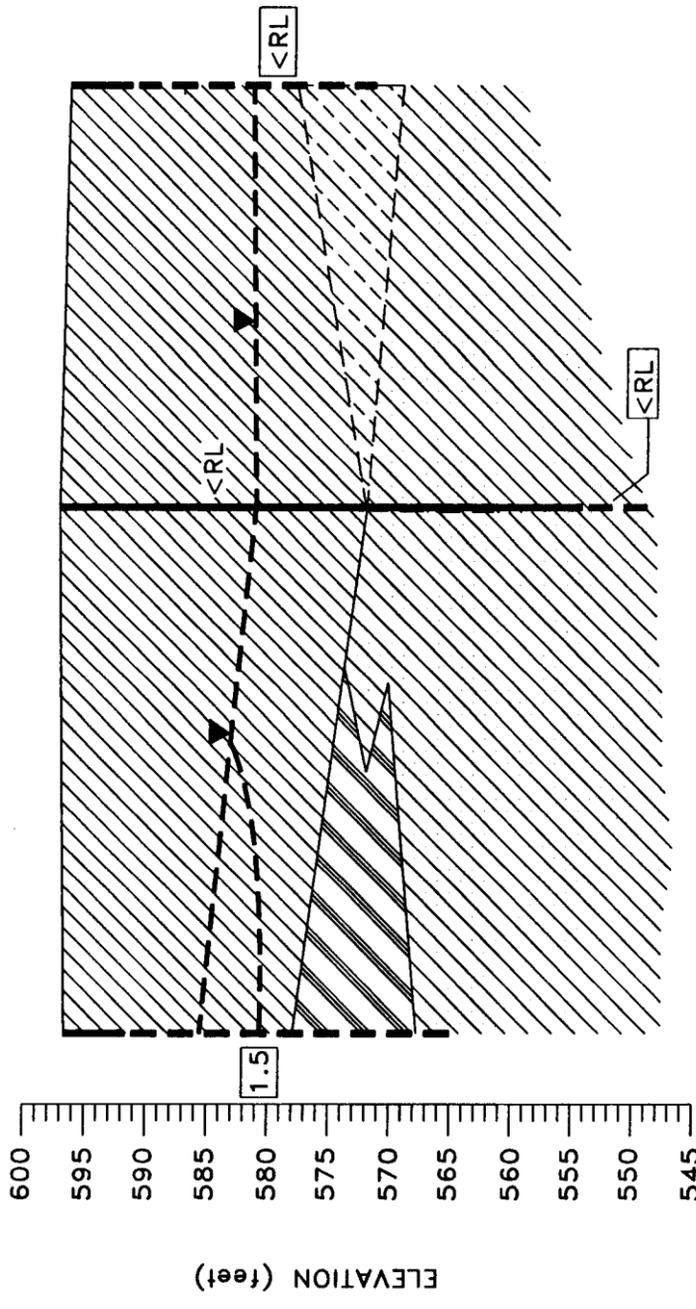
<RL

CONCENTRATION OF ADSORBED TPH AS GASOLINE AND DIESEL IN SOIL.

B
MW-2

B'
VMW-5

B'
MW-3



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SUITE 1
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SUITE 1
MORRISVILLE, NC 27560
(919) 467-2227

REV. NO.: DRAWING DATE: 7/19/96 ACAD FILE: 0102-XBB

GEOLOGIC CROSS-SECTION B-B'

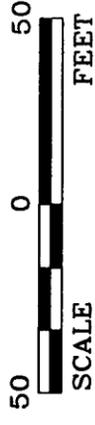
CLIENT:	SUN COMPANY, INC.	PM:	
LOCATION:	2903 S. ELM ST. GREENSBORO, NC	PE/RG:	
DESIGNED:	KAT	PROJECT NO.:	053240102
DETAILED:	SS/RTJ	FIGURE:	6

LEGEND

-  SANDY CLAY
-  SILTY CLAY
-  CLAYEY SAND
-  CLAY
-  WATER-TABLE ELEVATION (feet) (12/20/95)

LEGEND

- ◆ MONITORING WELL
- VERTICAL DEFINITION MONITORING WELL
- FH FIRE HYDRANT
- ⊙ SOIL BORINGS
- * TANK EXCAVATION SAMPLES
- INFERRED EXTENT OF ADSORBED HYDROCARBONS
- (171) CONCENTRATION OF TPH AS GASOLINE IN PARTS PER MILLION



SOURCE: JAMES L. HAINES & ASSOC. - 6/16/93 SURVEY



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SERVICES, INC., P.C.

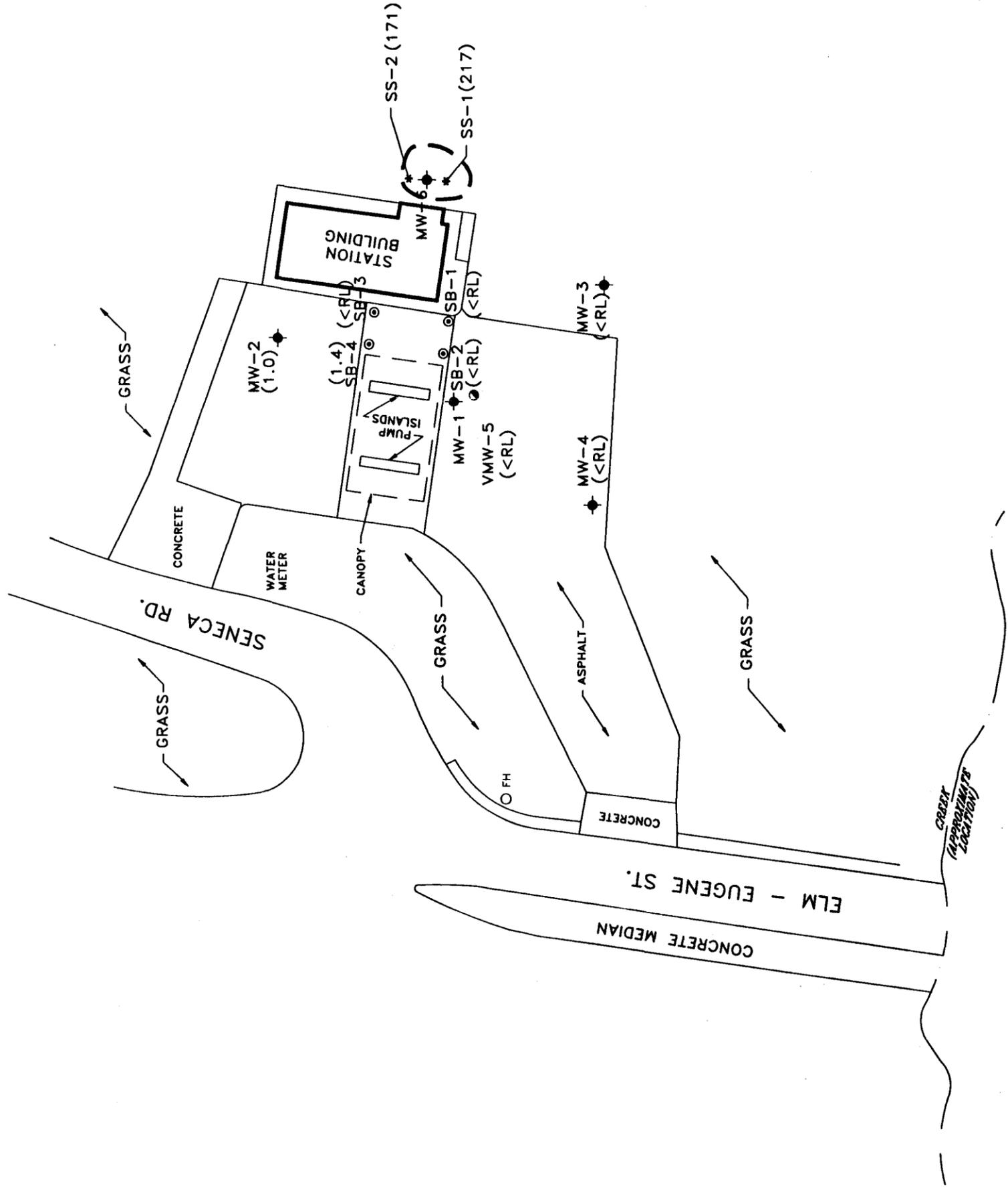
REV. NO.: DRAWING DATE: 7/19/96 ACAD FILE: 01021295

**TOTAL PETROLEUM HYDROCARBONS
IN SOIL CONCENTRATION MAP**

CLIENT: SUN COMPANY, INC. P.M:

LOCATION: 2903 S. ELM ST.
GREENSBORO, NC PE/RG:

DESIGNED: KAT DETAILED: RTJ PROJECT NO.: 053245455 FIGURE: 7



LEGEND

- ◆ MONITORING WELL
- VERTICAL DEFINITION MONITORING WELL
- FH FIRE HYDRANT
- ⊙ SOIL BORINGS
- * TANK EXCAVATION SAMPLES
- INFERRED EXTENT OF ADSORBED HYDROCARBONS
- (171) CONCENTRATION OF TPH AS DIESEL IN PARTS PER MILLION



SOURCE: JAMES L. HAINES & ASSOC. - 6/16/93 SURVEY



FLUOR DANIEL GTI

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(919) 467-2227

REV. NO.:

DRAWING DATE: 7/19/96

ACAD FILE: 01021295

**TOTAL PETROLEUM HYDROCARBONS
IN SOIL CONCENTRATION MAP**

CLIENT:

SUN COMPANY, INC.

PM:

LOCATION:

2903 S. ELM ST.
GREENSBORO, NC

PE/RG:

DESIGNED:

KAT

DETAILED:

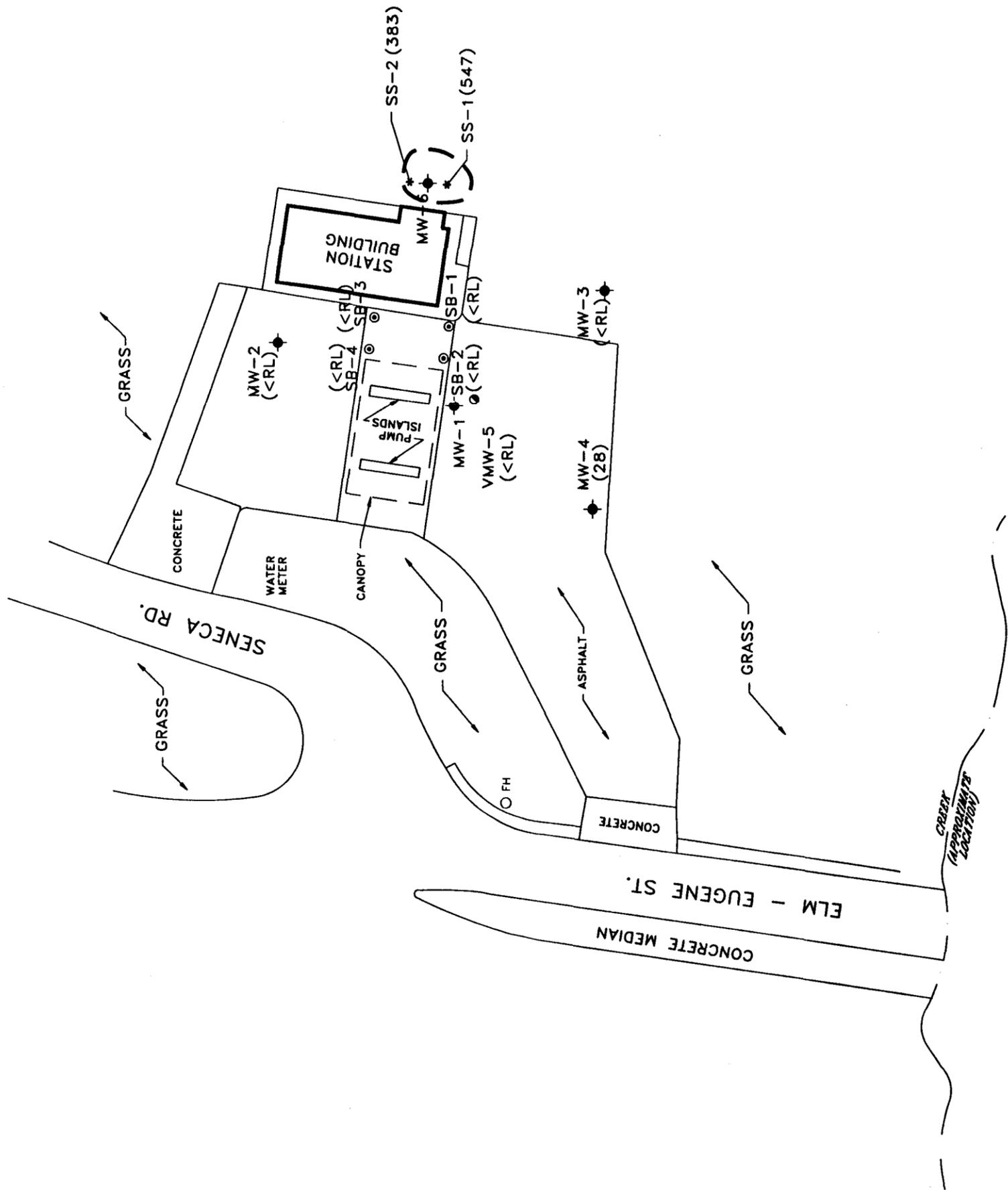
RTJ

PROJECT NO.:

053245455

FIGURE:

8



LEGEND

- ◆ MONITORING WELL
- VERTICAL DEFINITION MONITORING WELL
- FH FIRE HYDRANT
- ⊙ SOIL BORINGS
- * TANK EXCAVATION SAMPLES
- (582.82) WATER-TABLE ELEVATION (FT)
- INFERRED CONTOUR
- GENERALIZED DIRECTION OF SHALLOW GROUNDWATER FLOW



SOURCE: JAMES L. HAINES & ASSOC. - 6/16/93 SURVEY

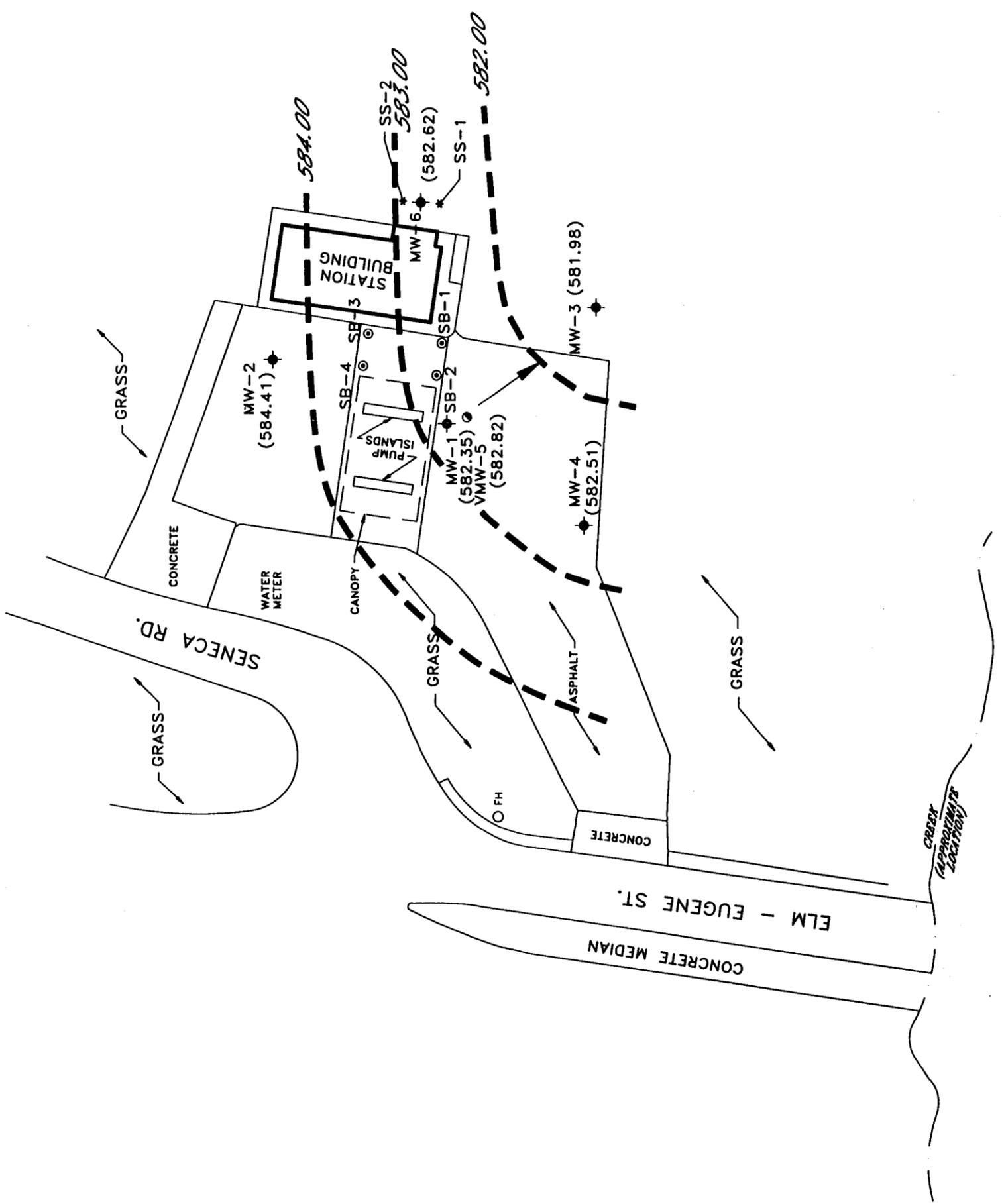
FLUOR DANIEL GTI
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GT DESIGN
1000 PERIMETER PARK DR.
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MORRISVILLE, NC 27560
SERVICES, INC., P.C. (919) 467-2227

REV. NO.: DRAWING DATE: 7/19/96 ACAD FILE: 01021295

**WATER-TABLE ELEVATION
CONTOUR MAP
DECEMBER 20, 1995**

CLIENT:	SUN COMPANY, INC.	PM:	
LOCATION:	2903 S. ELM ST. GREENSBORO, NC	PE/RG:	
DESIGNED:	KAT	PROJECT NO.:	053245455
RTJ		FIGURE:	9



LEGEND

- ◆ MONITORING WELL
- VERTICAL DEFINITION MONITORING WELL
- FH FIRE HYDRANT
- ⊙ SOIL BORINGS
- * TANK EXCAVATION SAMPLES
- <RL BELOW LABORATORY REPORTING LIMIT
- INFERRED EXTENT OF DISSOLVED BENZENE IN EXCESS OF 2L STANDARDS



SOURCE: JAMES L. HAINES & ASSOC. - 6/16/93 SURVEY



FLUOR DANIEL GTI

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(919) 467-2227

GT DESIGN SERVICES, INC., P.C.

1000 PERIMETER PARK DR.
SUITE 1
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(919) 467-2227

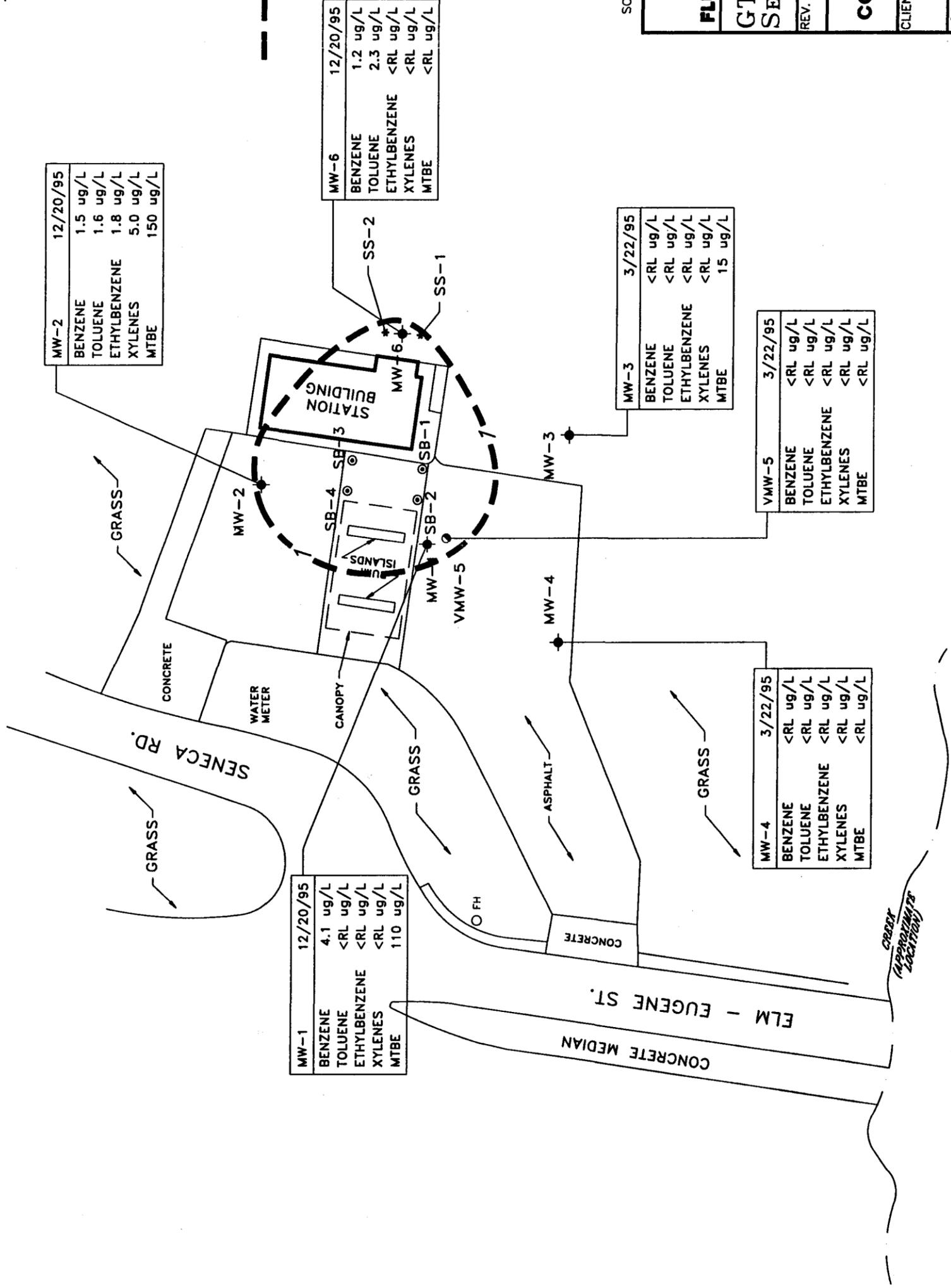
REV. NO.: DRAWING DATE: 7/19/96 ACAD FILE: 01021295

**DISSOLVED VOLATILE ORGANIC COMPOUNDS CONCENTRATION MAP
DECEMBER 20, 1995**

CLIENT: SUN COMPANY, INC. PM:

LOCATION: 2903 S. ELM ST. GREENSBORO, NC PE/RC:

DESIGNED: KAT DETAILED: RTJ PROJECT NO.: 053245455 FIGURE: 10



CHERRY (APPROXIMATE LOCATION)

Tables

TABLE 1
Summary of Soil Analytical Results

Sun Company, Inc.
 2903 South Elm Street, Greensboro, NC
 Duns # 0275-7516

Sample Location	Date	Sample Depth (feet)	PID Response (ppm Equivalent)	TPH 5030.0 (mg/kg)	TPH as Diesel (mg/kg)	TPH 3550 (mg/kg)
MW-2	06/01/93	12-14	21	1	<10	NA
MW-3	06/02/93	14-16	13	<1.0	<1.0	NA
MW-4	06/02/93	12-14	89	<1.0	28	NA
VMW-5	06/01/95	12-14	6	<1.0	<10	NA
SS-1	04/28/93	9.5	5.6	217	547	NA
SS-2	04/24/93	9.5	2.4	171	383	NA
SB-1	08/19/95	14-16	64	<0.13	<13	NA
SB-2	08/19/95	10-12	54	<0.12	<12	NA
SB-3	08/19/95	8-10	100	<0.12	<12	NA
SB-4	08/19/95	8-10	900	1.4	<11	NA
TB-2	12/20/95	6-8	1000+	<0.1	110	<12
TB-3	12/20/95	8-10	1000+	<0.1	12	15
TB-4	01/08/96	2-4	9.5	<0.1	<12	180
TB-5	01/08/96	2-4	9.5	<0.1	<12	120
TB-6	01/08/96	4-6	5.8	<0.1	<12	370
TB-7	01/08/96	6-8	5.8	<0.1	<13	970
TB-BG	01/08/96	4-6	2	<0.1	<12	170

Notes:
 mg/kg = Milligrams per kilograms
 NA = Not applicable

TABLE 2
Owners of Adjacent Properties

Sun Company, Inc.
 2903 S. Elm St., Greensboro, NC
 Duns # 0275-7516

Property ID Number	Registered Property Owner	Property Owner Address	Phone Number of Registered Property Owner
1	M.T. Used Cars, Inc.	2903 S. Elm St.	(910) 275-7533
2	Howard Johnsons John P. Bryant (General Manager)	110 Seneca Rd.	(910) 275-9331
3	Amoco Station Lisa Parker (Owner)	2915 S. Elm - Eugene St.	(910) 273-4738
4	Lorillard Federal Credit Union	2917 S. Elm - Eugene St.	(910) 272-5244
5	Mr. Steak Resteraunt	Not Listed	No Listing
6	Cricket Inn	2914 S. Elm St.	(910) 275-9471
7	Texaco Station	2906 S. Elm - Eugene St.	(910) 274-2852
8	Mother Murphies Laboratories, Inc.	2826 S. Elm St.	(910) 273-1737
9	Ramada Inn	2838 S. Elm - Eugene St.	(910) 275-0741

TABLE 3
Water-Table Elevations
December 20, 1995

Sun Company, Inc.
2903 South Elm Street, Greensboro, NC
Duns # 0275-7516

Well ID	Date	Well Head Elevation (feet/msl)	Depth to Water (feet)	Groundwater Elevation (feet/msl)
MW-1	12/20/95	597.04	14.69	582.35
MW-2	12/20/95	596.61	12.20	584.41
MW-3	12/20/95	596.36	14.38	581.98
MW-4	12/20/95	596.47	13.96	582.51
VMW-5	12/20/95	597.10	14.28	582.82
MW-6	12/20/95	596.69	12.07	584.62

Notes

Depth to water measurements are in feet below top of well casing
msl = Mean sea level

TABLE 4
Summary of Historical Groundwater Analytical Results (ug/L)
EPA Method 602

Sun Company, Inc.
 2903 S. Elm Street, Greensboro, NC
 Duns # 0275-7516

Well ID	Sampling Date	Benzene *(1 ug/L)	Toluene *(1,000 ug/L)	Ethyl- benzene *(29 ug/L)	Xylenes (total) *(530 ug/L)	MTBE *(200 ug/L)	Isopropyl- ether **
MW1	06/15/93	5.0	8.0	<RL	<RL	230	33
	09/24/93	1.0	<RL	<RL	0.7	300	—
	12/07/93	0.9	<RL	0.3	<RL	410	—
	02/15/94	0.7	<RL	<RL	<RL	290	—
	06/15/94	7.1	<RL	<RL	<RL	160	—
	03/22/95	4.7	<RL	<RL	<RL	130	—
	12/20/95	4.1	<RL	<RL	<RL	110	—
MW2	06/15/93	<RL	<RL	<RL	<RL	290	<RL
	09/24/93	<RL	<RL	<RL	0.5	220	—
	12/07/93	<RL	<RL	<RL	<RL	270	—
	02/15/94	<RL	<RL	<RL	<RL	280	—
	06/15/94	<RL	<RL	<RL	<RL	210	—
	03/22/95	<RL	<RL	<RL	4.4	200	—
	12/20/95	1.5	1.6	1.8	5.0	150	—
MW3	06/15/93	<RL	1.0	<RL	<RL	5.0	<RL
	09/24/93	0.4	0.9	<RL	0.8	24	—
	12/07/93	<RL	<RL	<RL	<RL	19	—
	02/15/94	<RL	<RL	<RL	<RL	<RL	—
	06/15/94	<RL	<RL	<RL	<RL	12	—
	03/22/95	<RL	<RL	<RL	<RL	15	—
MW4	06/15/93	<RL	<RL	<RL	<RL	<RL	3.0
	09/24/93	<RL	<RL	2	1	<RL	—
	12/07/93	<RL	<RL	0.7	0.7	<RL	—
	02/15/94	<RL	<RL	<RL	<RL	<RL	—
	06/15/94	<RL	<RL	<RL	1.3	<RL	—
	03/22/95	<RL	<RL	<RL	<RL	<RL	—
VMW5	06/15/93	0.3	0.3	<RL	0.5	5	<RL
	09/24/93	<RL	<RL	<RL	<RL	<RL	—
	12/07/93	<RL	<RL	<RL	<RL	<RL	—
	02/15/94	<RL	<RL	<RL	<RL	<RL	—
	06/15/94	<RL	<RL	<RL	<RL	<RL	—
	03/22/95	<RL	<RL	<RL	<RL	<RL	—
MW-6	12/20/95	1.2	2.3	<RL	<RL	<RL	—

Notes

ug/L - Micrograms per liter

<RL-Below laboratory reporting limit

*North Carolina Administrative Code Subchapter 2L Groundwater Standard

**No 2L Standard adopted

Attachment A

Sun Company, Inc.

4041 Market Street
Aston PA 19014
215 499 5770

May 8, 1996

Ms. Sherri V. Knight
Groundwater Supervisor
North Carolina Department of Environment, Health, and Natural Resources
Winston-Salem Regional Office (WSO)
585 Waughtown Street
Winston-Salem, NC 27107-2241

**SUBJECT: Ownership of Closed UST Systems
Elm Street Sunoco - Facility ID Number 0-002409
Greensboro, North Carolina**

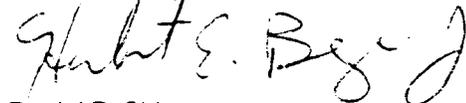
Dear Ms. Knight:

Sun Company, Inc. (SUN) has received and reviewed correspondence from your office dated April 16, 1996. The subject correspondence references the closure of three UST systems (three 6,000 gallon gasoline, one 6,000 gallon diesel, and one 1,000 gallon waste oil) at the site in 1993, by TEKCON, Inc. As indicated on the attached forms obtained from the Division of Environmental Management (DEM), at the time of UST closure, Mid-State Petroleum Company was the registered owner and operator of the UST systems. While SUN has performed subsequent environmental investigations at the site, SUN was neither the owner nor operator of the subject property or UST, nor was SUN involved in the closure of the subject UST systems. SUN respectfully requests that the DEM contact Mid-State Petroleum Company regarding the subject UST closure report, and the discrepancies as noted in the April 16 correspondence. SUN would like to receive copies of all correspondence for our files.

Thank you in advance for your assistance with this matter. If there are any questions, please do not hesitate to contact me at (610) 859-5705, or Mr. Joe Beaman with Groundwater Technology, Inc. at (919) 467-2227.

Sincerely,

Sun Company, Inc.



Daniel P. Shine
Environmental Engineer

cc: Joe Beaman, GTI
John C. Nantz

QUALITY INFORMATION

Facility ID: 0-002409 Address: 2903 SOUTH ELM ST
City: GREENSBORO State: NC Zip: 27409
City: GUILFORD Phone: (215) 977-6202
Manager: CLETE LEWIS Title: ENVIRON SPEC

OWNER INFORMATION:

Name: MIDSTATE OIL COMPANY Phone: (215) 977-6202
Address: PO BOX 849/1820 S MAIN STREET
City: LEXINGTON State: NC Zip: 27293-0849
City: GUILFORD Bill Type: A Bill Qtr: 4 File Status: A
Owner Type: 9 Date Received: 19860507 Date Signed: 19860505
Date Entered: 19860935 Updated: 19901119 Clerk: U16

- PF3=PREV MENU PF4=PREV SCREEN PF5=TANK LIST PF10=CERTIFICATE
- PF6=DETAILED AFS PF12=INVOICE PF13=PREV OWNER PF14=PAYMENTS
- PF7=TWOSIDE/PAY PF17=PERMITS PF18=PAILED AFS

MAY 06 1996

Post-It® Fax Note 7671		Date 5.6.96	# of pages 1
To Joe Beaman	From Muriel Bennett		
Co./Dept Grandwater Tech	Co. G/water Section		
Phone #	Phone #		
Fax # 919.467.2299	Fax # 919.733.9413		

ANK INFORMATION FOR: 0-002407 SOUTH ELK SARCSD

ANK ID	STAT	INSTALL	REMOVE	SIZE	FRQD	TYPE	EXEMPT
001	P	19700509	19930727	6000	3	NDN	N
002	P	19830506	19930727	6000	3	NDN	N
003	P	19700509	19930726	1000	14	NDN	N
004	P	19700509	19930726	6000	3	NDN	N
005	P	19700509	19930727	6000	3	NDN	N

RECEIVED
MAY 06 1996

ENTER TANK ID TO VIEW:

PF3=PREV MENU PF4=BACK/TOP PF5=FORWARD PF6=BACKWARD PF9=FAC/OWNER
 PF10=CERTIFICATE PF11=DETAIL/APP PF12=INVOICES PF13=PREV/OWNER PF14=PAYMENTS
 PF15=INVOICE/PAY PF17=PERMIT PF18=MAILED/APP

Post-it® Fax Note	7671	Date	5.6.96	# of Pages	1
To	Joe Beaman	From	Muriel Bennett		
Co./Dept.	Grandwater Tech	Co.	G/Water Section		
Phone #		Phone #			
Fax #	919.467.2299	Fax #	919.733.9413		