Macdonald, Janet K

From: Rick Garrett [rick.garrett@catlinusa.com]
Sent: Thursday, January 12, 2012 11:56 AM
To: Macdonald, Janet K
Cc: Leonard, Doug
Subject: FW: Coca Cola Bottling Co. Wilmington REC Project January Status Report
Attachments: 2012_01_Coca-Cola Qtrly Status Update.pdf

Categories: Quarterly update

Janet,
Attached is the January Status Report for the Coca Cola Bottling Company Wilmington REC Site along with the certification pages from Doug Leonard and me. Also attached is a site map with the analytical results from the soil sampling thus far. I have proposed collection of additional samples in a phased approach so that we can establish site specific background levels for metals prior to attempting to delineate the semi-volatile PAHs and metals. We propose to conduct this sampling in accordance with the methodologies described in the May 17, 2011 work plan.
Please let me know if you have any concerns, comments or recommendations for proceeding with this work.
I hope all is well with you.
Rick
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Date January 12, 2012

REC PROGRAM QUARTERLY STATUS UPDATE
Coca-Cola Bottling Co. Consolidated
Former Vehicle Maintenance Facility
1002 Princess Street
Wilmington
New Hanover County, NC
Site ID No. NONCD 000 2851
CATLIN Project No. 208069

ADMINISTRATIVE AGREEMENT
FOR REGISTERED ENVIRONMENTAL
CONSULTANT-DIRECTED ASSESSMENT AND REMEDIAL ACTION
PURSUANT TO N.C.G.S. 130A-310.9(C) and 15A NCAC 13C.0300.
REC-AA (REV. 12/16/10)
DOCKET NUMBER 10-SF-329
Effective Date June 4, 2010

STATUS UPDATE:

The following is provided as the January 2012 status update for the above-referenced project. The fieldwork proposed in the Remedial Investigation (RI) Work Plan has been completed.

Analytical results from groundwater sampling detailed in the May 17, 2011 RI Work Plan revealed no North Carolina Administrative Code Title 15A Subchapter 02L exceedances in the monitoring well MW-01 or in the directly down gradient well MW-02 groundwater samples. Soil sample results provided on the attached Figure indicate additional soil sampling is required. In an attempt to minimize analytical costs, the following phased approach sampling is proposed in accordance with the RI Work Plan. Once analytical data from this phase is received and evaluated, additional testing will be proposed. Soil sampling proposed at this time is as follows:

1) In an attempt to establish a site specific background concentration for metals, collect five soil samples from approximately 2-3 feet below land surface (BLS) at up gradient and off-site cross gradient locations away from the contaminant area. Submit soil samples for laboratory analysis per methods 6010C, 6020A, and 7471B with request for Hexavalent and Trivalent Chromium speciation.
2) Collect four soil samples from approximately 2-3 feet BLS surrounding SB-10. Submit soil samples for laboratory analysis per EPA Methods 8260B, 8270D for semi-volatile PAHs, and total metals per 6010C, 6020A, and 7471B. Also collect and submit additional sample material for laboratory to hold for potential analysis per SPLP Methods dependent on volatile, semi-volatile, and total metals results.

3) Collect two soil samples from approximately 2-3 feet BLS north and east of SB-08. Submit soil samples for laboratory analysis per EPA Methods 8270D for semi-volatile PAHs and total metals per 6010C, 6020A, and 7471B. Also collect and submit additional sample material for laboratory to hold for potential analysis per SPLP Methods dependent on volatile, semi-volatile, and total metals results.
4) Collect one soil sample from approximately 2-3 feet BLS adjacent to SB-10. Submit soil sample for laboratory analysis per 8260 SPLP (tetrachloroethylene only).
5) Collect one soil sample from approximately 2-3 feet BLS adjacent to SB-08. Submit soil sample for laboratory analysis per 8270 (PAHs) SPLP.
6) Collect three soil samples from approximately 2-3 feet BLS adjacent to borings SB-04, SB-07, and SB-11. Submit soil samples for Total Chromium, Trivalent Chromium, and Hexavalent Chromium laboratory analysis.

CATLIN and Coca-Cola Bottling Company Consolidated personnel will review the data and propose additional investigations to delineate contaminants.

Work is progressing in a manner to achieve the mandatory work phase completion deadlines set out in 15A NCAC 13C.0302 (h).

G. Richard Garrett, PG
Registered Site Manager

REC PROGRAM DOCUMENT CERTIFICATION FORM - PAGE 1 OF 2
IHSB SITE NAME Coca-Cola Bottling Facility,Wilmington,New Hanover Cnty,NC Site ID# NONCD0002851
DATE & NAME OF DOCUMENT 1/12/12 Status Report
TYPE OF SUBMITTAL (circle all that apply): Report, Workplan, Work Phase Comp. Statement, Schedule Change

REMEDIATING PARTY DOCUMENT CERTIFICATION STATEMENT (.0306(B)(2))

"I certify under penalty of law that I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this certification, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, the material and information contained herein is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for willfully submitting false, inaccurate or incomplete information."

Doug Leonard
CCBC of Wilmington
Name of Remediating Party

Doug Leonard
Signature of Remediating Party

1/12/12
Date

NOTARIZATION

NC (Enter State)

Mecklenburg **COUNTY**

I, Edith A. Quine, a Notary Public of said County and State, do hereby certify that Doug Leonard did personally appear and sign before me this day, produced proper identification in the form of personal appearance, was duly sworn or affirmed, and declared that, he or she is the duly authorized environmental consultant of the remediating party of the property referenced above and that, to the best of his or her knowledge and belief, after thorough investigation, the information contained in the above certifications is true and accurate, and he or she then signed these Certifications in my presence.

WITNESS my hand and official seal this 12 day of January, 2012.

Edith A. Quine
Notary Public (signature)

(OFFICIAL SEAL)
EDITH A. QUINE
NOTARY
MY COMMISSION EXPIRES 5/5/2016
PUBLIC
MECKLENBURG COUNTY, NC

My commission expires: 5/5/2016.

Document Certification Form No. DC - 1
(Revised 3/11)

IHSB SITE NAME Coca-Cola Bottling Facility,Wilmington,New Hanover Cnty,NC
DATE & NAME OF DOCUMENT 1/12/12 Status Report Site ID# NONCD0002851
TYPE OF SUBMITTAL (circle all that apply): Report, Workplan, Work Phase Comp. Statement, Schedule Change
SITE ID NO. NONCD 0002851

REGISTERED SITE MANAGER CERTIFICATION OF SIGNATURES

As the Registered Environmental Consultant for the Site for which this filing is made, I certify that the signatures included herewith are genuine and authentic original handwritten signatures and/or true, accurate, and complete copies of the genuine and authentic original handwritten signatures of the persons who purport to sign for this filing. I further certify that I have collected through reliable means the originals and/or copies of said signatures from the persons authorized to sign for this filing who, in fact, signed the originals thereof. Those persons and I understand and agree that any copies of signatures have the same legally binding effect as original handwritten signatures, and I certify that any person for whom I am submitting a copy of their signature has provided me with their express consent to submit said copy. Additionally, I certify that I am authorized to attest to the genuineness and authenticity of the signatures, both originals and any copies, being submitted herewith and that by signing below, I do in fact attest to the genuineness and authenticity of all the signatures, both originals and copies, being submitted for this filing.

G. Richard Garrett
Name of Registered Site Manager

GR Garrett
Signature of Registered Site Manager

1/12/12
Date

REGISTERED SITE MANAGER DOCUMENT CERTIFICATION STATEMENT (.0306(b)(1))

"I certify under penalty of law that I am personally familiar with the information contained in this submittal, including any and all supporting documents accompanying this certification, and that the material and information contained herein is, to the best of my knowledge and belief, true, accurate and complete and complies with the Inactive Hazardous Sites Response Act G.S. 130A-310, et seq, and the remedial action program Rules 15A NCAC 13C .0300. I am aware that there are significant penalties for willfully submitting false, inaccurate or incomplete information."

G. Richard Garrett
Name of Registered Site Manager

GR Garrett
Signature of Registered Site Manager

1/12/12
Date

NOTARIZATION

North Carolina (Enter State)

New Hanover COUNTY

I, Michelle M. Johnson, a Notary Public of said County and State, do hereby certify that G. Richard Garrett did personally appear and sign before me this day, produced proper identification in the form of Personal Knowledge, was duly sworn or affirmed, and declared that, he or she is the duly authorized environmental consultant of the remediating party of the property referenced above and that, to the best of his or her knowledge and belief, after thorough investigation, the information contained in the above certifications is true and accurate, and he or she then signed these Certifications in my presence.

WITNESS my hand and official seal this 12th day of January, 2012.

Michelle M Johnson
Notary Public (signature)

(OFFICIAL SEAL)

MICHELLE M JOHNSON
NOTARY PUBLIC
NEW HANOVER COUNTY, NC

My commission expires: Nov 7, 2016

Document Certification Form No. DC - II
(Revised 3/11)

SUMMARY OF SOIL LABORATORY RESULTS - EPA METHOD 8260B

Sample ID	Contaminant of Concern →		4-Isopropyltoluene	Tetrachloroethene (Tetrachloroethylene, Perc, PCE)	All other Method 8260B Parameters
	Date Collected	Sample Depth (ft. BLS)			
SB01 (1.0-2.0)	8/12/2011	(1.0 - 2.0)	<1.17	**43.4**	BSRG
SB01 (2.0-3.0)	8/12/2011	(2.0 - 3.0)	<0.975	**27.9**	BSRG
SB02 (1.0-2.0)	8/11/2011	(1.0 - 2.0)	<3.87	**229**	BSRG
SB02 (2.0-3.0)	8/11/2011	(2.0 - 3.0)	<3.86	**298**	BSRG
SB03 (0.5-1.5)	8/11/2011	(0.5 - 1.5)	<1.11	**1.47 J**	BSRG
SB03 (1.5-2.5)	8/11/2011	(1.5 - 2.5)	<1.06	2.28 J	BSRG
SB04 (2.0-3.0)	8/11/2011	(2.0 - 3.0)	<1.30	3.96 J	BSRG
SB05 (2.0-3.0)	8/11/2011	(2.0 - 3.0)	<0.931	**29.5**	BSRG
SB06 (2.0-3.0)	8/11/2011	(2.0 - 3.0)	<1.06	**51.1**	BSRG
SB07 (1.0-1.5)	8/12/2011	(1.0 - 1.5)	<1.09	**5.08 J**	BSRG
SB08 (2.0-3.0)	8/12/2011	(2.0 - 3.0)	<0.994	**7.32**	BSRG
SB09 (2.0-3.0)	8/11/2011	(2.0 - 3.0)	<3.89	**267**	BSRG
SB10 (2.0-3.0)	8/12/2011	(2.0 - 3.0)	<3.86	**632**	BSRG
SB11 (2.0-3.0)	8/12/2011	(2.0 - 3.0)	<1.04	**8.90**	BSRG
SB11D (2.0-3.0)	8/12/2011	(2.0 - 3.0)	<1.00	**8.46**	BSRG
SB12 (2.0-3.0)	8/12/2011	(2.0 - 3.0)	<1.11	**9.08**	BSRG
SB13 (2.0-3.0)	8/12/2011	(2.0 - 3.0)	**743**	**21.6 J**	BSRG
Trip Blank	8/12/2011	Not Applicable	<1.04	<0.752	BSRG
Protection of Groundwater PSRG			680	5.0	Various
Preliminary Residential Health Based PSRG			NE	550	Various
Preliminary Industrial Health Based PSRG			NE	2,600	Various

All results and Preliminary Soil Remediation Goals (PSRG) in micrograms per kilogram (ug/kg).
ft. BLS = Feet Below Land Surface
Results in **Bold** exceed the low-est PSRG
Shaded results exceed the Residential Health Based PSRG
BSRG = Below low-est corresponding Soil Remediation Goal
< = Less than method detection limit
J = Amount detected is betw-een the Method Detection Limit and the Low-er Calibration Limit
BMDL = Below Method Detection Limit. Refer to analytical report for a complete list of parameters and detection limits.
NE = None Established

SUMMARY OF SOIL LABORATORY RESULTS - EPA METHOD 8270D

Sample ID	Contaminant of Concern →		Benzo(a)anthracene	Benzo(a)pyrene	Benzo(b)fluoranthene	Dibenz(a,h)anthracene	Indeno(1,2,3-cd)pyrene	All other Method 8270D Parameters
	Date Collected	SampleDepth (ft. BLS)						
SB01 (1.0-2.0)	8/12/2011	(1.0 - 2.0)	**364**	*** 537**	**937**	**93.7 J**	**400**	BSRG
SB01 (2.0-3.0)	8/12/2011	(2.0 - 3.0)	133 J	*** 255 J**	**513**	**38.4 J**	**234 J**	BSRG
SB02 (1.0-2.0)	8/11/2011	(1.0 - 2.0)	**163 J**	*** 219 J**	**289 J**	**39.8 J**	**153 J**	BSRG
SB02 (2.0-3.0)	8/11/2011	(2.0 - 3.0)	101 J	**122 J**	**154 J**	<15.8	80.5 J	BSRG
SB03 (0.5-1.5)	8/11/2011	(0.5 - 1.5)	<19.5	<20.1	<20.4	<16.0	<27.7	BSRG
SB03 (1.5-2.5)	8/11/2011	(1.5 - 2.5)	<18.3	<18.9	<19.2	<15.0	<26.0	BSRG
SB04 (2.0-3.0)	8/11/2011	(2.0 - 3.0)	51.9 J	**59.9 J**	71.9 J	<18.0	<31.2	BSRG
SB05 (2.0-3.0)	8/11/2011	(2.0 - 3.0)	<17.7	<18.2	<18.6	<14.5	<25.1	BSRG
SB06 (2.0-3.0)	8/11/2011	(2.0 - 3.0)	<18.3	<18.8	<19.1	<15.0	<25.9	BSRG
SB07 (1.0-1.5)	8/12/2011	(1.0 - 1.5)	31.7 J	**31.7 J**	<20.3	<15.9	<27.5	BSRG
SB08 (2.0-3.0)	8/12/2011	(2.0 - 3.0)	**968**	*** 839**	**1,250**	**116 J**	**367**	BSRG
SB09 (2.0-3.0)	8/11/2011	(2.0 - 3.0)	87.2 J	**94.1 J**	136 J	<15.8	45.3 J	BSRG
SB10 (2.0-3.0)	8/12/2011	(2.0 - 3.0)	43.4 J	**70.2 J**	104 J	<15.1	40.1 J	BSRG
SB11 (2.0-3.0)	8/12/2011	(2.0 - 3.0)	44.4 J	**54.7 J**	82.0 J	<15.4	27.3 J	BSRG
SB11D (2.0-3.0)	8/12/2011	(2.0 - 3.0)	43.6 J	**53.7 J**	80.5 J	<15.2	<26.2	BSRG
SB12 (2.0-3.0)	8/12/2011	(2.0 - 3.0)	<20.3	<20.9	<21.3	<16.7	<28.8	BSRG
SB13 (2.0-3.0)	8/12/2011	(2.0 - 3.0)	71.9 J	**80.4 J**	114 J	<19.1	38.1 J	BSRG
Protection of Groundwater PSRG			180	59	600	190	2,000	Various
Preliminary Residential Health Based PSRG			150	15	150	15	150	Various
Preliminary Industrial Health Based PSRG			2,100	210	2,100	210	2,100	Various

All results and Preliminary Soil Remediation Goals (PSRG) in micrograms per kilogram (ug/kg).
ft. BLS = Feet Below Land Surface
Results in **Bold** exceed the low-est PSRG
Shaded results exceed the Residential Health Based PSRG
* = Result exceeds the Industrial Health Based PSRG
BSRG = Below low-est corresponding Soil Remediation Goal
< = Less than method detection limit
J = Amount detected is betw-een the Method Detection Limit and the Low-er Calibration Limit
BMDL = Below Method Detection Limit. Refer to analytical report for a complete list of parameters &detection limits.
NE = None Established

SUMMARY OF SOIL LABORATORY RESULTS
EPA METHOD 8260B-SPLP (PCE ONLY)
AND EPA METHOD 8270D-SPLP (PAHs ONLY)

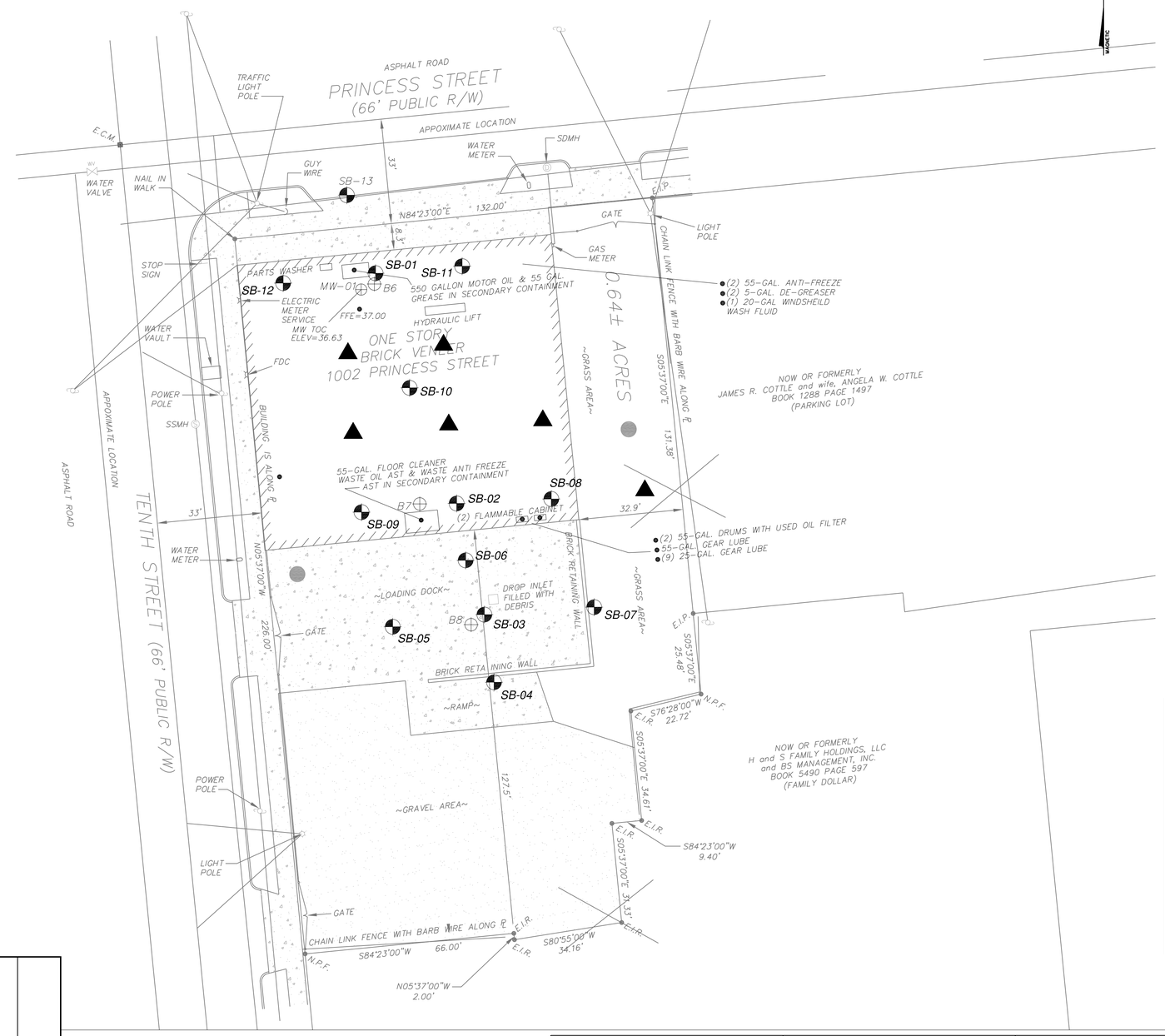
Sample ID	Method →		8260B-SPLP	8270D-SPLP
	Contaminant of Concern →		Tetrachloroethene (Tetrachloroethylene, Perc, PCE)	All 8270D-SPLP PAH Parameters
	Date Collected	Sample Depth (ft. BLS)		
SB01 (1.0-2.0)	8/12/2011	(1.0 - 2.0)	0.230 J	BMDL
SB01 (2.0-3.0)	8/12/2011	(2.0 - 3.0)	0.170 J	BMDL
SB02 (1.0-2.0)	8/11/2011	(1.0 - 2.0)	0.330 J	BMDL
SB02 (2.0-3.0)	8/11/2011	(2.0 - 3.0)	0.540 J	BMDL
SB03 (0.5-1.5)	8/11/2011	(0.5 - 1.5)	0.160 J	BMDL
SB03 (1.5-2.5)	8/11/2011	(1.5 - 2.5)	<0.155	BMDL
2L GWQS			0.7	Various

All results and Preliminary Soil Remediation Goals (PSRG) in micrograms per kilogram (ug/kg).
ft. BLS = Feet Below Land Surface
SPLP = Synthetic Precipitation Leaching Procedure
PAH = Polycyclic Aromatic Hydrocarbons
< = Less than method detection limit
J = Amount detected is betw-een the Method Detection Limit and the Low-er Calibration Limit
BMDL = Below Method Detection Limit. Refer to analytical report for a complete list of parameters and detection limits
2L GWQS = NCAC T15A:02L Groundw-ater Quality Standards

SUMMARY OF SOIL LABORATORY RESULTS - EPA 6010C -SPLP AND 7470A-SPLP

Sample ID	Contaminant of Concern →		Antimony	Arsenic	Beryllium	Cadmium	Chromium	Copper	Lead	Manganese	Nickel	Selenium	Thallium	Zinc	Mercury
	Date Collected	Sample Depth (ft. BLS)													
SB07 (1.0-1.5)	8/12/2011	1.0 - 1.5	<0.00319	<0.00369	<0.00858	**0.00326 J**	**0.0261**	0.048	**0.373**	0.0172	<0.00306	<0.00268	<0.00857	0.326	0.0000652 J
SB11 (2.0-3.0)	8/12/2011	2.0 - 3.0	<0.00319	<0.00369	<0.00858	0.00183 J	**0.0177**	0.0597	**0.296**	0.177	<0.00306	<0.00268	<0.00857	0.182	0.000278
2L GWQS (mg/L)			0.001	0.01	0.004	0.002	0.01	1	0.015	0.05	0.1	0.02	0.0002	1	0.001

All results in milligrams per liter (mg/L).
ft. BLS = Feet Below Land Surface.
< = Less than method detection limit
Result in bold exceed the NCAC:2L Groundw-ater Quality Standard (2L GWQS).



GRAPHIC SCALE: 1"=20'
20 0 20 40 60

LEGEND:

E.I.P.	EXISTING IRON PIPE
E.C.M	EXISTING CONCRETE MONUMENT
E.I.R.	EXISTING IRON REBAR
○	PROPERTY CORNER
I.P.S.	IRON PIPE SET
N.P.F.	NO POINT FOUND
P.O.B.	POINT OF BEGINNING
P.O.C.	POINT OF COMMENCEMENT
±	APPROXIMATE
R/W	RIGHT-OF-WAY
	HANDI-CAP PARKING
℄	CENTER LINE
P.L.	PROPERTY LINE
RCP	REINFORCED CONCRETE PIPE
CMP	CORRUGATED METAL PIPE
PVC	POLY VINYL CHLORIDE
SS	SANITARY SEWER
CO	CLEAN OUT
W	WATER LINE
NCNG	NORTH CAROLINA NATURAL GAS
OHP	OVERHEAD POWER
UGE	UNDERGROUND ELECTRIC
	WATER/DITCH
	FENCE LINE
	BUILDING LINE
	BOUNDARY LINE
	CONCRETE AREA
	GRAVEL AREA
	NEW GROUNDWATER MONITORING WELL
	EXISTING GROUNDWATER MONITORING WELL
	NEW SOIL SAMPLE LOCATIONS
	FORMER SOIL SAMPLE LCATIONS
	PIEZOMETER LOCATION
	PROPOSED SOIL SAMPLE LOCATIONS

PRELIMINARY
NOT FOR REAL ESTATE
SALES OR CONVEYANCE

SUMMARY OF SOIL LABORATORY RESULTS - EPA METHODS 6010C , 6020A, AND 7471B

Sample ID	Contaminant of Concern →		Arsenic	Chromium	Lead	Manganese	Mercury	All other analyzed EPA 6010C, 6020A, 7471B Metals
	Date Collected	Sample Depth (ft. BLS)						
SB01 (1.0-2.0)	8/12/2011	(1.0 - 2.0)	<0.401	**2.64**	162	**86.7**	0.195	BSRG
SB01 (2.0-3.0)	8/12/2011	(2.0 - 3.0)	**0.597 J**	**5.40**	**504**	**133**	0.281	BSRG
SB02 (1.0-2.0)	8/11/2011	(1.0 - 2.0)	**0.985 J**	**3.40**	174	57.5	0.469	BSRG
SB02 (2.0-3.0)	8/11/2011	(2.0 - 3.0)	<0.403	**4.65**	193	**84.6**	0.323	BSRG
SB03 (0.5-1.5)	8/11/2011	(0.5 - 1.5)	<0.379	**1.88**	62.7	9.66	0.0942	BSRG
SB03 (1.5-2.5)	8/11/2011	(1.5 - 2.5)	<0.376	**1.72**	20.9	11.0	0.0270	BSRG
SB04 (2.0-3.0)	8/11/2011	(2.0 - 3.0)	*** 2.74**	*** 11.2**	**577**	**325**	**2.69**	BSRG
SB05 (2.0-3.0)	8/11/2011	(2.0 - 3.0)	<0.371	**2.23**	121	11.5	0.137	BSRG
SB06 (2.0-3.0)	8/11/2011	(2.0 - 3.0)	<0.337	**0.409 J**	1.79	1.66	0.00227 J	BSRG
SB07 (1.0-1.5)	8/12/2011	(1.0 - 1.5)	*** 2.29**	*** 22.0**	**396**	46.2	0.271	BSRG
SB08 (2.0-3.0)	8/12/2011	(2.0 - 3.0)	**1.45**	**3.50**	105	36.6	0.385	BSRG
SB09 (2.0-3.0)	8/11/2011	(2.0 - 3.0)	**0.479 J**	**3.90**	194	**88.8**	0.493	BSRG
SB10 (2.0-3.0)	8/12/2011	(2.0 - 3.0)	<0.363	**2.74**	163	**68.0**	0.603	BSRG
SB11 (2.0-3.0)	8/12/2011	(2.0 - 3.0)	**0.488 J**	*** 25.1**	**445**	**95.3**	0.786	BSRG
SB11D (2.0-3.0)	8/12/2011	(2.0 - 3.0)	<0.336	*** 11.0**	257	**87.5**	0.644	BSRG
SB12 (2.0-3.0)	8/12/2011	(2.0 - 3.0)	<0.390	**0.982 J**	29.2	28.5	0.107	BSRG
SB13 (2.0-3.0)	8/12/2011	(2.0 - 3.0)	<0.434	**2.41**	40.5	23.8	0.165	BSRG
Protection of Groundwater PSRG			5.8	3.8	270	65	1.0	Various
Preliminary Residential Health Based PSRG			0.39	0.29	400	360	2.0	Various
Preliminary Industrial Health Based PSRG			1.6	5.6	800	4,600	31	Various

All results and Preliminary Soil Remediation Goals (PSRG) in milligrams per kilogram (mg/kg).
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Results in **Bold** exceed the low-est PSRG
Shaded results exceed the Residential Health Based PSRG
* = Result exceeds the Industrial Health Based PSRG
BSRG = Below low-est corresponding Soil Remediation Goal
< = Less than method detection limit
J = Amount detected is betw-een the Method Detection Limit and the Low-er Calibration Limit

CATLIN Engineers and Scientists
220 Old Dairy Road
Wilmington, NC 28405
Corporate Licensure No. for Engineering Services C-0585

PROJECT: COCA COLA, LLC. WORKPLAN 1002 PRINCESS STREET WILMINGTON, NC

TITLE: *SITE MAP WITH SUMMARIZED SOIL SAMPLE ANALYTICAL RESULTS AND PROPOSED SOIL SAMPLE LOCATIONS*

FIGURE: DRAFT

JOB NO.	DATE:	SCALE:	DRAWN BY:	CHECKED BY:
208069	SEPT 2011	AS SHOWN	THW	GRG

S:\CAD\DWG\2008\208-069\JAN2012\FIGURE6 WITHOUT NOTES.DWG