

OGDEN ENVIRONMENTAL AND ENGINEERING SERVICES

October 8, 1992

Charlotte Office:
9800 West Kincey Avenue
Suite 190
Huntersville, NC 28078
704 875 3570
Fax 704 875 8718

Mr. Thomas A. Salley, Hydrogeological Technician II
North Carolina Department of Environment,
Health, & Natural Resources
Division of Environmental Management
8025 North Point Boulevard, Suite 100
Winston-Salem, North Carolina 27106

RECEIVED
N.C. Dept. of EHNR

OCT 13 1992

Winston-Salem
Regional Office

Re: **UST Closure Report**
Piedmont Natural Gas Company
651 North Fayetteville Street
Asheboro, North Carolina
(Randolph County)

Dear Mr. Salley:

Ogden Environmental and Engineering Services (Ogden) is pleased to submit the attached Underground Storage Tank Closure Report for the above referenced site.

Should you have any questions or comments concerning the above, or need any additional information from Ogden, please do not hesitate to contact us.

Sincerely,

Ogden Environmental and Engineering Services



John R. Isham
Project Manager

cc: Mike Parrott, Piedmont Natural Gas Company (with attachment)

attachment

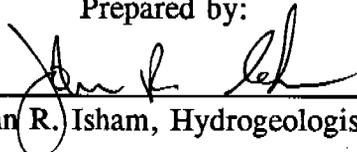
**UNDERGROUND STORAGE TANK CLOSURE REPORT
PIEDMONT NATURAL GAS COMPANY
651 NORTH FAYETTEVILLE STREET
ASHEBORO, NORTH CAROLINA**

Prepared for:

Piedmont Natural Gas Company
P. O. Box 33068
Charlotte, North Carolina 28233

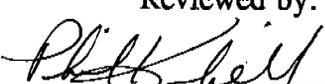
Ogden Project Number: 2-4446-0000

Prepared by:



John R. Isham, Hydrogeologist

Reviewed by:



NC Geologist No. 893 Date 10/8/96



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UNDERGROUND STORAGE TANK CLOSURE REPORT

Piedmont Natural Gas Company
651 North Fayetteville Street
Asheboro, North Carolina

1.0 INTRODUCTION

1.1 Purpose

On June 25, 1992, Ogden Environmental and Engineering Services (Ogden) was retained by the Piedmont Natural Gas Company to perform underground storage tank (UST) closure services at the Piedmont Natural Gas facility located at 651 North Fayetteville Street, Asheboro, North Carolina (Randolph County). A regional Site Location Map is included in the Appendix.

1.2 Site Description and Demographics

The Piedmont Natural Gas facility currently operates as a service center which contained two 550-gallon underground storage tanks located behind the service center near the western edge of the property. Unleaded gasoline (motor fuel) was dispensed from a single dispenser located at the northern edge of the tankhold. The referenced UST system was reportedly constructed and began dispensing fuels at the referenced property in 1974.

A total of two USTs were removed on September 8, 1992 at the above referenced site in pursuant to the guidelines under 40 CFR 280.71(b) and North Carolina Administrative Codes (NCAC) Title 15A, Subchapter 2N Section .0803. Figure 2 in the Appendix illustrates the layout of the site and former UST locations. The following sections outline the various site activities conducted at the above referenced site during the underground storage tank facilities removal and closure sampling procedures. This information was obtained to supplement the GW/UST-2 form (Site Investigation Report for Permanent Closure of USTs). A copy of this form is included in the Appendix.

2.0 ENVIRONMENTAL SETTING

2.1 Site Topography and Physiography

According to the Asheboro 7.5 Minute Series United States Geological Survey (USGS) Topographic Map (1970; photorevised 1981), the referenced site lies at an elevation of approximately 890 feet above mean sea level. The surface topography of the site slopes gently to the east towards a tributary of Haskett's Creek. The site is located within the Asheboro City limits and is supplied with municipal drinking water and sewer service. Ogden did not observe any public or private water wells within a 1500 foot radius of the site.

2.2 Regional Geology

The referenced site is located within the Carolina Slate Belt of the Piedmont Physiographic Province of North Carolina. According to the Geologic Map of North Carolina (1985), the area is underlain by light gray to greenish gray metamorphosed dacitic to rhyolitic volcanic flows. The Carolina Slate Belt in the area also contains metamorphosed interbedded mafic and intermediate volcanic tuffs, argillite and metamudstones of Paleozoic age.

2.3 Regional Hydrogeology

In the Piedmont Physiographic Province where crystalline and metamorphic rocks predominate, ground water is accumulated from direct precipitation. At a certain depth, moisture increases and a phreatic surface occurs, known as the ground-water level. The fraction of precipitation which reaches the ground water is generally less than one-third. Ground water typically occurs in the undisturbed primary permeability within the residual soil weathered from crystalline or igneous bedrock (Saprolite). Ground water is available within the underlying crystalline bedrock through joints, fractures, cleavage planes, planes of schistosity, bedding planes, and solution channels and primary porosity. Ground-water recharge in the Asheboro area occurs in interstream areas and the discharge is into streams, lakes, and swamps. In valleys the water table generally is at or near the surface; on wide flat uplands the water table generally is not more than a few tens of feet below the surface; and on sharp hills the water table may be more than 100 feet below the land surface (LeGrand and Mundorff, 1952). The shallow soils consist

of a yellowish-brown to tan fine sandy silts with occasional clayey silts. The soils are typically mottled exhibiting relict quartz, feldspar, and biotite mica grains in a clastic texture. Relict sedimentary structures are also visible. Ground water was not encountered within the excavation site to a depth of 8 feet below grade.

3.0 UNDERGROUND STORAGE TANK REMOVAL PROCEDURES

On September 8, 1992, a total of two underground storage tanks were removed from the referenced site. A Notification of Tank Closure was submitted to the Winston-Salem Regional Office of the Department of Environment, Health and Natural Resources (NCDEHNR) on June 15, 1992. State acknowledgement was received on June 26, 1992. A copy of the closure request is included in the Appendix.

The USTs at the referenced facility consisted of two 550 gallon unleaded gasoline tanks. Each underground storage tank was constructed from a steel aboveground propane tank. The tanks and associated plumbing were cathodically protected with the delivery plumbing being manifolded to a single, suction type, dispensing unit. The buried product dispensing lines (2-inch diameter steel), aboveground vent piping and dispensing unit were also removed in conjunction with the referenced underground storage tanks. Table 1 is a summary of known storage tank construction and installation data for the referenced site.

Jones and Frank Inc. of Charlotte, North Carolina was contracted by the Piedmont Natural Gas Company to excavate, remove, and dispose of the storage tanks in accordance with American Petroleum Institute (API) Bulletin 1604 and Federal Register Section 280. All required permits were reportedly obtained prior to commencement of excavation activities by Jones and Frank. All underground utility locations in the vicinity of the storage tanks were reportedly located prior to initiating site activities by Jones and Frank personnel. A backhoe was utilized during the excavation and removal of the storage tanks. A photographic record of site activities showing the location of site features and the excavation area is shown in the Appendix.

The site soils consisted of approximately six inches of a brown silty clayey sand (topsoil). The former tank pit was filled with an orange clayey silt to approximately 8 feet below grade. The native soils beneath the storage tanks consisted of a mottled reddish orange and yellow clayey silt (saprolite). Relic metamorphic structures and igneous fabrics were evident within the saprolite. White veins of clay were present throughout the section. Photographs of the site soils are included the Appendix.

Table 1. Summary of Underground Storage Tank Construction and Installation Data

Piedmont Natural Gas Company
 651 North Fayetteville Street
 Asheboro, North Carolina

TANK ID NUMBER	DIMENSIONS (feet)	CAPACITY (gallons)	CONSTRUCTION MATERIAL	DATE INSTALLED	BURIAL DEPTH	OVERFILL/CONTAINMENT	PRODUCT STORED
T1	3.0'D x 10.0'L	550	Steel	1974*	6.5 ft	no/no	gasoline
T2	3.0'D x 10.0'L	550	Steel	1974	6.5 ft	no/no	gasoline

L - Length

D - Diameter

* - Approximate date of installation based on personal communication.

4.0 TANK PIT SAMPLING PROCEDURES

Excavated soils were periodically screened onsite with a field calibrated photoionization detector (PID) for the presence of volatile organic vapors. After each storage tank was removed from the excavation, two soil samples were collected from beneath each tank. One sample was collected from beneath each end of each tank at a depth of approximately two feet beneath the bottom of the excavation (burial depth). In-situ samples were collected from the pit by the backhoe bucket under the direction of Ogden personnel. A composite grab sample from each location was placed in laboratory-prepared glass containers, sealed with minimal head space, labeled, packed on ice with a Chain-of-Custody record and taken to PACE Laboratories, Inc. (Charlotte) for chemical analyses of total petroleum hydrocarbons (TPH) by EPA Methods 5030 (gasoline). A soil sample was also collected and sent for chemical analysis from approximately two feet beneath the product dispenser island. Shallow ground water was not encountered within the excavation at a depth of approximately 8 feet below surface grade. Soils in the bottom of the tank pit were dry in appearance and showed no indication of ground water. A summary of the sampling depths and analytical test results is presented in Table 2. The complete laboratory reports of analysis and associated Chain-of-Custody are included in the Appendix.

Each soil sample retained for chemical analysis was screened onsite with a calibrated photoionization detector (PID) for the presence of volatile organic vapors. The results from the onsite screenings are tabulated in Table 2. The excavation area, as well as each storage tank, was periodically screened for the presence of organic vapors and explosive conditions with a combustible gas indicator (CGI) and oxygen monitor (LEL/O₂). No explosive conditions were noted during excavation activities.

Table 2. Summary of Soil Analytical Sampling Data and Results Summary

Piedmont Natural Gas Company
 651 North Fayetteville Street
 Asheboro, North Carolina

SAMPLE ID NUMBER	SAMPLE DEPTH (ft)	SAMPLE DATE	SAMPLE TIME	TPH 5030 (gasoline)	TPH 3550 (kerosene)	TPH 3550 (diesel)	HYDROCARBON ODOR/ppm
PNG-1	5.0	9/8/92	11:40	<6.0	---	---	none/0.00
PNG-2	8.0	9/8/92	11:45	<6.0	---	---	none/0.00
PNG-3	5.0	9/8/92	12:45	<6.0	---	---	none/0.00
PNG-4	8.0	9/8/92	12:50	<6.0	---	---	none/0.00
PNG-5	2.0	9/8/92	12:55	<6.0	---	---	none/0.00

Less than symbol (<) indicates compound tested for but not detected at indicated quantitation limit.

TPH - Total Petroleum Hydrocarbons.

(gasoline) = gasoline detection.

(kerosene) = kerosene detection.

(diesel) = diesel detection.

Concentrations are in milligrams per kilogram (mg/kg), which are approximately equivalent to parts per million (ppm).

5.0 UST REMOVAL, DISPOSAL AND EXCAVATION BACKFILLING

All storage tanks were checked for the presence of explosive conditions prior to removal with a field calibrated combustible gas indicator (CGI). Each tank was checked prior to removal for any liquids or sludges. Any remaining fuel/sludges were pumped from each tank to at least a 1-inch depth prior to removal. The tanks were loaded and secured onto a special trailer designed for hauling tanks supplied by Southern Tank Disposal Company. Each tank was chained in place prior to leaving the site. A copy of the disposal certificate showing the disposition of each tank removed at the referenced site is included in the Appendix.

Petroleum hydrocarbon impact (based on PID and odor) was not apparent in the soils excavated during closure activities. Therefore, all excavated soils were placed in the former tank pit and supplemented with approximately 10.5 tons of crushed stone. All material (excavated soil and backfill) was placed in the tank pit in 6-inch lifts and compacted with a remote sheeps-foot compactor. No geotechnical compaction performance testing was performed on the fill material. It is recommended that standard geotechnical tests be performed on the tank pit fill material should any foundation or structure be built over the tank pit.

6.0 CONCLUSIONS

The North Carolina Department of Environment, Health and Natural Resources, Division of Environmental Management has set target levels for clean-up of hydrocarbon-impacted soils as follows:

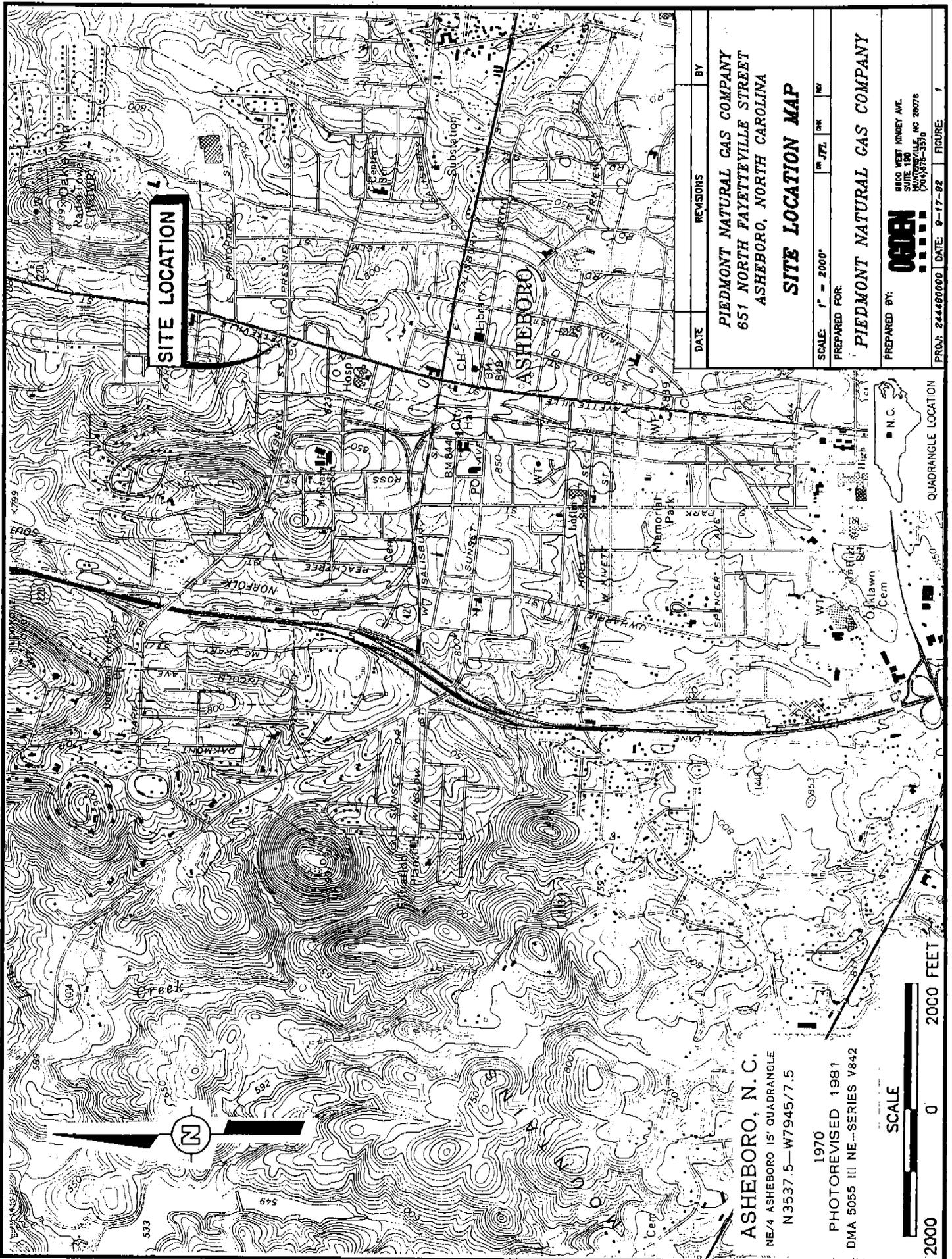
- less than 10 ppm residual TPH - No action required;
- between 10 and 100 ppm residual TPH - Corrective action may be required on site-specific basis;
- greater than 100 ppm residual TPH - Corrective action required.

All soil samples collected from beneath UST and dispenser locations PNG-1 through PNG-5 did not contain petroleum hydrocarbon concentrations in excess of the laboratory method detection limit of 6 ppm. Table 2 summarizes the soil analytical laboratory results. The laboratory reports for all soil samples collected are included in the Appendix.

The site soils consisted of approximately six inches of a brown silty clayey sand (topsoil). The former tank pit was filled with an orange clayey silt to approximately 8 feet below grade. The native soils beneath the storage tanks consisted of a mottled reddish orange and yellow clayey silt (saprolite). Relic metamorphic structures and igneous fabrics were evident within the saprolite. White veins of clay were present throughout the section. The presence of dry soils at the base of the excavation site at a depth of approximately 8 feet below surface grade indicates that the water table aquifer is not present at this depth. Since ground water was not encountered during removal activities, the presence or absence of hydrocarbon-impacted ground water can not be determined from this scope of work. Based on the apparent absence of hydrocarbon-impacted soils, this condition is not likely.

Each storage tank was inspected for the presence of corrosion and pitting prior to being removed from the site for disposal and was found to be in relatively good condition with only minimal corrosion with no visible holes. No evidence of a release was apparent based on the field screenings and site observations.

ILLUSTRATIONS



SITE LOCATION

DATE _____ REVISIONS _____ BY _____
PIEDMONT NATURAL GAS COMPANY
651 NORTH PAYETTEVILLE STREET
ASHEBORO, NORTH CAROLINA
SITE LOCATION MAP
 SCALE: 1" = 2000'
 PREPARED FOR:
PIEDMONT NATURAL GAS COMPANY
 PREPARED BY:
OGDEN
 8800 WEST KINGSLEY AVE.
 SUITE 100
 HANTONVILLE, NC 28078
 (704)875-3570
 PROJ: 244680000 DATE: 9-17-88 FIGURE: 1

ASHEBORO, N.C.
 NE/4 ASHEBORO 15' QUADRANGLE
 N3537.5-W7945/7.5

1970
 PHOTOREVISED 1981
 DMA 5055 III NE--SERIES V842



QUADRANGLE LOCATION

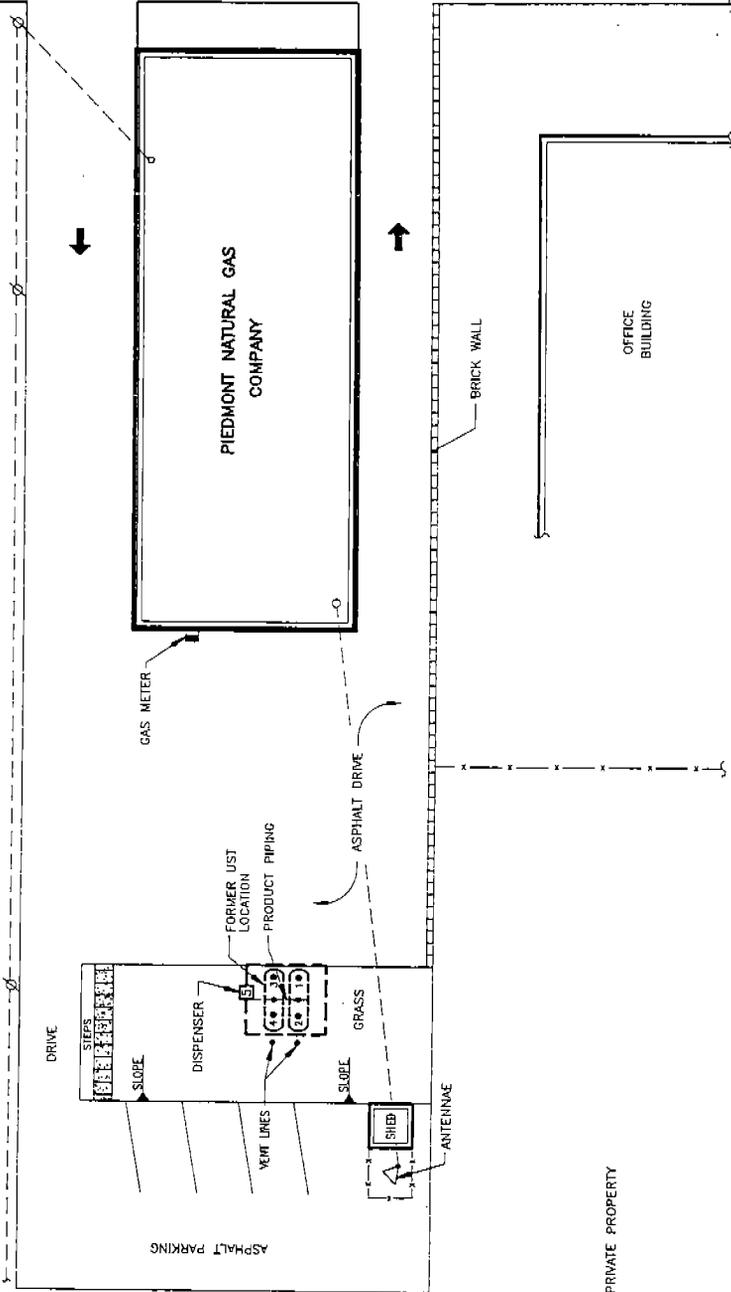
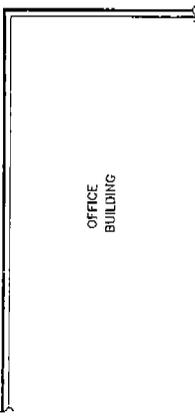
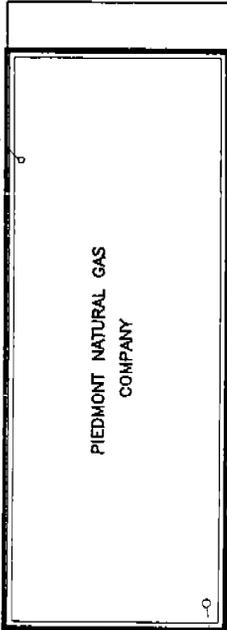
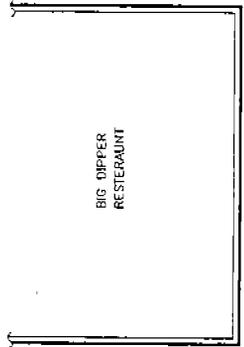
NORTH

LEGEND

- SOIL SAMPLE LOCATIONS
- ⊕ POWER POLE
- OVERHEAD POWER LINE

DATE	REVISIONS	BY
PIEDMONT NATURAL GAS COMPANY 651 NORTH FAYETTEVILLE STREET ASHEBORO, NORTH CAROLINA FACILITY LAYOUT & SAMPLE LOCATIONS		
SCALE:	1" = 20'	1" = 75'
PREPARED FOR:	PIEDMONT NATURAL GAS COMPANY	
PREPARED BY:	JOHN R. HENRY, INC. 2000 W. HARRIS AVENUE WASHINGTON, D.C. 20004	
PROJ. 24428000	DATE: 8-9-88	DRAWING: 7

FAYETTEVILLE ROAD



PRIVATE PROPERTY

CLOSURE DOCUMENTATION AND CERTIFICATE OF DISPOSAL

Notice of Intent: UST Permanent Closure or Change-in-Service

FOR
TANKS
IN
NC

Return Completed Form To:
The appropriate DEM Regional Office according to the county of the facility's location. [SEE REVERSE SIDE OF OWNER'S COPY (BLUE) FOR REGIONAL OFFICE ADDRESS].

State Use Only
I. D. Number _____
Date Received _____

INSTRUCTIONS

Complete and return thirty (30) days prior to closure or change-in-service.

I. OWNERSHIP OF TANK(S)

Tank Owner Name: Piedmont Natural Gas
(Corporation, Individual, Public Agency, or Other Entity)
Street Address: 1915 Rexford Road
County: Mecklenburg
City: Charlotte State: NC Zip Code: 28211
Tele. No. (Area Code): (704) 364-3120

II. LOCATION OF TANK(S)

Facility Name or Company Piedmont Natural Gas
Facility ID # (if available) _____
Street Address or State Road: 651 N. Fayetteville
County: Randolph City: Asheboro Zip Code: 27203
Tele. No. (Area Code): (919) 629-4104

III. CONTACT PERSON

Name: Mike Parrott Job Title: _____ Telephone Number: (704) 364-3120

IV. TANK REMOVAL, CLOSURE IN PLACE, CHANGE-IN-SERVICE

1. Contact Local Fire Marshall.
2. Plan the entire closure event.
3. Conduct Site Soil Assessments.
4. If Removing Tanks or Closing in Place refer to API Publications, 2015 "Cleaning Petroleum Storage Tanks" & 1604 "Removal & Disposal of Used Underground Petroleum Storage Tanks".
5. Provide a sketch locating piping, tanks and soil sampling locations.
6. Fill out form GW/UST-2 "Site Investigation Report for Permanent Closure" and return within 30 days following the site investigation.
7. Keep records for 3 years.

V. WORK TO BE PERFORMED BY:

(Contractor) Name: Jones & Frank Corp
Address: 4240 Morris Field Dr. State: NC Zip Code: 28208
Contact: Lance Holycross Phone: (704) 393-8542

VI. TANK(S) SCHEDULED FOR CLOSURE OR CHANGE-IN-SERVICE

TANK ID#	TANK CAPACITY	LAST CONTENTS	PROPOSED ACTIVITY		
			CLOSURE		CHANGE-IN-SERVICE
			Removal	Abandonment In Place	New Contents Stored
<u>01</u>	<u>550</u>	<u>U/L GAS</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<u>02</u>	<u>550</u>	<u>U/L GAS</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

VII. OWNER OR OWNER'S AUTHORIZED REPRESENTATIVE

Print name and official title
Mike Parrott

Signature: *Mike Parrott* *Scheduled Removal Date: 8-10-92
Date Submitted: 6-15-92

*If scheduled work date changes, notify your appropriate DEM Regional Office 48 hours prior to originally scheduled date.

FOR TANKS IN NC

Return Completed Form To: The appropriate DEM Regional Office according to the county of the facility's location. [SEE MAP ON REVERSE SIDE OF OWNER'S COPY (PINK) FOR REGIONAL OFFICE ADDRESS].

State Use Only I.D. Number Date Received

INSTRUCTIONS

Complete and return within (30) days following completion of site investigation.

I. Ownership of Tank(s)

II. Location of Tank(s)

PIEDMONT NATURAL GAS CO. 1915 REXFORD ROAD MECKLENBURG CHARLOTTE, N.C. 28211 704-364-3120

PIEDMONT NATURAL GAS CO. 651 N. FAYETTEVILLE ST. RANDOLPH ASHEBORO 27203 919-629-4104

III. Contact Person

MIKE PARROTT PNG 704-364-3120 JONES & FRANK CORP. 4240 MORRIS FIELD DR. CHARLOTTE N.C. 704-393-8542 OGDEN ENVIRONMENTAL CO. 9800 WEST KINCEY AV. SUITE 190, HUNTERVILLE N.C. 704-875-3570

IV. U.S.T. Information

V. Excavation Condition

VI. Additional Information Required

Table with 10 columns: Tank No., Size in Gallons, Tank Dimensions, Last Contents, Water in Excavation (Yes/No), Fire Product (Yes/No), Notable Odor or Visible Soil Contamination (Yes/No). Rows 1 and 2 show UL GASOLINE.

See reverse side of pink copy (owner's copy) for additional information required by N.C. - DEM in the written report and sketch.

VII. Check List

Check the activities completed.

- Checklist items: Contact local fire marshal, Notify DEM Regional Office, Drain & flush piping, Remove all product, Excavate down to tank, Clean and inspect tank, etc.

- ABANDONMENT IN PLACE: Fill tank until material overflows, Plug or cap all openings, Disconnect and cap or remove vent line, Solid inert material used - specify: N/A

- REMOVAL: Create vent hole, Label tank, Dispose of tank in approved manner

SOUTHERN TANK & ENVIRONMENTAL

VIII. Certification (Read and Sign)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

Print name and official title of owner or owner's authorized representative

Signature

Date Signed

JOHN R. ISHAM PROJECT MANAGER

John R. Isham

10/8/92

— WE APPRECIATE YOUR BUSINESS —

JAMES WASTE OIL SERVICE
P.O. Box 5651 • Charlotte, NC 28225

FED. ID NO.
56-0934831

Manifest No. JWO-5012

SPECIAL TRANSPORTATION MANIFEST

Purchase Order No. 107907-6

Generator/Location
Industrial National Gas
NAME

Work Contracted by
Bill To
(if different from location)
Jones + Frank
NAME

ADDRESS WHERE SHIPMENT ORIGINATES

ADDRESS

MAILING ADDRESS
157 hood NC
CITY STATE ZIP

Charlotte NC
CITY STATE ZIP

SERVICE/INVOICE SECTION

QTY.	D.O.T. PROPER SHIPPING NAME	DESCRIPTION	GROSS QTY	PRICE	LINE TOTAL
56	COMBUSTIBLE LIQUID, NOS, NA 1993	WASTE WATER & OIL PUMPED FROM TANKS			
	NON-HAZARDOUS WASTE OILY WATER	WASTE COOLANT PUMPED FROM TANKS			
	COMBUSTIBLE LIQUID, NOS, NA 1993	HEAVY EMULSIFIED OIL PUMPED			
	COMBUSTIBLE LIQUID, NOS, NA 1993	OFF SPEC LIGHT OIL			
	COMBUSTIBLE LIQUID, NOS, NA 1993	OFF SPEC #4 OIL			
		SERVICE CHARGE			
		INDIVIDUAL ANALYSIS FOR EACH 55-GALLON DRUM			
		SERVICE CHARGE FOR EACH 55-GALLON DRUM			
		SALES TAX			
		TOTAL			

WASTE SEGREGATION CERTIFICATION

Generator hereby certifies that the information provided above is true and correct. Generator also certifies that the used oils supplied to James Waste Oil will not be mixed, combined, or otherwise blended in any quantity with materials containing polychlorinated biphenyls (PCBs), halogenated solvents, or any other material defined as hazardous waste under 40 CFR Part 261 or applicable State regulations. Generator agrees to indemnify and hold James Waste Oil harmless for any damages, costs, attorneys and experts fees, arising out of or in any way related to a breach of any of the above certifications by Generator.

(SIGNATURE)
[Signature]
By: [Signature] DALTON
(PRINT CUSTOMER'S NAME) (TITLE)

EPA IDENTIFICATION NUMBER									

TO BE COMPLETED BY TRANSPORTER

THIS IS TO CERTIFY THAT THE ABOVE NAMED MATERIALS ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, LABELED AND ARE IN PROPER CONDITION FOR TRANSPORTATION ACCORDING TO THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION AND THE EPA.

TRANSPORTER NAME James Waste Oil Service
ADDRESS P.O. Box 5651, Charlotte, NC 28225
PHONE NUMBER (704) 332-8692 (704) 332-9059

EPA IDENTIFICATION NUMBER												
F	N	C	D	0	4	8	4	6	1	3	7	0

This manifest form does not, in any way, replace the national uniform hazardous waste manifest, which must be used if this transported waste is a hazardous waste.

SIGNATURE OF TRANSPORTER AGENT _____ DATE _____ MO _____ / DAY _____ / YEAR _____

FACILITY INFORMATION AND CERTIFICATE OF DISPOSAL

RECEIVER'S NAME James Waste Oil Service
BUSINESS ADDRESS P.O. Box 5651, Zip 28225
DESTINATION (SITE) ADDRESS 210 Dalton Avenue, Charlotte, NC
FACILITY PHONE NUMBER (704) 332-8692 (704) 332-9059

EPA IDENTIFICATION NUMBER												
F	N	C	D	0	4	8	4	6	1	3	7	0

This is to certify that all non-hazardous material removed from above location has been received and will be disposed of in accordance with applicable local, state, and federal regulations in the following manner:

Petroleum products are blended into a beneficial reuseable fuel for use in large industrial burners.
Waste waters are treated with polymers, pH adjusters, and a flocculant, then flows through a dissolved air flotation system for pretreatment separation before it runs through a large vacuum filter prior to discharge through the ultra-filtration unit, then into the C.M.U.D. sanitary sewer system under permit #0433.
Sludges from these treatment systems are hauled to E.P.A. approved incineration facilities for proper disposal. Manifest and certificate of disposal are on file.
Our treatment system operates on a first in, first out basis and product should be processed within seven days.

SIGNATURE OF FACILITY AGENT _____ DATE _____ MO 10 / DAY 5 / YEAR 2002

WHITE COPY — FACILITY/TRANSPORTER YELLOW COPY — RETURNED TO GENERATOR PINK COPY — GENERATOR



Certificate of Disposal

Date: SEPTEMBER 10, 1992

To: PIEDMONT NATURAL GAS CO.
1915 REXFORD ROAD
CHARLOTTE, N.C. 28211

Location PIEDMONT NATURAL GAS
651 N. FAYETTEVILLE ST.
ASHEBORO, N.C. 27203

The following tanks were removed and disposed of in accordance with API Bulletin 1604 and the Federal Register Section 280:

(2) 550 UL GAS gal. () gal. () gal.
() gal. () gal. () gal.

The tanks were cut into pieces and sold for scrap.

We thank you for your business and look forward to serving you again.

Sincerely,

Lance R. Holycross
Lance R. Holycross
Installation Manager

/dcm

JONES & FRANK CORPORATION
4240 MORRIS FIELD DRIVE
CHARLOTTE, NORTH CAROLINA 28208
(704) 393-8542 FAX (704) 393-8618

PHOTOGRAPHIC RECORD

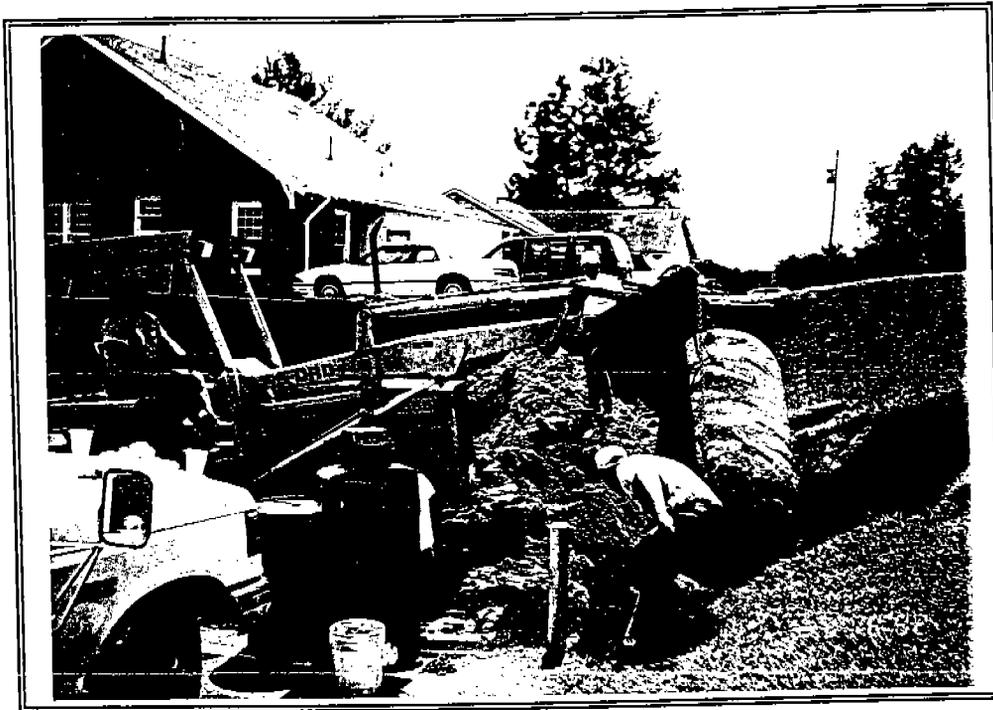


PLATE 1: A backhoe was utilized during underground storage tank (UST) removal. The suction dispenser (foreground), product delivery piping and vent lines were also removed (photo by Ogden).

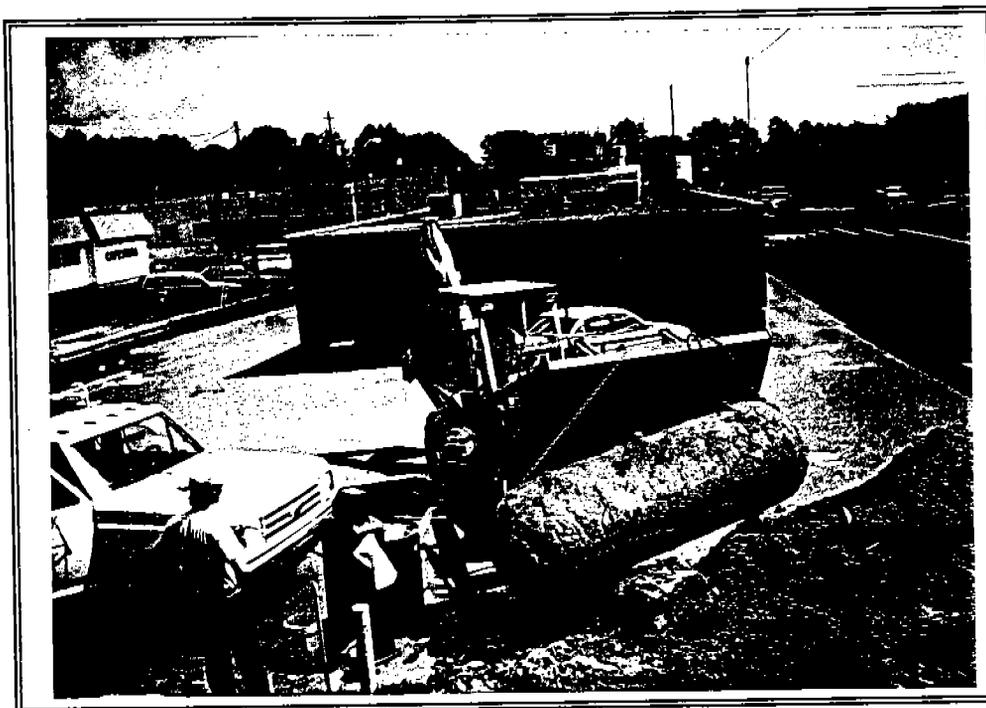


PLATE 2: Each tank was loaded onto a trailer, secured in place and taken to Southern Tank Disposal Company and cut into scrap metal (photo by Ogden).

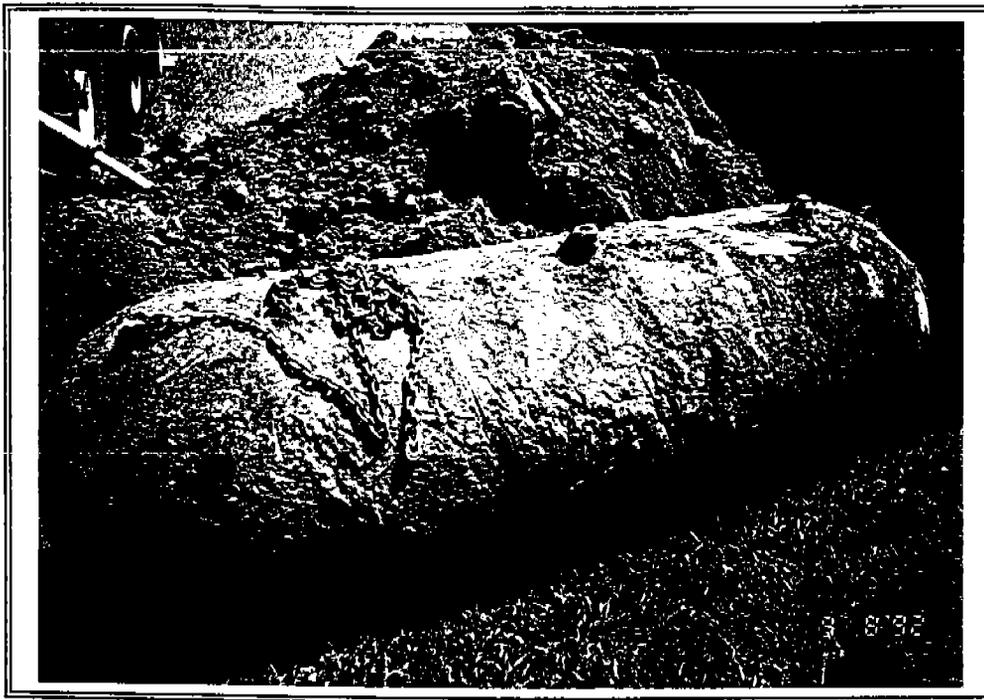


PLATE 3: Each tank was monitored for vapors and inspected for the presence of pitting prior to removal from site (photo by Ogden).

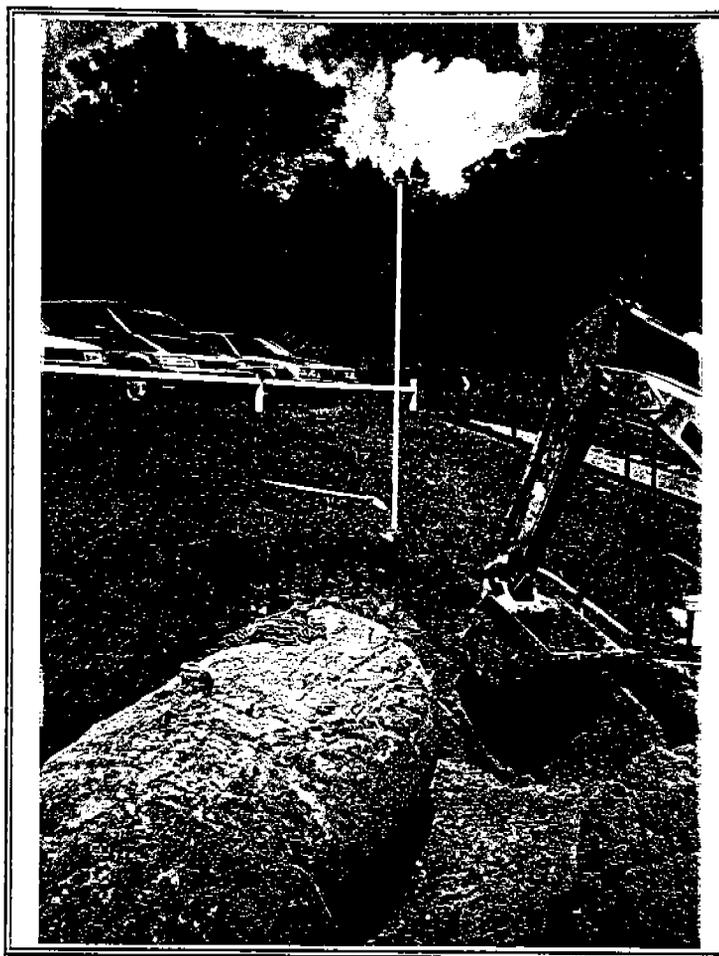


PLATE 4: In-situ soil samples were collected from the ends of each tank using the backhoe (photo by Ogden).

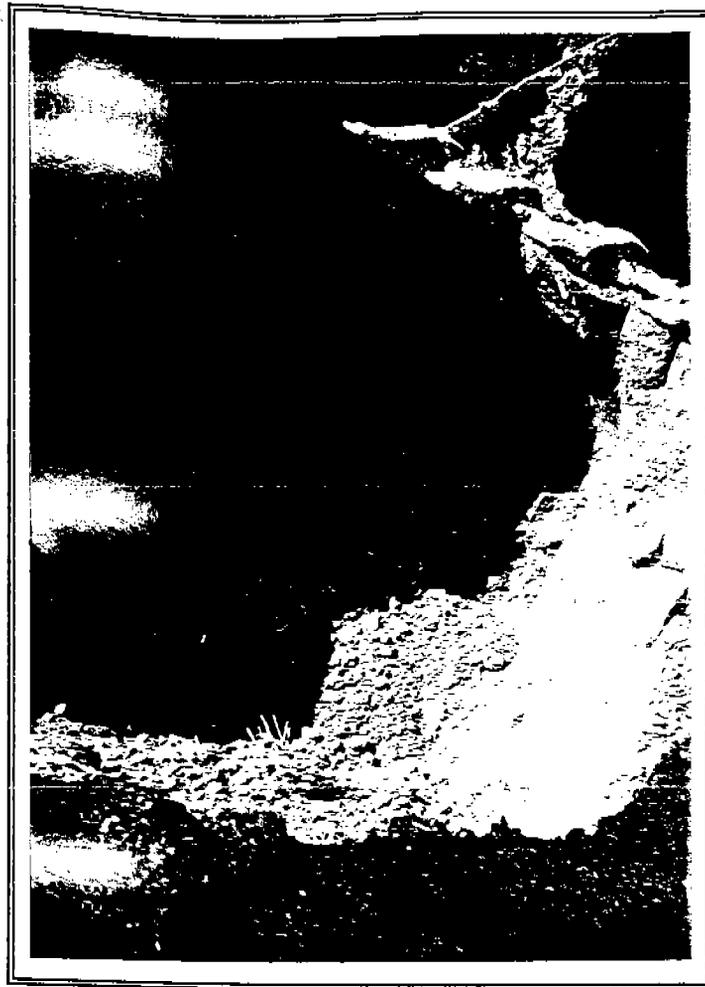


PLATE 5: Reddish-orange clayey silts were encountered during excavation procedures (photo by Ogden).



PLATE 6: The excavation was backfilled with fill material, compacted in place and the area returned to grade (photo by Ogden).

OGDEN

LABORATORY CERTIFICATE OF ANALYSIS REPORTS

September 11, 1992

Mr. John Isham
Ogden Environmental
9800 W. Kinsey Avenue
Suite 190
Huntersville, NC 28078

RE: PACE Project No. 620908.551
Client Reference: Piedmont Gas - Asheboro

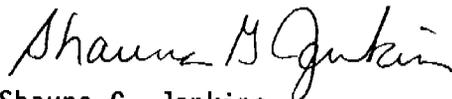
Dear Mr. Isham:

Enclosed is the report of laboratory analyses for samples received September 08, 1992.

Footnotes are given at the end of the report.

If you have any questions concerning this report, please feel free to contact us.

Sincerely,



Shauna G. Jenkins
Project Manager

Enclosures



REPORT OF LABORATORY ANALYSIS

Ogden Environmental
 9800 W. Kinsey Avenue
 Suite 190
 Huntersville, NC 28078

September 11, 1992
 PACE Project Number: 620908551

Attn: Mr. John Isham

Client Reference: Piedmont Gas - Asheboro

PACE Sample Number: 92 0107411
 Date Collected: 09/08/92
 Date Received: 09/08/92
 Client Sample ID: PNG-1 Tank
 Bottom

<u>Parameter</u>	<u>Units</u>	<u>MDL</u>	<u>Sample -1</u>	<u>METHOD</u>	<u>DATE ANALYZED</u>
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ORGANIC ANALYSIS

INDIVIDUAL PARAMETERS

Percent Solids	%	0.01	78		09/09/92
Petroleum Hydrocarbons as Gasoline	mg/kg	6.0	ND	5030/8015	09/09/92

PACE Sample Number: 92 0107420
 Date Collected: 09/08/92
 Date Received: 09/08/92
 Client Sample ID: PNG-2 Tank
 Bottom

<u>Parameter</u>	<u>Units</u>	<u>MDL</u>	<u>Sample -2</u>	<u>METHOD</u>	<u>DATE ANALYZED</u>
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ORGANIC ANALYSIS

INDIVIDUAL PARAMETERS

Percent Solids	%	0.01	75		09/09/92
Petroleum Hydrocarbons as Gasoline	mg/kg	6.0	ND	5030/8015	09/09/92



REPORT OF LABORATORY ANALYSIS

Mr. John Isham
Page 2

September 11, 1992
PACE Project Number: 620908551

Client Reference: Piedmont Gas - Asheboro

PACE Sample Number: 92 0107438
Date Collected: 09/08/92
Date Received: 09/08/92
Client Sample ID: PNG-3 Tank
Bottom

<u>Parameter</u>	<u>Units</u>	<u>MDL</u>	<u>Sample -3</u>	<u>METHOD</u>	<u>DATE ANALYZED</u>
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ORGANIC ANALYSIS

INDIVIDUAL PARAMETERS

Percent Solids	%	0.01	74		09/09/92
Petroleum Hydrocarbons as Gasoline	mg/kg	6.0	ND	5030/8015	09/09/92

PACE Sample Number: 92 0107446
Date Collected: 09/08/92
Date Received: 09/08/92
Client Sample ID: PNG-4 Tank
Bottom

<u>Parameter</u>	<u>Units</u>	<u>MDL</u>	<u>Sample -4</u>	<u>METHOD</u>	<u>DATE ANALYZED</u>
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ORGANIC ANALYSIS

INDIVIDUAL PARAMETERS

Percent Solids	%	0.01	72		09/09/92
Petroleum Hydrocarbons as Gasoline	mg/kg	6.0	ND	5030/8015	09/09/92

Mr. John Isham
 Page 3

September 11, 1992
 PACE Project Number: 620908551

Client Reference: Piedmont Gas - Asheboro

PACE Sample Number: 92 0107454
 Date Collected: 09/08/92
 Date Received: 09/08/92
 Client Sample ID: PNG-5

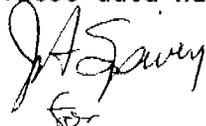
<u>Parameter</u>	<u>Units</u>	<u>MDL</u>	<u>Under Pump</u>	<u>METHOD</u>	<u>DATE ANALYZED</u>
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ORGANIC ANALYSIS

INDIVIDUAL PARAMETERS

Percent Solids	%	0.01	78		09/09/92
Petroleum Hydrocarbons as Gasoline	mg/kg	6.0	ND	5030/8015	09/09/92

These data have been reviewed and are approved for release.



John T. Stimus
 Manager, Organic Chemistry

Mr. John Isham
Page 4

FOOTNOTES
for pages 1 through 3

September 11, 1992
PACE Project Number: 620908551

Client Reference: Piedmont Gas - Asheboro

MDL Method Detection Limit
ND Not detected at or above the MDL.

Mr. John Isham
 Page 5

QUALITY CONTROL DATA

September 11, 1992
 PACE Project Number: 620908551

Client Reference: Piedmont Gas - Asheboro

Petroleum Hydrocarbons as Gasoline

Batch: 92 13774

Samples: 92 0107411, 92 0107420, 92 0107438, 92 0107446, 92 0107454

METHOD BLANK:

<u>Parameter</u>	<u>Units</u>	<u>MDL</u>	<u>Method Blank</u>
Petroleum Hydrocarbons as Gasoline	mg/kg	6.0	ND

SPIKE AND SPIKE DUPLICATE:

<u>Parameter</u>	<u>Units</u>	<u>MDL</u>	<u>920107330</u>	<u>Spike</u>	<u>Spike Recv</u>	<u>Spike Dupl Recv</u>	<u>RPD</u>
Petroleum Hydrocarbons as Gasoline	mg/kg	6.0	ND	130	92%	85%	7%

LABORATORY CONTROL SAMPLE:

<u>Parameter</u>	<u>Units</u>	<u>MDL</u>	<u>Reference Value</u>	<u>Recv</u>
Petroleum Hydrocarbons as Gasoline	mg/kg	6.0	63	113%

REPORT OF LABORATORY ANALYSIS

Mr. John Isham
 Page 5

QUALITY CONTROL DATA

September 11, 1992
 PACE Project Number: 620908551

Client Reference: Piedmont Gas - Asheboro

Petroleum Hydrocarbons as Gasoline

Batch: 92 13774

Samples: 92 0107411, 92 0107420, 92 0107438, 92 0107446, 92 0107454

METHOD BLANK:

Parameter	Units	MDL	Method Blank
Petroleum Hydrocarbons as Gasoline	mg/kg	6.0	ND

SPIKE AND SPIKE DUPLICATE:

Parameter	Units	MDL	920107330	Spike	Spike Recv	Spike Dupl Recv	RPD
Petroleum Hydrocarbons as Gasoline	mg/kg	6.0	ND	130	92%	85%	7%

LABORATORY CONTROL SAMPLE:

Parameter	Units	MDL	Reference Value	Recv
Petroleum Hydrocarbons as Gasoline	mg/kg	6.0	63	113%

Mr. John Isham
Page 6

FOOTNOTES
for page 5

September 11, 1992
PACE Project Number: 620908551

Client Reference: Piedmont Gas - Asheboro

MDL Method Detection Limit
ND Not detected at or above the MDL.
RPD Relative Percent Difference

DATE: 9/08/92
6:30 PMP A C E
NORTH CAROLINA REGION

PAGE: 1

Sample and Analysis Data Entry Form - New Sample(s)

Ogden Environmental
Mr. John Isham
9800 W. Kinsey Avenue
Suite 190
Huntersville, NC. 28078Client No : 611682
: Client Contact
: Address

704-875-3570

: Telephone No

Project No: 620908.551 Due Date: 9/15/92 Client P.O. No: 244460000000
Project Manager: SGJ Project Name: Piedmont Gas - Asheboro
Manager's Name: Shauna G. Jenkins
Project Type: U UST
QC Level: B Report Style: m
Desc:Sample No: 92 010741.1 Collected Date: 9/08/92 Collected By: E. NUNNALLY
Lab Rec'd Date: 9/08/92 Checked-In By: SGJ Priority: 4
Due Date: 9/15/92 Sample Desc: PNG-1 Tank Bottom Sample -1
Bottle Types: GN
Comnt: RUSH: DUE 9/15/92 Matrix: SOLID
Analysis Abbr: Name:
%GS Percent Solids
THC-GS Petroleum Hydrocarbons as GasolineSample No: 92 010742.0 Collected Date: 9/08/92 Collected By: E. NUNNALLY
Lab Rec'd Date: 9/08/92 Checked-In By: SGJ Priority: 4
Due Date: 9/15/92 Sample Desc: PNG-2 Tank Bottom Sample -2
Bottle Types: GN
Comnt: RUSH: DUE 9/15/92 Matrix: SOLID
Analysis Abbr: Name:
%GS Percent Solids
THC-GS Petroleum Hydrocarbons as GasolineSample No: 92 010743.8 Collected Date: 9/08/92 Collected By: E. NUNNALLY
Lab Rec'd Date: 9/08/92 Checked-In By: SGJ Priority: 4
Due Date: 9/15/92 Sample Desc: PNG-3 Tank Bottom Sample -3
Bottle Types: GN
Comnt: RUSH: DUE 9/15/92 Matrix: SOLID
Analysis Abbr: Name:
%GS Percent Solids
THC-GS Petroleum Hydrocarbons as Gasoline

PACE, Inc. reserves the right to return all samples at its discretion.

DATE: 9/08/92
6:30 PM

P A C E
NORTH CAROLINA REGION

PAGE: 2

Sample and Analysis Data Entry Form -- New Sample(s)

Ogden Environmental
Mr. John Isham
Project No: 620908.551 Due Date: 9/15/92 Client P.O. No: 244460000000
Client No : 611682
: Client Contact

Sample No: 92 010744.6 Collected Date: 9/08/92 Collected By: E. NUNNALLY
Lab Rec'd Date: 9/08/92 Checked-In By: SGJ Priority: 4
Due Date: 9/15/92 Sample Desc: PNG-4 Tank Bottom Sample -4
Bottle Types: GN
Comnt: RUSH: DUE 9/15/92 Matrix: SOLID
Analysis Abbr: Name:
%GS Percent Solids
THC-GS Petroleum Hydrocarbons as Gasoline

Sample No: 92 010745.4 Collected Date: 9/08/92 Collected By: E. NUNNALLY
Lab Rec'd Date: 9/08/92 Checked-In By: SGJ Priority: 4
Due Date: 9/15/92 Sample Desc: PNG-5 Under Pump
Bottle Types: GN
Comnt: RUSH: DUE 9/15/92 Matrix: SOLID
Analysis Abbr: Name:
%GS Percent Solids
THC-GS Petroleum Hydrocarbons as Gasoline

DATE: 9/08/92
6:30 PM

P A C E
NORTH CAROLINA REGION

PAGE: 1

SAMPLE CONDITION UPON RECEIPT CHECKLIST

Client: Ogden Environmental
Project: 620908551
Date Received: 9/08/92
Samples Received By: SGJ

1. Is there a chain of custody (COC) or letter stating information contained on COC? YES
2. Is the date and time relinquished in agreement with that written on the letter or COC? YES
3. Do the samples received agree with the COC or accompanying paperwork (i.e. number of samples, matrices, sample tags, sample containers, analyses, etc.)? YES
4. Are all the samples within the holding times for requested analyses? Communicate any lapse of greater than 4 days beyond date of collection for VOA analysis. YES
5. Are all the sample containers intact (i.e., not broken, leaking, etc.)? YES
6. Are the sample at the proper temperature? YES
7. Is there enough sample to do all the analyses? YES
8. Are the samples preserved correctly? YES
9. Are the VOA vials head-space free? YES

'NO' Items Explained:

CHAIN-OF-CUSTODY RECORD
Analytical Request

Client: COVEN ENVIRONMENTAL
 Report To: JOHN R ISHAM
 Address: 7800 W. KINCKY AVE, STE 190
 Bill To: SAME AS LEFT
PLUMESVILLE, MO 64078
 P.O. # / Billing Reference: 2-4446-0000-0000
 Pace Client No. 611682
 Pace Project Manager SGJ
 Pace Project No. 620908, 551
 Project Name / No. FREDMONT GAS - ASHES
 Requested Due Date: NORMAL

NO. OF CONTAINERS	PRESERVATIVES				ANALYSES REQUEST	REMARKS
	UNPRESERVED	H ₂ SO ₄	HNO ₃	VOA		
					METHOD 500	

ITEM NO.	SAMPLE DESCRIPTION	TIME	MATRIX	SHIPMENT OUT / DATE	METHOD RETURNED / DATE	ITEM NUMBER	RELINQUISHED BY / AFFILIATION	ACCEPTED BY / AFFILIATION	DATE	TIME
1	TANK BOTTOM SAMPLE - 1 PNG-1	9/8/92	SOIL		107411	1				
2	TANK BOTTOM SAMPLE - 2 PNG-2		SOIL		107420	1				
3	TANK BOTTOM SAMPLE - 3 PNG-3		SOIL		107438	1				
4	TANK BOTTOM SAMPLE - 4 PNG-4		SOIL		107446	1				
5	Under Pump PNG-5		SOIL		107454	1				
6										
7										
8										

Sampled By (PRINT): E.S. Nunnally
 Sampler Signature: E.S. Nunnally
 Date Sampled: 9/8/92
 COOLER NOS. _____
 BAILERS _____
 SHIPMENT OUT / DATE _____
 METHOD RETURNED / DATE _____
 ITEM NUMBER: 1-2 E.S. Nunnally DAF
 RELINQUISHED BY / AFFILIATION: _____
 ACCEPTED BY / AFFILIATION: 9/8 4:20
 DATE: _____
 TIME: _____

Additional Comments