

March 2, 2010

Mr. Vance Jackson
North Carolina DENR
Division of Waste Management
401 Oberlin Road, Suite 150
Raleigh, North Carolina 27605
919-508-8541



**Re: Annual Monitoring Plan - 2010
Former Seaboard Chemical Corp./Riverdale Drive Landfill Site
Jamestown, North Carolina**

Via Email Transmission

Dear Vance:

On behalf of the Seaboard Group II and the City of High Point, ERM NC, PC is submitting this proposed annual monitoring program for 2010 for the Seaboard Chemical/Riverdale Drive Landfill Site. The proposed annual monitoring activities for 2010 consist of ground water and surface water quality sampling and analyses and water level gauging. The primary objectives of the 2010 annual monitoring program are:

- Monitor VOC concentrations in ground water at selected monitor well locations
- Monitor surface water quality in the Deep River, Northern Intermittent Stream and Southern Intermittent Stream
- Monitor ground water elevations, hydraulic gradients and ground water flow directions

Ground water sampling is proposed at 23 monitor wells to monitor VOC concentrations at on-site and off-site locations. Surface water sampling is proposed at a total of 8 surface water stations including 1 station on the Northern Intermittent Stream, 3 stations on the Southern Intermittent Stream and 4 stations on Randleman Lake. Water level gauging of ground water and surface water at the site is proposed at 104 monitor wells.

The proposed 2010 monitoring program is summarized in Table 1 (ground water monitoring and water level gauging) and Table 2 (surface water monitoring). The proposed sampling and gauging locations for 2010 are shown on Figure 1.

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The surface water monitoring will be conducted during a dry weather period when the contribution to flow due to stormwater runoff is minimal. Stream discharge in the Southern Intermittent Stream and the Northern Intermittent Stream will be measured using the float method or visual estimation method, as feasible.

The sampling procedures will be in accordance with the specifications provided in the project Sampling and Analysis Plan (July 11, 2008). The ground water and surface water samples will be analyzed for volatile organic compounds (VOCs including 1,4-dioxane) by EPA Method 8260.

The results of the 2010 annual monitoring activities will be presented in a brief summary report including data tables, ground water elevation contour maps and ground water and surface water quality maps for total volatile organic compounds and 1,4-dioxane. The summary report will be submitted to the North Carolina Division of Waste Management within 90 days of receipt of laboratory results.

The Seaboard Group and the City of High Point request written approval of the proposed annual monitoring program for 2010. Please contact Jim LaRue if there are any questions or comments.

Sincerely,



Thomas M. Wilson, P.G.

Cc: Jim LaRue
Chris Thompson
Gary Babb
Randy Smith

TABLE 1
2010 Annual Monitoring Program - Ground Water
Seaboard Chemical/Riverdale Drive Landfill Site
Jamestown, North Carolina

<i>Sampling Location</i>	<i>Aquifer Zone</i>	<i>Total Depth (Ft BGL)</i>	<i>EPA 8260 VOCs + 1,4-Dioxane</i>
<i>Monitor Wells (23):</i>			
MW-1	SBR	57	X
MW-3C	SBR	57	X
MW-6	SBR	110	X
MW-10	SAP	28	X
MW-12A	SAP	20	X
MW-12B	SBR	58	X
MW-12D	SBR	202	X
MW-15A	SBR	34	X
OW-DR2	SBR	186	X
OW-LFS2	SAP/SBR	50	X
PW-3D	DBR	209.5	X
PW-4I	SBR	122	X
PW-5D	SBR	306	X
PW-6D	SBR	275	X
PW-6I	SBR	76	X
PW-10D	SBR	200	X
PW-10I	SBR	100	X
PW-12I	SBR	105	X
PW-13I	SBR	250	X
PW-15D	SBR	163.5	X
PW-18	SBR	225	X
PW-SF1 ¹	SBR	120	X
W-4A	SAP	38.5	X
Total			23

SAP = Saprolite zone SBR = Shallow Bedrock zone DBR = Deep Bedrock zone

Note 1. PW-SF1 is a 6-inch I.D. well. All other wells are 2-inch I.D.

TABLE 1
2010 Annual Monitoring Program - Ground Water
Seaboard Chemical/Riverdale Drive Landfill Site
Jamestown, North Carolina

Water Level Gauging		
<i>Monitor Wells (104):</i>		
MW-1	PW-1D	W-1
MW-2A	PW-2D	W-2
MW-2B	PW-3D	W-3
MW-2C	PW-4I	W-3A
MW-3A	PW-5D	W-3B
MW-3B	PW-6I	W-4
MW-3C	PW-6D	W-4A
MW-4	PW-7I	W-4B
MW-5	PW-8S	W-5
MW-6	PW-9I	W-6
MW-7A	PW-10I	W-6A
MW-7B	PW-10D	W-6B
MW-8	PW-11I	W-12
MW-9	PW-12I	W-12A
MW-10	PW-13I	W-14
MW-11	PW-14S	W-15
MW-12A	PW-14D	W-16
MW-12B	PW-15S	W-17
MW-12D	PW-15D	W-18
MW-14	PW-16S	W-19
MW-15A	PW-16D	W-20
MW-15B	PW-17	W-13
MW-16	PW-18	W-21
MW-17	PW-19	W-23A
MRF-1	PW-DR1	W-23B
MRF-2	PW-SF1	W-24
OW-DR1	PW-SIS1	W-25
OW-DR2		W-26
OW-DR3	RW-LFS1	W-27
OW-DR4	RW-LFS2	W-29
OW-LFS1	RW-NIS1	W-30
OW-LFS2	RW-SIS2	
OW-NIS1	RW-SIS3	
OW-SF1	RW-SIS4	
OW-SF2	RW-SIS5	
OW-SIS1	RW-SIS6	
OW-SIS2		
OW-SIS3		

TABLE 2
2010 Annual Monitoring Program - Surface Water
Seaboard Chemical/Riverdale Drive Landfill Site
Jamestown, North Carolina

<i>Sampling Location</i>	<i>Location Description</i>	<i>EPA 8260 VOCs + 1,4- Dioxane</i>
<i>Randleman Lake (former Deep River):</i>		
SW-6 ¹	Upstream Randleman Lake at Kivett Rd. bridge (~ 1.8 miles upstream of Site)	X
SW-7 ¹	Randleman Lake at downstream landfill property line near I-85 bridge	X
SW-DRP-2 ¹	Randleman Lake above confluence of SIS (main plume discharge zone)	X
SW-DRP-11 ¹	Randleman Lake above confluence of Richland Creek (~ 0.7 mile downstream of Site)	X
<i>SIS:</i>		
SW-3	Western segment of SIS near Seaboard (~ 100 ft. upstream of SIS pipe & landfill)	X
SW-4 ¹	Downstream of landfill - confluence of SIS & Randleman Lake	X
SW-5	Upstream SIS	X
<i>NIS:</i>		
SW-2 ¹	Downstream of landfill - confluence of NIS & Randleman Lake	X
Total		8

Notes:

1 - The general locations of these historical surface water sampling stations on the Deep River will be utilized, if practical, as equivalent locations for the Randleman Reservoir at normal pool.

SIS = Southern Intermittent Stream; NIS = Northern Intermittent Stream

Sampling to be conducted during low flow period (normal pool elevation conditions or lower), if feasible.

