



## SEABOARD GROUP II AND CITY OF HIGH POINT

30 PURGATORY ROAD  
MONT VERNON, NH 03057

February 10, 2011

Mr. Vance Jackson, P.G.  
North Carolina Department of Environment and Natural Resources  
Division of Waste Management  
401 Oberlin Road, Suite 150  
Raleigh, North Carolina 27605

Re: Quarterly Remedial Action Construction Progress Report, 4<sup>th</sup> Quarter 2010 Seaboard Chemical Corp. and Riverdale Drive Landfill Site, Jamestown, North Carolina

Dear Mr. Jackson:

Seaboard Group II and the City of High Point (herein the Parties) are providing the 2010 4<sup>th</sup> Quarter Remedial Action Construction Progress Report for the former Seaboard Chemical Corporation and closed Riverdale Drive Landfill Site. The Remedial Action Pre-Construction Report for the mechanical treatment systems was submitted to North Carolina Department of Environment and Natural Resources (NCDENR) on December 28, 2009. The report was subsequently approved by NCDENR, Division of Waste Management (NCDWM) on March 22, 2010. Although the Natural Treatment Systems Remedial Action Pre-Construction Report has not been approved by NCDWM, it was submitted on October 25, 2010 and the Parties have elected to include comments on those activities with this report.

### ***Summary of Remedial Construction Work Performed – 4<sup>th</sup> Quarter 2010***

The activities conducted in the 4<sup>th</sup> Quarter of 2010 involved planning and preparation for remedial construction as well as some field construction activities. The following construction-related activities were performed:

#### NIS Relocation work

- Completed and approved by the Parties.
- Prepared to replant areas damaged in blasting incident.

#### Concrete Pad Foundations

- Revised drawings and specifications for concrete pad.
- Selected engineering firm to oversee concrete pad installation.

#### Physical Treatment System

- Vendor of the AO+ system (Purifics ES, Inc.) notified the Parties of construction delays. The main system was ordered on April 28, 2010 (metals removal, air stripper and advanced oxidation system (AO+)) as specified in the bid documents and delivery was estimated to be 26 weeks from approval of drawings. Due to

equipment vendor delays in shipping components to Purifics, the delivery has been delayed until May 2011.

- Vendor initiated in-shop fabrication of the integrated treatment system as specified in the bid documents (approximately 30% complete at end of period)

#### Lift Stations (LS-1, LS-2 and LS-3)

- 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 and subsequently put on hold pending the resolution of certain issues concerning the constructed treatment wetlands (CTW).
- Vendor initiated construction of LS-1 and LS-2 as specified in the bid documents (approximately 30% complete at end of period).

#### Groundwater and Leachate Recovery Pumps

- Contractor purchased and installed groundwater and leachate pneumatic recovery pumps as specified in the bid documents. The purchased order was issued on September 8, 2010 and the work completed in December 2010.
- The Parties submitted a Technical Memorandum dated January 4, 2011 identifying the monitoring wells located at the Site that are no longer necessary, and requested permission to plug and abandon them.

#### Natural Treatment Systems

- On October 25, 2010, the Parties submitted the Pre-construction Report for the natural treatment system that included a report on the results of the 2009 – 2010 1,4-Dioxane pilot study. As a result of the data collected during that study it was determined that the phytoremediation system was capable of degrading the chlorinated volatile organic compounds contained in the groundwater and leachate. The Parties will examine the feasibility of eliminating the CTW from the natural treatment system as a result of these findings.
- Refined the specifications for the phytoremediation control and instrumentation system to eliminate spread spectrum radio transmission of data, and the inherent difficulties that presents, from the system. The modified system will provide for hard wiring of data transmission using fiber optics.

The Parties have been notified that there will be an additional 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 have requested an extension of the March 22, 2011 mechanical system construction deadline. The extension requested that the deadline for completion of the construction of the mechanical treatment system be extended until July 31, 2011. The extension request was submitted to the

NCDWM on January 5, 2011 in the form of a Technical Memorandum as required under the Scope of Work in the Remedial Action Settlement Agreement.

***Remedial Construction Work Remaining***

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

NIS Relocation

- Final completion and acceptance. (Q1 2011)
- Prepare as-built drawings documenting work performed. (Q2 2011)
- Repair blasting damage to buffer area (Q2 2011)

Concrete Pad Foundations

- Obtain necessary building permits prior to initiating site work (Q1 2011).
- Clear the areas for the concrete pads. (Q1 2011)
- Select contractor to construct concrete pads as specified in the bid documents (Q1 and Q2 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 (Q2 2011)
- On-site electrical and mechanical hook-ups (Q2 and Q3 2011)
- On-site testing of treatment system (Q3 Q4 2011 and Q1 2012)

Lift Stations (LS-1, LS-2)

- Vendor to build LS-1, and LS-2 as specified in the bid documents (Q1 and Q2 2011)
- Shop testing and delivery of LS-1 and LS-2 to site (Q2 2011)
- On-site electrical and mechanical hook-ups for LS-1 and LS-2 (Q2 and Q3 2011)
- On-site testing of LS-1 and LS-2 (Q3 Q4 2011 and Q1 2012)

Groundwater and Leachate Recovery Pumps

- On-site electrical and mechanical hook-ups (Q2 2011)
- On-site testing of pumps (Q3 2011)

NIS Leachate Collection System

- On-site electrical and mechanical hook-ups (Q2 2011)
- On-site testing (Q3 2011)

Soil Residue Mound

- Clear area for soil residue mound improvements (Q1 2011)
- Re-grade soil cap on soil residue mound (Q1 and Q2 2011)
- Install cover liner and geotextile on soil residue mound (Q2 and Q3 2011)

Natural Treatment Systems

- Finalize design of control and instrumentation system. (Q1 2011)
- Prepare report and Technical Memorandum on Constructed Treatment Wetlands issue. (Q1 2011)

Cedrow Park Buffer Impact Mitigation Project

- Prepare site and plant trees Q1 and Q2 2011)
- Complete all work (Q2 2011)

Please contact Gary Babb (919-325-0696) or Jim LaRue (281-431-3571) if there are any questions or comments. Please direct correspondence related to this matter to:

Gary D. Babb, P.G.  
Seaboard Group II and City of High Point  
Care of Babb & Associates, P.A.  
P.O. Box 37697  
Raleigh, NC 27627.

Communications via electronic mail should be directed to [gbabb@nc.rr.com](mailto:gbabb@nc.rr.com) and [jarue@swenv.com](mailto:jarue@swenv.com).

Respectfully,

**Seaboard Group II and City of High Point**



James C. LaRue  
Oversight Consultant – Seaboard Group II

cc Gary Babb  
Chris Thompson  
Randy Smith  
Jackie Drummond  
Dave Roberson