

**ATTACHMENT 2**  
**Pilot Corrective Action**  
**Study Monitoring Plan**



January 30, 2009

The Dow Chemical Company  
Midland, Michigan 48674  
USA

CERTIFIED MAIL  
7007 2680 0001 3709 4275

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Subject: 1925 Landfill Pilot Corrective Action Study Hydraulic Monitoring Plan Submittal

In correspondence dated November 12, 2008, Dow provided the 1925 Landfill Pilot Corrective Action Study. MDEQ staff requested a hydraulic monitoring plan be prepared and submitted for the Corrective Action Study in a meeting on November 20, 2008. In accordance with that request, attached you will find the 1925 Landfill Pilot Corrective Action Study Hydraulic Monitoring Plan.

If you have any questions regarding this Study, please contact Steve Lucas at (989) 638-6012.

A handwritten signature in black ink, appearing to read "Brad Fedorchak".

Brad Fedorchak  
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Enclosure

mdc

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The Dow Chemical Company  
1925 Landfill Seepage  
Pilot Corrective Action Study  
Hydraulic Monitoring Plan

January 30, 2009

Prepared by URS Corporation

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## **1.0 Introduction**

MDEQ periodically inspects Final Cover over capped areas at Michigan Operations, located in Midland, Michigan (see Figure 1). MDEQ conducted a Final Cover Inspection of the Localized Elevated Level Sites II and III on June 27, 2007, and provided subsequent written documentation of the inspection dated September 28, 2007. As part of that inspection, MDEQ also inspected portions of the 1925 Landfill adjacent to Sites II and III. Figure 2 presents the location of Sites II and III. Corrective measures recommended by MDEQ included an area of apparent seepage in the 1925 Landfill. In a response to the MDEQ Final Cover Inspection Report for Localized Elevated Level Sites II and III, dated November 21, 2007, it was noted that hydraulic investigation work had been initiated to determine the source of the seepage. It was originally anticipated that the investigative work could be completed by June 2008 and a corrective action plan submitted by August 2008. However additional data were needed, to propose a corrective action plan for the cover in the seepage areas. An interim update letter was submitted to MDEQ on August 29, 2008, summarizing work that had been done to date. A hydrogeologic evaluation and Corrective Action Study Plan was submitted on November 12, 2008. This monitoring plan is intended to supplement that Corrective Action Study.

## **2.0 Design Objectives**

This objective of the Pilot Corrective Action Study is to reduce the hydraulic head within the 1925 Landfill in this area to an elevation below the ground surface. This will be accomplished by supplementing the existing vegetation with a willow tree plot that will increase transpiration and reduce the volume of water currently infiltrating into the landfill.

### **2.1 Summary of Conceptual Design**

Previous hydrogeologic evaluation for the 1994 and 2001 RGIS Upgrade Projects in this area have designed for upland ground water seepage rates of  $1.1 \times 10^{-4}$  and  $0.89 \times 10^{-4}$  cfs/lineal foot of trench perpendicular to groundwater (Dow, 1994 and McDowell, 2000). The width of the tree stand perpendicular to ground water flow is 400 feet (reference Figure 2). Water table affects similar to those produced by the RGIS tile systems in this area may therefore be anticipated from a total ground water removal rate ranging from 3,100 to 3,800 cfd. This removal rate, taken over 608 total trees results in a water use rate between 5.10 and 6.25 cfd/tree (38 to 47 gal/day/tree). This range of water use is within the range that can be eventually expected for an established tree stand (Pivetz, 2001). Based on water level readings on the south portion of the 1925 Landfill, this should decrease the water level to below grade level and therefore stop seepage (see Figure 3).

### **2.2 Performance Monitoring**

Water levels from a network of thirty-six (36) new and existing piezometers will be measured on a monthly basis to evaluate progress during the Pilot Corrective Action Study. In addition to water level monitoring, on-going inspections of the area of identified seepage will continue throughout the Pilot Corrective Action Study.

As discussed in the Corrective Action Study Plan, two areas of ground water recharge have been identified during the hydrogeologic investigation. Because of this fact, water levels from both

recharge areas will be monitored on a monthly basis throughout the study, with the recharge area adjacent to MW-3 vertical piezometer cluster being utilized as a control area to evaluate the net benefit caused by the willow tree stand. It is anticipated that piezometers in and adjacent to the willow tree stand should show a long-term downward trend in ground water elevations as compared to the control area. Hydraulic control through the use of trees such as is being proposed is understood to require a significant amount of time to develop, and minimal change should be expected to be observed during the first year.

Water levels from the new and existing piezometers will be measured on a monthly basis and submitted in the Quarterly Environmental Monitoring Reports. An evaluation summary of each year's data and observations will be provided in the Annual Environmental Monitoring Reports. Changes to water level monitoring frequency will likely be possible over the life of the project. Alterations to the monitoring frequency will be specified in the Quarterly Monitoring Reports, as appropriate. If it becomes clear that the objective cannot be achieved utilizing these methods, further corrective measures will be proposed to reduce the hydraulic head within the 1925 Landfill to an elevation below ground surface, and therefore eliminate seepage.

### **2.3 Existing Piezometers**

Currently, there are eighteen (18) existing piezometers that are being monitored on a monthly basis. Water level data obtained from the existing piezometers are included in Table 1 and summarized in Figure 4.

### **2.4 Additional Piezometers**

Once the tree stand has been planted, six additional vertical piezometer clusters will be installed as shown in Figure 5. At each vertical cluster location, a piezometer will be installed at depths of eight feet (8'), fifteen feet (15'), and twenty-five feet (25'). Minimal affects from the tree stand are anticipated throughout the first growing season, so the first year of data may be considered a baseline condition for the new piezometers.

### **3.0 Schedule**

The following schedule is established for the work listed above. This schedule may change, dependent upon weather and ground conditions. The general tasks are listed below with the ranges of dates that these tasks are anticipated to be completed in, they do not represent durations.

<b>Task</b>	<b>Start</b>	<b>End</b>
Order & Receive Trees	February 1	March 15
Mob & Site Prep	March 30	April 15
Planting	March 30	April 30
Piezometer Installation	May 1	May 20

### **4.0 Citations**

Dow, September 15, 1994. 1994 RGIS Tile Upgrade Project Flow Calculations and Tile Sizing evaluation by John

McDowell & Associates, February 2000. Final Report Hydrogeological Study and Design: 2001 RGIS Upgrade Project – Lift Station #5 to Station 69+25 (High Point). Midland, Michigan.

Pivetz, Bruce E., February 2001. Phytoremediation of Contaminated Soil and Ground Water at Hazardous Waste Sites. EPA/540/S-01/500.

Table 1  
1925 Landfill Pilot Corrective Action Study  
Water Level Data

Static Water Level					
LOCATION	Casing Elev.	5/13/2008	8/15/2008	11/25/2008	12/31/2008
MW-1	627.43		21.31	21.59	21.69
MW-2s	637.99		24.92	25.32	25.51
MW-2d	637.47		28.70	28.78	28.42
MW-3s	638.01		10.36	11.06	8.96
MW-3d	637.97		21.86	22.11	22.16
MW-3i	639		16.72	17.27	18.01
MW-4s	633.93		7.59	8.38	7.00
MW-4d	633.68		20.90	17.37	16.80
MW-5s	620.63		12.71	11.57	10.36
MW-5d	621.52		13.98	14.04	12.21
PZ-1s	631.06	4.62		7.60	6.77
PZ-1d	631.51	4.99		7.43	6.56
PZ-2	627.75	1.51		4.22	3.18
PZ-4s	633.93	14.32		15.92	15.75
PZ-4d	633.68	15.59		17.29	17.10
PZ-5	618.8	10.39		10.92	9.86
PZ-6	626.11	0.00		2.45	1.98
PZ-8	622.56	14.92		15.87	<i>damaged</i>

Ground Water Elevation					
LOCATION		5/13/2008	8/15/2008	11/25/2008	12/31/2008
MW-1			606.12	605.84	605.74
MW-2s			613.07	612.67	612.48
MW-2d			608.77	608.69	609.05
MW-3s			627.65	626.95	629.05
MW-3d			616.11	615.86	615.81
MW-3i			622.28	621.73	620.99
MW-4s			626.34	625.55	626.93
MW-4d			612.78	616.31	616.88
MW-5s			607.92	609.06	610.27
MW-5d			607.54	607.48	609.31
PZ-1s		626.44		623.46	624.29
PZ-1d		626.52		624.08	624.95
PZ-2		626.24		623.53	624.57
PZ-4s		619.61		618.01	618.18
PZ-4d		618.09		616.39	616.58
PZ-5		608.41		607.88	608.94
PZ-6		626.11		623.66	624.13
PZ-8		607.64		606.69	<i>damaged</i>



City of Midland

Dow Chemical  
Michigan Operations

Site

Midland County  
Bay County

**Legend**

-  Dow Facility Boundary
-  City of Midland

**URS**  
Dow Business Unit

Figure 1  
General Site Location  
1925 Landfill CA Study  
The Dow Chemical Company  
Midland, Michigan

Drawn: MDC	Checked: 11/4/08	Approximate Scale: 1" = 1 mile
Date: 04 Nov 2008	Drawing File: Figure 1.mxd	

# Legend

 Willow Tree Stand



Location of Design Area from 1994 RGIS Upgrade for Flow Comparison

Location of Design Area from 2001 RGIS Upgrade for Flow Comparison

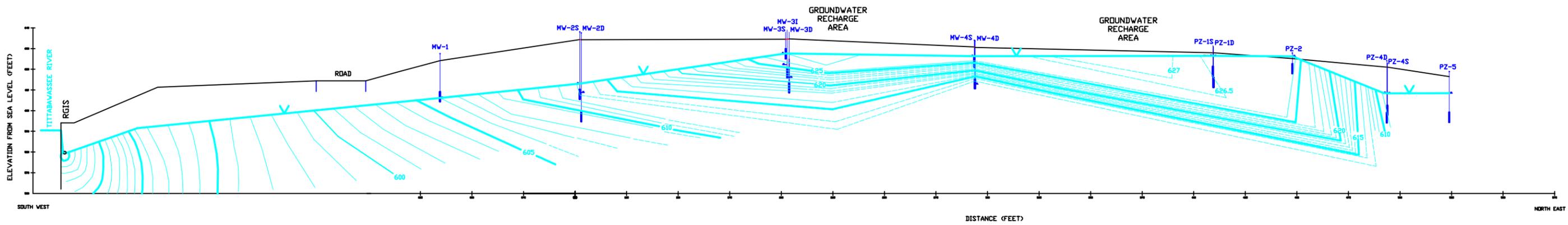
Location of Willow Tree Stand



Figure 2  
General Site Plan  
1925 Landfill CA Study  
The Dow Chemical Company  
Midland, Michigan

Drawn: MDC	Checked: 0128/09	Approximate Scale: 1" = 300'
Date: 28 Jan 2009	Drawing File: Figure 2.mxd	

GROUNDWATER ELEVATION DATA			
WELL	CASING ELEV	SWL	ELEVATION
MW-1	627.43	21.31	606.12
MW-2S	637.99	24.92	613.07
MW-2D	637.47	28.70	608.77
MW-3S	638.01	10.36	627.65
MW-3I	639.00	16.72	622.28
MW-3D	637.97	21.86	616.11
MW-4S	633.93	7.59	626.34
MW-4D	633.68	20.90	612.78
MW-5S	620.36	12.71	607.65
MW-5D	621.52	13.98	607.54
(SB-1B) PZ-1S	631.06	4.62	626.44
(SB-1A) PZ-1D	631.51	4.99	626.52
PZ-2	627.75	1.51	626.24
(SB-4A) PZ-4S	622.64	14.32	608.32
(SB-4B) PZ-4D	624.06	15.59	608.47
PZ-5	618.80	10.39	608.41
PZ-6	626.11	0.00	626.11
PZ-8	622.56	14.92	607.64



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TITLE  
 FIGURE 3  
 HYDROLOGIC CROSS SECTION



URS CORPORATION – DOW BUSINESS UNIT – MIDLAND, MICHIGAN (989)–638–1696

DATE 11/01/08	JOB NO. 41568415
DR. MDC	SKETCH NO.
CK. MS	Section1_1925Landfill-MC.dwg



# Legend

-  New Piezometer Clusters
-  Piezometers
-  WIF Sewer
-  proposed-planting-area



Figure 5  
Piezometer Location Plan  
1925 Landfill CA Study  
The Dow Chemical Company  
Midland, Michigan

Drawn by: MDC	Checked: 01/24/09	Approximate Scale: 1" = 60'
Date: 24 Jan 2009	Drawing File: Figure 5.mxd	

**ATTACHMENT 3**  
**Inspection Form**

# 1925 Landfill CAMMP Inspection Form

## Procedure checklist

Use the following steps to inspect 1925 Landfill.

Step	Action (and Hazard/Precaution if applicable)	Initials date/time
1	<p><b><u>Erosion of Finished Slopes</u></b></p> <p>The finished slopes will be checked for washouts during the spring and fall when the ground is not frozen.</p> <p><b>Finished slopes inspected – circle one: Yes or No</b></p> <p><b>Comments:</b> _____            _____            _____            _____</p> <p><b>Work Order number:</b> _____</p>	
2	<p><b><u>Settlement</u></b></p> <p>The tops of the closed areas will be inspected for unexpected ponding during the spring and fall seasons when temperatures are above freezing.</p> <p><b>Inspection for settlement – circle one: Yes or No</b></p> <p><b>Comments:</b> _____            _____            _____            _____</p> <p><b>Work Order number:</b> _____</p>	

*Continued on next page*

## 1925 Landfill CAMMP Inspection Form, Continued

3	<p><b><u>Final Cover (Vegetative and Asphalt)</u></b></p> <p>The final cover will be inspected for adequacy at least once during spring and fall seasons.</p> <p>Areas of bituminous or aggregate cover identified to have cracks or settlement that cause exposure of in-place, subsurface waste will be repaired by filling or sealing.</p> <p><b>Final Cover Inspected – circle one: Yes or No</b></p> <p><b>Comments:</b> _____          _____          _____          _____</p> <p><b>Work Order number:</b> _____</p>	
4	<p><b><u>Run-off and Run-on Control</u></b></p> <p>The drainage swales to divert storm water across and off site will be checked at least once during the spring and fall seasons to assure proper drainage.</p> <p>Detention basin and restricted outlets will be checked in the spring, fall and after every 2-inch or greater rainfall event to ensure proper drainage is occurring.</p> <p><b>Run-off and Run-on Control inspected – circle one: Yes or No</b></p> <p><b>Comments:</b> _____          _____          _____          _____</p> <p><b>Work Order number:</b> _____</p>	

## **FIGURES**



LEL I

LEL II

LEL III

DIVERSION  
BASIN

TITTABAWASSEE RIVER

1005 HILL

ENVIRONMENTAL  
OPERATIONS AREA

DEWATERING  
FACILITY

8 POND

S SAGINAW ROAD

**LEGEND & NOTES**



Represents the approximate limits of the 1925 Landfill.

**URS**

Dow Business Unit

Figure 1  
1925 Landfill Inspection Site Plan  
The Dow Chemical Company  
Midland, Michigan

Drawn: MDC	Checked:	Approximate Scale: 1" = 600'
Date: 28 September 2010	Drawing File: 1925 Landfill.mxd	

Poseyville Landfill

Corrective Action Monitoring and Maintenance Plan



October 28, 2011

The Dow Chemical Company  
Midland, Michigan 48674  
USA

CERTIFIED MAIL  
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Liane J. Shekter Smith, Chief  
Michigan Department of Environmental Quality  
Resource Management Division  
P.O. Box 30241  
Lansing, MI 48909

cc: Cheryl Howe, MDEQ – P.O. Box 30241, Lansing, MI 48909;  
Al Taylor, MDEQ – P.O. Box 30241, Lansing, MI 48909;  
Trisha Confer, MDEQ – Saginaw Bay District Office, 401 Ketchum Street,  
Suite B, Bay City, MI 48708.

SUBJECT: REVISED POSEYVILLE LANDFILL  
CORRECTIVE ACTION MONITORING AND MAINTENANCE PLAN  
(CAMMP); EPA FACILITY NUMBER MID 000 724 724

In accordance with Attachment 28 (Compliance Schedule) of the Act 451 Part 111 Operating License issued to The Dow Chemical Company, Michigan Division, effective June 12, 2003 (Operating License), Dow is submitting the revised *Poseyville Landfill Corrective Action Monitoring and Maintenance Plan* (CAMMP). This report was prepared by URS Corporation on behalf of The Dow Chemical Company, Michigan Operations.

This document, upon MDEQ approval, will be incorporated into the appropriate monitoring and inspection sections of the Operating License.

If you have any questions regarding this information, please contact Martin Crook at 989-638-9552.

Dan Rader  
EH&S Responsible Care Leader  
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Enclosure

mdc

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The Dow Chemical Company  
Compliance Schedule Task L-1  
Poseyville Landfill Corrective Action  
Monitoring and Maintenance Plan  
(CAMMP)

October 1, 2010  
Revised October 2011

Prepared by URS Corporation

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## **POSEYVILLE LANDFILL CORRECTIVE ACTION MONITORING AND MAINTENANCE PROGRAM**

### **1.0 INTRODUCTION**

In accordance with the Part XII Compliance Schedules of The Dow Chemical Company's (Dow) Hazardous Waste Management Facility Operating License (License) issued June 12, 2003, Dow has prepared this Post-Closure Corrective Action Monitoring and Maintenance Program (CAMMP) for the Poseyville Landfill (Landfill). The CAMMP provides a plan for long-term maintenance of the Landfill, including chemical and hydraulic monitoring. This CAMMP replaces and supersedes the Corrective Action Monitoring Plan dated February 14, 1989 (Approved by EPA on May 9, 1990

Dow's Poseyville Landfill is located outside the Midland plant site on Poseyville Road in Midland, Michigan. The Landfill was originally operated by the City of Midland as a municipal landfill. Dow acquired the property from the City of Midland in 1955, and operated it as an industrial landfill until 1981.

Closure activities in 1981 and 1982 consisted of the installation of a 1,500 foot long slurry wall along the northeast corner of the landfill. Shallow till sands are located in this region and the slurry wall was keyed into the underlying clay to provide a hydraulic barrier to contaminant migration. A leachate collection tile system was installed around the perimeter of the Landfill. A 2-foot compacted clay cap was also installed over the Landfill and keyed into the underlying clay. Four purge wells were installed in the till sands to collect and prevent the migration of the impacted groundwater. The impacted groundwater from the till sands is piped to the Dow waste water treatment plant (WWTP) for treatment and disposal.

In 2007, a lateral extension of the perimeter tile was extended into the cell to prevent leachate outbreaks along the south side of the landfill.

The till sand strata is hydraulically and chemically monitored on a periodic basis. Specific details on the monitoring program are contained in the Sampling and Analysis Plan (SAP), Attachment 24 of the Facility License and Part X.C of the License.

The Poseyville Landfill is underlain by naturally-occurring, low-permeability lacustrine clay and glacial tills which serve as a barrier to vertical migration of waste constituents.

## 2.0 OBJECTIVE OF PLAN

The objective of the CAMMP for the Poseyville Landfill is as follows:

- Provide for adequate long-term maintenance and hydraulic control of the Landfill through hydraulic and chemical monitoring. The CAMMP will include provisions to inspect and ensure the integrity of the cover material, prevent the migration of impacted groundwater, and recover impacted groundwater from the subsurface.

## 3.0 EXISTING MONITORING PLAN

The current Detection and Monitoring Plan is referenced in Section X.C of Dow's June 12, 2003 License, and is incorporated by reference into this CAMMP.

Pursuant to that plan, Dow conducts periodic assessments of monitoring wells, purge wells, and piezometers at the Landfill. The data has consistently shown that impacted groundwater has been hydraulically controlled through the operation of four purge wells, and that groundwater contaminant concentrations have not increased over time.

## 4.0 INSPECTION ACTIVITIES

Inspections will include the following activities with observations and corrective measures documented as specified on the Inspection Form (example provided as Attachment 1):

*4.1 Security*

Dow's perimeter security system is managed by Dow's Emergency Services and Security Department. The entire Poseyville Landfill site perimeter is fenced, and routine, security inspections of the site are conducted.

*4.2 Erosion/Cover Settlement/Cover Condition*

Inspections for erosional effects to finished slopes, cap settlement areas and general cover condition will be conducted each spring and each fall. Two inspections will be conducted annually as a minimum. Cover conditions are also observed during mowing activities. The site Inspection Form contains a more detailed listing of features that are inspected.

*4.3 Piezometers/Monitoring Wells*

Piezometers and monitoring wells are inspected at the time of sampling/measuring to ensure there have been no breaches to their physical integrity. The specific details of piezometer monitoring and sampling/measuring are included in the Facility SAP (Attachment 24 of the Facility License).

*4.4 Leachate System*

The perimeter tile manholes are inspected twice per week for any potential integrity issues. The flow meter readings on the lift stations and purge wells are used to review the gallons of leachate removed and/or runtime per day.

## 5.0 MAINTENANCE ACTIVITIES

Current maintenance activities are consistent with the existing plans and include provisions for the following:

### 5.1 *Erosion*

Any repairs to documented breaches of cap integrity are conducted expeditiously, with new cover being placed and vegetation re-established as soon as feasible by seasonal variables.

### 5.2 *Cover Settlement*

Areas identified where final cover settlement results in ponding will be graded and vegetated to re-establish appropriate drainage.

### 5.3 *Vegetative Cover*

The vegetative cover is routinely maintained through re-seeding (as necessary) and mowing during the growing season as appropriate.

### 5.4 *Run-off and Run-on Control*

The landfill cap is maintained so that no ponding or accumulation of storm water occurs.

### 5.5 *Perimeter tile jetting*

To maintain adequate drainage, the perimeter tiles are jetted on an annual basis to clear any potential obstructions that may have materialized throughout the year.

## 6.0 MONITORING ACTIVITIES

Future monitoring activities for the Poseyville Landfill will be consistent with Part X.C and Attachment 24 of the License and include a Detection Monitoring program and Corrective Action Chemical and Hydraulic Monitoring Programs. Details of the monitoring activities are included in the above-referenced sections of the Facility License. Monitoring results and evaluations are reported as specified in the License.

## 7.0 DATA EVALUATIONS AND CORRECTIVE MEASURES ASSESSMENTS

Information obtained through the inspection, maintenance, monitoring programs, and previously submitted documents will be evaluated and if data gaps are identified or corrective measures are determined to be required, a work plan will be prepared and submitted to the MDEQ for review and approval prior to implementation.

## 8.0 POST-CLOSURE USE

Alternate future land use of Poseyville Landfill that will not reduce the effectiveness of the final cover, liner(s), or any other components of the containment system or the function of the closed units' monitoring systems are allowable without prior approval. Note: Poseyville Landfill is not subject to post-closure cap land use restrictions contained in Part IX of the License.

## **ATTACHMENTS**

**ATTACHMENT 1**  
**Inspection Form**

# Poseyville Landfill CAMMP Inspection Form

**Procedure checklist**

Use the following steps to inspect Poseyville Landfill.

Step	Action (and Hazard/Precaution if applicable)	Initials date/time
1	<p><b><u>Erosion of Finished Slopes</u></b></p> <p>The finished slopes will be checked for washouts during the spring and fall when the ground is not frozen.</p> <p><b>Finished slopes inspected – circle one: Yes or No</b></p> <p><b>Comments:</b> _____                      _____                      _____                      _____</p> <p><b>Work Order number:</b> _____</p>	
2	<p><b><u>Settlement</u></b></p> <p>The surface of the cap will be inspected for ponding during the spring and fall seasons when higher periods of precipitation occur and the freeze/thaw cycle could effect heaving on the cover.</p> <p><b><u>Inspection for settlement – circle one: Yes or No</u></b></p> <p><b>Comments:</b> _____                      _____                      _____                      _____</p> <p><b><u>Work Order number:</u></b> _____</p>	

*Continued on next page*

## Poseyville Landfill CAMMP Inspection Form, continued

3	<p><b><u>Cover Settlement</u></b></p> <p>The final cover will be inspected for adequacy. Vegetation of the seeded area must be maintained to prevent deterioration. All cracked, eroded and uneven areas due to settling in the final cover shall be repaired</p> <p><b>Final Cover Inspected – circle one: Yes or No</b></p> <p><b>Comments:</b> _____          _____          _____          _____          _____</p> <p><b>Work Order number:</b> _____</p>	
4	<p><b><u>Run-off and Run-on Control</u></b></p> <p>The surface of the capping of the landfill is such that precipitation and storm water does not accumulate. Inspect to assure proper drainage.</p> <p><b>Run-off and Run-on Control inspected – circle one: Yes or No</b></p> <p><b>Comments:</b> _____          _____          _____          _____</p> <p><b>Work Order number:</b> _____</p>	

## **FIGURES**

