



eDEP Transaction # 255499,256461

August 7, 2009

Commonwealth of Massachusetts
Department of Environmental Protection
Western Regional Office
436 Dwight Street, Suite 500
Springfield, Massachusetts 01103

**RE: Response Action Outcome Retraction & Post Audit Completion Statement
Sunoco Station, 88-90 South Maple Street
Westfield, Massachusetts 01103
DUNS: 0374-5593
MA DEP RTN: 1-15718
NON WE-09-3A035
File No. 5795-05**

To Whom It May Concern:

On behalf of Sunoco, Inc. (R & M) [Sunoco], Corporate Environmental Advisors, Inc. (CEA) presents this *Response Action Outcome Retraction* (RAOR) and *Post-Audit Completion Statement* (PACS) for the above location, prepared in accordance with the *Notice of Audit Findings/Notice of Noncompliance* (NOAF/NON) issued to Sunoco by the Massachusetts Department of Environmental Protection (MassDEP) on May 1, 2009. A Class A-3 Response Action Outcome (RAO) was filed with MassDEP on March 28, 2008.

Polychlorinated biphenyls (PCBs) were detected in unpaved, surficial soils at the site at concentrations above 10 milligrams per kilogram (mg/kg) as part of post-audit assessment activities. MassDEP was notified of these findings as a possible Imminent Hazard Condition within two hours of obtaining knowledge on June 15, 2009, in accordance with 310 CMR 40.0312(2). Subsequent Imminent Hazard Evaluations (IHE) submitted on June 25, 2009 and August 3, 2009 indicated that no Imminent Hazard exists in relation to the detection of PCBs in surficial soil. A Release Notification Retraction (RNR) was submitted on August 3, 2009.

Based on the recent 2009 PCB data, the Method 3 Risk Characterization that was completed for the site in 2008 is no longer valid; therefore, the March 28, 2008 Class A-3 RAO is hereby retracted with this submittal. The *Notice of Activity and Use Limitation* (AUL) recorded on March 6, 2008 with the Hampden County Registry of Deeds was terminated on August 5, 2009. The *Termination of Notice of AUL* was submitted to MADEP on August 6, 2009. A Tier Classification Submittal is being submitted under a separate transaction as required by the May 1, 2009 NOAF.

Please contact me at (508) 835-8822 if you have any questions or comments on this submittal.

Sincerely,
Corporate Environmental Advisors, Inc.

Scott VanderSea, LSP, LEP
Principal Hydrogeologist

cc: Mr. William J. Brochu, Sunoco, Inc (R & M), PO Box 4209, Concord, NH 03302-4209

ADDRESS Hartwell Business Park
127 Hartwell Street, West Boylston, MA 01583
TEL 508.835.8822 | 800.358.7960
FAX 508.835.8812
WEB www.cea-inc.com

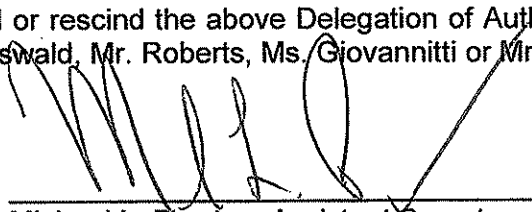
Sunoco, Inc.
Assistant Secretary's Certificate In Lieu Of A Resolution

I, Michael L. Preston, the duly elected and qualified Assistant Secretary of Sunoco, Inc., a corporation organized under the laws of the Commonwealth of Pennsylvania ("Sunoco" or the "Company"), do hereby certify that:

1. Sunoco's Management Control Process Policy ("Policy") was duly adopted by a resolution of the Company's Board of Directors ("Board"), at a meeting duly called and held on March 2, 2006, at which a quorum was present and acting throughout; such resolution has not been amended, modified or revoked and remains in full force and effect.
2. Pursuant to the Delegation of Authority provisions of said Policy, the Board has delegated to the Chief Executive Officer (the "CEO") the authority for stewardship responsibilities with respect to the execution of access agreements, discharge monitoring reports, NPDES permits, notifications of release, deed notices, and permits on behalf of Sunoco and/or any of its subsidiaries including but not limited to Sunoco, Inc. (R&M).
3. Further pursuant to the Delegation of Authority provisions of said Policy, at the discretion of the CEO, the CEO may delegate in writing all or portions of the authority granted to the CEO.
4. Under said Delegations of Authority, the CEO has delegated to Robert W. Owens, Senior Vice President, Marketing, the authority for stewardship responsibilities with respect to the execution of access agreements, discharge monitoring reports, NPDES permits, notifications of release, deed notices, and permits on behalf of Sunoco and/or any of its subsidiaries including but not limited to Sunoco, Inc. (R&M).
5. Further under said Delegations of Authority, Mr. Owens has delegated to Cynthia A. Archer, Vice President, Marketing and Development the authority for stewardship responsibilities with respect to the execution of access agreements, discharge monitoring reports, NPDES permits, notifications of release, deed notices, and permits on behalf of Sunoco and/or any of its subsidiaries including but not limited to Sunoco, Inc. (R&M).
6. Further under said Delegations of Authority, Ms. Archer has delegated to Richard E. Oswald, Director, Technical Services the authority for stewardship responsibilities with respect to the execution of access agreements, discharge monitoring reports, NPDES permits, notifications of release, deed notices, and permits on behalf of Sunoco and/or any of its subsidiaries including but not limited to Sunoco, Inc. (R&M).
7. Further under said Delegations of Authority, Mr. Oswald has delegated to Joseph W. Roberts, Manager, Environmental Services, the authority for stewardship responsibilities with respect to the execution of access agreements, discharge monitoring reports, NPDES permits, notifications of release, deed notices, and permits on behalf of Sunoco and/or any of its subsidiaries including but not limited to Sunoco, Inc. (R&M).
8. Further under said Delegations of Authority, Joseph W. Roberts has delegated to

Rhonda M. Giovannitti, Senior Environmental Consultant the authority for stewardship responsibilities with respect to the execution of access agreements, discharge monitoring reports, NPDES permits, notifications of release, deed notices, and permits on behalf of Sunoco and/or any of its subsidiaries including but not limited to Sunoco, Inc. (R&M).

9. Further under said Delegations of Authority, Rhonda M. Giovannitti has delegated to William Brochu, Senior Environmental Specialist the limited authority for stewardship responsibilities with respect to the execution of access agreements, discharge monitoring reports, NPDES permits, notifications of release, deed notices, and permits on behalf of Sunoco and/or any of its subsidiaries including but not limited to Sunoco, Inc. (R&M).
10. No action has been taken to amend or rescind the above Delegation of Authority to the CEO, Mr. Owens, Ms. Archer, Mr. Oswald, Mr. Roberts, Ms. Giovannitti or Mr. Brochu.



Michael L. Preston, Assistant Secretary

October 22, 2007
Philadelphia, PA

[Corporate Seal]