



February 29, 2024

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 2023 Annual Monitoring Report
Seaboard Group II and the City of High Point, dated January 16, 2024
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 has reviewed the referenced document submitted to the HWS on January 16, 2024. Babb & Associates, P.A. prepared and submitted the report on behalf of Seaboard Group II and the City of High Point (SG parties). Both the former Seaboard Chemical facility and the former Riverdale Landfill were operated adjacent to each other, and past operations have impacted groundwater and surface water around the property. For assessment and remediation purposes, the "Site" encompasses the combined footprints of the two facilities. Based upon our review of the 2023 annual monitoring report, we offer the following comments.

Table 1, Monitoring Well Construction Information and Groundwater Elevations.

Table 1 spans 30 pages and lists groundwater elevations obtained at the site back to 2000. Action Item: In future reports documenting annual monitoring events, edit the table to list only data from well gauging events back to 2010. (Most wells appear to have at least a few groundwater elevations from gauging events between 2010 and 2012, when most site monitoring wells were sampled). At the bottom of the table, include a note directing the reader to the 2023 report to obtain groundwater level measurements prior to 2010.

Section 5.2.1 – Groundwater Analytical Results and Figures 5 through 9

- Well PW-SF-1 and its associated contaminant concentrations are not shown on any of the isoconcentration maps. This well has the highest concentration of 1,4-dioxane and vinyl chloride among the wells sampled during the 2023 annual event. Action Item: Revise the five isoconcentration maps to include the results from sampling of well PW-SF-1.
- The isoconcentration maps do not show the results for contaminants of concern (COCs) detected in the samples from each monitoring well installed as part of a well cluster. A comparison of the



lab results table with each isoconcentration map indicates that Babb & Associates labeled the well in each well cluster that had the highest concentration. Action Item: Place a note on each figure indicating that this approach was used for displaying the results.

- The contaminant plumes for total volatile organic compounds (VOCs), chlorobenzene and vinyl chloride in bedrock extend beneath the Deep River and under the land within the regulated buffer of the Piedmont Triad Regional Water Authority (PTRWA). This contamination is evidenced by concentrations above the NC Groundwater Quality Standards (2L Standards) at PW-15D and PW-16D. The concentrations and total VOCs in groundwater have decreased in the wells since the remediation system became fully operational in 2017. However, the concentrations for chlorobenzene and vinyl chloride remain above the 2L Standards.
- A November 2007 figure produced by ERM NC, PRC (Figure 2, *Site Map and Monitoring Locations*), shows a bedrock monitoring well (PW-19) located about 920 feet east-northeast of well pair PW-6i/6D. This property is labelled as owned by the City of High Point and the “Former Stone Property”. The PW-19 well location appears potentially downgradient of the northeasterly plume orientations shown on the maps. Action Item: Document the condition of well PW-19 and access to the well for potential future sampling.
- On December 11, 2023 the HWS requested that the SG parties update the receptor survey for the Site. The findings from the updated receptor survey are anticipated in late March 2024. Action Item: In the receptor survey text, document the current occupancy and ownership status of the properties on the other side of the PTRWA buffer where the former property owners once provided access to sample monitoring wells PW-18 and PW-19. These wells were last sampled in January 2019 and 2015, respectively.¹ Total VOCs in the sample collected from PW-18 were measured at an estimated concentration of 24 J ug/l (“J” qualified by the lab). A common laboratory contaminant, acetone, composed 17 of the 24 ng/l. Contaminants were not detected above the quantitation limit in the sample collected in 2015 from PW-19.

Please respond to the comments in this letter through submittal of revised isoconcentration maps that include well PW-SF-01. After February 29, 2024, until further notice, please address correspondence to Kim Caulk, Facilities Management Branch Head along with Jackie Drummond. The remaining action items may be addressed in the upcoming receptor survey update and future monitoring reports. Please contact us if you have any questions or comments about this letter.



Eric B. Aufderhaar, Project Manager
Facilities Management Branch, Hazardous Waste Section
Division of Waste Management, NC DEQ

cc: Craig Coslett, de maximis, Inc.
Jackie Drummond, Solid Waste Section
Kim T. Caulk, Facilities Management Branch Head, Hazardous Waste Section

¹ Documents in the regulatory file and verbal communication with the SG parties indicate that subsequent requests for permission to sample the well were unsuccessful despite repeated attempts over several years.

