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**Sun Company, Inc.**  
Ten Penn Center  
1801 Market Street  
Philadelphia PA 19103-1699

March 30, 1999

Cynthia Nadolski, Esq.  
U. S. Environmental Protection Agency  
Region VII  
1650 Arch Street  
Philadelphia, PA 19103-2029

Re: Welsh Road Superfund Site  
a/k/a Welsh Road/Barkman Landfill Site

Dear Ms. Nadolski:

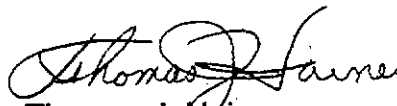
Mr. Abraham Ferdas' letter to Mr. Robert Campbell of Sun Company, Inc. (R&M) (Sun) was forwarded to my office.

As EPA's files should reflect, Sun had previously responded to the interview summaries by people allegedly familiar with the landfill which were sent to Sun by the Agency. Sun does not believe that these summaries provided information which would establish a nexus between Sun and the site, and in fact, the majority of the interviewees indicated that they had no knowledge of Sun using this site.

Although Sun recognizes the significance of a Section 106 Order, it does not believe that a nexus has been shown between Sun and the site. Consequently, it will not agree to participate in the implementation of the ROD.

If you have any questions or additional documents you wish Sun to review, please contact me at (215) 977-6273.

Sincerely,

  
Thomas J. Haines  
Senior Attorney

TJH/ln  
cc: C. D. Barksdale, Jr.  
J. C. Wilson