

ERM NC, PC

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December 13, 2010

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



**Re: Quarterly Remedial Action Construction Progress Report
3rd Quarter 2010
Seaboard Chemical Corp./Riverdale Drive Landfill Site
Jamestown, North Carolina**

Dear Vance:

On behalf of the Seaboard Group II and the City of High Point, ERM NC, PC (ERM) is providing the 2010 3rd Quarter Remedial Action Construction Progress Report for the Seaboard Chemical Corp./Riverdale Drive Landfill Site. The Remedial Action Pre-Construction Report was submitted to NC DWM on December 28, 2009. The report was subsequently approved by NC DWM on March 22, 2010.

Summary of Remedial Construction Work Performed – 3rd Quarter 2010

The activities conducted in 3rd Quarter 2010 involved planning and preparation for remedial construction as well as some field construction activities. The following construction-related activities were performed:

- NIS Relocation
 - Obtained necessary permits prior to initiating site work
 - Procured services of contractor to perform work as specified in the bid documents
 - Performed on-site construction activities as specified in the bid documents (approximately 50% complete at end of period)
- Concrete Pad Foundations
 - Procured services of vendor to construct concrete pad foundations as specified in the bid documents

- Physical Treatment System
 - Procured services of vendor (Purifics) to construct the integrated treatment system. The main system was ordered on April 28, 2010 (metals removal, air stripper and advanced oxidation system) as specified in the bid documents
 - Vendor initiated in-shop fabrication of the integrated treatment system as specified in the bid documents (approximately 10% complete at end of period)
- Lift Stations (LS-1, LS-2 and LS-3)
 - Prepared bid package for LS-3, reviewed bids and selected vendor (Purifics)
 - Procured services of vendor (Purifics) to construct the LS-1, LS-2 and LS-3) as specified in the bid documents. Lift Stations 1 and 2 were ordered on August 18, 2010, and LS-3 was ordered on October 15, 2010.
 - Vendor initiated construction of LS-1 and LS-2 as specified in the bid documents (approximately 10% complete at end of period)
- Groundwater and Leachate Recovery Pumps
 - Procured services of contractor to purchase and install groundwater and leachate pneumatic recovery pumps (Product Recovery Management, Inc.) as specified in the bid documents. A purchased order was issued on September 8, 2010.

Seaboard Group II and City of High Point (Parties) have been notified that there will be a delay in the fabrication of the Mechanical Treatment System and Lift Stations. The selected vendor (Purifics) indicates there has been a delay in acquiring all the necessary parts for the system. As such, the Parties plan to request an extension of the March 22, 2011 mechanical system construction deadline. The extension will request that the deadline for completion of the construction of the mechanical treatment system be extended until July 31, 2011. The extension request will be submitted to the NCDWM in the form of a Technical Memorandum as required under the Scope of Work of the Remedial Action Settlement Agreement.

Remedial Construction Work Remaining

The following construction activities remain to complete the implementation of the remedy:

- NIS Relocation
 - Complete on-site construction activities as specified in the bid documents (Q4 2010)
 - Prepare as-built drawings documenting work performed (Q4 2010)
- Concrete Pad Foundations
 - Obtain necessary permits prior to initiating site work (Q4 2010 and Q1 2011)
 - Contractor to construct concrete pads as specified in the bid documents (Q1 2011)
- Physical Treatment System
 - Purifics to continue in-shop fabrication of the integrated treatment system as specified in the bid documents (Q4 2010 and Q1 2011)
 - Shop testing and delivery of treatment system to site (Q1 2011)
 - On-site electrical and mechanical hook-ups (Q2 2011)
 - On-site testing of treatment system (Q2 2011)
- Lift Stations (LS-1, LS-2)
 - Vendor to build LS-1, and LS-2 as specified in the bid documents (Q4 2010 and Q1 2011)
 - Shop testing and delivery of LS-1 and LS-2 to site (Q1 2011)
 - On-site electrical and mechanical hook-ups for LS-1 and LS-2 (Q2 2011)
 - On-site testing of LS-1 and LS-2 (Q2 2011)
 - Shop testing and delivery of LS-3 associated with constructed wetlands and natural treatment system (Q2 2011)
 - On-site electrical and mechanical hook-ups for LS-3 (Q2 2011)
 - On-site testing of LS-3 (Q3 2011)
- Groundwater and Leachate Recovery Pumps
 - Contractor to purchase and install pumps at the site (Q4 2010)
 - On-site electrical and mechanical hook-ups (Q1 2011)
 - On-site testing of pumps (Q1 2011)

- NIS Leachate Collection System
 - Finalize design of the system
 - Obtain necessary permits prior to initiating site work (Q4 2010 and Q1 2011)
 - Procure services of contractor to construct a leachate collection system at/near the location of the former NIS outfall as specified in the bid documents (Q4 2010)
 - Perform on-site construction activities as specified in the bid documents (Q1 2011)
 - On-site electrical and mechanical hook-ups (Q2 2011)
 - On-site testing (Q2 2011)

Please contact me or Jim LaRue if there are any questions or comments.

Sincerely,



Thomas M. Wilson, P.G.

Cc: Jim LaRue
Chris Thompson
Gary Babb
Randy Smith