



FROEHLING & ROBERTSON, INC.
Engineering Stability Since 1881

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Record No: 62N-0447

November 10, 2011

Public Works-Engineering
1700 Memorial Avenue
Lynchburg, Virginia 24501
Email: Joe.Smith@lynchburgva.gov

Attention: Joe Smith

Subject: Asbestos and Lead Testing Services
Kemper Street Bridge
Lynchburg, Virginia

Mr. Smith;

Froehling & Robertson, Inc. (F&R) personnel conducted an asbestos and lead based paint survey on October 27, 2011 of the Kemper Bridge. The sections below summarize on-site activities and findings.

1.0 LIMITED ASBESTOS SURVEY FINDINGS AND RESULTS

Fourteen (14) bulk samples of suspect asbestos containing materials were collected at the site and analyzed. The suspect ACMs were submitted to Environmental Hazards Services, L.L.C. an NVLAP accredited (NVLAP Lab Code: 101882-0) and Virginia licensed asbestos laboratory, in Richmond, Virginia, for analysis by Polarized Light Microscopy (PLM) following EPA Method 600/R-93/116. The analytical results are shown in the following table. A copy of the laboratory Asbestos Bulk Analysis Report is included as an attachment to this report. The survey results are presented in Table I.

TABLE I: Asbestos Sample Results: October 27, 2011

Sample Number	Sample Location	Sample Type	Lab Description	Analytical Results
ASRW01	South side	Black Bottom Layer Under Pad	Black Tar-Like	NAD ¹
ASRW02	South side	Pad	Gray Granular	NAD
ASRW03	South side	Sealant	Gray Brittle	NAD

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Sample Number	Sample Location	Sample Type	Lab Description	Analytical Results
ASRW04	Under Bridge	Caulking/Sealer (between beam and pad on column)	Gray Brittle	Trace <1% Chrysotile
ASRW05	Middle of Abutment	Black Bottom Layer Under Pad	Black Tar-Like	NAD
ASRW06	Top of Water Line	Silver Paint	Silver Paint	NAD
ASRW07	Southwest side	Expansion Joint/Sealant- Dark Gray	Tan Brittle	NAD
ASRW08	East Side Under Hand Rail Plates	Light Gray Gasket	Gray Brittle	2% Chrysotile
ASRW09	North side Under Beams	Black Bottom Layer	Black Tar-Like	NAD
ASRW10	Southeast side	Expansion Joint-Black	Black Rubber	NAD
ASRW11	North side	Drain	Black Tar-Like	NAD
ASRW12	Under Bridge Between Beams	Rope/String	Tan Fibrous; Gray Powder	NAD
ASRW13	North side	Drain	Black Tar-Like	NAD
ASRW14	West side Under Hand Rail Plates	Light Gray Gasket	Gray Brittle	2% Chrysotile

¹NAD: No Asbestos Detected

1.1. Friable Asbestos Containing Materials:

Asbestos (2% Chrysotile) was detected in two (2) representative samples (ASRW08 and ASRW14) of the light gray gasket material under the plates of the hand rails where they bolt onto the bridge. This material is classified as friable ACM and was in fair condition. All similar light gray gasket material located on Kemper Bridge should be assumed to be an asbestos-containing material.

1.2. Non-Friable Asbestos Containing Materials:

Asbestos (Trace <1%) was detected in one (1) representative sample of the caulking/sealer located between the bridge beams and the pads on the support columns and buttresses under Kemper Bridge. Although this level is below the regulatory threshold under EPA regulations, OSHA has regulations for the removal and disturbance of trace levels of asbestos. F&R recommends that the owner either conduct follow-up sampling of the caulking/sealer using a more sensitive method (TEM analysis) to evaluate if there is asbestos present in this material or assume that the material is asbestos containing and manage it accordingly. F&R notes however that this is not a regulatory requirement and our recommendation is based on experience and good practice.



If during demolition or repair/renovation activities, work is performed that will impact suspect materials that **have not been sampled**, it is recommended that these materials be sampled by a Virginia licensed Asbestos Inspector prior to disturbance.

The Asbestos Analytical Report and the Chain of Custody Documentation is provided as an attachment to this report.

2.0 APPLICABLE REGULATIONS - ASBESTOS

2.1. EPA/NESHAP Regulations for Asbestos Containing Materials

The U.S. Environmental Protection Agency promulgated the National Emission Standards for Hazardous Air Pollutants (NESHAP) [40 CFR Part 61], which addresses the application, removal, and disposal of asbestos-containing materials (ACM). Under NESHAP the following categories are defined for asbestos-containing materials:

Friable - When dry, can be crumbled, pulverized, or reduced to powder by hand pressure.

Non-friable - When dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.

Category I Non-friable ACM - Packings, gaskets, resilient floor coverings, and asphalt roofing products containing more than 1% asbestos.

Category II Non-friable ACM – Any material, excluding Category I Non-friable ACM, which contains more than 1% asbestos.

Regulated Asbestos Containing Material (RACM) – One of the following:

1. Friable ACM
2. Category I Non-friable ACM that has become friable.
3. Category I Non-friable ACM that will be or has been subjected to sanding, grinding, cutting, or abrading.
4. Category II Non-friable ACM that has a high probability of becoming, or has become, friable by the forces expected to act on the material in the course of demolition or renovation operations.

Under NESHAP, the following actions are required:

1. Prior to the commencement of demolition or renovation activities, the building owner must inspect the affected facility or part of the facility where the demolition or renovation activities will occur for the presence of asbestos.
2. Remove all RACM from the facility before any activity begins that would break up, dislodge, or similarly disturb the material or preclude access for subsequent removal.



3. RACM need not be removed if:
- a) It is Category I non-friable ACM that is not in poor condition.
 - b) It is on a facility component that is encased in concrete or other similar material and is adequately wet whenever exposed.
 - c) It was not accessible for testing and was therefore not discovered until after demolition began and because of the demolition the material cannot be safely removed.
 - d) It is Category II non-friable ACM and the probability is low that the material will become crumbled, pulverized, or reduced to powder during demolition.

3.0 LIMITED LEAD-BASED PAINT SURVEY FINDINGS AND RESULTS

Froehling & Robertson, Inc. (F&R) personnel also performed lead based paint (LBP) testing of painted components under the Kemper Bridge. Based on the nature of this survey, when one component tests positive for the presence of lead paint all similar painted components must be assumed to be positive, unless additional testing is performed.

The sampling procedure used to obtain representative samples of coatings present on structural components was by collection of dried paint film in general accordance with ASTM E 1729-05. Samples were analyzed by EPA method 7000 by an NVLAP 101882-0 accredited laboratory and are listed below. A total of four (4) paint samples were taken on the components of the bridge. The water lines and steel hangers tested positive for LBP when compared to the HUD action level of 0.5 % by weight.

Table 2: - Lead Based Paint Sampling Results

Sample#	Sample Location	Component	Pb (ug/g) ppm	% Pb by Wt.
PSRW01	Kemper Bridge	Water Line (South side)	61000	6.1
PSRW02	Kemper Bridge	Steel Hanger	270000	27
PSRW03	Kemper Bridge	Water Line (North side)	91000	9.1
PSRW04	Kemper Bridge	Top of Water Line	23000	2.3

Based on the detection of LBP on specific component types, the following materials are assumed to be coated with LBP:

- The water lines and steel hangers under the bridge.

F&R recommends that all of these materials and all similar painted surfaces be assumed to be coated with LBP.



4.0 APPLICABLE REGULATIONS – LEAD BASED PAINT

4.1. OSHA Regulations for Lead-Based Paint

It is important to note that any painted surface may contain concentrations of lead in the paint, which when disturbed, may generate lead dust greater than the maximum exposure concentration of 30 micrograms per cubic millimeter established by the OSHA “Lead Exposure in Construction Rule” (29 CFR 1926.62). The OSHA standard gives no guidance on acceptable levels of lead in paint at which no exposure to airborne lead (above the action level) would be expected. Rather, OSHA defines airborne concentrations, and references specific types of work practices and operations from which a lead hazard may be generated (reference 29 CFR 1926.62, section d). Environmental and personnel monitoring should be conducted during any removal or demolition process (as appropriate) to determine actual personal exposure. This monitoring information can be used to determine the levels of personnel protection and environmental controls required for work involving specific removal/demolition processes on specific structures. Under OSHA requirements, the Contractor performing the work will be required to conduct this monitoring. It is important to note that environmental controls will vary dependent upon the content of lead in paint, the process used to remove it, duration of the work, and the amount of paint to be removed.

4.2. EPA Regulations for Lead-Based Paint

Under the new Renovation, Repair, and Painting (RRP) Regulation the Contractor shall complete all renovation work that will affect LBP coated surfaces in accordance with the requirements found in 40 CFR 745. At a minimum the contractor shall assume that this facility is classified as a Child Occupied Facility under the US EPA RRP regulations found under 40 CFR 745.

The Contractor should submit documentation of compliance with this standard to the Client prior to start-up of work, including personal training, certification of personal, and a means and methods work plan to comply with the RRP regulations.

For disposal of construction/demolition debris that has LBP, the Environmental Protection Agency (EPA) requires that testing of lead content be performed to determine proper disposal. EPA regulations require that a generator of waste determine if that waste is hazardous by performing testing in accordance with the requirements of 40 CFR 261.11 or for wastes that may be RCRA hazardous (such as items with high lead content), the generator may assume that the waste is hazardous and comply with the hazardous waste regulation.



5.0 LIMITATIONS

This report has been prepared for the exclusive use of the City of Lynchburg Public Works Department and/or their agents. This service was performed in accordance with generally accepted environmental practices. No other warranty, expressed or implied, is made. Our conclusions and recommendations are based, in part, upon information provided to us by others and our site observations. We have not verified the completeness or accuracy of the information provided by others, unless otherwise noted. Our observations and recommendations are based upon conditions readily visible at the site at the time of our site visit, and upon current industry standards. During F&R's non-invasive inspection, accessible areas were visually surveyed for the presence of suspect asbestos materials and suspected LBP. Areas inspected for the above-referenced materials were limited to those designated by the Client and the scope of services.

During this study, suspect asbestos samples were submitted for analysis at an NVLAP-accredited laboratory via polarized light microscopy and suspect hazardous material samples were submitted for laboratory analysis. As with any similar survey of this nature, actual conditions exist only at the precise locations from which suspect asbestos samples were collected. Certain inferences are based on the results of this sampling and related testing to form a professional opinion of conditions in areas beyond those from which the samples were collected. It is also understood that this is a non-invasive survey so that it is possible that concealed materials may be present that were not accessible during the original survey. No other warranty, expressed or implied, is made.

Under this scope of services, F&R assumes no responsibility regarding response actions (e.g. O&M Plans, Encapsulation, Abatement, Removal, Notifications, etc.) initiated as a result of these findings. F&R assumes no liability for the duties and responsibilities of the Client with respect to compliance with these regulations. Compliance with regulations and response actions are the sole responsibility of the Client and should be conducted in accordance with local, state, and/or federal requirements and should be performed by appropriately qualified and licensed-personnel, as warranted.

Froehling & Robertson, Inc. by virtue of providing the services described in this report, does not assume the responsibility of the person(s) in charge of the site, or otherwise undertake responsibility for reporting to any local, state, or federal public agencies any conditions at the site that may present a potential danger to public health, safety, or the environment. The Client agrees to notify the appropriate local, state, or federal public agencies as required by law, or otherwise to disclose, in a timely manner, any information that may be necessary to prevent any danger to public health, safety, or the environment. The contents of the report should not be construed in any way as a recommendation to purchase, sell, or develop the project site.



6.0 SIGNATURES

If you have any questions concerning this report, please feel free to contact the undersigned. Froehling & Robertson, Inc. appreciates the opportunity to work with you as your Environmental Consultant, and looks forward to a continued cordial working relationship with you.

Respectfully Submitted,
FROEHLING & ROBERTSON, INC.

Mary Beth Wriston
Industrial Hygienist

Gregory L. Whitt
Environmental Group Manager

Attachments: Appendices



APPENDIX A

Analytical Certificates and Chains of Custody Forms



Environmental Hazards Services, L.L.C.
7469 Whitepine Rd
Richmond, VA 23237

Telephone: 800.347.4010

Asbestos Bulk Analysis Report

Report Number: 11-10-04115

Client: Froehling & Robertson Inc. - Roanoke
1734 Seibel Drive, N.E.
Roanoke, VA 24012

Received Date: 10/31/2011
Analyzed Date: 11/01/2011
Reported Date: 11/03/2011

Project/Test Address: 62N-0447, Lynchburg, VA

Client Number:
48-4628

Fax Number:
540-344-3657

Laboratory Results

Lab Sample Number	Client Sample Number	Layer Type	Lab Gross Description	Asbestos	Other Materials
11-10-04115-001	ASRW01		Black Tar-Like	NAD	29% Cellulose 71% Non-Fibrous
11-10-04115-002	ASRW02		Gray Granular	NAD	100% Non-Fibrous
11-10-04115-003	ASRW03		Gray Brittle	NAD	100% Non-Fibrous
11-10-04115-004	ASRW04		Gray Brittle	Trace <1% Chrysotile	100% Non-Fibrous
				Total Asbestos: Trace <1%	
11-10-04115-005	ASRW05		Black Tar-Like	NAD	34% Cellulose 66% Non-Fibrous
11-10-04115-006	ASRW06		Silver Paint	NAD	100% Non-Fibrous

Environmental Hazards Services, L.L.C

Client Number: 48-4628
 Project/Test Address: 62N-0447, Lynchburg, VA

Report Number: 11-10-04115

Lab Sample Number	Client Sample Number	Layer Type	Lab Gross Description	Asbestos	Other Materials
11-10-04115-007	ASRW07		Tan Brittle	NAD	100% Non-Fibrous
11-10-04115-008	ASRW08		Gray Brittle	2% Chrysotile	98% Non-Fibrous
				Total Asbestos: 2%	
11-10-04115-009	ASRW09		Black Tar-Like.	NAD	34% Cellulose 66% Non-Fibrous
11-10-04115-010	ASRW10		Black Rubber	NAD	100% Non-Fibrous
11-10-04115-011	ASRW11		Black Tar-Like	NAD	34% Cellulose 66% Non-Fibrous
11-10-04115-012	ASRW12		Tan Fibrous; Gray Powder	NAD	76% Cellulose 24% Non-Fibrous
11-10-04115-013	ASRW13		Black Tar-Like	NAD	34% Cellulose 66% Non-Fibrous
11-10-04115-014	ASRW14		Gray Brittle	2% Chrysotile	98% Non-Fibrous
				Total Asbestos: 2%	

Environmental Hazards Services, L.L.C

Client Number: 48-4628
Project/Test Address: 62N-0447, Lynchburg, VA

Report Number: 11-10-04115

Lab Sample Number	Client Sample Number	Layer Type	Lab Gross Description	Asbestos	Other Materials
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QC Sample: 14-M11996-2
QC Blank: SRM 1866 Fiberglass
Reporting Limit: 1% Asbestos
Method: EPA Method 600/R-93/116
Analyst: Christian H. Schaible

Reviewed By Authorized Signatory:



Tasha Eaddy
QA/QC Clerk

The condition of the samples analyzed was acceptable upon receipt per laboratory protocol unless otherwise noted on this report. Results represent the analysis of samples submitted by the client. Sample location, description, area, volume, etc., was provided by the client. This report cannot be used by the client to claim product endorsement by NVLAP or any agency of the U.S. Government. This report shall not be reproduced except in full, without the written consent of the Environmental Hazards Service, L.L.C. California Certification #2319 NY ELAP #11714. All information concerning sampling location, date, and time can be found on Chain-of-Custody. Environmental Hazards Services, L.L.C. does not perform any sample collection.

Environmental Hazards Services, L.L.C. recommends reanalysis by point count (for more accurate quantification) or Transmission Electron Microscopy (TEM), (for enhanced detection capabilities) for materials regulated by EPA NESHAP (National Emission Standards for Hazardous Air Pollutants) and found to contain less than ten percent (<10%) asbestos by polarized light microscopy (PLM). Both services are available for an additional fee.

* All California samples analyzed by Polarized Light Microscopy, EPA Method 600/M4-82-020, Dec. 1982.

LEGEND: NAD = no asbestos detected

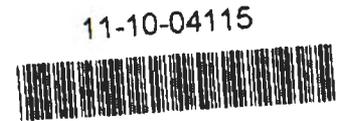


14 PLM

Asbestos Chain-of-Custody

Environmental Hazards Services, LLC

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 (800)347-4010 Richmond, VA
 (804)275-4907 (fax) 23237



11-10-04115

Due Date:
 11/03/2011
 (Thursday)
 ER ML

OKS

Company Name: Froehling & Robertson Address: 1734 Seibel Drive NE City/State/Zip: Roanoke/Va/24012
 Phone: (540) 344-7939 Fax: () E-mail: gwhitt@fandr.com Acct. Number: _____
 Project Name / Testing Address: 62N-0447 City/State (Required): Lynchburg/Va
 Collected by: R. and M.B. Nriston Purchase Order Number: _____

Turn Around Times : *If no TAT is specified, sample(s) will be processed and charged as 3-day TAT.*
 _____ 1 - Day _____ 2 - Day _____ 3 - Day _____ Same Day (Must Call Ahead) _____ Weekend (Must Call Ahead)

No.	Client Sample ID	Date Collected	ASBESTOS							AIR				COMMENTS	
			PLM	PLM/Nest (cont. #)	PLM/Pink (cont. #)	PLM Reference	PCM	TEM (Certified) (Balls)	TEM/BEN (Air)	Time On	Time Off	Flow Rate (L/min)	Total Time (minutes)		Volume (Total Liters)
1	ASRW01	10-27-11	✓												Bottom - Black
2	ASRW02		✓												Pad-gravel bits/gray
3	ASRW03		✓												Sealant - off white
4	ASRW04		✓												Rawlking - sealer
5	ASRW05		✓												Black - middle of the end of bridge
6	ASRW06		✓												Water line - Silver
7	ASRW07		✓												Expansion joint sealant dark gray
8	ASRW08		✓												Under Saddles - East light gray
9	ASRW09		✓												Under Beams - North Black
10	ASRW10		✓												Expansion joint (Black)

Released by: Mary Beth Nriston Signature: Mary Beth Nriston Date/Time: 10-28-11 / 10 am
 Received by: K. T. JEN Signature: K. T. JEN Date/Time: 11/21/11



Asbestos Chain-of-Custody

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www.leadlab.com 7469 Whiteline Rd
 (800)347-4010 Richmond, VA
 (804)275-4907 (fax) 23237

Company Name: Froehling & Robertson Address: 1734 Seibel Drive NE City/State/Zip: Roanoke/Va/24012

Phone: (540) 344-7939 Fax: () E-mail: gwhitt@fandr.com Acct. Number: _____

Project Name / Testing Address: 62N-0447 City/State (Required): Lynchburg/Va

Collected by: R. and M.B. Wriston Purchase Order Number: _____

Turn Around Times : *If no TAT is specified, sample(s) will be processed and charged as 3-day TAT.*

1 - Day
 2 - Day
 3 - Day
 Same Day (Must Call Ahead)
 Weekend (Must Call Ahead)

No.	Client Sample ID	Date Collected	ASBESTOS						AIR			COMMENTS			
			PLM	PLM/Asst (Asst 40)	PLM/Asst (Asst 10)	PLM NY Protocol	PCM	TEM Charfield (Bulk)	TEM/Asst (Air)	Time On	Time Off		Flow Rate (L/min)	Total Time (minutes)	Volume (Total Liters)
1	ASRW11	10-27-11	✓												Drain - North (Black) (white) Sting bit beams Drain - North Black Under Saddles - West light grey
2	ASRW12	↓	✓												
3	ASRW13	↓	✓												
4	ASRW14	↓	✓												
5															
6															
7															
8															
9															
10															

Released by: Mary Beth Wriston Signature: Mary Beth Wriston Date/Time: 10-28-11/10:45am
 Received by: _____ Signature: [Signature] Date/Time: 10/31/11



Environmental Hazards Services, L.L.C.
7469 Whitepine Rd
Richmond, VA 23237
Telephone: 800.347.4010

Lead Paint Chip Analysis Report

Report Number: 11-10-04120

Client: Froehling & Robertson Inc. - Roanoke
1734 Seibel Drive, N.E.
Roanoke, VA 24012

Received Date: 10/31/2011
Analyzed Date: 11/03/2011
Reported Date: 11/03/2011

Project/Test Address: 62N-0447; Lynchburg, VA
Collection Date: 10/27/2011

Client Number:
48-4628

Laboratory Results

Fax Number:
540-344-3657

Lab Sample Number	Client Sample Number	Collection Location	Pb (ug/g) ppm	% Pb by Wt.	Narrative ID
11-10-04120-001	PSRN01	KEMPER BRIDGE	61000	6.1	
11-10-04120-002	PSRN02	KEMPER BRIDGE	270000	27	
11-10-04120-003	PSRN03	KEMPER BRIDGE	91000	9.1	
11-10-04120-004	PSRN04	KEMPER BRIDGE	23000	2.3	

Environmental Hazards Services, L.L.C

Client Number: 48-4628

Report Number: 11-10-04120

Project/Test Address: 62N-0447; Lynchburg, VA

Lab Sample Number	Client Sample Number	Collection Location	Pb (ug/g) ppm	% Pb by Wt.	Narrative ID
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Method: EPA SW846 7000B

Reviewed By Authorized Signatory:



Tasha Eaddy
QA/QC Clerk

The HUD lead guidelines for lead paint chips are 0.50% by Weight, 5000 ppm, or 1.0 mg/cm². The Reporting Limit (RL) is 10.0 ug Total Pb. Paint chip area and results are calculated based on area measurements determined by the client. All internal quality control requirements associated with this batch were met, unless otherwise noted.

The condition of the samples analyzed was acceptable upon receipt per laboratory protocol unless otherwise noted on this report. Results represent the analysis of samples submitted by the client. Sample location, description, area, etc., was provided by the client. Results reported above in mg/cm³ are calculated based on area supplied by client. This report shall not be reproduced except in full, without the written consent of the Environmental Hazards Service, L.L.C. California Certification #2319 NY ELAP #11714.

LEGEND	Pb= lead	ug = microgram	ppm = parts per million
	ug/g = micrograms per gram	Wt. = weight	



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(804) 275-4907 (fax) 23237

Lead Chain-of-Custody

11-10-04120



Due Date:
11/03/2011
(Thursday)
ER ML

MS

Company Name: Froehling & Robertson Address: 1734 Seibel Drive NE City/State/Zip: Roanoke / VA / 24012
Phone: (540) 344-7939 Fax: () _____ E-mail: gwhitt@fandr.com Acct. Number: _____
Project Name / Testing Address: 62N-047 City/State (Required): Lynchburg / VA
Collected by: R and M.B. Wriston Certification Number: _____ Purchase Order Number: _____

* Do wipe samples submitted meet ASTM E1792 requirements? Yes No

Turn Around Time (TAT) <input type="checkbox"/> 1-Day <input type="checkbox"/> 3-Day <input type="checkbox"/> Same Day (Must Call Ahead) <input type="checkbox"/> Weekend (Must Call Ahead) If no TAT is specified, sample(s) will be processed and charged as 3-Day TAT.	Sample Type Single Dust Wipe = DW Soil = S Paint Chip = PC Air = A Composite Soil = CS	Abbreviations FR = Family Room F = Front O = Basement LR = Living Room R = Rear KT = Kitchen DN = Den LT = Left BA = Bath DR = Dining Room RT = Right BR = Bedroom 1 = 1st Fl 2 = 2nd Fl	Surface Type for Dust Wipe FL = Floor CP = Carpet SL = Window Sill WW = Window Well
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No.	Sample Type	Date Collected	Client Sample ID	Collection Location (LR, KT, LTFBR, RTRBR, etc)	Surface Type	Area			Paint Chip			Air			Comments
						Length X Width in inches (Provide paint chip area only if requesting mg/cm ²)	mg/cm ²	PPM	%	Flow Rate (L/min)	Total Time (minutes)	Volume (Total Liters)			
1	PC	10-27-11	PSRN01	Klempfer Bridge		X			X	X					Water line
2	PC		PSRN02			X			X	X					Skel Hanger
3	PC		PSRN03			X			X	X					Water line
4	PC	↓	PSRN04	↓		X			X	X					Top of water line
5						X									
6						X									
7						X									
8						X									
9						X									
10						X									

Released by: Marcy Beth Wriston Signature: Marcy Beth Wriston Date/Time: 10-28-11 / 10:00am
Received by: K. TYLER Signature: K. Tyler Date/Time: 10/31/11