SEABOARD GROUP II AND THE CITY OF HIGH POINT

November 17, 2023

Eric B. Aufderhaar, P.G., Environmental Program Consultant
North Carolina Department of Environmental Quality
Division of Waste Management
1646 Mail Service Center
Raleigh, North Carolina 27699-1646

Re: Response to Comments on TM-11 Fourth Quarter and Final Summary Report
Former Seaboard Chemical and Riverdale Drive Landfill Site
Jamestown, Guilford County, North Carolina
EPA ID No. NCD071574164/ Solid Waste Permit No. 4101-MSWLF-1979

Dear Mr. Aufderhaar:

In response to NC DEQ email comments received on the TM-11 Fourth Quarter and Final Summary Report dated November 3, 2023, the Seaboard Group/City of High Point (Parties) provide the following response:

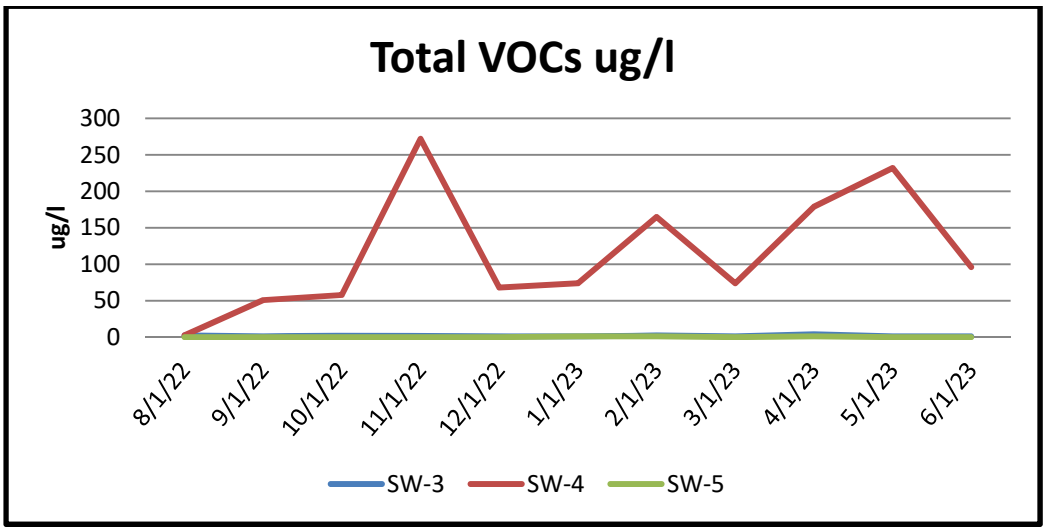
1. Comment: On Figure 2 for the Pond 3 area spikes in total VOC concentrations are shown for samples from OW-SF1 for Q1 and Q3. In the SIS Basin part of the report, Section 3.2, you indicated that the spikes in concentration were attributed to inefficiencies in operation of the RW-SIS7 pump in that the pump and discharge line were susceptible to iron fouling which limited the extraction rate. Have the pump and discharge line in OW-SF1 also had iron fouling problems?

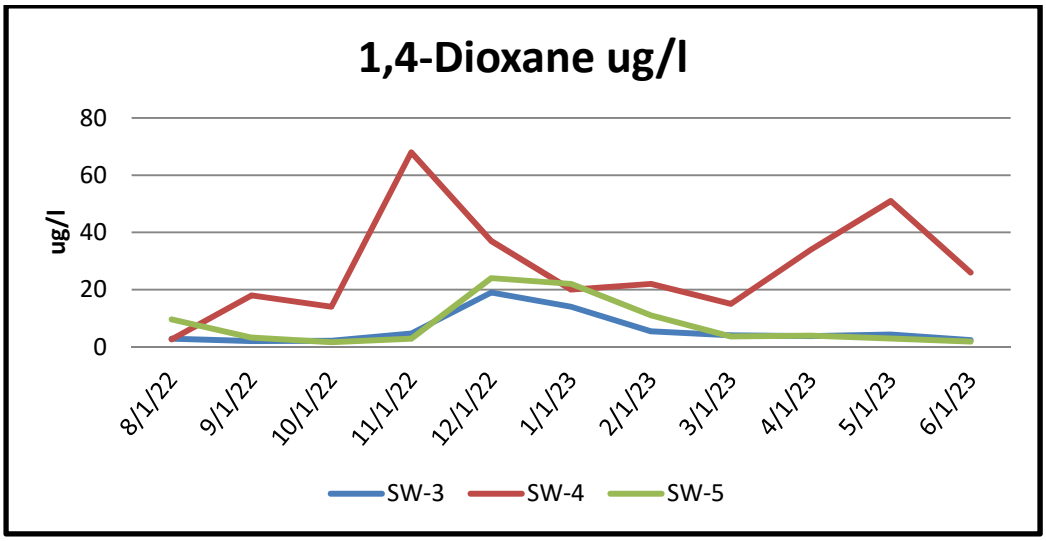
   Response: We do have iron fouling at OW-SF1, the pump and discharge line in this extraction well have required cleaning. We have recently replaced the pump and discharge line in this well with a higher capacity pump and discharge line with a larger diameter to help with fouling and improve the extraction rate. However, the iron fouling at the Pond 3 Area is minor compared to the SIS Basin Area, likely due to the presence of inorganics in the groundwater at the SIS Basin Area.

   The flow rate in all of the extraction wells is monitored weekly, if a drop-off is noted in the pumping rate the cause is investigated and addressed.

2. Comment: In Section 3.2 and in Section 5 (Conclusions and Recommendations), you indicated that the expanded groundwater capture zone at the SIS basin appears to have improved Surface Water Quality at the SW-4 monitoring location and the graph for 1,4-dioxane is shown on Page 7. Did the laboratory test samples of SW-4 for VOCs during one or more of the four quarters, and if yes, did VOC concentrations trend downward?

Response: A comparison of the historical total VOCs and 1,4-dioxane in the surface water samples in the SIS drainage basin during the Extraction System Evaluation is provided below:





As shown on the graphs, total VOCs exhibited decreasing concentration trends similar to decreasing trends observed for 1,4-dioxane.

3. Comment: The surface water locations for SW-3 and SW-5 are not shown on the Figures. Please revise one of the first three figures to show their locations. The SW-4 location is shown on Figure 4.

   Response: The locations of SW-4 and SW-5 have been added to Figure 1 - Pond 3 Potentiometric Map (attached).

4. Comment: We concur with the recommended quarterly program indicated on page 12.

   Response: We plan to begin the quarterly monitoring effective the 4th quarter of 2023.

Please contact us if there are any questions or comments regarding this correspondence.

Respectfully,
Seaboard Group II and City of High Point

Gary D. Babb

Mr. Gary D. Babb, P.G.
Babb & Associates, P.A.

Attachment

cc: Jackie Drummond - NCDEQ Division of Solid Waste

SIS Pipe Inlet

SW-3

Southern Intermittent Stream

SW-5

700

705

710

715

720

725

690

685

695

W-14

OW-SF1

PW=3D

PW-4I

W-8A

W-18

W-5

W-12A

W-12

PW-SF1

R-1

MW-7B

MW-7A

POND 3

W-30

Former Seaboard Processing Area

Riverdale Drive

N

February 2019 Photography

Pre-pumping water levels shown in yellow

GW Elevations

W-5	714.32
W-8A	695.88
W-12	703.64
W-12A	Dry
W-14	704.56
W-18	713.89
W-30	726.26
MW-7A	Dry
MW-7B	694.26
OW-SF1	687.63
PW-3D	686.84
PW-4I	694.87
PW-SF1	684.21
R-1	681.59

Observation Well

Extraction Well

Contour Interval = 5'

Babb & Associates, P.A.

5506 Bradford Pear Court
Raleigh, North Carolina 27606
(919) 605-4719

Date: July 5, 2023

Rev. By: G. Babb

Prep. By: G. Babb

Scale: 1"=88'

Figure 1

July 5, 2023 Groundwater Potentiometric Map – Pond 3 Area
Former Seaboard Chemical/Riverdale Drive Landfill Site
Jamestown, Guilford County, North Carolina

Figure 1

SIS Pipe Inlet

SW-3

Southern Intermittent Stream

SW-5

700

705

710

715

720

725

690

685

695

W-14

OW-SF1

PW=3D

PW-4I

W-8A

W-18

W-5

W-12A

W-12

PW-SF1

R-1

MW-7B

MW-7A

POND 3

W-30

Former Seaboard Processing Area

Riverdale Drive

N

February 2019 Photography

Pre-pumping water levels shown in yellow

GW Elevations

W-5	714.32
W-8A	695.88
W-12	703.64
W-12A	Dry
W-14	704.56
W-18	713.89
W-30	726.26
MW-7A	Dry
MW-7B	694.26
OW-SF1	687.63
PW-3D	686.84
PW-4I	694.87
PW-SF1	684.21
R-1	681.59

Observation Well

Extraction Well

Contour Interval = 5'

Babb & Associates, P.A.

5506 Bradford Pear Court
Raleigh, North Carolina 27606
(919) 605-4719

Date: July 5, 2023

Rev. By: G. Babb

Prep. By: G. Babb

Scale: 1"=88'

Figure 1

July 5, 2023 Groundwater Potentiometric Map – Pond 3 Area
Former Seaboard Chemical/Riverdale Drive Landfill Site
Jamestown, Guilford County, North Carolina

Figure 1