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September 17, 2009

Project No. 083-9650609.100

Department of Environment and Natural Resources  
Division of Waste Management  
Solid Waste Section  
401 Oberlin Road, Suite 150  
Raleigh, North Carolina 27605  
919-733-4996

Attention: Ms. Jaclynne Drummond  
Hydrogeologist

**Re: Groundwater Assessment Work Plan  
Closed Henderson County Landfill, Permit No. 45-01  
Hendersonville, North Carolina**

Dear Jaclynne:

On behalf of Henderson County, Golder Associates NC, Inc. (Golder) is submitting the enclosed Groundwater Assessment Work Plan, to address the groundwater issues associated with the recently closed C&D landfill, and to further delineate the groundwater contamination related to the closed MSW facility so that a comprehensive Nature and Extent Study can be submitted. As you are aware, we discussed the additional activities proposed in the enclosed Work Plan in our meeting on September 17, 2009.

If you have any questions, please contact the undersigned at 336-852-4903. We appreciate your assistance with this project.

Sincerely,  
**GOLDER ASSOCIATES NC, INC.**

A handwritten signature in blue ink, appearing to read "David Y. Reedy II".

David "Dusty" Y. Reedy II, P.G.  
Senior Project Hydrogeologist

A handwritten signature in blue ink, appearing to read "Rachel P. Kirkman".

Rachel P. Kirkman, P.G.  
Senior Project Geologist

Enclosure

- C. Will Sagar, Solid Waste Division Manager, Henderson County, 802 Stoney Mountain Road, Hendersonville, NC 28791. 828-697-4505.  
Marcus Jones, Director of Engineering, Henderson County, 100 North King Street, Hendersonville, NC 28792. 828-694-6560

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# **GROUNDWATER ASSESSMENT WORK PLAN**

## **CLOSED HENDERSON COUNTY LANDFILL, PERMIT NO. 45-01 HENDERSON COUNTY, NORTH CAROLINA**

**SEPTEMBER 2009**

**PREPARED FOR:**



**HENDERSON COUNTY SOLID WASTE DIVISION  
802 STONEY MOUNTAIN ROAD  
HENDERSONVILLE, NORTH CAROLINA 28791**

**PREPARED BY:**



**GOLDER ASSOCIATES NC, INC.  
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PROJECT No. 083-9650609.200**

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Drawing 1 Total Volatile Organic Compounds (VOCs) and groundwater surface contour map, March 2009

## **1.0 INTRODUCTION**

The purpose of this Work Plan is to provide details for the investigation of the potential source(s) of constituents that have been detected above their respective NC 2L Drinking Water Standards (2L Standards) and/or Solid Waste Section Groundwater Protection Standards (GPSs) in recent groundwater samples collected from monitoring wells at Henderson County's closed construction and demolition (C&D) landfill. This Work Plan also includes additional groundwater assessment activities required to complete a Nature and Extent Study (NES) and collect initial screening data for monitored natural attenuation parameters at the County's closed municipal solid waste (MSW) landfill. Both facilities are maintained by the County under Permit No. 45-01 issued by the North Carolina Department of Environment and Natural Resources (NCDENR).

## **2.0 WORK PLAN**

Analytical results for groundwater samples collected from monitoring wells at the closed C&D landfill and the closed MSW landfill indicate that constituents are present above their applicable groundwater standards during recent sampling events. The exceedances related to each landfill and the proposed steps to address them are addressed separately below.

### **2.1 C&D Landfill**

Henderson County is in the process of completing closure activities for the C&D landfill. Because the facility operated past December 31, 2006, it is subject to 15A NCAC 13B .0544 and .0545 of the North Carolina Solid Waste Management Regulations (NCSWMR). Therefore, under .0545 of the NCSWMR, exceedances of groundwater standards should be investigated to determine the source of the constituents, and if appropriate, corrective action taken.

#### **2.1.1 Overview**

During the March 2009 monitoring event, the reported concentrations of three inorganic constituents (iron, manganese, and vanadium) exceeded their respective groundwater standards. Due to the presence of these three constituents in the upgradient well at similar concentrations, iron, manganese, and vanadium are considered to be naturally occurring. Also, the vanadium concentration in the sample from MW-12 is an estimated value below the Solid Waste Section Limit (SWSL); therefore, no further action is required. None of these constituents are considered constituents of concern (COCs).

Two NC Appendix I organic constituents (tetrachloroethene in MW-12 and trichlorofluoromethane in MW-12 and MW-13) were detected above their respective SWSLs during the March 2009 event at the C&D landfill. The concentration of tetrachloroethene in the sample from MW-12 is above the NC 2L Standard. This was the second consecutive event during which tetrachloroethene has been detected above the SWSL and NC 2L Standard in the well. The concentrations of trichlorofluoromethane in samples from MW-12 and MW-13 are

similar to detections during recent events and are below the NC 2L Standard. Tetrachloroethene is considered to be a COC.

### 2.1.2 Proposed Actions

Based on the types of constituents reported present in groundwater samples and their reported concentrations, along with the close proximity of wells to waste, landfill gas is a potential source for the organic constituents detected in downgradient wells at the closed C&D landfill. Golder recommends collecting additional information in a phased approach to verify if landfill gas is the source of the contamination. During the next semi-annual groundwater monitoring event, tentatively scheduled for September 2009, the headspace of each monitoring well will be monitored for methane and hydrogen sulfide prior to sampling the well. This will be accomplished by quickly removing the expansion well cap and inserting tubing into the well to a depth just above the water table. The tubing will be connected to a portable gas monitoring instrument. The top of the well will remain covered as much as possible to prevent gases from escaping from the well until the measurement is taken. The highest measurement of methane and hydrogen sulfide for each well will be documented.

If methane is detected, headspace gases may be collected in summa canisters and analyzed for NC Appendix I organic constituents during the subsequent event (March 2010). The laboratory results will be evaluated using Henry's Law to determine if the organic constituents detected in groundwater could be derived from landfill gas.

During the March 2010 event, samples from the wells may also be analyzed for additional geochemical parameters including calcium, magnesium, potassium, sodium, and sulfide. Groundwater samples may also be analyzed for select isotope analyses. The laboratory results will be compared to typical C&D landfill leachate data using Piper and Stiff Diagrams, and other types of graphical representations. If appropriate based on these data, an Alternate Source Demonstration (ASD) Report will summarize the results and will be submitted to NCDENR. If it is determined that landfill gas, rather than leachate, is responsible for organic impacts to groundwater, an appropriate corrective action will be investigated to remedy the landfill gas impacts. Otherwise, additional assessment activities may be required.

Based on recent data for groundwater samples from MW-10, MW-12, and MW-13, we recommend that these two wells be re-developed prior to the September 2009 compliance monitoring event.

## 2.2 Closed MSW Landfill

Henderson County closed the unlined MSW/C&D landfill prior to operating the recently closed C&D facility. Because there are exceedances of groundwater standards in samples from one or more of the facility monitoring wells, and from the four assessment wells installed downgradient of an area of concern, the facility is subject to 15A NCAC 13B .1634 through .1637 of the NCSWMR. The County has already collected recent data to define the nature and extent of groundwater contamination by installing and sampling two nested well pairs southwest of the

permitted facility boundary and sampling additional existing non-compliance wells for analysis of COCs. Based on these data, additional NES evaluation is recommended.

### 2.2.1 Overview

During the March 2009 monitoring event, two NC Appendix I inorganic constituents were detected in samples from one downgradient monitoring well at concentrations that exceed groundwater standards. Mercury was detected at a concentration that exceeds the NC 2L Standard and vanadium was detected at an estimated concentration that exceeds the GWPS in the sample from MW-8. Because the vanadium concentration in the sample from MW-12 is an estimated value below the Solid Waste Section Limit (SWSL), and since vanadium has been detected at similar concentration in samples from the upgradient monitoring well, no further action is required. Therefore, mercury is considered to be the only inorganic COC.

Ten NC Appendix I volatile organic constituents (VOCs) were detected above their respective SWSLs in samples from one or more downgradient monitoring wells during the March 2009 event (acetone; chlorobenzene; 1,4-dichlorobenzene; cis-1,2-dichloroethene; methylene chloride; tetrachloroethene; trichloroethene; trichlorofluoromethane; vinyl chloride; and xylenes). Five of these constituents were detected at concentrations that exceeded their respective NC 2L Standards during the March 2009 monitoring event: 1,4-dichlorobenzene in MW-7 and AMW-1D; methylene chloride in MW-8; tetrachloroethene in MW-8 and MW-9; trichloroethene in MW-8; and vinyl chloride in MW-7, AMW-1D, and AMW-2S. Acetone; chlorobenzene; 1,4-dichlorobenzene; cis-1,2-dichloroethene; methylene chloride; tetrachloroethene; trichloroethene; trichlorofluoromethane; vinyl chloride; and total xylenes are considered COCs. Benzene was not detected above the SWSLs during the March 2009 event; however, based on recent benzene detections in samples from several site wells, it is also considered to be a COC.

### 2.2.2 Proposed Actions

Based on the available data, the potential source(s) of the groundwater standard exceedances noted for mercury and VOCs may be unrelated. Therefore, the investigation will address the mercury and organic detections separately. As stated above, during the March 2009 monitoring event, mercury was detected in the sample from MW-8 at a concentration that exceeded the NC 2L Standard. During the April 2008 event, non-compliance wells Old MW-1, Old MW-2, and MW-2 were sampled and mercury was detected at concentrations that exceeded the NC 2L Standard in Old MW-1 and Old MW-2. Based on the groundwater surface contour map provided as Drawing 1, and the location of the wells in which mercury has been detected, it appears that the source of the mercury detected in samples from MW-8, Old MW-1, and Old MW-2 may be the closed TVA disposal area, which based on anecdotal evidence is more likely to contain mercury-bearing waste than the MSW landfill.

In order to address the NC 2L Standard exceedance of mercury in MW-8 during the March 2009 event, Golder recommends that MW-8 and MW-6, which had a relatively high turbidity reading during the March 2009 sampling event, be re-developed prior to the September 2009 monitoring event. During the September 2009 event, a dissolved mercury sample should be collected from

MW-8 to determine if entrained sediment in the groundwater samples is a potential source of the elevated mercury concentrations. The dissolved mercury sample will be analyzed if total mercury is detected above its standard in the same sample.

If mercury remains above its NC 2L Standard during the September 2009 event in the sample from MW-8 or any other compliance wells, Golder recommends the installation and sampling of an assessment well (AMW-3) between the closed MSW landfill and the closed TVA disposal area as shown on Drawing 1 to assist in determining the source of the mercury. If mercury is not detected in the proposed well, it provides additional evidence that the constituent is derived from the closed TVA disposal area and not the closed MSW landfill. If mercury is detected in the sample from AMW-3, an additional well (AMW-4) may be installed between the closed TVA disposal area and the inactive disposal area north of the TVA disposal area to further delineate the source. The location of both potentially proposed wells are shown on Drawing 1. The first well (AMW-3) will be installed and sampled between the September 2009 and March 2010 sampling events. The results of this investigation will be submitted to NCDENR as an ASD as appropriate. Otherwise, mercury will remain a COC for groundwater assessment activities at the MSW landfill.

Based on the map provided as Drawing 1, monitoring well MW-9 is located downgradient of the C&D landfill, and cannot adequately monitor the MSW landfill. The well is located downgradient of MW-12, which monitors the C&D unit. The well may also monitor the TVA disposal area, which is hydrogeologically side gradient of the well. The TVA disposal area is situated between the closed MSW landfill and MW-9. Since the facility is not required to monitor the TVA disposal area, well MW-9 does not serve its intended purpose and should be removed from the compliance network. Therefore, we are requesting that well MW-9 be removed from the compliance network for the MSW facility and remain for water levels and/or assessment of the C&D groundwater contamination.

Due to the continued groundwater standard exceedances of NC Appendix I organic constituents in wells MW-7, MW-8, AMW-1D, and AMW-2S, additional data need to be collected to prepare an NES. This investigation will continue the work previously performed by Camp Dresser & McKee (CDM). The NES will include an updated groundwater map, a plume map, hydrogeologic cross sections to define the vertical extent of contamination, and updated groundwater flow/contaminant migration rates, using existing aquifer testing data.

Based on the presence of daughter products of chlorinated solvents in samples from downgradient monitoring wells MW-7 and MW-8, and from non-compliance wells Old MW-1; Old MW-2; and MW-2, it is believed that natural attenuation is occurring at the facility. To provide additional data to support this theory and in order to provide some baseline data for future Assessment of Corrective Measures (ACM) activities, we propose to analyze Solid Waste Section (SWS) approved monitored natural attenuation (MNA) indicator parameters in samples from monitoring wells MW-5, MW-6, MW-7, MW-8, Old MW-1, MW-1, Old MW-2, and MW-2 during the next scheduled semi-annual monitoring event (September 2009). The MNA indicator parameters include alkalinity, carbon dioxide, chloride, ethane, ethene, ferrous iron, hydrogen, methane, nitrate, nitrite, sulfide, sulfate, total organic carbon, fatty acids, dissolved oxygen, and oxidation reduction potential. These wells will be sampled utilizing low-flow sampling techniques with a decontaminated portable pump to obtain groundwater samples. The

headspace of each monitoring well will also be analyzed for the methane using portable gas monitoring equipment to evaluate the potential for landfill gas to groundwater impacts in the vicinity of the MSW landfill.

Based on information provided by CDM, monitoring well MW-1 is currently damaged and unable to be sampled. Due to the depth and location of MW-1, this will be an important monitoring well as this investigation continues because it is screened in the lower aquifer as opposed to Old MW-1, which is screened in the uppermost aquifer. A criteria of a NES is to delineate the vertical extent of contamination as well as the horizontal extent. Therefore, Golder proposes to attempt to repair MW-1 during the installation of proposed well AMW-3, if the well cannot be sampled during the September 2009 event.

Non-compliance wells Old MW-1, MW-1, Old MW-2, and MW-2 will be sampled for NC Appendix I parameters plus mercury during the next semi-annual monitoring event, in order to obtain more recent data and assess the COCs. The laboratory data, which will include NC Appendix I organic parameters and MNA parameters, will be evaluated using the EPA Natural Attenuation Screening Protocol and the BIOCHLOR Monitored Natural Attenuation Analysis software. If the analysis shows that natural attenuation is occurring at the site, MNA may be evaluated during the ACM as a potential remedy. Due to the presence of NC Appendix I constituents above groundwater standards in deep, bedrock wells, a more active remediation technology, such as enhanced bioremediation, may also be evaluated. Remediation strategies will be addressed in an ACM after the completion of the NES and mercury ASD, and receipt of approval from the SWS.

Assessment monitoring wells AMW-1S, AMW-1D, AMW-2S, and AMW-2D were installed on County property outside the permitted (compliance) facility boundary by CDM to assess the extent of contamination from the landfill. A comparison of VOCs detected in samples from well MW-6 to those detected in samples from the assessment monitoring wells, which appear to be downgradient of MW-6, do not correlate well. During the March 2009 event, acetone was the only NC Appendix I VOC detected in the sample from MW-6; it was detected at a concentration below the NC 2L Standard. Eight VOCs (chlorobenzene; 1,2-dichlorobenzene; 1,4-dichlorobenzene; dichlorodifluoromethane; 1,1-dichloroethane; cis-1,2-dichloroethene; vinyl chloride; and xylenes) were detected in samples from the assessment monitoring wells during the March 2009 event. The concentrations of the VOCs in the assessment wells were below the SWSLs, except for chlorobenzene in AMW-1D and 1,4-dichlorobenzene in AMW-1D and AMW-2S. Two VOCs (1,4-dichlorobenzene in AMW-1D and vinyl chloride in AMW-1D and AMW-2S) were detected at concentrations that exceeded their respective NC 2L Standard, though the concentrations of vinyl chloride were estimated below the SWSL.

Historically, constituents consistent with a petroleum source, including benzene; chlorobenzene; 1,2-dichlorobenzene; 1,4-dichlorobenzene; ethylbenzene; naphthalene; toluene; and xylenes, have been detected in samples from MW-6. The chlorinated (1,1-dichloroethane, cis-1,2-dichloroethene, and vinyl chloride) and fluorocarbon (dichlorofluoromethane) solvents detected in the assessment wells have not historically been detected in MW-6. Therefore, some of the VOCs detected in the assessment monitoring wells may be related to releases from the adjacent Henderson County bus depot (located east of the assessment wells), rather than the

closed MSW landfill. The bus depot area is hydraulically side gradient and topographically upgradient with respect to the assessment monitoring wells as shown on Drawing 1.

Since the assessment wells are located outside of the compliance boundary for the MSW landfill, and the recent sample from MW-6 indicates compliance with groundwater standards at the facility boundary, this area will not be considered as an Area of Concern for the NES unless warranted by future results. Rather, as described above, additional data will be collected from the areas downgradient of wells MW-7 and MW-8 during the NES. Therefore, we request that the four existing assessment monitoring wells (AMW-1S, AMW-1D, AMW-2S, and AMW-2D) be removed from the compliance monitoring network and remain for collection of semi-annual water levels.

## **5.0 SUMMARY**

This Work Plan proposes actions to address and/or investigate the source of recent groundwater standard exceedances in samples collected from monitoring wells at the closed C&D landfill and closed MSW landfill maintained by Henderson County. Much of the initial field work associated this work plan will occur before or during the next semi-annual monitoring event and will include re-development of select monitoring wells at both landfills, monitoring headspace of the C&D monitoring wells for methane, the collection of NC Appendix I, mercury, and MNA parameters from select MSW compliance and assessment wells (Table 1). The results of these activities will be combined with data collected previously and submitted to NCDENR as specified in the sections above.

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## **TABLE**

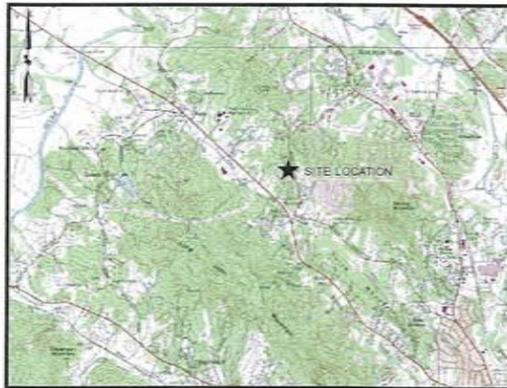
**TABLE 1**

**Proposed Schedule for Groundwater Assessment Actions for the C9/16/2009 and MSW Landfills  
Closed Henderson County Landfill, Permit No. 45-01**

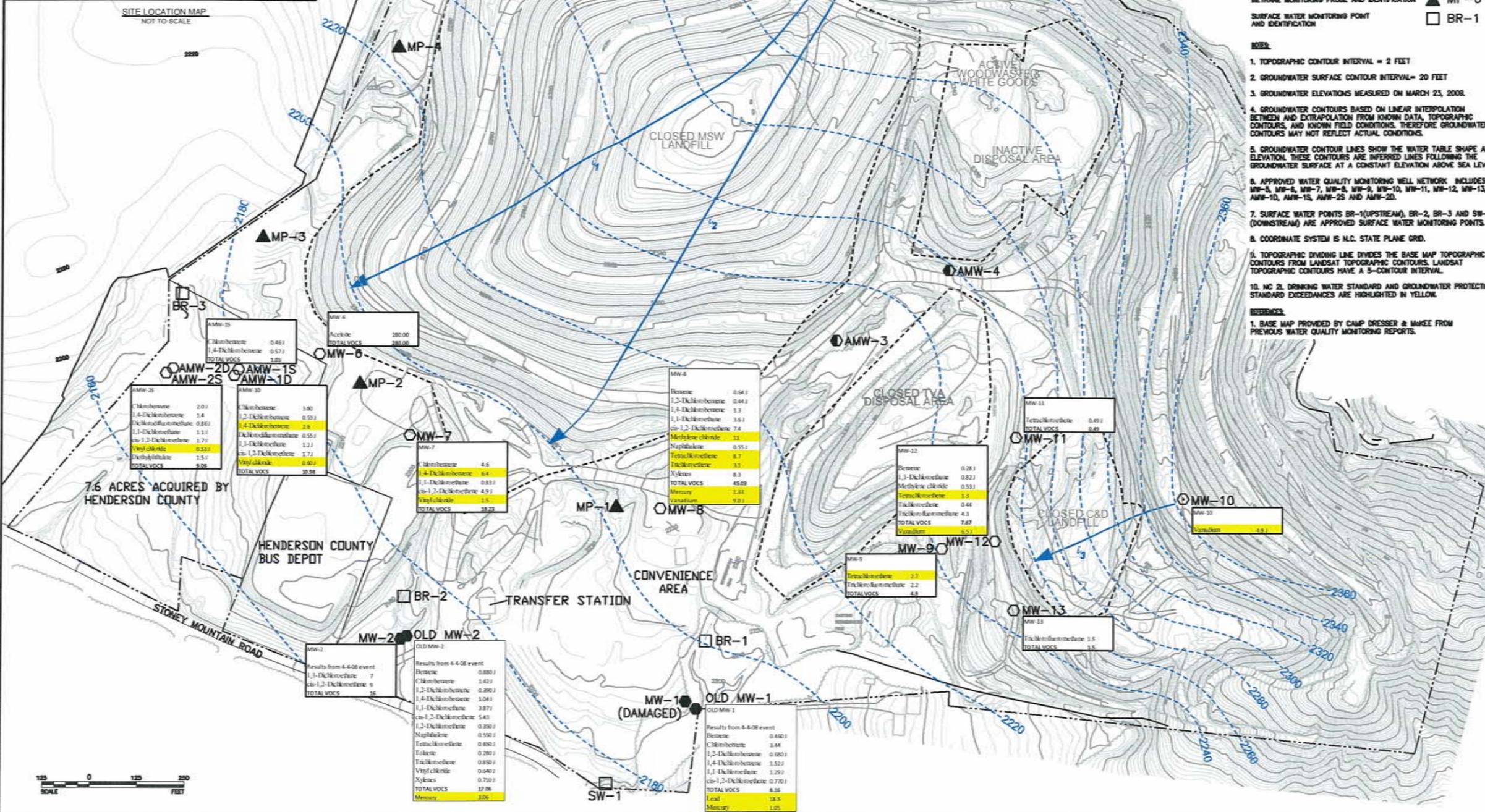
<b>C&amp;D Landfill</b>	
<b>Proposed Schedule</b>	<b>Proposed Action</b>
During September 2009 Event	Re-develop monitoring wells MW-10, MW-12, and MW-13. Monitor headspace in monitoring wells MW-9, MW-11, MW-12 and MW-13 for methane and hydrogen sulfide.
During March 2010 Event	Collect landfill gas samples from the headspace of MW-9, MW-11, MW-12, and MW-13 and have them analyzed for NC Appendix I VOCs (pending results of methane headspace monitoring). Analyze groundwater samples from MW-9, MW-10, MW-11, MW-12, and MW-13 for leachate indicator parameters.
After March 2010 Event	Submit ASD to NCDENR for VOC detections in downgradient wells, pending results.
<b>MSW Landfill</b>	
<b>Proposed Schedule</b>	<b>Proposed Action</b>
Current Action	Request NCDENR to remove MW-9 from the compliance monitoring network for the MSW facility (to remain for assessment purposes). Request NCDENR to remove AMW-1S, AMW-1D, AMW-2S, and AMW-2D from the compliance monitoring network (to remain for future use if needed).
During September 2009 Event	Re-develop monitoring wells MW-6 and MW-8. Collect dissolved mercury sample from MW-8 and analyze if total mercury is detected. Sample MW-5, MW-6, MW-7, MW-8, Old MW-1, MW-1, Old MW-2, and MW-2 using low-flow sampling techniques and analyze samples for NC Appendix I parameters, mercury, and approved MNA parameters.
Prior to March 2010 Event	Install AMW-3 if mercury is detected in downgradient compliance wells during the September 2009 event. Repair MW-1, if necessary and feasible.
During March 2010 Event	Sample AMW-3 for analysis of mercury, if installed.
Prior to September 2010 Event	Install AMW-4, if needed.
During September 2010 Event	Sample AMW-4 for analysis of mercury, if installed.
After March or September 2010 Event	Submit ASD to NCDENR for mercury detection in MW-8, pending results. Submit NES to NCDENR for VOC detections in downgradient wells, pending results.

**Notes:** MW = Monitoring well  
 AMW = Assessment Monitoring Well  
 NC = North Carolina  
 ASD = Alternate Source Demonstration  
 NCDENR = North Carolina Division of Environment and Natural Resources  
 VOCs = Volatile Organic Compounds  
 MNA = Monitored Natural Attenuation  
 NES = Nature and Extent Study

## **DRAWING**



SITE LOCATION MAP  
NOT TO SCALE



- LEGEND**
- DUSTING 10 FT. CONTOUR
  - DUSTING 2 FT. CONTOUR
  - PROPERTY LINE
  - LIMITS OF WASTE
  - STREAM
  - BUFFER
  - TREELINE
  - DUSTING ROAD
  - TOPOGRAPHIC DIVIDING LINE (SEE NOTE #9)
  - GROUNDWATER SURFACE CONTOURS
  - APPROXIMATE GROUNDWATER FLOW DIRECTION USED TO CALCULATE GRADIENT
  - MONITORING WELL AND IDENTIFICATION
  - NON COMPLIANCE MONITORING WELL AND IDENTIFICATION
  - PROPOSED ASSESSMENT MONITORING WELL AND IDENTIFICATION
  - METHANE MONITORING PROBE AND IDENTIFICATION
  - SURFACE WATER MONITORING POINT AND IDENTIFICATION

- NOTES**
1. TOPOGRAPHIC CONTOUR INTERVAL = 2 FEET
  2. GROUNDWATER SURFACE CONTOUR INTERVAL = 20 FEET
  3. GROUNDWATER ELEVATIONS MEASURED ON MARCH 23, 2009.
  4. GROUNDWATER CONTOURS BASED ON LINEAR INTERPOLATION BETWEEN AND EXTRAPOLATION FROM KNOWN DATA, TOPOGRAPHIC CONTOURS, AND KNOWN FIELD CONDITIONS. THEREFORE GROUNDWATER CONTOURS MAY NOT REFLECT ACTUAL CONDITIONS.
  5. GROUNDWATER CONTOUR LINES SHOW THE WATER TABLE SHAPE AND ELEVATION. THESE CONTOURS ARE INFERRED LINES FOLLOWING THE GROUNDWATER SURFACE AT A CONSTANT ELEVATION ABOVE SEA LEVEL.
  6. APPROVED WATER QUALITY MONITORING WELL NETWORK INCLUDES: MW-5, MW-6, MW-7, MW-8, MW-9, MW-10, MW-11, MW-12, MW-13, AMW-10, AMW-15, AMW-25 AND AMW-30.
  7. SURFACE WATER POINTS BR-1 (UPSTREAM), BR-2, BR-3 AND SW-1 (DOWNSTREAM) ARE APPROVED SURFACE WATER MONITORING POINTS.
  8. COORDINATE SYSTEM IS N.C. STATE PLANE GRID.
  9. TOPOGRAPHIC DIVIDING LINE DIVIDES THE BASE MAP TOPOGRAPHIC CONTOURS FROM LANDSAT TOPOGRAPHIC CONTOURS. LANDSAT TOPOGRAPHIC CONTOURS HAVE A 5-CONTOUR INTERVAL.
  10. N.C. DRINKING WATER STANDARD AND GROUNDWATER PROTECTION STANDARD EXCEEDANCES ARE HIGHLIGHTED IN YELLOW.

**REFERENCES**

1. BASE MAP PROVIDED BY CAMP DRESSER & MAKEE FROM PREVIOUS WATER QUALITY MONITORING REPORTS.



**Golder Associates**  
GOLDER ASSOCIATES INC., INC.

REV	DATE	DES	REVISED DESCRIPTION	CAAD	CHK	BY

**HENDERSON COUNTY  
CLOSED MSW AND C&D  
LANDFILL PERMIT # 45-01**

**TOTAL VOLATILE ORGANIC  
COMPOUNDS (VOCs) AND  
GROUNDWATER SURFACE  
CONTOUR MAP  
MARCH 2009**

PROJECT No.	083-0850009
FILE No.	
REV. 0	SCALE 1"=125'
DESIGN	JAD 04/28/09
CHKD	LJB 04/28/09
CHECK	
REVIEW	

**DWG. 1**

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