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NORTH CAROLINA
Environmental Quality

February 23, 2023

Gary Babb, P.G.
Babb & Associates, P.A.
Seaboard Group II and City of High Point
5506 Bradford Pear Ct.
Raleigh, NC 27606

Re: Review of 2022 Annual Monitoring Report
Seaboard Group II and the City of High Point, dated December 12, 2022
Former Seaboard Chemical and Riverdale Drive Landfill Site
Jamestown, Guilford County, North Carolina
EPA ID# NCD071574164

Dear Mr. Babb,

The Hazardous Waste Section (HWS) of the Division of Waste Management have reviewed the referenced document submitted to the HWS on December 12, 2022. Based upon our review, we offer the following comments.

Section 1.2 – Site Geology:

Reference a figure that shows the location of geologic features or identify well locations to orient the reader to where the features are located. Items in this section where better orientation is needed for the reader or where incorrect wells appear to be stated in the text include the following:

- Southern Intermittent Stream (SIS) Fault. Does the fault trend (or contain) the open ditched portion of the SIS from SW-5 to SW-3 as shown on Figure 3? If yes, use these sample locations or wells near the locations for reference.

- Seaboard Dike. Text indicates that the dike runs from the former Seaboard facility past PW-13i and then runs north of the Deep River. Does it continue to trend N-NE between the near-vertical river segment and PW-14D shown on Figure 2?

- PW-5D Dike/Fault. The text references PW-8S on the east side of the Seaboard site. This well is not shown on the Figures. PW-5D is located south of the river (Figure 2) while the text indicates that it is located north of the river.

- Regional Fault/Dike. Text indicates that it trends north of the Deep River. Is it inferred to pass through or by PW-16D?

Section 2.1 – Groundwater Monitoring Network and **Figure 2** – Groundwater Monitoring Well Locations

Well PW-SF1 is referenced in the Section but is not shown on Figure 2.

Section 5.0 – Hydrogeological Conditions

The third paragraph references an extraction rate/capture zone test that was completed using well PW-DR01. This well is not shown on any of the figures.

Figures 5 and 6 – Iso-concentration maps for 1,4-dioxane and total VOCs

The contaminant plumes for 1,4-dioxane (1,4-D), total VOCs and chlorobenzene in bedrock extend across the Deep River under the land in the regulated buffer of the Piedmont Triad Regional Water Authority, as evidenced by concentrations above the NC Groundwater Quality Standard (2L Standards) at MW-15D and PW-16D. The concentrations for 1,4-D, chlorobenzene and the VOCs in groundwater have decreased over the last five years after the remediation system became fully operational. However, the concentrations remain above the 2L Standards. Upgrades to the remediation system were described in *Technical Memorandum E-11* (TM E-11) submitted to the HWS on February 3, 2022 and approved on March 8, 2022 after additional information was provided. New extraction wells were installed and operational by June 2022. The Seaboard Group II and the City of High Point (Seaboard Group) submitted two quarterly progress reports after the extraction wells were started, covering the period June to December 2022. Data in the second quarterly report, dated February 13, 2023, indicates that total VOCs and 1,4-D are decreasing at several bedrock wells in the SIS basin area.

Seaboard Group II and the City of High Point should continue to monitor the contaminant concentrations in wells across the Deep River along with well MW-12b, in the northwest part of the plume. At well MW-12b, the contaminant concentrations have not decreased as much over the last five years.

Table 1 – Well MW-17 (WSW-1) is listed in the table but not shown on any of the figures. Where is it located?

Please respond to the comments in this letter through submittal of a revised 2022 annual monitoring report. Please contact us if you have any questions or comments about this letter.

Eric B. Aufderhaar, Project Manager
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