

ROY COOPER
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MICHAEL SCOTT
Director



September 18, 2023

R. Craig Coslett, Project Coordinator
Seaboard Group II and the City of High Point
c/o de maximis, Inc.
1550 Pond Road, Suite 120
Allentown, PA 18103

Re: *PFAS Monitoring Workplan Approval with Conditions*
Seaboard Group II and the City of High Point
Former Seaboard Chemical and Riverdale Drive Landfill Site
Jamestown, Guilford County, North Carolina
EPA ID# NCD071574164
Solid Waste Section Permit No.: 4101-MSWLF-1979

Dear Mr. Coslett,

Both the Hazardous Waste Section (HWS) and the Solid Waste Section (SWS) of the Division of Waste Management (DWM) have reviewed the *Technical Memorandum No. E-12 – PFAS Monitoring Workplan* dated September 11, 2023. The DWM is requiring the Former Seaboard Chemical and Riverdale Drive Landfill Site to conduct PFAS monitoring in addition to the routine water quality monitoring beginning with the Fall 2023 monitoring event as indicated during our August 2, 2023 call and in the DWM letter dated August 10, 2023. The Seaboard Group II and the City of High Point have proposed the following groundwater monitoring wells and surface water sampling locations for a standalone one-time PFAS sampling event using EPA Method 1633: MW-1, MW-12A, MW-3C, PW-6I, MW-10, SW-2, and SW-4.

Based upon a review of the document, the DWM approves the proposed five groundwater monitoring wells and two water sampling locations. However, the DWM is also requiring the sampling of groundwater monitoring wells W-4A and PW-3D during this PFAS standalone event in addition to requiring a confirmatory PFAS sampling event using EPA Method 1633 to include MW-1, MW-12A, MW-3C, PW-6I, MW-10, W-4A, PW-3D, SW-2, and SW-4. Well PW-3D is a deep bedrock well and a passive sampling device (e.g. HydraSleeve) is approved for sampling provided that the device and associated equipment are PFAS free and an equipment blank is also collected and tested for PFAS by EPA Method 1633.



North Carolina Department of Environmental Quality | Division of Waste Management
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From the August 2, 2023 meeting, the DWM understands that surface water sampling of Randleman Lake for PFAS is being planned by the Piedmont Triad Water Authority. In the August 10, 2023 letter, the Workplan was to include the sharing of the results of the surface water sampling with DWM, and the submitted Workplan did not mention those results. Please provide those results to the DWM at your earliest opportunity.

Please contact us if you have any questions or concerns.

Sincerely,



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

cc: Ed Mussler, Solid Waste Section Chief
Kim Caulk, Facilities Management Branch Head, Hazardous Waste Section
Perry Sugg, Environmental Compliance Branch Head, Solid Waste Section
Jackie Drummond, Hydrogeologist, Solid Waste Section
Gary Babb, Babb & Associates

