Superior Water Light & Power Company

Superior, Wisconsin

Site Investigation Work Plan for the Superior Manufactured Gas Plant.

Located at the Intersection of Winter and Water Street Superior, Wisconsin

October 2001
09413-098

Superior Water Light & Power Company

November 2, 2001

Mr. Jamie Dunn
Hydrogeologist, Northern Division
WI Department of Natural Resources
810 W. Maple Street
Spooner, WI 54801

RE: SUPERIOR WATER, LIGHT AND POWER COMPANY – MANUFACTURED GAS PLANT

Dear Mr. Dunn:

Enclosed please find SWL&P's work plan for the Phase II Investigation at the Superior MGP. The work plan was prepared by ENSR in general conformance with NR716 requirements, and contains all of the elements outlined in the October 1, 2001 technical memorandum you have reviewed.

The Phase II schedule includes installing the eight monitoring wells beginning on Tuesday, November 6th, and returning to the site on Tuesday, November 13th, for the test trenching and soil borings. We will proceed with this work as scheduled, unless we hear otherwise from you. Thank you for your time working with us on this project.

Sincerely,

William S Bombich

William S. Bombich
General Manager

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CONTENTS

LIST OF FIGURES

1.0 INTRODUCTION

ENSR International (ENSR) has been contracted by the Superior Water Light and Power Company to conduct a site investigation at the Former Manufactured Gas Plant (MGP), located at the intersection of Winter and Water Street in Superior, Wisconsin (Site). The Site location is shown in Figure 1. This work plan presents the anticipated scope of work to determine if MGP wastes, petroleum hydrocarbons, or other MGP-related chemicals are present at the subject property.

1.1 Background

ENSR performed a Phase 1 environmental assessment at the Site in September/October of 2001. The Phase I report identified areas that have the potential for to contain MGP-related chemicals. These areas included four gas holder bases and a tar receiver tank. The location of the gas holders is shown on Figure 2. The tar receiver tank was located just outside the northeast wall of the building. This tank is presumed to have stored coal tar condensed from the gas manufactured prior to 1904.

The gas plant was built in 1888 and began operations on November 1, 1889. The gas produced was a water gas made by the improved "Springer" process. Two gas holders were initially constructed on the Property; one of 35,000 cubic feet capacity, built in October 1889, single lift and one double lift holder of 250,000 cubic feet capacity, dimensions of 92 ft x 21 ft x 21 ft, completed in October 1891. In 1924, a third gas holder was constructed at the subject property. This 750,000-cubic foot gas holder was located southwest of the former MGP building. A spherical gas holder called the "Horton Sphere" was constructed in 1950.

Gas was produced at the Superior MGP from November 1889 to August 1904. After August 1904, all gas sold by Superior Water Light & Power (SWL&P) was purchased by the company from the Zenith Furnace Company (later known as Interlake, Corporation). The gas purchased from Zenith/Interlake was purified in West Duluth before it was piped to SWL&P's plant in Superior. Therefore, no purifier wastes were generated in Superior after August 1904. The Superior MGP produced a total of approximately 262,000 MCF (million cubic feet) of gas during its 15-year production history.

In 1929, the gas plant building was rebuilt to its present configuration. Gas purchased from Zenith/Interlake was stored in the gas holders, and pumped and metered from the reconstructed building.

Storage and metering of manufactured gas purchased from Zenith/Interlake continued until natural gas supplies became available in 1959. The 35,000-cubic foot gas holder was removed prior to 1938. The 250,000-cubic foot gas holder was removed between 1940 and 1961. The 750,000-cubic foot gas holder was removed between 1962 and 1966, and the Horton Sphere was removed in 1985.

In 1978, SWL&P sold the former gas plant building, and the property depicted on Figure 3 as purple lines, to CLM, Inc. The building was gutted, concrete floors were poured over the existing sand floors, and the building has been used for storage since that time.

Rough estimates of the amount of MGP wastes produced by the plant were calculated in the Phase I report. Based on a total plant gas production of 262,000 MCF, an estimated 200-cubic yards of coal ash, 2 to 22 yards of coal tar sludge, and 70 to 350 yards of oxide box wastes were produced at the Superior MGP.

In addition to the MGP wastes discussed above, there is a potential for petroleum hydrocarbons to be present in the soil or groundwater from the 12,000-gallon aboveground storage tank used by the MGP. The tank was located between the building and the shoreline and was observed on a 1892 Sanborn Map.

1.2 Site Location and Ownership

The former Superior MGP Site is located in the vicinity of the intersection of Winter and Water Streets in Superior, Wisconsin. The Site occupies a portion of the northeast quarter of the northwest quarter of Section 9, Township 49 North and Range 14 West (SW ¼, NW ¼ of Sec. 13, T49N, R14W). The Site location is depicted on Figure 1.

Portions of the former MGP property are now owned by Superior Water Light & Power (SWL&P), the City of Superior, the U.S. Department of Transportation, and CLM, Inc. Figure 3 is a color-coded map indicating property ownership in the vicinity of the MGP Site.

The owner contact is:

Bill Bombich
Superior Water Light and Power Company
2915 Hill Avenue
Superior, Wisconsin 54880
(715) 395-6288

1.3 Consultant and Contractor Identification

The Site investigation activities will be conducted by:

ENSR International
Attn: William M. Gregg
4500 Park Glen Road, Suite 210
St. Louis Park, MN 55416
(952) 924-0117 - phone
(952) 924-0317 – fax

Subcontractors anticipated to provide services for this project are identified below. The subcontractors selected to conduct the work may change due to availability or changes in the scope of work.

Laboratory Analytical Services

EnChem, Inc.
Attn: Barb
1795 Industrial Dr.
GreenBay, WI 54302
(800) 736-2436 – phone
(414) 469-8827 – fax
(WDNR Certification 405132750)

Surveying

Salo Engineering
Attn: Dale Berntsen
15 East First Street
Duluth, Mn 55802
(218) 727-8796 – phone
(218) 727-0216 – fax

Drillling

Twin Ports Testing
Attn: Greg Hage
1301 North 3rd Street
Superior, WI 54880
(715) 392-7114 – phone
(715) 392-7163 – fax

Trenching and Boring

Thein Well Company
Attn: Will Greeley
PO Box 429
Clara City, NB 56222
(320) 847-3207 – phone
(320) 847-3459 – fax

2.0 OBJECTIVES AND PROJECT SCOPE

The objectives of this investigation are to identify MGP wastes that may be present at the Site. Additional objectives include the identification of MGP chemicals in soil and/or groundwater and the definition of hydrogeological conditions at the subject property, including hydraulic gradient and groundwater flow direction.

The investigation will consist of the completion of six borings installed using a Geoprobe® or other hydraulic push drilling method and the installation of eight groundwater monitoring wells. In addition, nine test trenches will be installed with a backhoe. Upon receipt of the sample results, the data will be evaluated and, if required, recommendations for further actions at the Site will be made. The methodologies to be utilized during the investigation are described in the sections that follow.

2.1 Project Scoping

To the extent practical, the scope of the project was defined in consideration of the criteria listed in NR 716.07, as follows:

- Site Use: The only operations currently conducted on the subject property are associated with the brick building owned by CLM, Inc. According to Mr. Dana Stone, Vice President of Operations, for CLM, Inc., the building is only used for storage. One of the three rooms in the building at the subject property is being leased by Lakehead Cement Co, and is used for storage of sand, lime, cement, and miscellaneous materials related to Lakehead's adjacent ready-mix plant.

  This Site investigation will focus on prior Site use as a MGP. Specific areas of concern include four gas holder bases and a tar receiver tank. The location of the gas holders is shown on Figure 2. The tar receiver tank was located just outside the northeast wall of the building. Historical use is described in Section 1.1.

- Type and Amount of Impact: Impacts to the soil and groundwater have not been identified on the subject Site.

- Environmental Media Potentially Affected: Soil and groundwater are potentially affected.

- Other Environmental Investigations/Findings: ENSR performed a Phase 1 environmental assessment at the Site in September/October of 2001. The Phase I is discussed in Section 1.1.

- Potential Receptors: Groundwater discharges to Superior Bay, and there are no known groundwater users in the area. The municipal drinking water supply is obtained from Lake Superior. The nearest surface water body is Superior Bay.

- Significant Resources: Any impacts identified at the Site will be evaluated with respect to threatened or endangered species, sensitive habitats, wetlands and/or resource waters.

- Potential Remedial Actions: At this time, an evaluation of potential remedial actions to address potentially impacted media on the Property is premature. The information needed to determine the most appropriate remedial response, if any, includes the lateral and vertical boundaries of potential groundwater and soil impacts, groundwater elevations, groundwater flow direction and gradient and groundwater velocity.

2.2 Sampling Strategy

The sampling strategy was developed to identify MGP wastes on Site that may be a continuing source of chemicals to soil, and/or groundwater. The sampling locations were selected based on historical Site information. The following Site characteristics are provided for reference.

- Site Topography: Based on the USGS Superior, Wisconsin 7.5-minute topographic map (1993), the Site is located at approximately 613 feet above mean sea level in an area of gently sloping topography. The topography in the area of the subject property is relatively flat.

- Surface Water Drainage: Storm water runoff is generally sheet-flow across the Site toward Superior Bay. No known storm sewer system exists at the Site.

- Site Geology: Based on Site investigation data from the nearby Marine Fueling Terminal, soils at the Site consist predominantly of sandy fill overlying native red clay. Sandstone bedrock (Keweenawan Formation) is encountered beneath the unconsolidated soils. Depth to bedrock is estimated to be from 100 to 200 feet below ground surface.

  Based on the proximity to Lake Superior (elevation approximately 601 feet above mean sea level) groundwater is expected to flow across the Site from southwest to northeast. Groundwater is expected at approximately 10 feet below ground surface. Monitoring wells installed at the Marine Fueling Terminal indicate a shallow water table sloping toward Superior Bay.

- Potential Migration Pathways: Potential migration pathways include, vertical migration through the unsaturated zone with percolating precipitation, and lateral migration with local topography and anticipated groundwater flow.

3.0 INVESTIGATION SCOPE OF WORK

This Site investigation will be conducted to identify MGP wastes on Site and/or MGP related chemicals in soil and/or groundwater. The scope will include the completion of six borings installed using a Geoprobe® or other hydraulic push drilling method and the installation of eight groundwater monitoring wells. In addition, nine test trenches will be installed with a backhoe. All activities will be conducted in accordance with the WDNR WAC Chapters NR 716. Figure 2 presents the anticipated boring, groundwater monitoring well, and test trench locations that will be conducted during the Site investigation.

3.1 Soil and Groundwater Sampling

The sampling locations have been selected based on the available historic Site operational information and Site observations. The recommended locations of the soil borings, groundwater monitoring wells and test trenches to address the Site investigation scope of work, including the sampling parameters, are described below. In general, an average of one soil sample will be collected from each boring, trench, or well. All soil borings (including those for groundwater monitoring wells) will be continuously sampled and all soil samples will be field screened with a PID using a headspace screening technique. The locations/depths of the samples submitted for laboratory analysis will be selected based on field observations and PID field screening results. Soil samples will be analyzed for polynuclear aromatic hydrocarbons (PAH), RCRA metals (As, Ba, Cd, Cr, Pb ,Hg, Se, Ag), total cyanide, pH using Method 9045A, and benzene, toluene, ethyl benzene, and xylene (BETX).

- Eight test trenches (T1 through T8) will be conducted at former gas holder locations. Two test trenches will be performed at each gas holder location. One additional test trench (T9) will be conducted northeast of the current building to explore the former tar receiver. Test trench locations are shown on Figure 2. Test trenches will be excavated with a backhoe and will be approximately three feet wide, eight to twelve feet deep and ten to twenty feet in length. Soil samples will be obtained from the backhoe bucket. After all required samples have been obtained from a specific trench, the trench will be backfilled with the excavated material. The excavated material will be replaced in reverse order, i.e., last material excavated will be the first replaced in the trench. One soil sample will be collected from each location for laboratory analysis.

- Six soil borings will be installed to a depth of approximately 20 feet below ground surface using a Geoprobe or other hydraulic push drilling method. Soil boring locations are shown on Figure 2. One soil sample will be collected from each location and submitted for laboratory analysis. The depths of the samples submitted for laboratory analysis will be selected on field observations of visually impacted soils as field screening results indicating the presence of MGP related impacts. After collecting the soil samples, soil borings will be properly abandoned

with granular or chipped bentonite to near surface, then topped off with asphalt or concrete patch, if needed.

- Eight groundwater monitoring wells will be installed to a depth of approximately 15 to 20-feet using hollow-stem auger drilling techniques. Each well will be constructed using 2-inch diameter PVC casing and 10 foot PVC screens (0.010" slot). All wells will be screened across the water table and it is anticipated wells W5 through W8 will be completed in the basal fill material. One soil sample will be collected from each location and submitted for laboratory analysis. The depths of the samples submitted for laboratory analysis will be selected on field observations of visually impacted soils as field screening results indicating the presence of MGP related impacts. Groundwater monitoring well locations are shown on Figure 2. All groundwater monitoring wells will be sampled approximately two weeks after initial development. A second round of groundwater samples will be collected approximately 90 days after the initial sampling round. Groundwater samples will be analyzed for PAHs using method 8270, RCRA metals using Method 6020, total cyanide using Method 9010A, and BETX using Method 8021.

3.2 Field Methodologies

3.2.1 Soil Sample Collection and Handling

Soil samples will be collected using standard soil probe and split-spoon-sampling methods as described by ASTM. Additional samples will be collected from a backhoe bucket from test trenches. All soil samples collected will be field screened with a PID. The soil samples for PID field screening will be contained in sealed plastic bags and allowed to warm to approximately 70°F. The bag will be opened enough for the probe of the PID to be inserted and the bag resealed around the probe. The PID will remain within the sample bag until the readings become steady or consistently decline. Peak PID readings will be recorded for each sample.

After collection, soil samples intended for laboratory analysis will be immediately sealed in appropriate laboratory-provided containers. A fresh pair of latex (or similar) gloves will be used during handling of each sample to minimize the potential for cross-contamination. The samples intended for BETX analysis will be containerized in pre-tared 60-milliliter glass jars with Teflon® septa. Approximately 25 grams of soil will be placed loosely in each jar. The sample will be preserved with 25 grams of laboratory-provided purge-and-trap grade methanol. A dry-weight sample will also be collected from each interval intended for laboratory analysis. The samples intended for PVOC, RCRA metals, pH, and total cyanide will be containerized in jars provided by the laboratory. The jars will be completely filled with soil and the lids will be securely attached.

As quickly as possible following sample collection, the sample jars will be labeled with the sample location identification, depth of sample, date of sample collection and intended analysis. The sample jars will then be placed in resealable plastic bags and packed in an iced, insulated container. A chain-of-custody form will be filled out upon completion of sampling each day and will accompany each container of samples to the laboratory. Samples will be transported from the facility to the laboratory via courier.

3.2.2 Groundwater Monitoring Well Development

The main purpose of well development is to remove residual materials remaining in the wells after installation has been completed, and to re-establish the natural hydraulic flow conditions of the formations which may gave been disturbed by well construction. The groundwater monitoring wells will be developed, purged and sampled using standard field procedures and as required in Wisconsin Administrative Code NR 141. The wells will be developed using a submersible pump with Tygon® or PVC tubing.

3.2.3 Elevation Survey

The locations and elevations of the eight monitoring wells will be measured by a licensed surveyor (Salo Engineering).

3.2.4 Water Level Measurements

Water level measurements will be collected from all monitoring wells. Measurements will be made using an electronic water level sensor, or similar equipment. The well casing will be wiped clean and the survey measure mark on the top of the casing noted. The probe will be lowered carefully into the well and the depth to water measured from the survey mark at the top of the well casing. The depths will be recorded in a bound field notebook.

3.2.5 Slug Testing

Slug tests will be performed on all groundwater monitoring wells using a transducer based automatic data logger to obtain water level data for an assessment of the saturated deposits. The data will be interpreted using a commercial computer based application such as Aqtesolv software or equivalent. Data from the slug tests will be analyzed using the Bower and Rice Method.

3.2.6 Groundwater Field Parameters

The wells will be purged and sampled using dedicated, or decontaminated, bailers, pumps, tubing and other appropriate equipment. Field parameters will be collected during purging of the wells to indicate stabilization of the water prior to sampling. Field parameters will include specific, conductivity, pH, and temperature.

3.2.7 Groundwater Sample Collection and Handling

Groundwater samples collected for BETX analysis will be containerized in pre-preserved laboratory-provided 40-milliliter vials. Each sample vial will be filled until a positive meniscus is formed and securely capped with a Teflon®-septum lid. Each sample will then be inverted and firmly tapped to check for air bubbles. If bubbles are present in the sample, the sample will be discarded and another collected. Samples collected for RCRA metals analysis will be field filtered using a 0.45 µm filter to remove soil particles. Samples collected for PAH will be containerized in laboratory-provided 1-liter bottles.

Each sample vial/bottle will be labeled with the sample location identification, depth of sample (for soil samples), and date of sample collection and intended analysis. The sample vials/bottles will then be placed in resealable plastic bags and packed in an iced, insulated container. A chain-of-custody form will be filled out upon completion of sampling each day, and will accompany each container of samples to the laboratory. Samples will be transported from the facility to the laboratory via overnight courier.

3.2.8 Decontamination Procedures

All down-hole equipment will be decontaminated before each sampling interval using an Alconox© or TSP© solution and rinsed in potable water (i.e., municipal tap or bottled deionized). Sampling tools (e.g., spoons, knives, spatulas, etc.) will be cleaned in a solution of Alconox© or TSP© and rinsed in potable water prior to collection of each sample. A clean pair of latex, gloves will be used during collection of each sample to minimize the potential for cross-contamination of samples.

3.2.9 Investigative Waste Management

All soil, decontamination water and purge water waste generated during investigative activities, sampling sleeves, sampling gloves and used sample jars not intended for laboratory analysis will be contained in 55-gallon drums and stored on Site, out of the way of daily Site activities, pending laboratory analysis for disposal. Excavated fill and soil from the test trenches will be back filled into the trenches.

3.3 Laboratory Analyses

3.3.1 Soils

Soil samples will be submitted for analysis of PAHs using SW-846 Method 8270, RCRA metals using SW-846 Methods CVAA-7470 and ICPMS-6020, total cyanide using SW-846 Method 9010A, pH using SW-846 Method 9045A,and BETX using SW-846 Method 8021. Minimum detection levels (MDLs) range from 10 to 17 µg/kg for PAH. MDLs for RCRA metals range from 0.05 to 0.36 mg/kg.

3.3.2 Groundwater

Groundwater samples will be analyzed for PAHs using SW-846 Method 8270, RCRA metals using SW-846 Methods CVAA-7470 and ICPMS-6020, total cyanide using EPA Method 335.3, and BETX using SW-846 Method 8021. Minimum detection levels (MDLs) range from 0.012 to 0.028 µg/L for PAH. MDLs for RCRA metals range from 0.044 to390 µ/L.

3.4 Quality Assurance/Quality Control Methods

The following quality assurance/quality control measures will be implemented during the Site investigation activities:

- Decontamination procedures and measures to minimize the potential for cross-contamination of samples will be followed as specified in the Field Methodologies section above.
- All Site activities will be recorded in a bound field notebook (see Field Documentation section below).
- Stringent chain of custody procedures will be followed (see below).
- Sample blanks will be collected and analyzed (see below).

3.4.1 Chain of Custody Procedures

Chain-of-custody forms will be completed to the extent possible prior to sample shipment. Included on the form will be the sample identification (sample location identification, depth of sample and date of sample collection), sample type, sample container (type and number of

containers), analytical method to be performed, preservatives, and name of sampler. The forms will be filled out in a legible manner, using blue or black waterproof ink.

A chain-of-custody document will accompany each sample shipment. The sampler will relinquish custody of the samples to the courier, retaining one copy of the record for the project file. Samples will be transported to the laboratory in containers that meet applicable state and federal standards for safe shipment.

3.4.2 Duplicate and Field/Trip Blank Samples

The following QA/QC samples will be submitted with the soil samples. If multiple days and/or containers are used, appropriate increases in the number of blanks will be made.

- Methanol blanks.

  The sample will be collected in the same manner as the soil samples with methanol preservation without placing soil into the container. One blank will be collected per sampling event per 20 samples (or fraction thereof).

- Field Duplicates.

  One duplicate sample will be collected per sampling event per ten samples (or fraction thereof) and submitted for analysis of all parameters analyzed in the original sample.

- Matrix Spike/Matrix Spike Duplicates

  One Matrix Spike/Matrix Spike Duplicate sample is prepared by and analyzed by the laboratory per every batch of 20 samples to evaluate data accuracy.

The following QA/QC samples will be submitted with the groundwater samples. If multiple days and/or containers are used, appropriate increases in the number of blanks will be made.

- Trip blanks

  The trip blank(s) will be prepared by the laboratory and transported with the sample jars. One trip blank per day per shipping container containing BETX and/or PAH samples.

- Field Duplicates

One duplicate sample will be collected per sampling event per ten samples (or fraction thereof) and submitted for analysis of all parameters analyzed in the original sample.

- Field Blanks

  One field blank will be collected per sampling event per ten samples (or fraction thereof) and submitted for analysis of all parameters analyzed in the original sample.

- Matrix Spike/Matrix Spike Duplicates

  One Matrix Spike/Matrix Spike Duplicate sample is prepared by and analyzed by the laboratory per every batch of 20 samples to evaluate data accuracy.

3.5 Field Documentation

All Site activities will be documented in a bound field notebook. Included in the daily documentation are:

- Procedures for sampling and other routine activities associated with the Site investigation.
- Personnel working on the Site.
- Chronological log of Site activities.

3.6 Site Health and Safety

The protection of Site personnel and the general public is a primary concern. All reasonable measures will be taken to protect the health and safety of the project personnel and general public. A Site health and safety plan that meets or exceeds the standards found in 29 CFR 1910.120 has been prepared and is available for review. A copy will be on-Site during all Phase II activities.

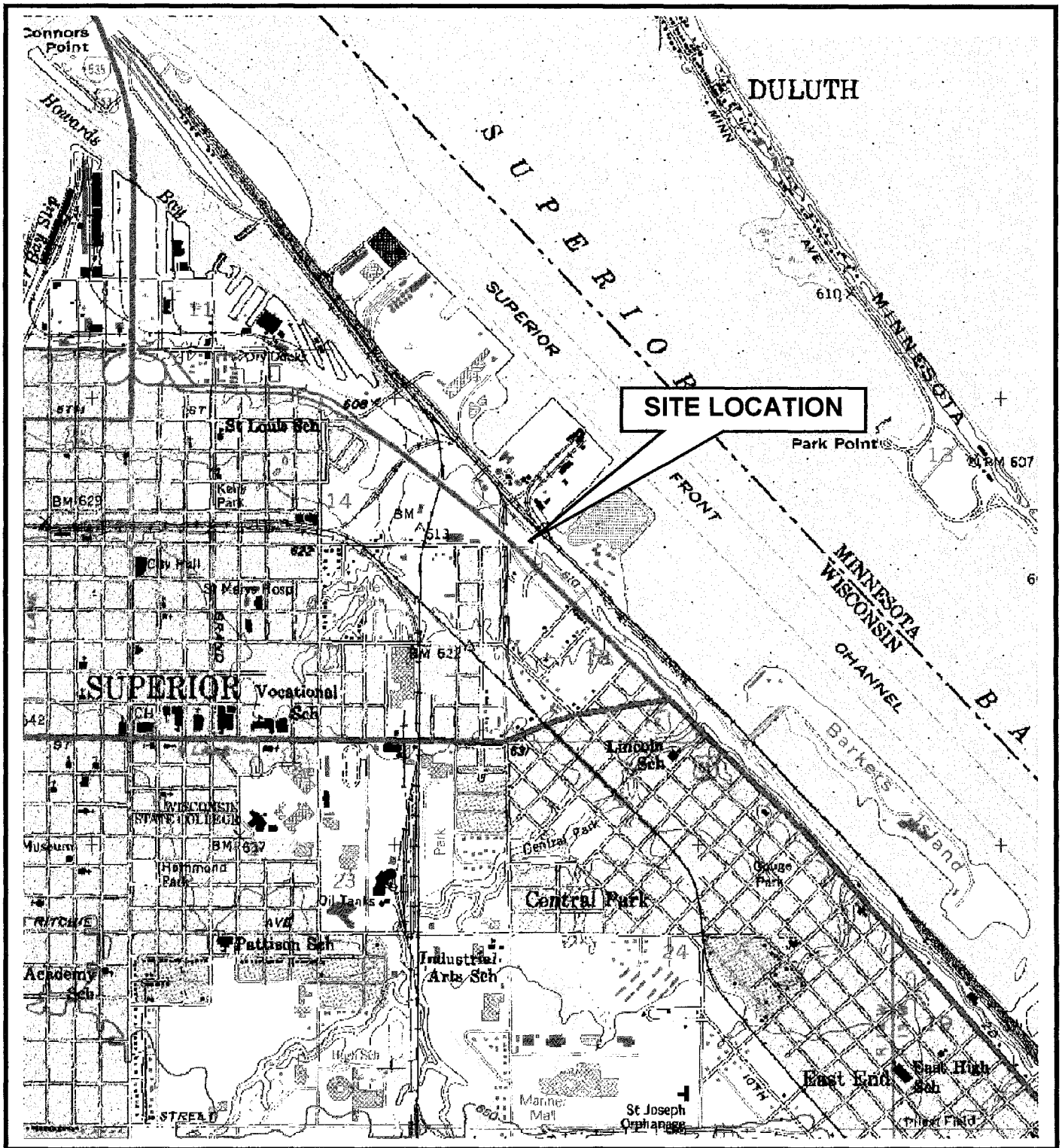
3.7 Reporting

Upon receipt of the laboratory reports, a report detailing the investigative activities and results will be prepared. The report will be submitted to the WDNR not later than 60 days following receipt of the laboratory reports, unless otherwise directed by the WDNR or pending further investigative activities if the objectives of the Site investigation are not met. The investigation report will include:

- A transmittal letter referencing the WDNR's identification number for the Site investigation (if applicable) and the date of the submittal;
- An executive summary of the investigation results and conclusions;
- The project title and purpose;
- A complete identification of the current Property owner(s) and other appropriate parties, the consulting firm and all subcontractors performing work associated with the investigation;
- A facility location description, Site location map and Site plan map showing sample locations and other relevant Site information;
- An assessment of the potential for events at the Site to present a public health threat and a summary of any response actions at the facility relating to the investigation;
- Investigative methods;
- Investigative results, including in-field observations, laboratory results, discrepancies between the field observations and laboratory results, data interpretations;
- Conclusions and recommendations; and
- Monitoring report to be submitted following collection and analysis of 2nd round of groundwater samples (within 30 days).

4.0 SCHEDULE

The investigation activities at the Superior MGP are anticipated to commence during the month of November 2001. The second groundwater monitoring sampling event would then take place in late February 2002. Laboratory results are generally provided within three weeks. The draft investigation report is anticipated to be completed within 60 days following receipt of the laboratory reports.



SOURCE: USGS 7½ Minute Topographic Quadrangle from DeLorme Superior, Wisconsin, 1993

SCALE

0 1/4 1/2 1 MILE

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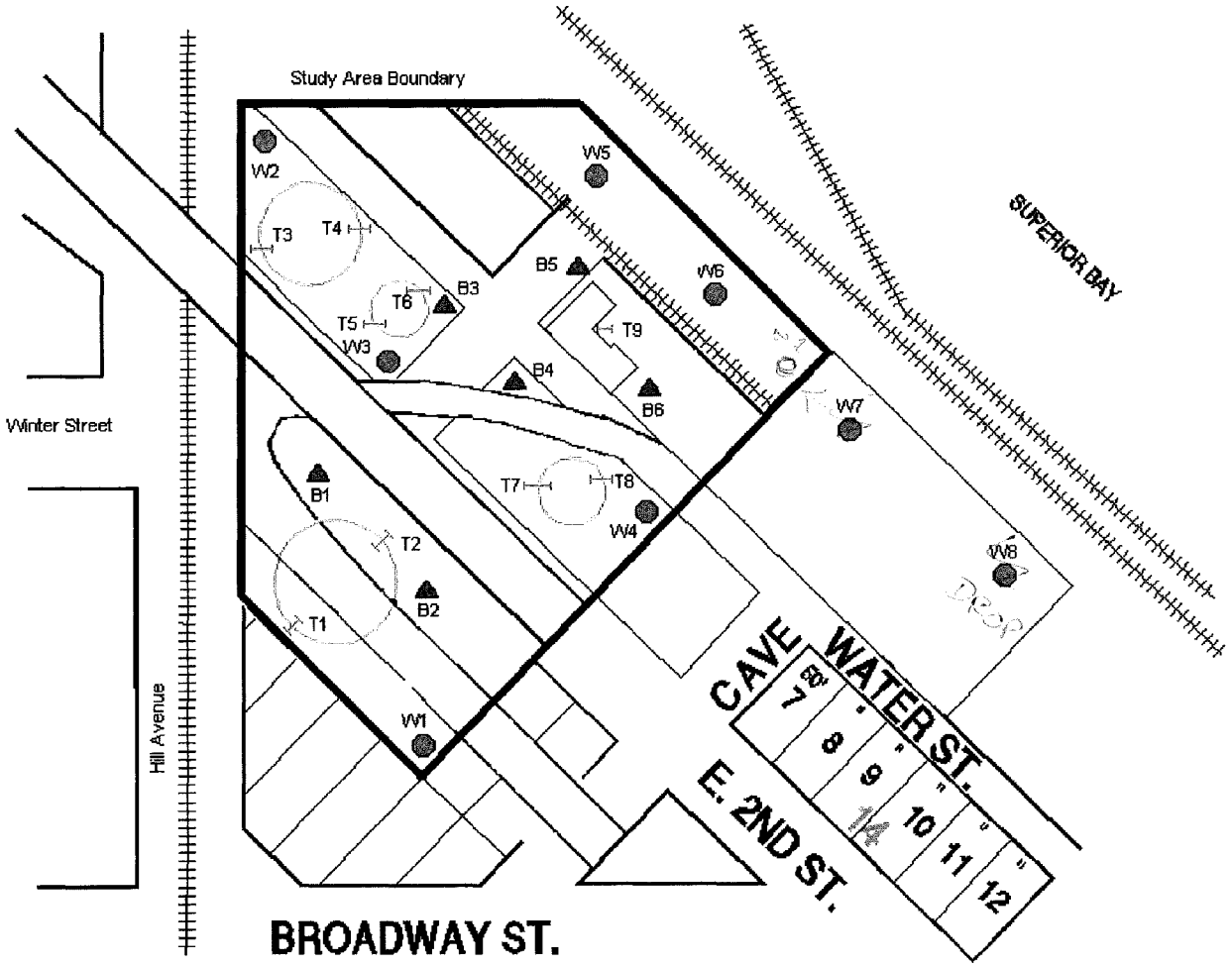
ENSR INTERNATIONAL

FIGURE 1
SITE LOCATION MAP
Superior Water Light & Power MGP
Superior, Wisconsin

PREPARED BY: CMB:	DATE: Sept 2001	PROJECT NO: 09413-098	REV: 0
FILE NO.: FIG1.DOC	CHECKED: WMG		



Former Gas Holders

W8 Monitor Well

B2 Soil Boring

T4 Test Trench

N

SOURCE: Base Map from SWL & P Company Records

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FIGURE 2

PHASE II WELLS, BORINGS AND TEST TRENCHES

Superior Water Light & Power MGP

Superior, Wisconsin

PREPARED BY: CMB:	DATE: Oct 2001	PROJECT NO: 09413-098	REV: 0
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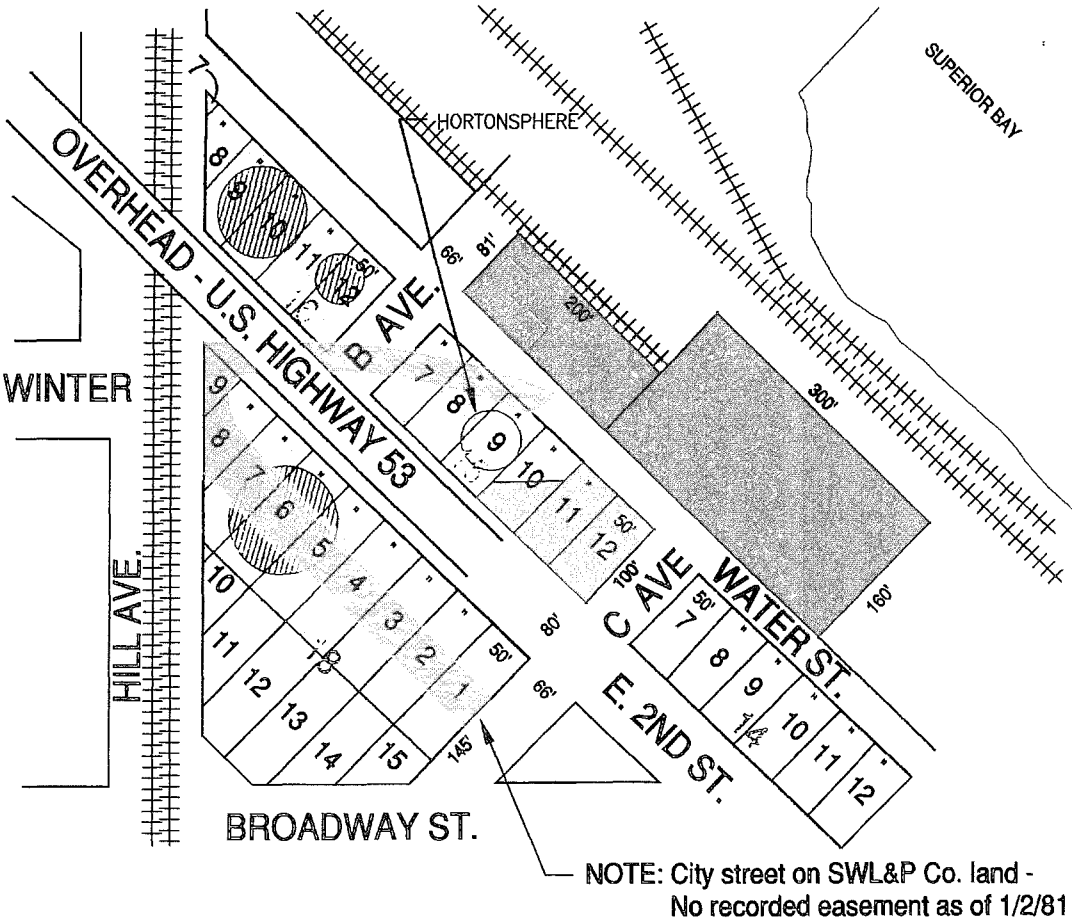

ROY'S ADDITION TO THE
CITY OF SUPERIOR

N

FORMER GAS HOLDERS

DEEDED TO STATE

OWNED BY SWL&P CO.

OWNED BY CLM

PROPERTY OWNED BY
SUPERIOR WATER, LIGHT & POWER
SUPERIOR, WI

APPROXIMATE SCALE

0 190'

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FIGURE 3

PROPERTY OWNERSHIP MAP

SUPERIOR MGP

Source: SWL&P Co. Records

PREPARED BY: AJT	DATE: SEP 2001	PROJECT NO: 9413-098	REV: 0
FILE NO.: Property.DOC	CHECKED: WMG		