



August 6, 2018

Mr. Scott Bence  
Heritage Place Joint Venture/Land 15 LLC  
W178N9912 Rivercrest Drive, Suite 101  
Germantown, WI 53022

KEEP THIS DOCUMENT WITH YOUR PROPERTY RECORDS

Subject: Case Closure Addendum for Jacobus Oil Co.  
N116 W16261 Main Street, Germantown, WI  
BRRTS #: 02-67-000801, FID #: 267054920

Dear Mr. Bence:

On March 4, 2013, the Wisconsin Department of Natural Resources (DNR) issued final case closure for the property listed above. The Saxony Village residential apartment building development at N115 W16170 Saxony Village Boulevard was constructed in 2017, partly on the former Jacobus Oil Co. site (Jacobus), BRRTS #: 02-67-000801, and partly on the adjacent CMC Heartland/Germantown Feed Mill (CMC) site, BRRTS #: 02-67-000341. Continuing obligations were imposed on both properties under the authority of Wis. Stats. § 292.12(2)(c). As a result of site development activities and new building construction, the continuing obligations originally imposed on the Jacobus site have changed. The purpose of this letter is to document changes to the continuing obligations imposed in the original Jacobus final closure letter issued in 2013. A separate closure addendum letter will be issued for the CMC site.

Original Closure Conditions

The Jacobus final closure letter dated March 4, 2013, imposed three continuing obligations: 1) proper management of residual groundwater contamination, 2) proper management of residual soil contamination, and 3) required vapor mitigation in any future construction at the site, unless demonstrated to DNR satisfaction that vapor mitigation is not needed.

Request to Modify Closure Conditions

Pursuant to Wis. Admin. § NR 718.12(2), your consultant, Himalayan Consultants, LLC (Himalayan), submitted a soil management plan (SMP) and a post-closure modification request on January 21, 2016, for this site as well as for the adjacent former CMC site. Himalayan's SMP was finalized on September 9, 2016, and approved by the DNR on September 14, 2016.

On January 26, 2018, Himalayan submitted a post construction soil management report, *Saxony Village Development*, and a cap maintenance plan, *Cover/Barrier/Ventilation Maintenance Plan*, dated July 27, 2018, (revised) for both the Jacobus and CMC sites. The details of the post-closure modifications are as follows:

1. At the location of the former Jacobus and CMC sites, the grade was raised with three feet of clean, imported soil in the area of residual contamination. Following the grade change, a surface cover was constructed, consisting of pavements, building foundation, and six inches of clay material, followed by one to two feet of topsoil in landscaped areas. The cover and barrier areas that are to be maintained are illustrated by Himalayan's Figure 4 and Figure 5, Barrier Installations for Soil Contamination and Barrier Installations for Groundwater Contamination, June 21, 2018.
2. A vertical clay barrier wall was constructed between the northwest end of Building 4 and the residual soil and groundwater contamination, the dimensions being 85 feet long by 20 feet wide to a depth of 2 feet below the building footings. Approximately 125 cubic yards of impacted soil were excavated for the barrier wall, from 3-5 feet below ground surface (bgs), temporarily stockpiled, and then placed under the upper clay and topsoil cover described above.
3. Approximately 1,740 tons of contaminated soil were excavated from new utility trenches and disposed at a licensed landfill. Crushed recycled concrete was placed inside the trench walls and compacted to limit migration of residual groundwater contamination. About 60 tons of contaminated soil was returned to the utility trench excavations and covered by pavement.

As a result of this work, Himalayan has submitted post construction documentation, sample results, and a request to modify the site's continuing obligations by adding 1) a protective barrier and cover and 2) a vapor mitigation system. These additional closure conditions are described below.

The original closure conditions requiring proper management of residual groundwater and soil contamination remain in effect as specified in the original closure letter. The requirement for vapor mitigation in future construction in the original closure letter has been replaced with the requirement to operate a vapor mitigation system.

#### Prohibited Activities

Certain activities are prohibited at closed sites because maintenance of a barrier is intended to prevent contact with any remaining contamination. When a barrier is required, the condition of closure requires notification of the DNR before making a change, to determine if further action is needed to maintain the protectiveness of the remedy employed. The following activities are prohibited on any portion of the property where the pavements, building foundations and clay and soil covers is required, as shown on the attached maps Figure 4 and Figure 5, Barrier Installations for Soil Contamination and Barrier Installations for Groundwater Contamination, June 21, 2018, unless prior written approval has been obtained from the DNR:

- removal of the existing barrier or cover;
- replacement with another barrier or cover;
- excavating or grading of the land surface;
- filling on covered or paved areas;
- plowing for agricultural cultivation;
- construction or placement of a building or other structure;
- changing the use or occupancy of the property to single-family residential use;
- changing the construction of a building that has a vapor mitigation system in place.

Revised Closure Conditions

Compliance with the requirements of this letter is a responsibility to which you, and any subsequent property owners must adhere. DNR staff will conduct periodic prearranged inspections to ensure that the conditions included in this letter and the attached maintenance plan are met. If these requirements are not followed, the DNR may take enforcement action under Wis. Stats. § 292.11 to ensure compliance with the specified requirements, limitations or other conditions related to the property.

Please send written notifications in accordance with the following requirements to:

Department of Natural Resources  
Attn: Remediation and Redevelopment Program Environmental Program Associate  
2300 N. MLK Dr.  
Milwaukee, WI 53212

Cover or Barrier (Wis. Stats. § 292.12 (2) (a), Wis. Admin. §§ NR 726.15, NR 727.07)

The pavements, building foundations, and clay and soil covers that exist in the locations shown on the attached maps, Figure 4 and Figure 5, Barrier Installations for Soil Contamination and Barrier Installations for Groundwater Contamination, June 21, 2018, shall be maintained in compliance with the attached maintenance plan to minimize the infiltration of water and prevent additional groundwater contamination that could pose a vapor intrusion threat, and to prevent direct contact with residual soil contamination that might otherwise pose a threat to human health.

The cover approved for this closure was designed to be protective for a commercial/multi-family residential use setting. Before using the property for single-family residential purposes, you must notify the DNR at least 45 days before taking an action, to determine if additional response actions are warranted.

A request may be made to modify or replace a cover or barrier. Before removing or replacing the cover, you must notify the DNR at least 45 days before taking an action. The replacement or modified cover or barrier must be protective of the revised use of the property, and must be approved in writing by the DNR prior to implementation. A cover or barrier for industrial land uses, or certain types of commercial land uses may not be protective if the use of the property were to change such that a residential exposure would apply. This may include, but is not limited to single-family residences, a school, day care, senior center, hospital or similar settings. In addition, a cover or barrier for multi-family residential housing use may not be appropriate for use at a single-family residence.

The attached maintenance plan and inspection log (DNR form 4400-305) are to be kept up-to-date and on-site. Inspections shall be conducted annually in accordance with the attached maintenance plan. Submit the inspection log to the DNR only upon request.

Vapor Mitigation or Evaluation (Wis. Stats. § 292.12 (2), Wis. Admin. §§ NR 726.15, NR 727.07)

Vapor intrusion is the movement of vapors coming from volatile chemicals in the soil or groundwater, into buildings where people may breathe air contaminated by the vapors. Vapor mitigation systems are used to interrupt the pathway, thereby reducing or preventing vapors from moving into the building.

Vapor Mitigation System: Soil vapor near Building 4 contains petroleum volatile organic compounds at levels that could pose a long-term risk to human health, if allowed to migrate into the building. The garage ventilation

system, installed when the building was constructed in 2017, must be operated, maintained and inspected in accordance with the attached maintenance plan. System components must be repaired or replaced immediately upon discovery of a malfunction. Annual inspections and any system repairs must be documented in the inspection log (DNR form 4400-305). The inspection log shall be kept up-to-date and on-site. Inspections shall be conducted annually in accordance with the attached maintenance plan. Submit the inspection log to the DNR only upon request.

If a decision is made to no longer use the ventilation system, or to make a change to the vapor mitigation system, the property owner must notify the DNR at least 45 days before shutting the ventilation system off, or before making any other change to the system, and evaluate whether conditions are protective of public health and safety. Additional response actions may be necessary. You or any future property owners are responsible for this continuing obligation.

In Closing

Please be aware that the case may be reopened pursuant to s. NR 727.13, Wis. Adm. Code, for any of the following situations:

- if additional information regarding site conditions indicates that contamination on or from the site poses a threat to public health, safety, or welfare or to the environment,
- if the property owner does not comply with the conditions of closure, with any deed restrictions applied to the property, or with a certificate of completion issued under s. 292.15, Wis. Stats., or
- a property owner fails to maintain or comply with a continuing obligation (imposed under this closure approval letter).

You and any future property owners must adhere to the requirements in this closure letter addendum, as well as any applicable continuing obligations applied to these properties in the final case closure letter dated March 4, 2013. Thank you for your efforts to protect Wisconsin's environment. If you have any questions about this letter, please contact the DNR project manager, John Feeney, at 920-893-8523, or by email at [johnm.feeney@wisconsin.gov](mailto:johnm.feeney@wisconsin.gov).

Sincerely,

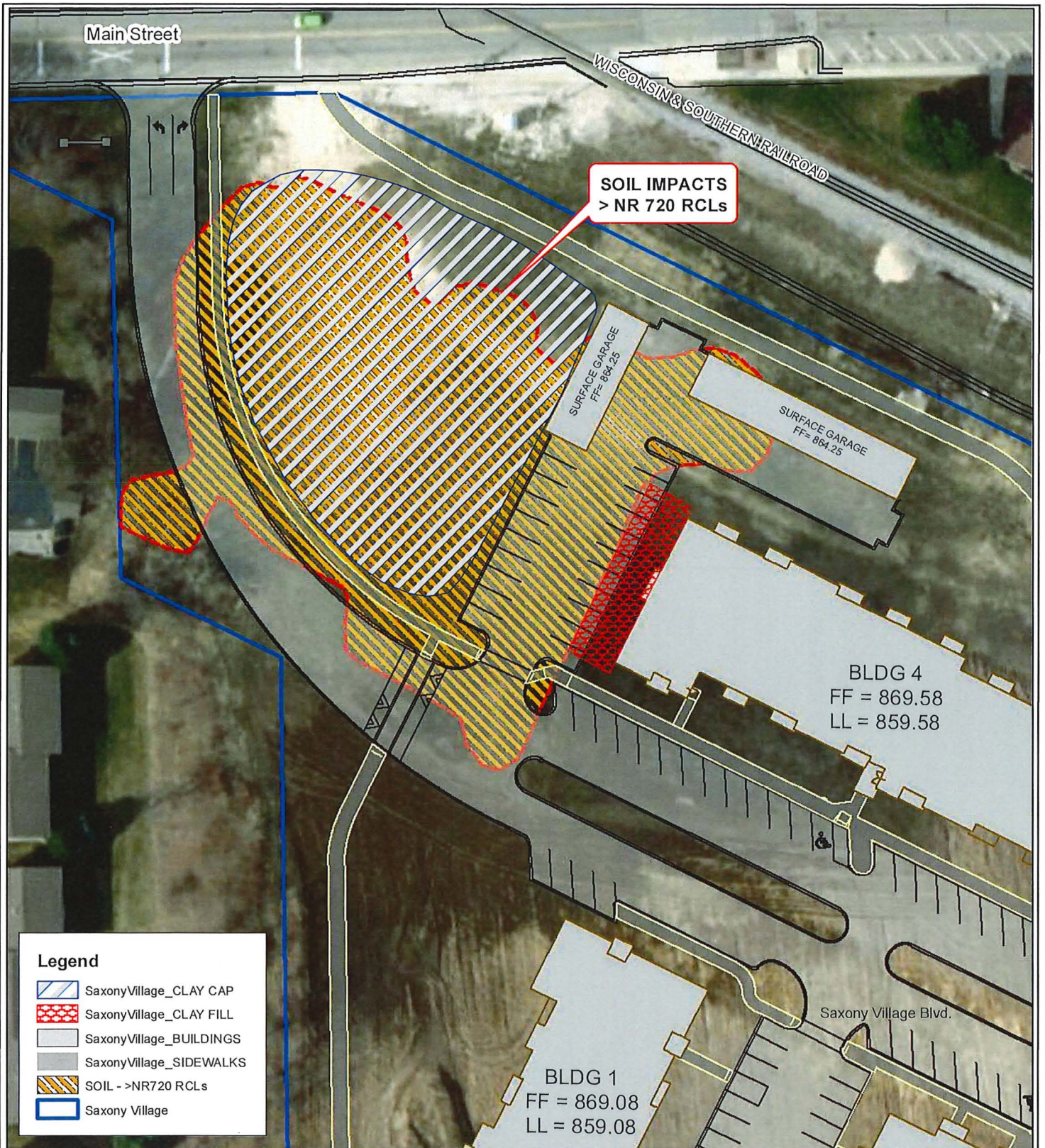


Michele R. Norman  
Southeast Region Team Supervisor  
Remediation & Redevelopment Program

Attachments: Figure 4 and Figure 5, Barrier Installations for Soil Contamination and Barrier Installations for Groundwater Contamination, June 21, 2018  
Cover/Barrier/Ventilation Maintenance Plan, July 27, 2018

cc: Mr. Thomas J. Dueppen, Himalayan Consultants, LLC  
SER File





Source: J.B.J. Companies, Washington County GIS

Scale: 0 37.5 75 150 Feet

**Figure 4: Barrier Installations for Soil Contamination**



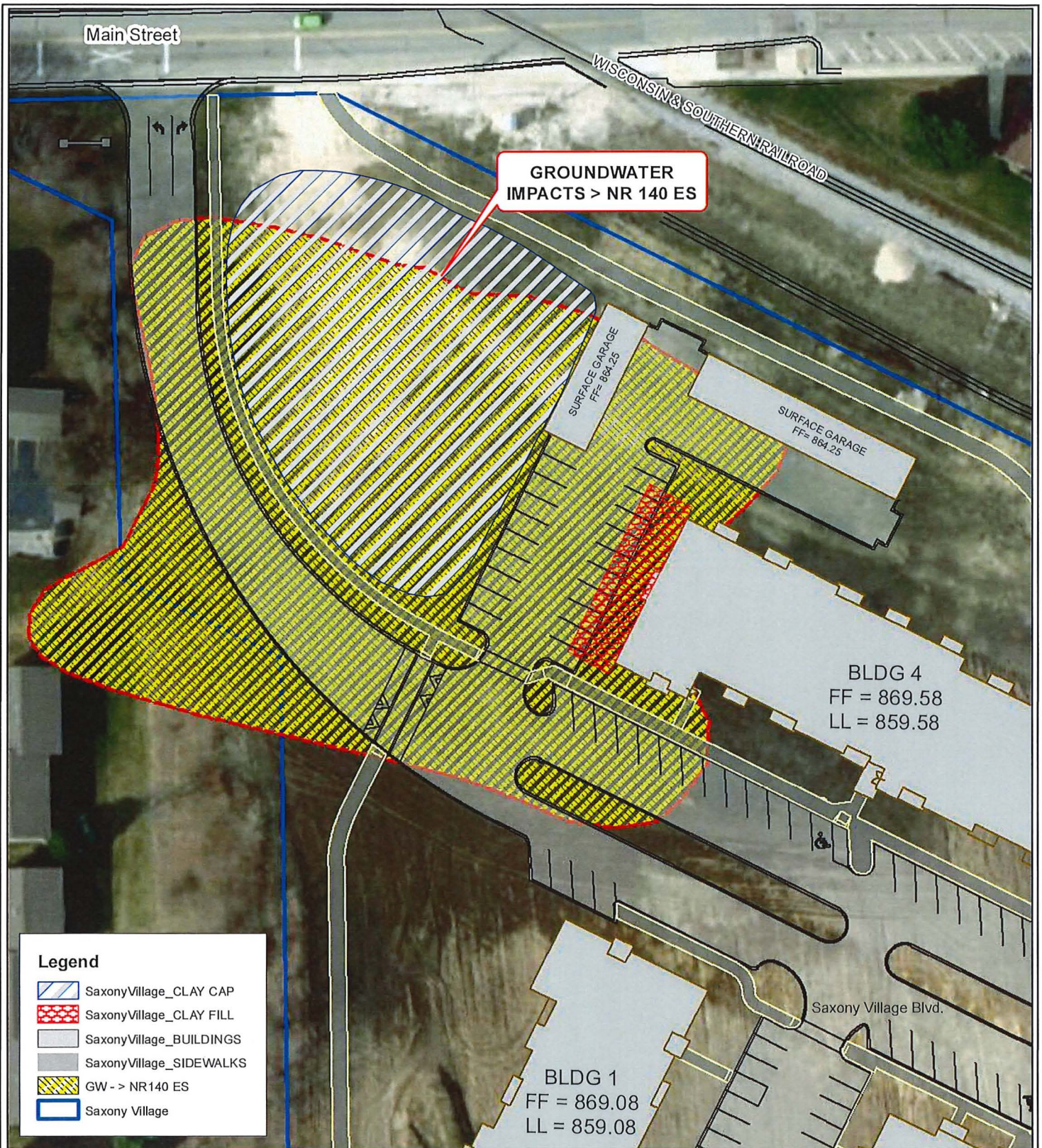
**HIMALAYAN CONSULTANTS, LLC**  
 Engineering and Hydrogeologists  
 W156 N11357 Pilgrim Road  
 Germantown, Wisconsin 53022  
 Phone: (262) 502-0066  
 Fax: (262)-0077

**Project # 17016.020**  
**Saxony Village Development Project**  
**Village of Germantown**  
**Washington County, Wisconsin**









Source: J.B.J. Companies, Washington County GIS

Scale: 0 37.5 75 150 Feet

**Figure 5: Barrier Installations for Groundwater Contamination**



**HIMALAYAN CONSULTANTS, LLC**  
 Engineering and Hydrogeologists  
 W156 N11357 Pilgrim Road  
 Germantown, Wisconsin 53022  
 Phone: (262) 502-0066  
 Fax: (262)-0077

**Project # 17016.020**  
**Saxony Village Development Project**  
**Village of Germantown**  
**Washington County, Wisconsin**









## COVER / BARRIER / VENTILATION MAINTENANCE PLAN

DATE Prepared: July 27, 2018

PROPERTY Located at: N116W16261 MAIN STREET, GERMANTOWN, WI 53022

DNR BRRTS/Activity # 02-67-000801, FID # 267054920

LEGAL DESCRIPTION: PT NW SE OL 4+PT OF OL 3 ASSRS PLAT OF NW SE DOC 1393203 EXC PART SOLD  
PT NW SE DOC 1325537+1424236+1424237

TAX /Parcel Identification Number: GTNV\_224027001

### Introduction

This document is the Maintenance Plan for a clay cap/barrier, building foundation, and asphalt/concrete pavement cover at the above-referenced property in accordance with the requirements of s. NR 724.13 (2), Wis. Adm. Code. The maintenance activities relate to the existing clay cap/barrier, building foundation, and asphalt/concrete pavement cover which addresses or occupies the area over the contaminated groundwater plume and soil.

More site-specific information about this property/site may be found in:

- The case file in the DNR Plymouth office
- At <http://dnr.wi.gov/topic/Brownfields/wrrd.html>, which includes:
  - BRRTS on the Web (DNR's internet based data base of contaminated sites)for the link to a PDF for site-specific information at the time of closure and on continuing obligations;
  - RR Sites Map for a map view of the site, and
- The DNR project manager for Washington County.

### D.1. Descriptions:

#### Description of Contamination

Soil contaminated by petroleum is located at a depth of 2 to 10 feet at the source property and several adjacent properties owned by Stonewood Homes & Condominiums (GTNV 224148 to 224163), Germantown Manor Apartments (GTNV 224026001 to 224026002 – Former Squire Drive Parcel), Heritage Place Joint Venture (GTNV 224992002 – Former Carl E Trapp Revocable Trust), and MCB Investments (GTNV 224025001 – Former CMC Heartland Parnters). Several areas have been identified with petroleum VOC concentrations above their respective NR720 RCLs. Groundwater contaminated by petroleum is located at a depth of 10 to 30 feet (+/- 5 feet). Several areas have been identified with petroleum VOC concentrations above their respective NR140 ESs. Previous investigation and remediation activities at the source property have been conducted in conjunction an adjacent ERP site to the northeast [CMC Heartland (BRRTS #02-67-000341)]. Contamination at both sites is assumed to be co-mingled and the estimated extent of the soil and groundwater contamination is shown on the attached Figures 1 and 2. The Saxony Village Development is comprised of two parcels associated with the ERP sites and the Heritage Place Joint Venture parcel to the south, for a total of approximately 23.8 acres of land. Phase 1 was completed in 2017, including Building #4 and roadway construction and infrastructure installation (water, storm and sanitary sewer, ponds, and electrical) for the remaining multi-family apartment complex. Management of contaminated material generated during these

activities and the cover/barrier/cap installation is documented in a letter report, dated January 26, 2018. The remaining complex is planned for completion in 2019. Current property boundaries and development plans are shown in attached Figure 3.

#### Description of the Cover/Barrier/Cap to be Maintained

The cap consists of approximately 6 inches of non-contaminated clay over most of the contaminated soil and groundwater remaining at the site. The cover system includes vegetation, one to two feet of clean topsoil and fill, concrete sidewalk, asphalt pavement on the parking lot and entranceway road, and garage building foundations. An additional barrier exists between Building #4 and the contaminated area, consisting of approximately 5 feet of non-contaminated clay. This barrier is a 20 x 85-foot area along the northwest side of Building #4, and extends about 2 feet below the building footing. The cover/barrier/cap system is located between the south side of Main Street and the north/northwest sides of Building #4, as shown on the attached Figures 4 and 5.

#### Cover/Building/Slab/Barrier Purpose

The clay cap and asphalt/concrete pavement cover over the contaminated soil and groundwater plume serve as a barrier to prevent direct human contact with residual soil contamination that might otherwise pose a threat to human health. The cover/barrier also acts as a partial infiltration barrier to minimize future soil-to-groundwater contamination migration that would violate the groundwater standards in ch. NR 140, Wisconsin Administrative Code. Based on the current use of the property, multi-family residential, the barriers should function as intended unless disturbed.

#### Description of Active Vapor Mitigation System to be Maintained

The vapor mitigation system consists of ventilation equipment designed for the periodic removal of automobile exhaust from the underground parking structure in Building #4. The ventilation equipment includes intake louvers (Vent Products Model 2000-31) located in the northeast corner of the garage, a CO / NO<sub>2</sub> detector (Brasch Model GSE-NCM-LL1) near the center of the garage, and an exhaust fan (S&P Model LCE48-ASSY) located in the southeast corner. Based on an intermittent ventilation design (i.e. time clock and CO/NO<sub>2</sub> detection), air flow within the parking structure will reach ¾ cfm per square foot or a minimum of five air exchanges per hour. The location of ventilation equipment in the underground parking structure is denoted in Figure 6 and photos of the equipment are included in Photo #2 - #4.

#### Active Vapor Mitigation System Purpose

The intermittent ventilation of automobile exhaust from the underground parking structure should significantly limit any other potential vapor accumulation within Building #4. Based on the current use of the property, multi-family residential, this mitigation system should function as intended unless disturbed.

#### Annual Inspection

The clay cap and asphalt/concrete pavement cover overlying the contaminated soil and groundwater plume as depicted in Figures 4 and 5 and Photo #1, and ventilation equipment in Photos #2 - #4 will be inspected once a year, normally in the spring after all snow and ice is gone, for deterioration, cracks and other potential problems that can cause additional infiltration into or exposure to underlying soils, and ventilation equipment malfunctions. The inspections will be performed by the property owner or their designated representative. The inspections will be performed to evaluate damage due to settling, exposure to the weather, wear from traffic, increasing age and other factors. Any area where soils have become or are likely to become exposed and

where infiltration from the surface will not be effectively minimized will be documented. Any repairs or replacements to the vapor mitigation system will be evaluated for proper performance.

A log of the inspections and any repairs will be maintained by the property owner and is included as D.4, Form 4400-305, Continuing Obligations Inspection and Maintenance Log. The log will include recommendations for necessary repair of any areas where underlying soils are exposed, where infiltration from the surface will not be effectively minimized, or vapor mitigation is not adequate. Once repairs are completed, they will be documented in the inspection log. A copy of the maintenance plan and inspection log will be kept at the site; or, if there is no acceptable place (for example, no building is present) to keep it at the site, at the address of the property owner and available for submittal or inspection by Wisconsin Department of Natural Resources (DNR) representatives upon their request. A copy of the inspection log must be submitted electronically to the DNR after every inspection, at least annually.]

### Maintenance Activities

If problems to the cap/cover system are noted during the annual inspections or at any other time during the year, repairs will be scheduled as soon as practical. Repairs can include patching and filling or larger resurfacing or construction operations. In the event that necessary maintenance activities expose the underlying soil, the owner must inform maintenance workers of the direct contact exposure hazard and provide them with appropriate personal protection equipment (PPE). The owner must also sample any soil that is excavated from the site prior to disposal to ascertain if contamination remains. The soil must be treated, stored and disposed of by the owner in accordance with applicable local, state and federal law.

In the event the cap/cover system overlying the contaminated soil and groundwater plume are removed or replaced, the replacement barrier must be equally impervious. Any replacement barrier will be subject to the same maintenance and inspection guidelines as outlined in this Maintenance Plan unless indicated otherwise by the DNR or its successor.

If problems to the ventilation system are noted during the annual inspections or at any other time during the year, repairs or replacement of system components will be scheduled immediately upon discovery of a malfunction. Repairs and replacements can include electrical connections, time clock and CO/NO<sub>2</sub> detector, intake louvers, and exhaust fan assembly.

The property owner, in order to maintain the integrity of the cover/barrier/cap [clay cap, clay barrier, concrete sidewalk, asphalt pavement on the parking lot and entranceway road, and garage building foundations] and vapor mitigation system, will maintain a copy of this Maintenance Plan at the site; or, if there is no acceptable place to keep it at the site (for example, no building is present), at the address of the property owner and make it available to all interested parties (i.e. on-site employees, contractors, future property owners, etc.) for viewing.

### Prohibition of Activities and Notification of DNR Prior to Actions Affecting a Cover/Barrier

The following activities are prohibited on any portion of the property where pavement, a building foundation, soil cover, engineered cap or other barrier is required as shown on the attached map, unless prior written approval has been obtained from the Wisconsin Department of Natural Resources: 1) removal of the existing barrier / ventilation system; 2) replacement with another barrier / ventilation system; 3) excavating or grading of the land surface; 4) filling on capped or paved areas; 5) plowing for agricultural cultivation; 6) construction or placement of a building or other structure; or 7) changing the use or occupancy of the property to single-family residential use.



If removal, replacement or other changes to the barrier / ventilation systems, or a building which is acting as a cover, are considered, the property owner will contact DNR at least 45 days before taking such an action, to determine whether further action may be necessary to protect human health, safety, or welfare or the environment, in accordance with s. NR 727.07, Wis. Adm. Code.

Amendment or Withdrawal of Maintenance Plan

This Maintenance Plan can be amended or withdrawn by the property owner and its successors with the written approval of DNR.

Contact Information

Date: \_\_\_\_\_, 2018

Site Owner and Operator: J.B.J. Companies, Inc.  
W178N9912 Rivercrest Drive, Suite 101, Germantown, WI 53022  
Contact: Scott J. Bence, Agent  
Phone: (262) 255-1800

Signature: \_\_\_\_\_

Property Owner: MCB Investments, LLC / Land15, LLC / Heritage Place Joint Venture  
W178N9912 Rivercrest Drive, Suite 101, Germantown, WI 53022  
Contact: Scott J. Bence, Agent  
Phone: (262) 255-1800

Signature: \_\_\_\_\_

Consultant: Himalayan Consultants, LLC  
W156 N11357 Pilgrim Road, Germantown, WI 53022  
(262) 502-0066

DNR: John M. Feeney  
1155 Pilgrim Road, Plymouth, WI 53073  
(920) 892-8756

**D.2 Location Map(s)**

See attached Figures 1 - 5.

**D.3 Photographs of Cover/Barrier/Ventilation**

See attached Photo #1 - #4.

**D.4 Continuing Obligations Inspection and Maintenance Log**

See attached DNR Fillable Form [Form 4400-305](#)





PHOTO #1 - COVER / BARRIER LOCATION

SAXONY VILLAGE DEVELOPMENT, GERMANTOWN, WI - 2/15/2018





PHOTO #2 - INTAKE LOUVERS

SAXONY VILLAGE DEVELOPMENT, BUILDING #4 GARAGE - 7/27/2018





PHOTO #3 - GAS DETECTOR

SAXONY VILLAGE DEVELOPMENT, BUILDING #4 GARAGE - 7/27/2018

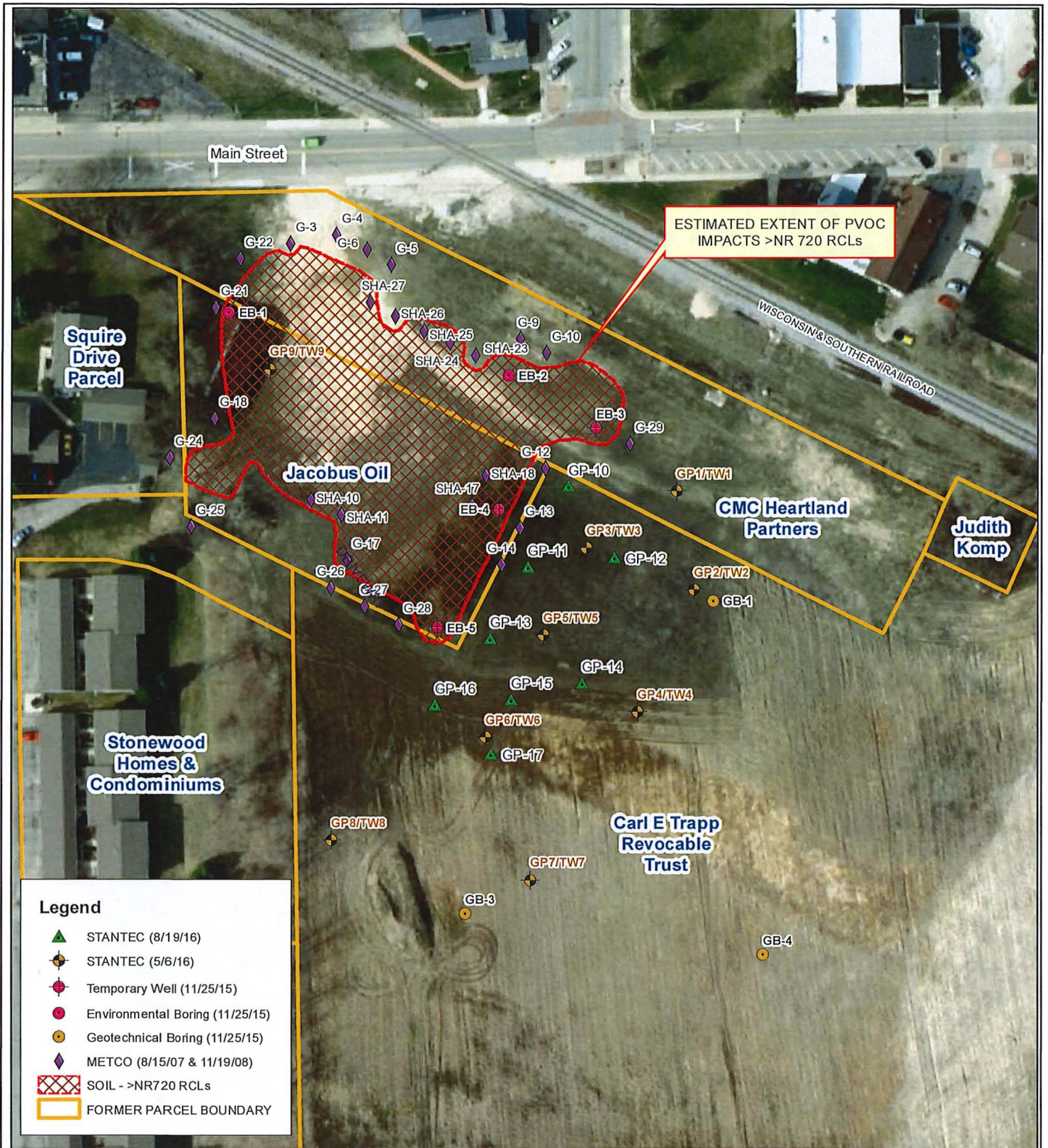




PHOTO #4 - EXHAUST FAN

SAXONY VILLAGE DEVELOPMENT, BUILDING #4 GARAGE - 7/27/2018



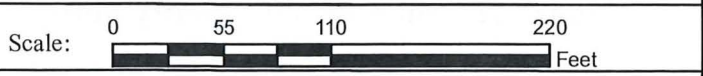


ESTIMATED EXTENT OF PVOC IMPACTS >NR 720 RCLs

**Legend**

- ▲ STANTEC (8/19/16)
- STANTEC (5/6/16)
- Temporary Well (11/25/15)
- Environmental Boring (11/25/15)
- Geotechnical Boring (11/25/15)
- ◆ METCO (8/15/07 & 11/19/08)
- SOIL - >NR720 RCLs
- FORMER PARCEL BOUNDARY

Source: ArcGIS Online, Washington County GIS



**Figure 1: Soil Quality Map**

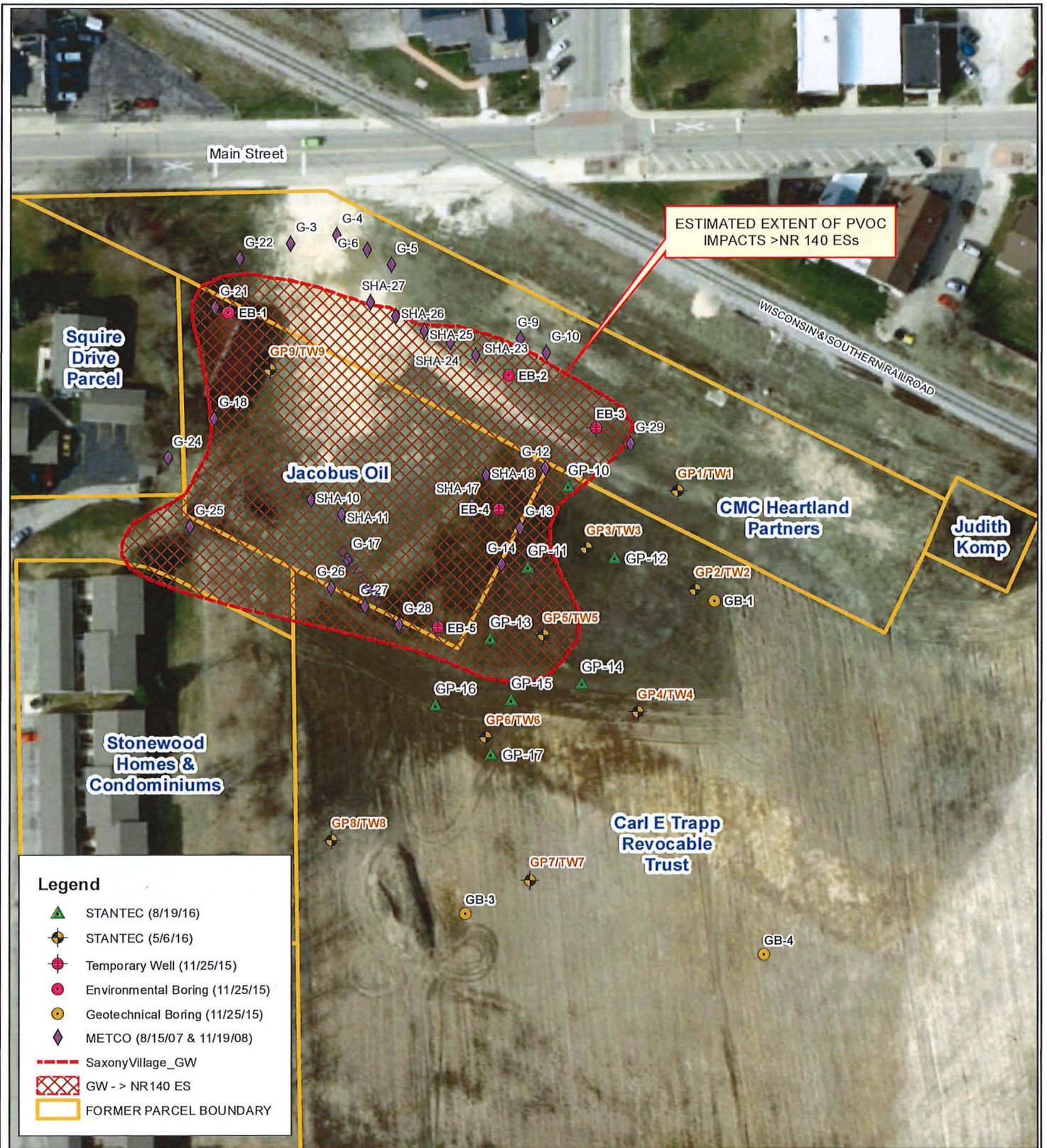


**HIMALAYAN CONSULTANTS, LLC**  
 Engineering and Hydrogeologists  
 W156 N11357 Pilgrim Road  
 Germantown, Wisconsin 53022  
 Phone: (262) 502-0066  
 Fax: (262)-0077

**Project # 17016.020**  
**Saxony Village Development Project**  
**Village of Germantown**  
**Washington County, Wisconsin**







Source: ArcGIS Online, Washington County GIS



Figure 2: Groundwater Quality Map



**HIMALAYAN CONSULTANTS, LLC**  
 Engineering and Hydrogeologists  
 W156 N11357 Pilgrim Road  
 Germantown, Wisconsin 53022  
 Phone: (262) 502-0066  
 Fax: (262)-0077

**Project # 17016.020**  
**Saxony Village Development Project**  
**Village of Germantown**  
**Washington County, Wisconsin**







Source: J.B.J. Companies, Washington County GIS

Scale: 0 100 200 400 Feet

**Figure 3: Development Plans**

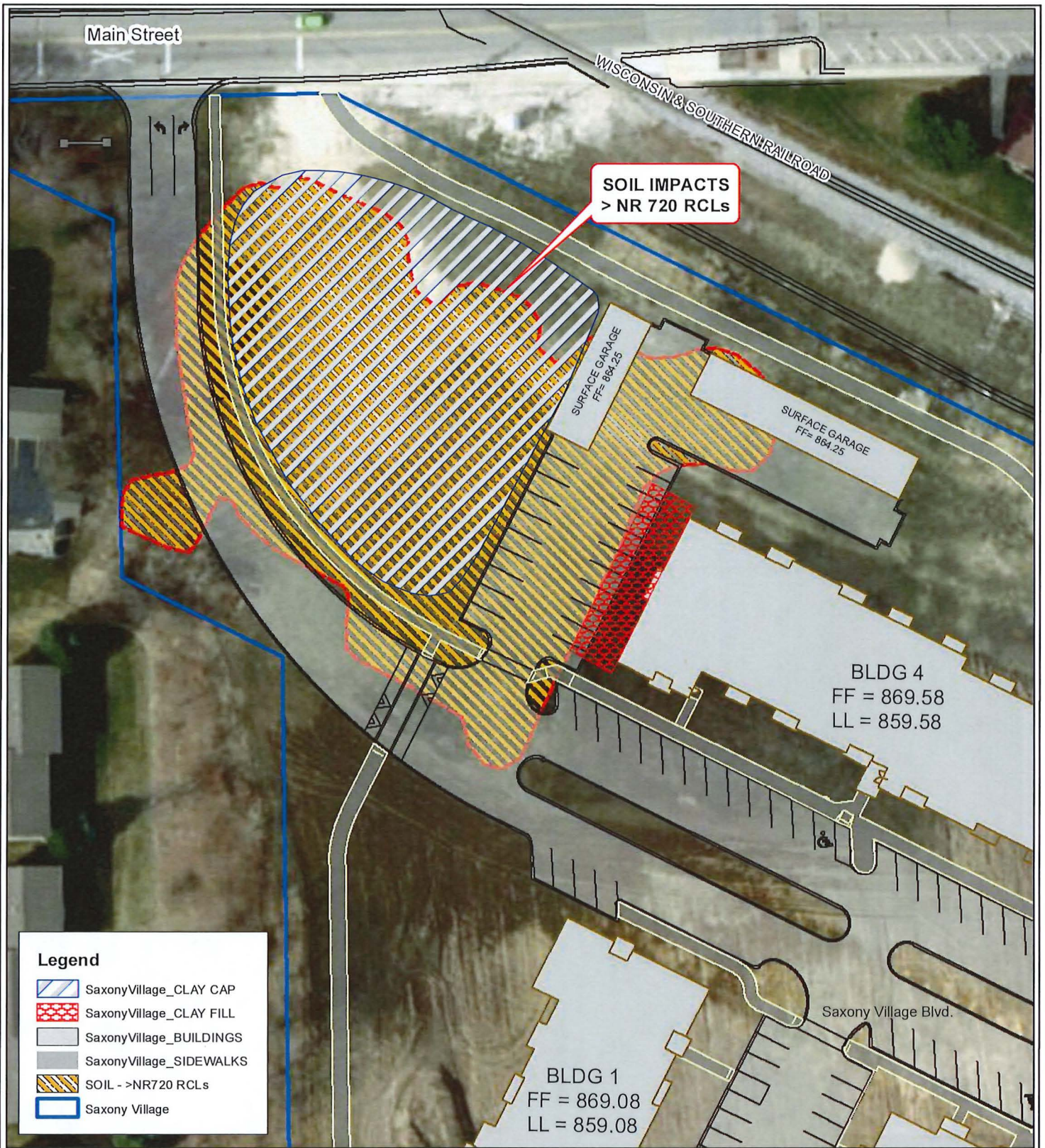


**HIMALAYAN CONSULTANTS, LLC**  
 Engineering and Hydrogeologists  
 W156 N11357 Pilgrim Road  
 Germantown, Wisconsin 53022  
 Phone: (262) 502-0066  
 Fax: (262)-0077

**Project # 17016.020**  
**Saxony Village Development Project**  
**Village of Germantown**  
**Washington County, Wisconsin**







Source: J.B.J. Companies, Washington County GIS

Scale: 0 37.5 75 150 Feet

**Figure 4: Barrier Installations for Soil Contamination**

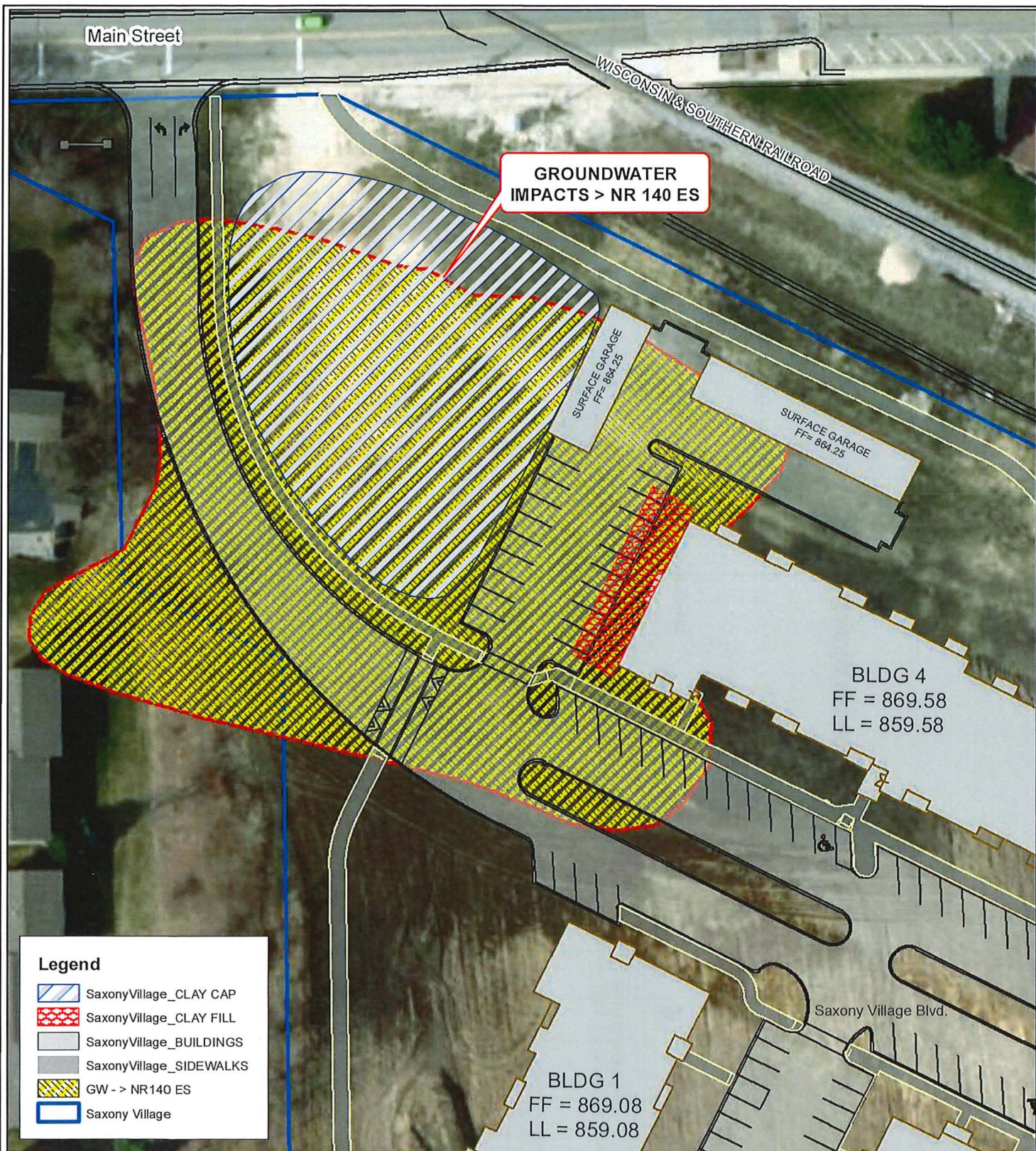


**HIMALAYAN CONSULTANTS, LLC**  
 Engineering and Hydrogeologists  
 W156 N11357 Pilgrim Road  
 Germantown, Wisconsin 53022  
 Phone: (262) 502-0066  
 Fax: (262)-0077

**Project # 17016.020**  
**Saxony Village Development Project**  
**Village of Germantown**  
**Washington County, Wisconsin**







Source: J.B.J. Companies, Washington County GIS

Scale: 0 37.5 75 150 Feet

**Figure 5: Barrier Installations for Groundwater Contamination**



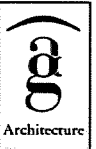
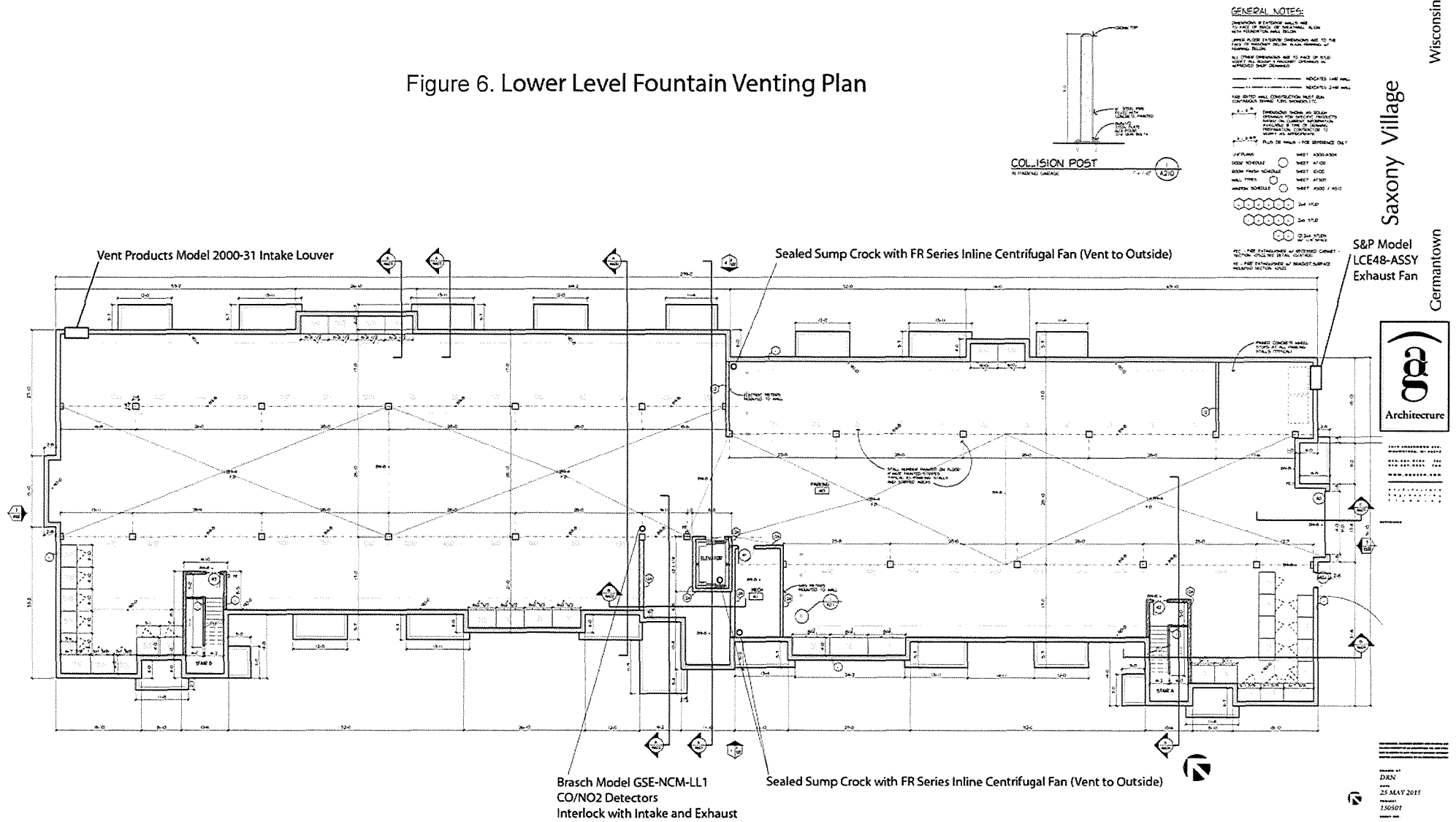
**HIMALAYAN CONSULTANTS, LLC**  
 Engineering and Hydrogeologists  
 W156 N11357 Pilgrim Road  
 Germantown, Wisconsin 53022  
 Phone: (262) 502-0066  
 Fax: (262)-0077

**Project # 17016.020**  
**Saxony Village Development Project**  
**Village of Germantown**  
**Washington County, Wisconsin**





Figure 6. Lower Level Fountain Venting Plan



1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
---	---	---	---	---	---	---	---	---	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	-----

DRAWN BY  
 DKN  
 DATE  
 25 MAY 2011  
 PROJECT  
 156501  
 SHEET NO.  
 1/8" LOWER LEVEL FLOOR PLAN - BLDG 4 A210