



July 27, 2010

NCDENR Division of Waste Management  
Solid Waste Section  
401 Oberlin Road  
Raleigh, North Carolina 27605-1358

Attention: Mr. Ervin Lane

**Reference: Corrective Action Plan Amendment**  
Edgecombe County Landfill  
Tarboro, North Carolina  
S&ME Project No. 1054-07-241A

Dear Mr. Lane:

On behalf of Edgecombe County, S&ME, Inc. (S&ME) is submitting the enclosed *Corrective Action Plan Amendment* which documents proposed revisions to the hydraulic barrier design proposed for the groundwater Corrective Action Plan for the Edgecombe County Landfill located in Tarboro, North Carolina.

The *Corrective Action Plan (CAP)* dates June 30, 2008 prepared by S&ME was based on the *Nature and Extent Study* and the *Assessment of Corrective Measures Report* approved by the Solid Waste Section on July 16, 2008. The CAP was approved by the Solid Waste Section for implementation on January 16, 2009 and was included in the permit application approved by the Solid Waste Section on March 31, 2010 by the renewal of the C&D landfill Permit to Operate (PTO). The design presented in the *Corrective Action Plan Amendment* is the same concept as the approved CAP, with minor revisions in the implementation of the hydraulic barrier.

Please call us at (919) 872-2660 if you have questions about the revised design provided in this document.

Sincerely,

**S&ME, Inc.**

David B. Wells, P.G.  
Senior Geologist

Samuel P. Watts, P.G.  
Senior Consultant

dbw/DBW/SPW

cc: Mr. Mike Cummings - Edgecombe County Solid Waste Manager

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CORRECTIVE ACTION PLAN AMENDMENT  
Edgecombe County Landfill  
(Permit #33-01)  
Tarboro, North Carolina  
S&ME Project No. 1054-07-241A

Prepared for:



Edgecombe County  
201 St. Andrew Street  
Tarboro, North Carolina 27886

Prepared by:



S&ME, Inc.  
3201 Spring Forest Road,  
Raleigh, North Carolina 27616

July 27, 2010

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## 1. BACKGROUND

Edgecombe County currently operates a construction and demolition (C&D) debris landfill on top of a closed municipal solid waste (MSW) landfill on a tract of land located off of Colonial Road (State Road 1601) in Edgecombe County, south of Tarboro, North Carolina. See the attached Vicinity Map on **Figure 1**. Site features are presented on the Site Plan in **Figure 2**.

On behalf of Edgecombe County, S&ME completed a *Corrective Action Plan (CAP)* for the landfill in accordance with Solid Waste Rules defined under 15A NCAC 13B .1636 and .1637. That CAP (dated June 30, 2008) was submitted on behalf of Edgecombe County to the North Carolina Department and Natural Resources (NCDENR) Division of Waste Management (DWM). The CAP included the selection of in-situ isolation combined with monitored natural attenuation (MNA) as the remedial alternatives for groundwater impacted with cobalt, petroleum constituents and chlorinated compounds. In-situ Isolation was selected because the site conceptual model indicated that surface water and groundwater management issues are the primary mechanism for addressing the release and migration of the constituents of concern at the landfill. MNA has been incorporated into the facility's updated (January, 2010) Water Quality Monitoring Plan (WQMP) to monitor and evaluate the effectiveness of the remedial measures.

The CAP was approved by the Solid Waste Section for implementation in a letter dated January 16, 2009. The CAP and the WQMP were submitted as part of the C&D Landfill permit application approved by the Solid Waste Section on March 31, 2010 by the renewal of the C&D landfill Permit to Operate (PTO).

After the CAP was submitted to the Solid Waste Section, S&ME collected additional information on the site geology and hydrogeology in the vicinity of the proposed hydraulic barrier as part of the design and implementation process. Additionally, the County has purchased the property immediately adjacent to the southern property boundary of the landfill facility (former Eagles Farm, LLC). S&ME reviewed the original design presented in the CAP, while also considering the additional space available to the south of the landfill by possibly using a portion of the new property and considering the newly obtained geologic and hydrogeologic information. Based on this review, S&ME had prepared this *Corrective Action Plan Amendment* describing the revised design for implementing the proposed up-gradient hydraulic barrier. The revised design presented in the *Corrective Action Plan Amendment* uses the same concept as the approved CAP, with minor revisions of the hydraulic barrier. The revised design is intended to reduce capital cost for implementation, minimize future maintenance, and more effectively divert groundwater flow around or away from landfill waste.

### 1.1 CAP Concept

The CAP prepared by S&ME in 2008 proposed corrective measures that focused on “in-situ isolation” of the landfill from surface water and groundwater sources that may enter or pass through the waste in the landfill. In-situ isolation system will minimize water exposure to the

buried wastes limiting the release of contaminants to the water and to the environment. The CAP corrective measures have three components: management of surface water infiltration and discharge, management of groundwater infiltration and discharge, and monitoring the naturally occurring biological degradation of constituents. In addition to the corrective measures components, permit requirements applicable to the corrective measure alternative must be met.

### *1.1.1 In-situ Isolation Surface Water*

The focus of an in-situ isolation system for surface water is to reduce infiltration of surface water from storm events and to manage the stormwater drainage discharged from the landfill site. The engineered design to address surface water infiltration includes a grading plan to improve stormwater drainage from the surface of the landfill and reduce surface water infiltration into the waste. The grading plan includes: removing soil berms that were installed on the surface of the landfill as erosion control measures during landfill construction; re-grading and shaping some portions of the landfill cap to increase the percent slope on filled areas to maintain consistent contours with the pre-1998 waste area; increasing the slope of the closed MSW area to facilitate improved surface drainage; and, excavating, stabilizing, and extending the drainage ditch located on the south side of the landfill waste boundary from the west end of the groundwater hydraulic barrier around to the southern and western perimeter of the landfill. The drainage routes for stormwater shed from the landfill will flow to sedimentation basins lined with low permeability material to manage the stormwater discharged to surface water features. Surface water and groundwater intercepted by the hydraulic barrier to the south of the landfill will flow through the former location of the Eagles Farm pond and will discharge to Jerry's Creek east of the landfill. Figure 5 from the Erosion and Sedimentation Control Plan summarized the grading plan. A copy of this figure is in **Appendix I**.

### *1.1.2 In-situ Isolation Groundwater*

The in-situ isolation of the landfill waste from groundwater requires an engineered design to reduce infiltration of groundwater from upgradient and lateral sources that allow groundwater flow through the subsurface toward the landfill waste. The engineered design will divert upgradient and lateral groundwater flow around or away from the landfill waste using a hydraulic barrier to reduce the volume of horizontal groundwater flow into the landfill. The engineered design will manage lateral groundwater flow toward the landfill waste and will discharge groundwater diverted from entry into the landfill waste using an improved perimeter drainage system. Retaining and/or diverting the groundwater from flowing through the waste in the landfill is intended to reduce the volume of water available for the production of leachate in the landfill. Therefore, the transport of leachate from the landfill would be reduced. The reduction of groundwater flow beneath the landfill is also intended to lower groundwater levels in the landfill, thereby minimizing contact of groundwater with waste and/or leachate contained in the landfill.

### *1.1.3 Natural Attenuation Monitoring*

The Monitored Natural Attenuation (MNA) program described in the CAP is necessary to review the performance of the engineered controls that will be implemented to reduce surface water and

groundwater infiltration into the waste at the landfill. The monitoring network at the landfill is comprised of monitor wells and piezometers that are gauged and or sampled on a semiannual schedule. Groundwater flow directions and concentrations of target constituents previously detected in surface water and groundwater believed to have originated from the waste facility are monitored. The MNA network will review performance of the engineered controls from changes in hydraulic head from upgradient to downgradient of control measures, and from parameter measurements in the groundwater to review the biological activity occurring in the natural attenuation process.

#### *1.1.4 Permitting*

Activities described in the corrective measures design require regulatory permits. The North Carolina Department of Environment and Natural Resources (NCDENR) Division of Land Resources (DLR) Land Quality Section (LQS) requires an application to perform land disturbing activities when the area disturbed is greater than one acre. The permit application process was implemented by submitting an Erosion and Sediment Control (E&SC) Plan. The LQS preliminary plan review comments were received and addressed, and the LQS approved the E&SC Plan in a letter dated May 20, 2009. This approval states that construction is covered under the National Pollutant Discharge Elimination System (NPDES) General Stormwater Permit NCG01000 (Construction Activities) issued by the Division of Water Quality (DWQ).

The DLR also reviews and enforces registered facilities in the North Carolina Dam Safety Program. The embankment that impounds the water in the existing pond located on the property immediately south of the landfill (former Eagles Farm, LLC property) is a registered dam with the DLR (**Figure 2**). Changes to the dam structure, reservoir volume, and outfall structure will require authorization from the DLR before the pond(s) on the former Eagles Property may be dewatered or the dam's breached. According to Mr. Steve McEvoy of the DLR, the dam and pond structures on the Edgecombe Landfill may be dewatered. However, a permit will be required if the outfall to the pond or dam structures are revised.

The DWQ requires permits to discharge stormwater from project sites to surface water. Permitted discharges are reviewed and enforced by the DWQ using the NPDES general permit application for MSW landfill facilities. The NPDES Notice of Intent (NOI) Application for discharge for the corrective measures as well as the facility borrow areas was submitted to DWQ May 12, 2009. The NOI indicated it was for the MSW landfill, however, DWQ considers the facility a C&D landfill. The DWQ general permit is for MSW landfills only and DWQ is currently reviewing whether to include C&D landfills under this general permit. As it currently stands, the site only has to follow the General Stormwater Permit NCG01000 during construction activities. S&ME will monitor the decision process for the NPDES permits relevant to C&D landfills and will confirm and assist the County with implementing changes for permit compliance if required.

The DWQ also is responsible for enforcing Riparian Buffer rules for encroachment activities. Due to the location of this project, it should be noted that buffers along water courses in this area

are subject to the Tar-Pamlico River Riparian Area Protection and Maintenance Rule (15A NCAC 2B .0259), effective January 1, 2000. Before buffer encroachment activities are performed for dewatering and trenching activities, a preconstruction notification will be submitted for authorization by DWQ and the US Army Corps of Engineers (USACE).

## **1.2 Regulatory Review, County Request for Revision**

The CAP was reviewed and the selected remedy was approved for implementation by NCDENR DWM per their correspondence dated January 16, 2009. The CAP was also submitted as part of the permit application approved by the Solid Waste Section on March 31, 2010 by the renewal of the C&D landfill Permit to Operate (PTO). After the CAP was approved, Edgecombe County purchased the adjoining Eagles Farm LLC property to the south of the landfill. With the purchase of the adjoining land to the south, the County was able to consider alternative designs for implementing the hydraulic barrier component of the corrective measures described in the CAP. On behalf of Edgecombe County, S&ME has prepared this *Corrective Action Plan Amendment* describing the revised design for implementing the proposed hydraulic barrier portion of the CAP. Edgecombe County respectfully requests the Solid Waste Section's approval for implementation of the revised CAP design.

## 2. HYDRAULIC BARRIER SCHEMATICS

At the request of Edgecombe County, S&ME has developed an alternative design for implementing the proposed hydraulic barrier system presented in the CAP that will achieve the goal of in-situ isolation and makes use of the County-owned property to the south. S&ME has prepared schematics for the hydraulic barrier system that include a combination of approaches using both physical barriers and dewatering methods to accomplish the objectives of the in-situ isolation.

### 2.1 CAP Includes Hydraulic Barrier, In-Situ Isolation and MNA

S&ME's revised design includes the same components of in-situ isolation and MNA in accordance with the selected/approved CAP and the same components for improvements to the landfill final grades, the landfill cap drainage system, and stormwater management program as listed below:

- Maintaining a consistent contour with the pre-1998 waste area;
- Increase slope of the closed MSW area;
- Stormwater improvements on the western half of the landfill;
- Implement E&SC Plan per the Permitted Erosion and Sedimentation Controls authorized by the Land Quality Section;
- Construct one new storm water sediment basin and grade improvements to two existing storm water sediment basins north of the landfill waste boundary to meet current DWQ and Land Quality Section requirements and to manage stormwater discharge; and,
- Implementation of a MNA program to address impacted groundwater.

The difference in the revised CAP is the design for the upgradient groundwater hydraulic barrier system.

### 2.2 Source Information for Revised Barrier Schematics

S&ME considered information from previous investigations and from the *Subsurface Exploration & Hydrogeologic Assessment* (S&ME, November 2009) to prepare the revised design for the implementation of the hydraulic barrier.

Based on the site specific information obtained from the site, the Yorktown Formation (marine clay) was encountered at depths less than five feet below the ground surface (bgs) to depths over 20 feet bgs. The Yorktown clay elevation ranged from approximately 45 feet mean sea level (msl) to 62 feet msl. Hydrogeologic information collected to assess the interaction of the surface water in the facility pond located on the southeast corner of the facility indicates that the pond acts as a recharge feature to the water table while the pond is at full pool elevation. The drawdown analysis of water levels measured during a pond discharge pilot test predicts that lowering the pond elevation by eight feet below the current pool elevation controlled by the

outfall structure would reverse the hydraulic function of the pond from a recharge feature to a discharge feature. Re-designing the pond to be a discharge feature would impose a hydraulic barrier diverting groundwater flow around or away from the landfill waste on the upgradient (southeastern) corner of the landfill. Lowering the surface water level in the pond was incorporated into an alternative component to the hydraulic barrier described in the original CAP design (S&ME 2008).

### **2.3 Hydraulic Barrier Options**

S&ME developed four different designs (options) for implementing the hydraulic barrier. The four options were presented to Edgecombe County in S&ME's report *Feasibility Review for Corrective Measures* (S&ME, March 2010) and are summarized as follows:

*Option 1 - Hydraulic Barrier Using 1,820 LF Sheet Pile Wall*

*Option 2 – 900 LF Sheet Pile Wall and Dewater Pond*

*Option 3 – 1,150 LF Ditch and Dewater Pond*

*Option 4 – 1,150 LF Trench Drain and Dewater Pond*

### 3. DESIGN SCHEMATIC OF SELECTED OPTION

Edgecombe County reviewed the four hydraulic barrier system options developed by S&ME for the proposed corrective measures. Based on the options review a hydraulic barrier that would utilize an interceptor trench drain in tandem with dewatering the pond on the southeast corner of the property (Option 4) was selected as the preferred design for implementing the hydraulic barrier system.

Option 4 includes dewatering the existing drainage ditch and pond features and installing a groundwater barrier trench drain to form a hydraulic barrier. Option 4 eliminates the subsurface sheet-pile barrier wall (Options 1 and 2), limits long term maintenance compared to an open ditch (Option 3), and retains access to the former Eagles Farm property. Option 4 will require revision to the erosion and sedimentation control permit due to additional area disturbed and will require coordination with NCDENR DWQ for a riparian buffer encroachment and NPDES permit requirements. Significant design features include the following:

- Re-design the outfall structure that regulates the flow through the ponds or remove the dam to the pond located on the southeast corner of the facility;
- Install 1,150 linear feet of groundwater barrier trench drain on the former Eagles Farm LLC property to direct groundwater to the existing pond to the east and/or drainage ditch to the west;

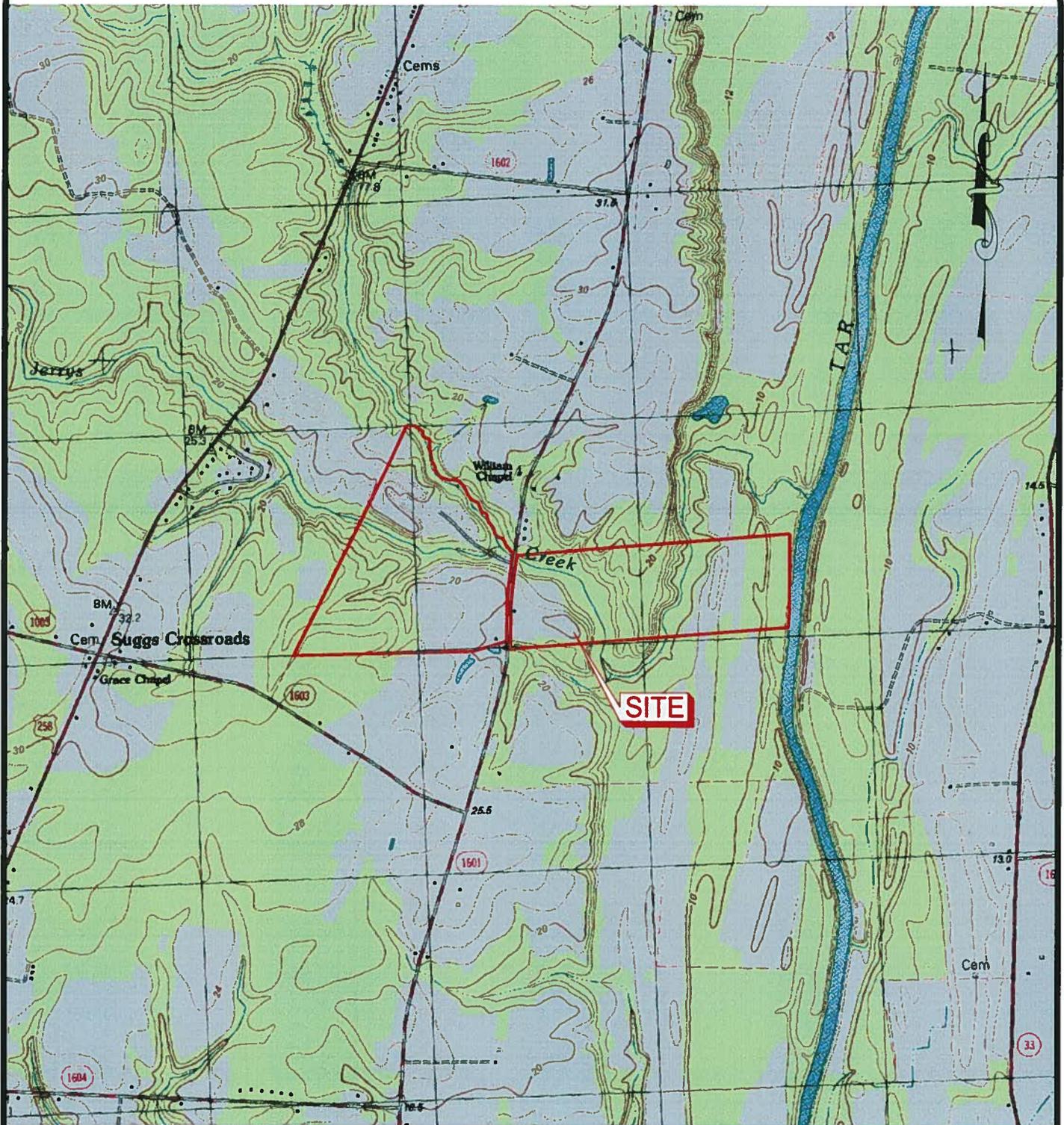
The location of the proposed hydraulic barrier system described in Option 4 is presented on **Figure 3**. **Figure 3** also presents a profile that depicts the ground surface; the top of the Yorktown Formation; the proposed groundwater barrier trench invert, and construction details for the hydraulic barrier trench. The hydraulic barrier proposes to block and divert groundwater above the Yorktown marine clay from flowing beneath the landfill. By retaining and/or diverting the groundwater from flowing beneath the landfill, the volume of water available for the production of leachate and/or the transport of leachate will be reduced. The reduction of groundwater flow beneath the landfill will also lower groundwater levels within the landfill.

The proposed grading plan for improvements to the landfill surface, re-establishing the drainage ditches on the south and west boundaries of the landfill and the proposed contours for three sedimentation basins is presented on Figure 5 of the Erosion and Sediment Control Plan. A copy of Figure 5 from the Erosion and Sediment Control Plan is in **Appendix I**.

## FIGURES

Figure 1	Vicinity Map
Figure 2	Site Map
Figure 3	Proposed Hydraulic Barrier

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GRAPHIC SCALE



( IN FEET )

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 CONTOUR INTERVAL: 2 METERS

SCALE: 1" = 2,000'  
 DATE: JUNE 2010  
 DRAWN BY:  
 PROJECT NO:  
 1054-07-240C



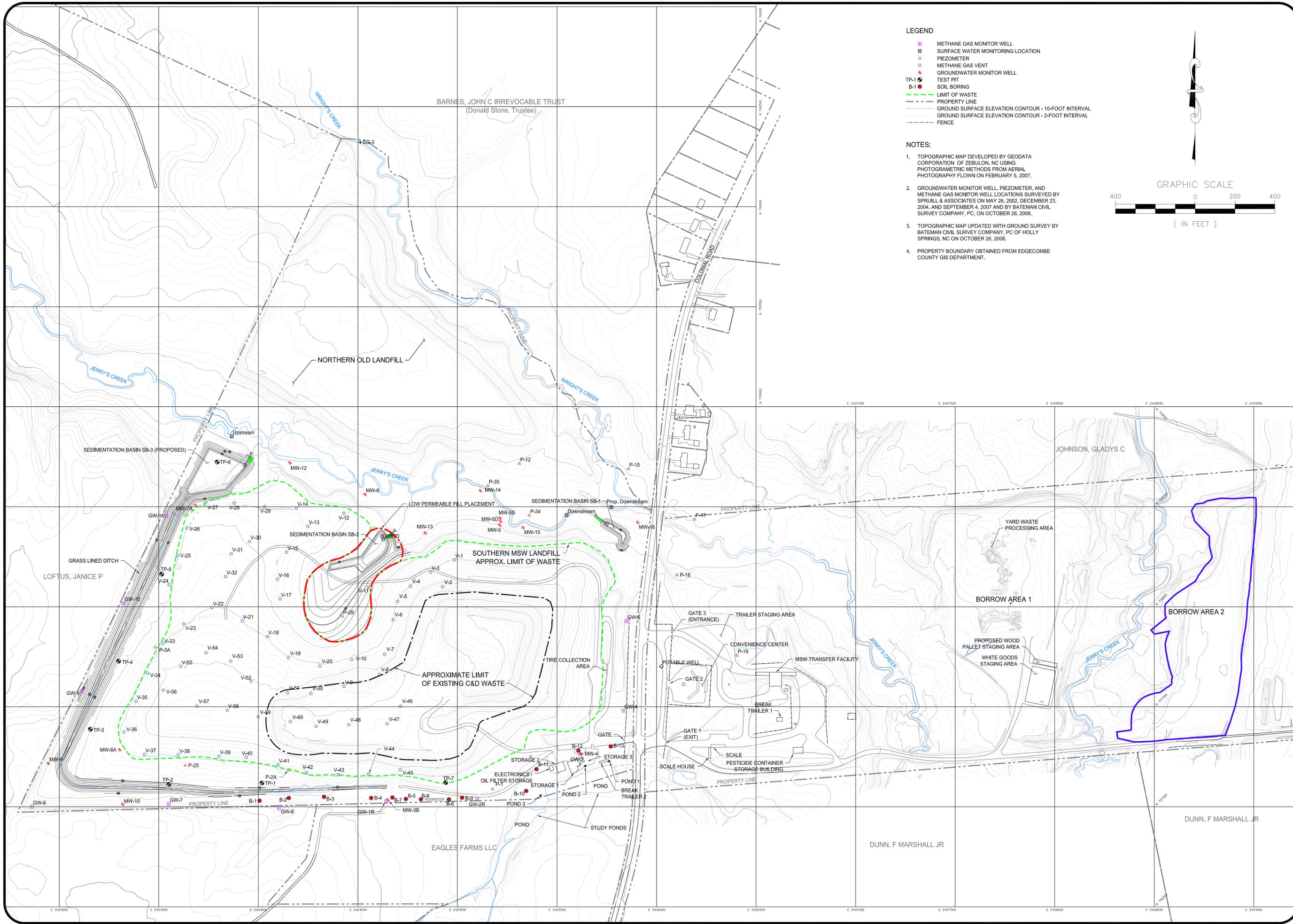
NC ENGINEER LICENSE #F-0176  
 3201 SPRING FOREST RD, RALEIGH, NC 27616

VICINITY MAP  
 EDGECOMBE COUNTY LANDFILL  
 TARBORO, NORTH CAROLINA

A-1816

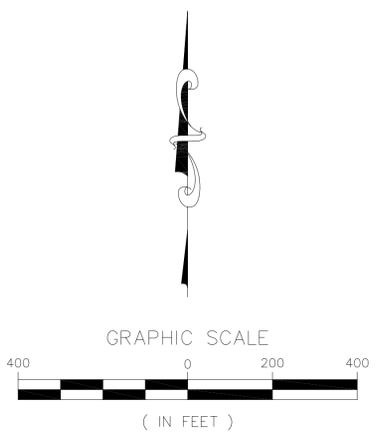
FIGURE NO.

1



- LEGEND**
- METHANE GAS MONITOR WELL
  - SURFACE WATER MONITORING LOCATION
  - △ PIEZOMETER
  - METHANE GAS VENT
  - GROUNDWATER MONITOR WELL
  - TP-1 TEST PIT
  - B-1 SOIL BORING
  - LIMIT OF WASTE
  - PROPERTY LINE
  - GROUND SURFACE ELEVATION CONTOUR - 10-FOOT INTERVAL
  - GROUND SURFACE ELEVATION CONTOUR - 2-FOOT INTERVAL
  - FENCE

- NOTES:**
1. TOPOGRAPHIC MAP DEVELOPED BY GEODATA CORPORATION OF ZEBULON, NC USING PHOTOGRAMETRIC METHODS FROM AERIAL PHOTOGRAPHY FLOWN ON FEBRUARY 5, 2007.
  2. GROUNDWATER MONITOR WELL, PIEZOMETER, AND METHANE GAS MONITOR WELL LOCATIONS SURVEYED BY SPRULL & ASSOCIATES ON MAY 26, 2002, DECEMBER 23, 2004, AND SEPTEMBER 4, 2007 AND BY BATEMAN CIVIL SURVEY COMPANY, PC, ON OCTOBER 26, 2008.
  3. TOPOGRAPHIC MAP UPDATED WITH GROUND SURVEY BY BATEMAN CIVIL SURVEY COMPANY, PC OF HOLLY SPRINGS, NC ON OCTOBER 26, 2008.
  4. PROPERTY BOUNDARY OBTAINED FROM EDGEcombe COUNTY GIS DEPARTMENT.



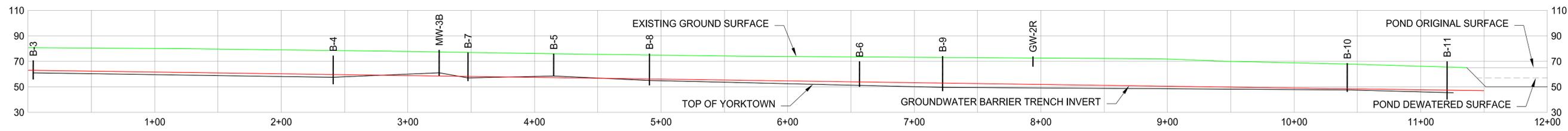
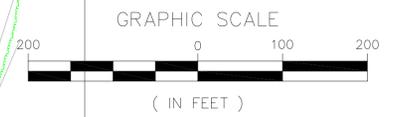
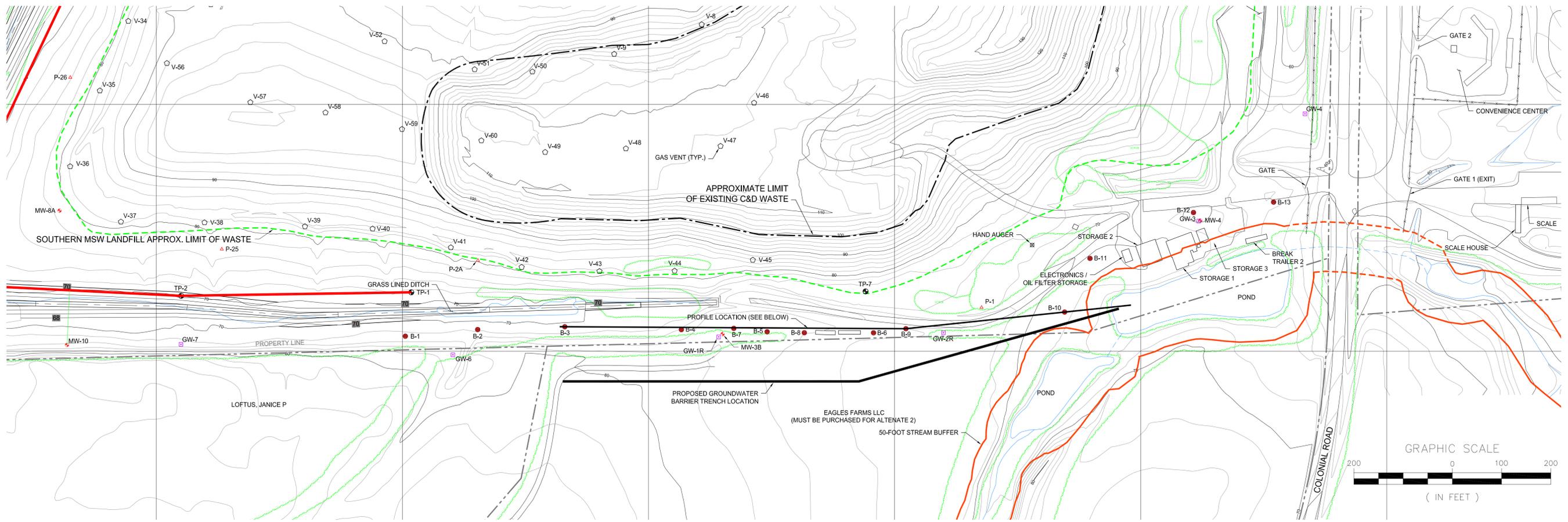
**S&ME**  
 WWW.SMEINC.COM  
 NC ENG. LICENSE #E-0176 PHONE: (919) 872-2660  
 3201 SPRING FOREST ROAD, RALEIGH, NC 27616

NO.	DATE	DESCRIPTION	BY

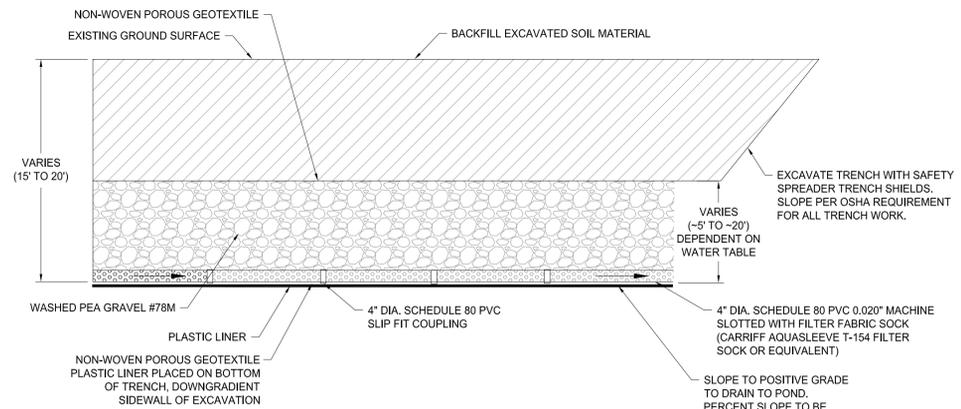
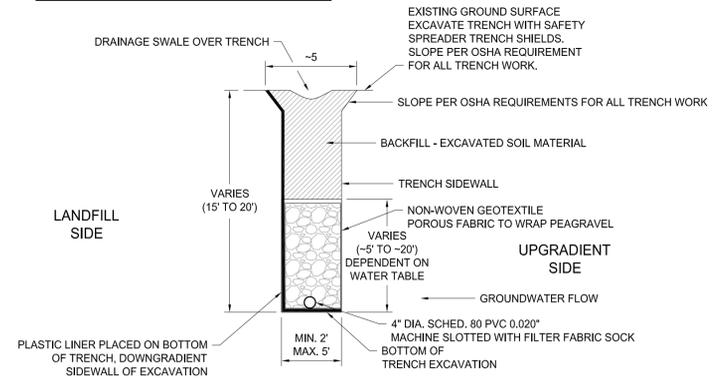
**SITE PLAN**  
 CORRECTIVE MEASURES DESIGN  
 EDGEcombe COUNTY LANDFILL  
 TARBORO, NORTH CAROLINA

DRAWN BY: BTR  
 CHECKED BY:   
 DESIGNED BY:   
 APPROVED BY:   
 PROJECT NUMBER: 1054-07-241A  
 SCALE: 1" = 200'  
 DATE: JUNE 2010  
 DRAWING NUMBER: D-1160  
 DRAWING: 2 OF:   
 DUNN, F MARSHALL JR

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**GROUNDWATER BARRIER TRENCH DETAIL**



**NOTES:**

- TOPOGRAPHIC MAP DEVELOPED BY GEODATA CORPORATION OF ZEBULON, NC USING PHOTOGRAMETRIC METHODS FROM AERIAL PHOTOGRAPHY FLOWN ON FEBRUARY 5, 2007.
- GROUNDWATER MONITOR WELL, PIEZOMETER, AND METHANE GAS MONITOR WELL LOCATIONS SURVEYED BY SPRULL & ASSOCIATES ON MAY 26, 2002, DECEMBER 23, 2004, AND SEPTEMBER 4, 2007 AND BY BATEMAN CIVIL SURVEY COMPANY, PC, ON OCTOBER 26, 2008.
- TOPOGRAPHIC MAP UPDATED WITH GROUND SURVEY BY BATEMAN CIVIL SURVEY COMPANY, PC OF HOLLY SPRINGS, NC ON OCTOBER 26, 2008.
- PROPERTY BOUNDARY OBTAINED FROM EDGECOMBE COUNTY GIS DEPARTMENT.

**LEGEND**

- GROUNDWATER MONITOR WELL
- PIEZOMETER
- METHANE GAS MONITOR WELL
- LANDFILL GAS VENT
- TEST PIT
- SOIL BORING
- LIMIT OF WASTE
- PROPERTY LINE
- GROUND SURFACE ELEVATION CONTOUR - 10-FOOT INTERVAL
- GROUND SURFACE ELEVATION CONTOUR - 2-FOOT INTERVAL
- FENCE

**S&ME**  
 WWW.SMEINC.COM  
 NC ENG. LICENSE #E-0176 PHONE: (919) 872-2660  
 3201 SPRING FOREST ROAD, RALEIGH, NC 27616

NO.	DATE	DESCRIPTION	BY

**PROPOSED HYDRAULIC BARRIER**  
 CORRECTIVE MEASURES DESIGN  
 EDGECOMBE COUNTY LANDFILL  
 TARBORO, NORTH CAROLINA

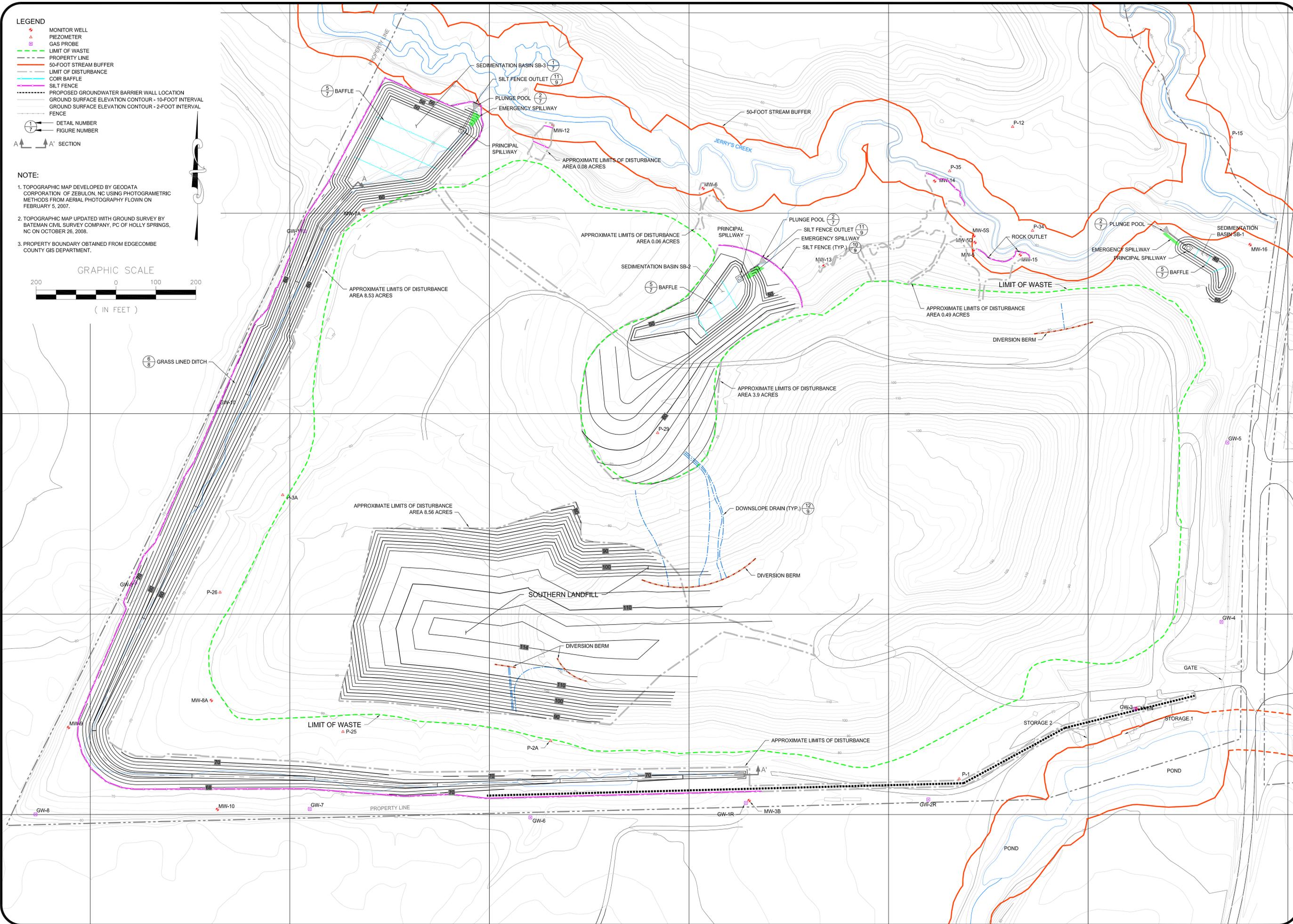
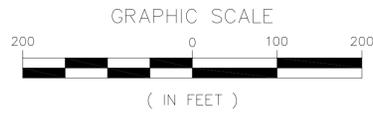
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 BTR  
 DESIGNED BY: APPROVED BY:  
 PROJECT NUMBER: 1054-07-240C  
 SCALE: AS SHOWN DATE: MARCH 2010  
 DRAWING NUMBER: D-1159  
 DRAWINGS: OF:  
**3**

## APPENDIX

Appendix I Proposed Grading Landfill Area (Figure 5 of the Erosion and Sediment Control Plan)

- LEGEND**
- MONITOR WELL
  - PIEZOMETER
  - GAS PROBE
  - LIMIT OF WASTE
  - PROPERTY LINE
  - 50-FOOT STREAM BUFFER
  - LIMIT OF DISTURBANCE
  - COIR BAFFLE
  - SILT FENCE
  - PROPOSED GROUNDWATER BARRIER WALL LOCATION
  - GROUND SURFACE ELEVATION CONTOUR - 10-FOOT INTERVAL
  - GROUND SURFACE ELEVATION CONTOUR - 2-FOOT INTERVAL
  - FENCE
  - DETAIL NUMBER
  - FIGURE NUMBER

- NOTE:**
1. TOPOGRAPHIC MAP DEVELOPED BY GEODATA CORPORATION OF ZEBULON, NC USING PHOTOGRAMETRIC METHODS FROM AERIAL PHOTOGRAPHY FLOWN ON FEBRUARY 5, 2007.
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  3. PROPERTY BOUNDARY OBTAINED FROM EDGEcombe COUNTY GIS DEPARTMENT.



NO.	DATE	DESCRIPTION	BY
1		GENERAL REVISIONS	
2		REPLACED ENERGY DISSIPATORS WITH PLUNGE POOLS	

**PROPOSED GRADING  
LANDFILL AREA**

**EROSION AND SEDIMENT CONTROL PLAN  
EDGEcombe COUNTY LANDFILL  
TARBORO, NORTH CAROLINA**

DRAWN BY: BTR  
DESIGNED BY: JAM

CHECKED BY:  
APPROVED BY: JAM

PROJECT NUMBER:  
1054-07-241A

SCALE: 1" = 100'  
DATE: FEB. 2009

DRAWING NUMBER:  
D-1069-01

FIGURE: 5 OF:

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