ECS CAROLINAS, LLP
Geotechnical • Construction Materials • Environmental

December 29, 2006

Mr. Bud Stafford
Bud Holding Company
P.O. Box 18109
Greensboro, North Carolina 27419

Reference: Report of Environmental Services
Piedmont Truck and Tire
312 South Regional Road
Greensboro, North Carolina
ECS Project G-13221A

Dear Mr. Stafford:

As authorized by your acceptance of our Proposal 09-10827-P dated November 20, 2006, ECS Carolinas, LLP (ECS) has completed the environmental services for the above referenced site. Included in this report is a description of the field activities, the results obtained, and our conclusions.

Background Information

The site is the Piedmont Truck Tires facility located at 312 South Regional Road in Greensboro, North Carolina (Figures 1 and 2). The site contains two oil water separator systems and approximately 150 feet of trench drains. The location of the underground piping associated with the oil water separators is unknown.

ECS recently completed a Phase II Environmental Site Assessment (ESA) for the site. (ECS Project G-13221, dated October 19, 2006). Based on the Phase II ESA, soil in the vicinity of the trench drain in the southern garage area has been impacted above the North Carolina Action Level. An apparent release has occurred in the vicinity of the oil water separator on the northwestern portion of the site; however, the concentration detected in the soil sample did not exceed the North Carolina Action Level. Based on a conversation with Ms. Sharon Cihak with the Guilford County Department of Public Health (GCDPH), Environmental Health Division, which is the implementing agency for the North Carolina Department of Environment and Natural Resources (NCDENR) in Guilford County, one risk-based soil sample will be required to be collected from the vicinity of the previously collected soil sample (GP-5). Ms. Cihak also mentioned that information pertaining to the discharge location of the oil/water separator's effluent would be needed.

ECS was contracted by Mr. Bud Stafford with Bud Holding Company to determine if soil in the vicinity of previously collected soil sample GP-5 exceeds the Soil-to-Groundwater Maximum Soil Contaminant Concentrations (MSCCs). Project information is based on conversations between Mr. Stafford and Mr. Jason Ricks of ECS and the previously cited report.

Field Activities

On December 1, 2006, ECS personnel advanced one hand auger soil boring (HA-1) in the vicinity of the previous soil boring GP-5 (Figure 2A). A core machine was used to cut through the concrete floor to allow access to the soil with the hand auger. Prior to initiating the boring, the hand auger was decontaminated by washing in a solution of Alconox detergent and potable water, followed by a rinse with the potable water. The soil boring was advanced to an approximate depth of 5 feet below ground surface (bgs).

One soil sample (HA-1) was collected from the termination depth of approximately 5 feet bgs from soil boring HA-1. The soil sample was placed in laboratory prepared containers using a new pair of disposable nitrile gloves for the sample. The containers were labeled with the project name, sample location, presence or absence of preservative, and the date and time the sample was collected. The sample container was placed in a cooler containing ice to maintain the sample at approximately 4° Celsius. The soil sample was then delivered to Research & Analytical Laboratories, Inc. (R&A) in Kernersville, North Carolina for chemical analysis. A *Chain of Custody Record* was maintained and is attached.

The soil from the boring was screened using the probe of a Foxboro Model 1000B toxic vapor analyzer (TVA) which is a flame ionization detector (FID). The soil sample from the boring was placed in a resealable plastic bag for the purpose of field screening. The plastic bag was placed in a warm location for approximately ten minutes to allow the headspace in the bag to equilibrate with the soil. The probe of the FID was then inserted into the bag, and the bag was immediately resealed using finger pressure. A boring log was prepared and is attached.

The discharge location of the oil/water separator's effluent could not be determined.

Laboratory Results

Soil sample HA-1 was analyzed by R&A for semi-volatile organic compounds (SVOCs) using EPA Method 8270BN (base neutrals) and for extractable petroleum hydrocarbons (EPH) using the Massachusetts Department of Environmental Protection Method. Targeted compounds were not detected at concentrations above laboratory quantitation limits. A summary of the laboratory analytical results is included in Table 1. The laboratory data sheets are attached.

Conclusions and Recommendations

ECS personnel completed one hand auger soil boring in the vicinity of the previous soil sample GP-5. Based on laboratory analysis, targeted compounds were not detected above laboratory quantitation limits.

ECS recommends that the current property owner be notified and that a copy of this report be submitted to the Guilford County Department of Public Health. Furthermore, ECS requests that a "Notice of No Further Action" be issued and the site be closed.

ECS appreciates the opportunity to provide our environmental consulting services to you on this project. If you have any questions concerning this report or this project, please contact us at (336) 856-7150.

Sincerely,

ECS CAROLINAS, LLP

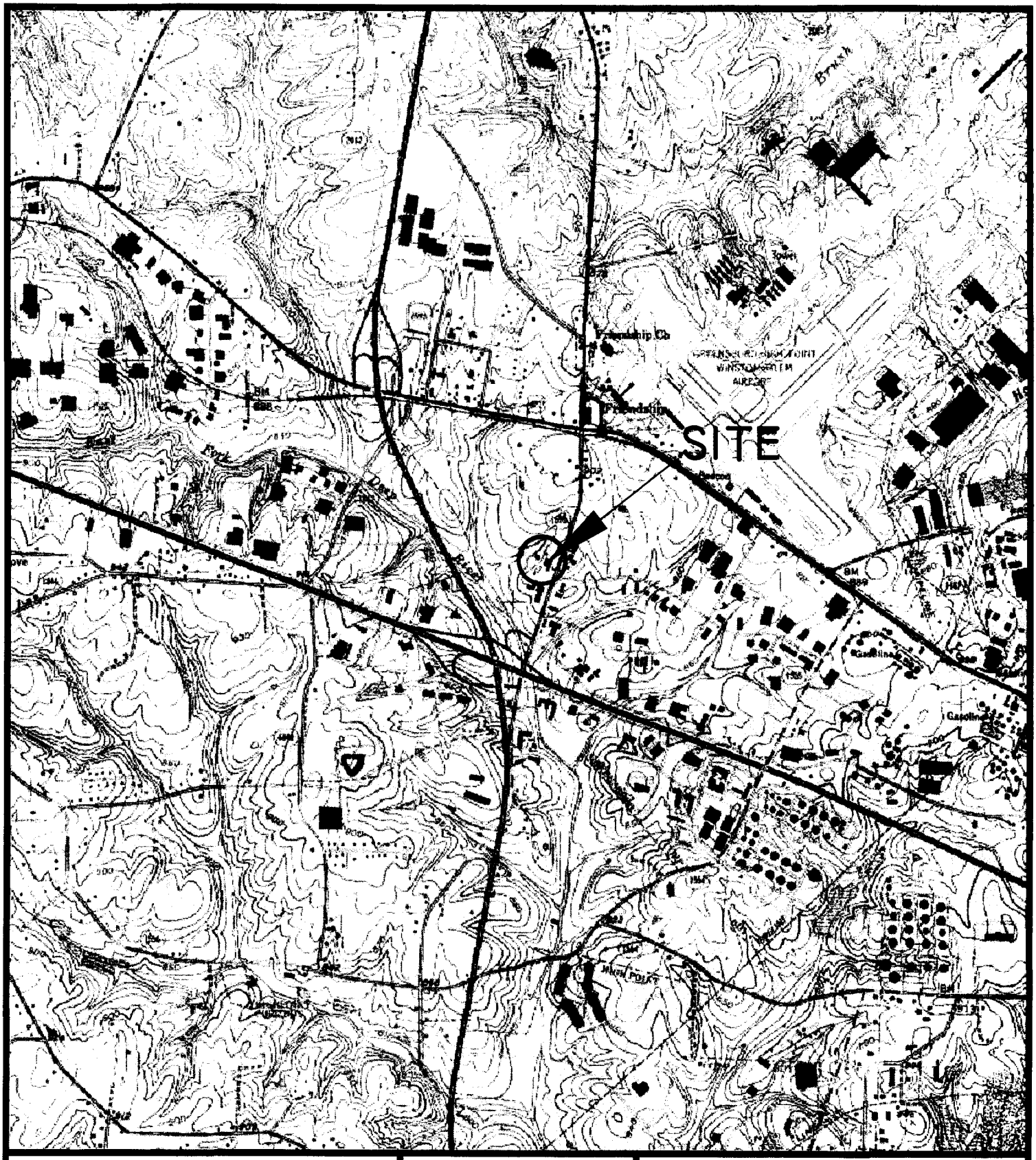
Jada Tullos Anderson
Staff Scientist

Jason T. Ricks
Project Scientist

James D. Hoskins, III, P.E.
Chief Engineer
Registered North Carolina PE 18493

NORTH CAROLINA PROFESSIONAL SEAL 18493 ENGINEER JAMES D. HOSKINS, III

Attachments: Figure 1 – Site Location Map
Figure 2 – Site Map
Figure 2A – Soil Sample Location Map
Table 1 – Summary of Soil Analytical Results
Boring Log
Laboratory Data Sheet and Chain of Custody Record



SCALE (IN FEET)
1000
2000
2000
0

REFERENCE:
USGS TOPOGRAPHIC MAP
GUILFORD NC, QUADRANGLE
DATED 1951 REVISED 1994

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FIGURE 1

SITE LOCATION MAP
PIEDMONT TRUCK AND TIRE
312 SOUTH REGIONAL ROAD
GREENSBORO, NORTH CAROLINA

ECS PROJECT G-13221A

SCALE (IN FEET)
125
250
250
0

REFERENCE:
2002 AERIAL PHOTOGRAPH
PROVIDED BY GUILFORD COUNTY
NC GIS DEPARTMENT

ECS LLP
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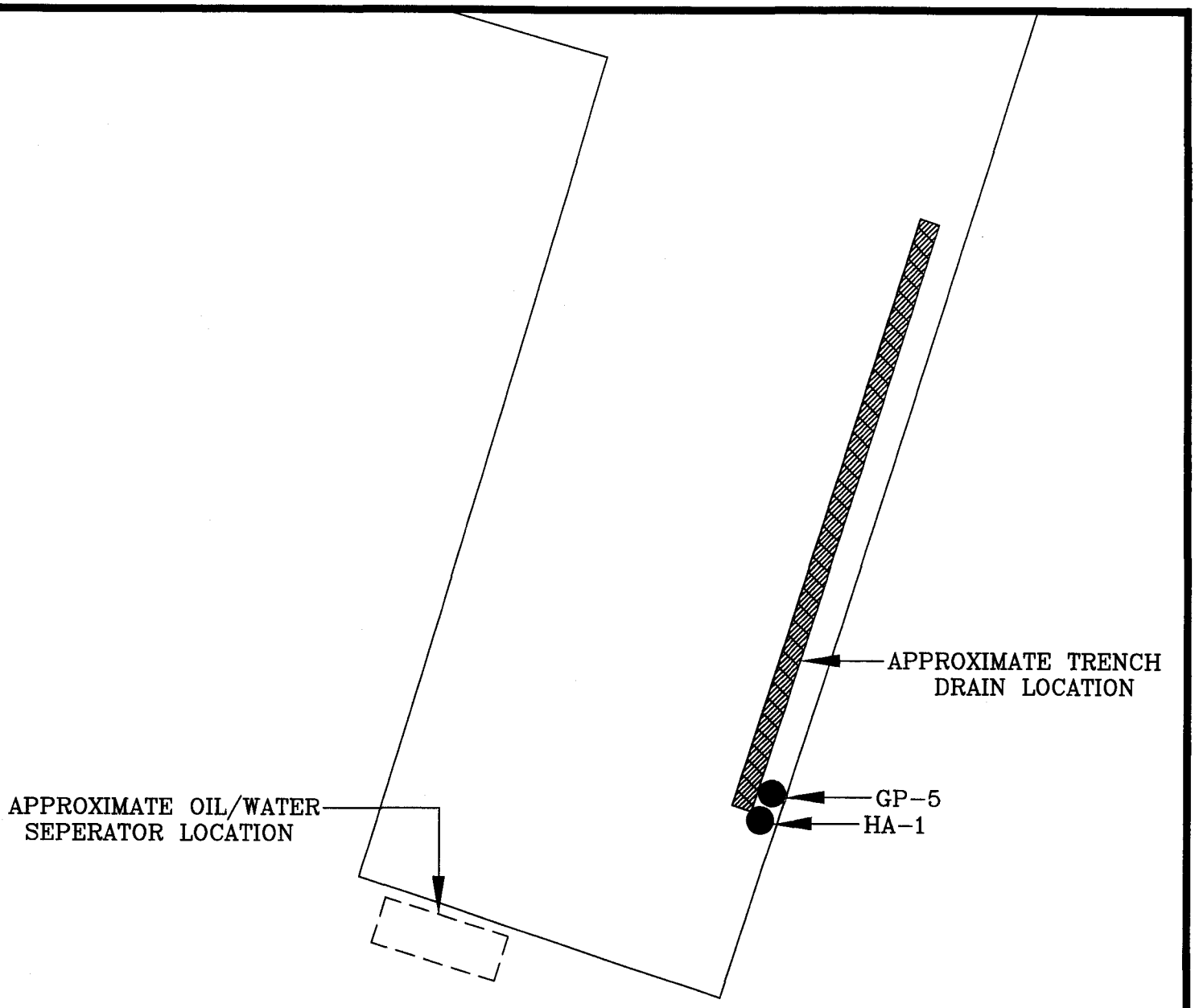
FIGURE 2

SITE MAP
PIEDMONT TRUCK AND TIRE
312 SOUTH REGIONAL ROAD
GREENSBORO, NORTH CAROLINA

ECS PROJECT G-13221A



LEGEND
● = SOIL SAMPLE LOCATION BELOW THE NC ACTION LEVEL
● = SOIL SAMPLE ABOVE THE NC ACTION LEVEL

SCALE (IN FEET)
10 20
20 0

REFERENCE:
FIELD NOTES BY ECS PERSONNEL

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FIGURE 2A

SOIL SAMPLE LOCATIONS MAP
PIEDMONT TRUCK AND TIRE
312 SOUTH REGIONAL ROAD
GREENSBORO, NORTH CAROLINA

ECS PROJECT G-13221A

TABLE 1
SUMMARY OF SOIL ANALYTICAL RESULTS

Project Name: Piedmont Truck Tires
ECS Project Number: G-13221A

Analytical Method			8270BN, EPH
Contaminant of Concern (mg/kg)			Targeted Compounds
Sample ID	Date Collected	Approximate Sample Depth (ft. bgs)	
HA-1	12/01/2006	5	BQL
Soil-to-Groundwater MSCC (mg/kg)			N/A
Industrial/Commercial Soil Cleanup Levels (mg/kg)			N/A

mg/kg = milligrams per kilograms = ppm
ppm = parts per million
ft. bgs = feet below ground surface
BQL = below quantitation limits
MSCC = Maximum Soil Contaminant Concentrations
N/A = not applicable

CLIENT	JOB #	BORING #	SHEET
BUD HOLDING COMPANY	G-13221A	HA-1	1 OF 1

PROJECT NAME	ARCHITECT-ENGINEER
PIEDMONT TRUCK TIRES	

ECS LLP CAROLINAS

SITE LOCATION
GREENSBORO, NORTH CAROLINA

CALIBRATED PENETROMETER TONS/FT.^{2}
1 2 3 4 5+

PLASTIC LIMIT % X — WATER CONTENT % ● — LIQUID LIMIT % Δ

ROCK QUALITY DESIGNATION & RECOVERY
RQD% — — — REC.%
20% 40% 60% 80% 100%

⊗ STANDARD PENETRATION BLOWS/FT.
10 20 30 40 50+

DEPTH (FT)	SAMPLE NO.	SAMPLE TYPE	SAMPLE DIST. (IN)	RECOVERY (IN)	DESCRIPTION OF MATERIAL — ENGLISH UNITS	WATER LEVELS ELEVATION (FT)
0					Concrete / Gravel	
					Dark Gray and Brown, Silty CLAY, With Rock	
5					Dark Gray and Brown, Silty CLAY, With Rock	
					Red and Brown, Clayey SILT	
					END OF BORING @ 5.0'	
10						
15						
20						
25						
30						

BOTTOM OF CASING ▶ — LOSS OF CIRCULATION 100%

SURFACE ELEVATION

THE STRATIFICATION LINES REPRESENT THE APPROXIMATE BOUNDARY LINES BETWEEN SOIL TYPES IN-SITU THE TRANSITION MAY BE GRADUAL

▽WL WS OR WD	BORING STARTED	
▽WL(BCR) ▽WL(ACR)	BORING COMPLETED	CAVE IN DEPTH ●
▽WL	RIG FOREMAN	DRILLING METHOD

NRR (12-22-06)

Research & Analytical Laboratories, Inc.
Analytical/Process Consultations

Chemical Analysis for Selected Parameters and Sampling Locations Identified as G-13221A
(An ECS, Ltd. Project #G-13221A, collected 01 December 2006)

I. Semi-Volatile Organics EPA Method 8270 BN Parameter	Quantitation Limit (mg/kg)	HA-1 (mg/kg)
Acenaphthene	0.33	BQL
Acenaphthylene	0.33	BQL
Anthracene	0.33	BQL
Benzoic Acid	6.67	BQL
Benzo(a)anthracene	0.33	BQL
Benzo(b)fluoranthene	0.33	BQL
Benzo(k)fluoranthene	0.33	BQL
Benzo(ghi)perylene	0.33	BQL
Benzo(a)pyrene	0.33	BQL
Benzyl Alcohol	3.33	BQL
Bis(2-chloroethoxy)methane	0.33	BQL
Bis(2-chloroethyl)ether	0.33	BQL
Bis(2-chloroisopropyl)ether	0.33	BQL
Bis(2-ethyl-hexyl)phthalate	0.33	BQL
4-Bromophenyl phenyl ether	0.33	BQL
Benzyl butyl phthalate	0.33	BQL
4-Chloroaniline	1.65	BQL
4-Chloro-3-methylphenol	0.33	BQL
2-Chloronaphthalene	0.33	BQL
2-Chlorophenol	0.33	BQL
4-Chlorophenyl phenyl ether	0.33	BQL
Chrysene	0.33	BQL
Dibenzo(a,h)anthracene	0.33	BQL
Dibenzofuran	0.33	BQL
Di-N-Butyl phthalate	0.33	BQL
1,2-Dichlorobenzene	0.33	BQL
1,3-Dichlorobenzene	0.33	BQL
1,4-Dichlorobenzene	0.33	BQL
3,3-Dichlorobenzidine	0.66	BQL
2,4-Dichlorophenol	0.33	BQL
Diethyl phthalate	0.33	BQL
2,4-Dimethylphenol	0.33	BQL
Dimethyl phthalate	0.33	BQL
4,6-Dinitro-2-methylphenol	1.65	BQL
2,4-Dinitrophenol	1.65	BQL
2,4-Dinitrotoluene	0.33	BQL
2,6-Dinitrotoluene	0.33	BQL
Di-N-Octyl phthalate	0.33	BQL
Azobenzene	3.33	BQL
Fluoranthene	0.33	BQL
Fluorene	0.33	BQL
Hexachlorobenzene	0.33	BQL
Hexachlorobutadiene	0.33	BQL
Hexachlorocyclopentadiene	0.33	BQL
Hexachloroethane	0.33	BQL
Indeno(1,2,3-cd) pyrene	0.33	BQL
Isophorone	0.33	BQL
2-Methylnaphthalene	0.33	BQL
2-Methylphenol	1.65	BQL
4-Methylphenol	1.65	BQL
Nitrobenzene	0.33	BQL
2-Nitrophenol	0.33	BQL
4-Nitrophenol	1.65	BQL
N-Nitrosodiphenylamine	0.33	BQL
N-nitrosodi-n-propylamine	0.33	BQL
Pentachlorophenol	1.65	BQL
Phenanthrene	0.33	BQL
Phenol	0.33	BQL
Pyrene	0.33	BQL
1,2,4-Trichlorobenzene	0.33	BQL
2,4,6-Trichlorophenol	0.33	BQL
2-Methyl-4,6-dinitrophenol	1.65	BQL
Benzidine	1.65	BQL
1,2-Diphenylhydrazine	1.65	BQL
N-Nitrosodimethylamine	0.33	BQL
Dilution Factor		1
Sample Number		577257
Sample Date		12/01/06
Sample Time (hrs)		1150

II. Method MADEP 98-1 EPH Parameter	Quantitation Limit (mg/kg)	HA-1 (mg/kg)
C9-C18 Aliphatics	10.0	BQL
C-19-C-36 Aliphatics	10.0	BQL
C11-C22 Aromatics	10.0	BQL
Dilution Factor		1
Sample Number		577257
Sample Date		12/01/06
Sample Time (hrs)		1150

mg/kg = milligrams per kilogram = parts per million (ppm)
BN = Base-Neutral Extractables
BQL = Below Quantitation Limits

EPH (Aliphatics/Aromatics) Laboratory Reporting Form

Client Name: ECS, Ltd.
Project Name: G-13221A
Site Location: RAL # 577257

Laboratory Name: Research & Analytical Laboratories, Inc
NC Certification # (Lab) 34
Sample Matrix: Solid

Sample Information and Analytical Results

Method for Ranges: MADEP EPH			Sample Identification		HA-1							
EPH Surrogate Standards			Date Collected		12/01/06							
Aliphatic: COD			Date Received		12/01/06							
Aromatic: o-terphenyl			Date Extracted		12/01/06							
EPH Fractionation Surrogates			Date Analyzed		12/04/06							
#1 2-Fluorobiphenyl			% Dry Solids		75.7							
#2 2-Bromonaphthalene			Dilution Factor		1							
Hydrocarbon Ranges	**Units of Measure**	**MDL**	**RL**	**Blank**	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
C9 - C18 Aliphatics **	mg/kg	5.3	10.0	BRL	BRL							
C19 - C36 Aliphatics **	mg/kg	2.4	10.0	BRL	BRL							
C11 - C22 Aromatics **	mg/kg	4.3	10.0	BRL	BRL							
Sample Surrogate Acceptance Range		N/A	N/A	40-140%	40-140%	40-140%	40-140%	40-140%	40-140%	40-140%	40-140%	40-140%
Aliphatic Surrogate % Recovery		N/A	N/A	109	107							
Aromatic Surrogate % Recovery		N/A	N/A	110	107							
Fractionation Surrogate Acceptance Range		N/A	N/A	40-140%	40-140%	40-140%	40-140%	40-140%	40-140%	40-140%	40-140%	40-140%
Fractionation Surrogate #1 % Recovery		N/A	N/A	N/A	N/A							
Fractionation Surrogate #2 % Recovery		N/A	N/A	N/A	N/A							

** Unadjusted value. Should exclude the concentration of any surrogate(s), internal standards, and/or concentrations of other ranges that elute within the specified range.

MDL = Method Detection Limit RL = Reporting Limit Blank = Laboratory Method Blank or Trip Blank whichever is higher (indicate type)

Were all performance/acceptable standards for required QA/QC procedures achieved? [X] Yes [ ] No - Details Attached

Was blank correction applied as a significant modification of the method? [ ] Yes [X] No

Were any significant modifications to the EPH method made? [X] No [ ] Yes - Details Attached

Research & Analytical Laboratories, Inc.

Analytical / Process Consultations
Phone (336) 996-2841

CHAIN OF CUSTODY RECORD 01918

Client: ECS
Address: 4711 Roger Blvd
Address: Greensboro, NC 27409
Quote #:

Project ID: G-13221A
Contact: J Rocks
Phone: 336 856 7150
Fax: 336 856 7160

Date: 12/1/06
Turnaround: std 5 day
Job Number:
P.O. Number:

Report To: Jason Rocks

Invoice To:

Sample ID	Date	Time	Matrix	Preservatives				Analyses								Comments: Please specify any special reporting requirements
				HCl				8270 MS	EPH							577257
HA-1	12/1/06	1150	soil	✓				✓	✓							Trust Fund 577257 Rate

Relinquished By	Date	Time	Received By	Date	Time	Temperature
	12/1/06	202		12-1-06	1402	

State Certification Requested

NC _____ SC _____ Other _____

ORIGINAL

ECS CAROLINAS, LLP
Geotechnical • Construction Materials • Environmental

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