

Protecting, maintaining and improving the health of all Minnesotans

MEMORANDUM

DATE: February 3, 2014

- **TO:** Licensed and Registered Well Contractors Advisory Council on Wells and Borings
- **FROM:** Thomas P. Hogan, Director Environmental Health Divisi P.O. Box 64975 St. Paul, Minnesota 55164-0975
- **PHONE:** 651-201-4675
- **SUBJECT:** Notice of Designation of a Special Well and Boring Construction Area, Former Finland Air Force Station, Lake County, Minnesota

The Minnesota Department of Health (MDH) is designating a **Special Well and Boring Construction Area** (SWBCA), which includes the area at and around the former Finland Air Force Station near Finland, Minnesota (see Figure 1). The SWBCA designation is effective February 15, 2014, and applies to the construction, repair, modification, and sealing of wells and borings. The SWBCA designation remains in effect until further notice.

AUTHORITY

Minnesota Statutes, section 103I.101, subdivision 5, clause 7, grants the commissioner of health the authority to establish standards for the construction, maintenance, sealing, and water quality monitoring of wells in areas of known or suspected contamination. Minnesota Rules, part 4725.3650, details the requirements for construction, repair, and sealing of wells within a designated SWBCA, including plan review and approval, water quality monitoring, and other measures to protect public health and prevent degradation of groundwater.

SITE HISTORY

The United States Air Force (USAF) operated a long-range radar station at the site of Lookout Mountain during 1951 through 1984. A total of 96 buildings and structures were on the site, which covered approximately 200 acres. USAF operations ceased in 1984. In 1984, the property was transferred to Finlandia, LLC of Minneapolis, Minnesota (MWH 2006). Approximately 140 acres of the original site is currently owned by Eagle Ministry, which plans to develop the site as a religious retreat and prayer center.

Licensed and Registered Well Contractors Advisory Council on Wells and Borings Page 2 February 3, 2014

During 1990-1996, a variety of investigations were conducted assessing possible sources and the extent and magnitude of soil and groundwater contamination. During this time, 11 underground storage tanks, 4 above-ground storage tanks, 40 electrical transformers containing polychlorinated biphenyls (PCBs), and approximately 1000 cubic yards of contaminated soil were removed (MWH 2006). Subsequently, the United States Army Corps of Engineers, MWH Americas, Inc., and a variety of consultants and subcontractors have conducted numerous investigations, including bore hole imaging fracture analysis, dye tracing, electromagnetic surveys, ground penetrating radar surveys, hydrophysical logging, rock coring, and soil gas surveys, summarized in the Remedial Investigation Report (MWH 2006).

In 1995, a community water-supply (CWS) well, Minnesota Unique Well Number (UN) 566974, was constructed to supply the planned development of Finlandia, LLC. The total well depth was 1015 feet. However, the well casing depth was only 17 feet (see Figure 2). When initially tested, 1,1, 2-Trichloroethylene (TCE) was detected at 74 micrograms/liter (μ g/L), much greater than the TCE Maximum Contaminant Level (MCL) of 5 μ g/L (see "Pubic Health Concerns" below). In 1996, this well was reconstructed for use only as a monitoring well by sealing the lower portion of the bore hole and completing a 2-inch diameter monitoring well at a depth of 265.5 feet. A 150-foot deep replacement CWS well UN 569172, was constructed in January 1996 approximately 1 mile south of UN 566974 and the USAF Finland Station site. TCE has not been detected in UN 569172. The status as a community public-water supply (MDH PWSID Number 1380007-Lookout Mountain Village) was changed to inactive on April 22, 2008.

A total of 30 monitoring wells and 12 domestic water-supply wells have been tested for volatile and semi-volatile organics and metals. The monitoring wells indicate the presence of a variety of ethanes and ethenes related to past storage and use of solvents and fuel products. Contaminants have not been detected in any of the domestic wells, which are tested annually.

SWBCA HYDROGEOLOGY

The site of the former USAF Finland Station is Lookout Mountain, part of the Sawtooth Range. The regional relief reaches 600 feet and Lookout Mountain has a maximum elevation of approximately 1950 feet above sea level. The geology consists of a very thin (0-13.5 feet) layer of soil, sand, and fill over the Duluth Complex, which includes igneous intrusions of gabbro and some more felsic units. The bedrock at the site is identified as the Finland Granophyre, consisting of a granular quartz ferromonzonite and a finer-grained leuxogranite (MWH 2006, Miller 1993).

Fractures, joints, and other secondary structural features and unit contacts dominate the occurrence and flow of groundwater and contaminant transport. The upper 50-80 feet of the mountain is characterized by extensive fracturing. Groundwater flow at Lookout Mountain is radial, with discharges to local seeps, wetlands, and small ponds. Flow within this zone can be

Licensed and Registered Well Contractors Advisory Council on Wells and Borings Page 3 February 3, 2014

very rapid (up to 100 feet/day) and is highly responsive to precipitation events. At a depth of approximately 150 feet, groundwater flow is regional to the southeast, towards the Baptism River and, ultimately, Lake Superior.

PUBLIC HEALTH CONCERNS

Groundwater at the former USAF Finland Station has been impacted by a variety of chlorinated ethanes and ethenes. The primary contaminant of concern within the SWBCA is TCE, which was most commonly used as a degreasing agent for cleaning metal parts and surfaces for equipment and tower maintenance. It was stored in tanks at the facility and may have been discharged from the wastewater treatment plant that received building discharges (MWH 2006).

Exposure to high levels of TCE in drinking water can damage the liver, kidneys, immune system, and nervous system. Exposure to low levels of TCE over a long period of time may be linked to an increased risk of several types of cancer (kidney, liver, and non-Hodgkin lymphoma). TCE may also harm a developing fetus if the pregnant mother is exposed in the first trimester. The MDH Health Based Value (HBV) for TCE in drinking water is $0.4 \mu g/L$. The MCL established by the United States Environmental Protection Agency is $5 \mu g/L$ for TCE. This standard applies to water delivered by community and nontransient, noncommunity public-water supplies.

BOUNDARIES OF THE SWBCA

The SWBCA includes the following areas of Lake County, Minnesota:

Township 57 North, Range 7 West

- All of Sections 3, 4, 5, 8, 9.
- East half (northeast quarter and southeast quarter) of Section 6.
- West half (northwest quarter and southwest quarter) of Section 10.
- Northwest quarter of Section 16.
- Northeast quarter of Section 17.

Township 58 North and Range 7 West

- All of Section 33.
- South half (southeast quarter and the southwest quarter) of Section 28.
- Southeast quarter of Section 29.
- Northeast, southeast, and southwest quarters of Section 32.

Licensed and Registered Well Contractors Advisory Council on Wells and Borings Page 4 February 3, 2014

See Figure 1 for the area included within the SWBCA.

REQUIREMENTS OF THE SWBCA

- All wells and borings regulated by the MDH are subject to the requirements of the SWBCA. Wells include water-supply wells (domestic, public, irrigation, commercial/industrial, cooling/heating, remedial); monitoring wells; and dewatering wells. Borings include environmental bore holes, elevator borings, and bored geothermal heat exchanger. Notifications and permit applications, and their respective fees, must be submitted to the MDH.
- 2. Construction of a new well or boring, or modification of an existing well or boring, may not occur until plans have been reviewed and approved in writing by the MDH. In addition to the normally required notification or permit application, with fee, the plan must include the following information: street address; well or boring depth; casing type(s), diameter(s), and depth(s) for each casing; construction methods, including grout materials and grouting methods; anticipated pumping rate; and use.
- 3. As a condition of the well construction plan approval, the well owner must agree to pay for a volatile organic chemical (VOC) analysis, to be performed by the MDH Public Health Laboratory. The MDH will review the analytical results and determine if the well can be completed, if the well can be reconstructed in another manner, or if the well must be permanently sealed.
- 4. Construction of a potable water-supply well is prohibited within the northeast quarter of Section 5 and northwest quarter of Section 4 in Township 57 North, Range 7 West and the southeast quarter of Section 32 and the southwest quarter of Section 33 of Township 58 North, Range 7 West in Lake County.
- 5. All other water-supply wells (not including dewatering wells, monitoring wells, or remedial wells) within the SWBCA, but beyond the area described in item 4, must be cased and grouted with cement-sand or neat-cement grout to a minimum depth of 100 feet and to an elevation of 1600 feet or less above sea level.
- 6. Hydrofracturing of a well or boring within the boundaries of the SWBCA is prohibited.
- 7. A well completed for a nonpotable use, such as groundwater quality monitoring, groundwater remediation, or construction dewatering may be allowed, provided that the MDH and the Minnesota Pollution Control Agency determine the well will not interfere with remediation efforts, cause further spread of contamination, or result in environmental or human exposures in excess of environmental and public health standards.
- 8. Borings, including environmental bore holes, elevator borings, and bored geothermal heat exchanger, may be allowed, provided that they are grouted with neat-cement or cement-sand grout to their full depth.
- 9. No well or boring in bedrock may be permanently sealed until the MDH has reviewed and approved the plan for the proposed sealing. In addition to the required notification and fee, the plan must include the following information: street address; original well/boring depth; current well/boring depth (if different); casing type(s), diameters(s), and depth(s); methods of identifying and sealing any open annular spaces; methods for identifying and removing any obstruction(s); grout materials; and placement methods.
- 10. All other provisions of Minnesota Rules, chapter 4725, are in effect.

Licensed and Registered Well Contractors Advisory Council on Wells and Borings Page 5 February 3, 2014

PERSONS TO CONTACT

For additional information regarding this SWBCA, please contact Mr. Michael Convery of the MDH Well Management Section at 651-201-4586 or *michael.convery@state.mn.us*.

Plans for the construction, modification (including repair), or sealing of wells or borings within the SWBCA must be submitted to: Ms. Sandra Beck

Minnesota Department of Health – Northeastern District Well Management Section Duluth Technology Village, Suite 290 11 East Superior Street Duluth, Minnesota 55802 218-302-6145 sandra.beck@state.mn.us

Notifications/permit applications for the construction, modification, or sealing of wells and borings must still be mailed or faxed, if appropriate, to the MDH Central Office at:

Minnesota Department of Health Well Management Section P.O. Box 64502 St. Paul, Minnesota 55164-0502 651-201-4599 (Fax)

For information regarding public health concerns, please contact:

Mr. Daniel Pena Minnesota Department of Health Site Assessment and Consultation Unit P.O. Box 64975 St. Paul, Minnesota 55164-0975 651-201-4920 *daniel.pena@state.mn.us*

For information regarding the investigation, monitoring, and remediation of the groundwater contamination, please contact:

Mr. Michael Bares Minnesota Pollution Control Agency Site Remediation & Redevelopment Section 520 Lafayette Road St. Paul, Minnesota 55155-4194 651-757-2210 mike.bares@state.mn.us Licensed and Registered Well Contractors Advisory Council on Wells and Borings Page 6 February 3, 2014

REFERENCES

Lake County Planning Commission – Public Hearing Notice for Conditional Use Application, February 17, 2012, 4p.

Miller, J. D., Green, J. C., Boerboom, T. J. and Chandler, V. W. 1993. *Geologic Map of the Doyle Lake and Finland Quadrangles, Lake County, Minnesota*. University of Minnesota, Minnesota Geological Survey.

Minnesota Pollution Control Agency Memorandum – Request for Special Well and Boring Construction Area, January 23, 2012, 9p.

MWH Americas, Inc. (MWH), 2006. Final Remedial Investigation Report – Former Finland Air Force Station, Finland, Minnesota, 8056p

Minnesota Department of Health, 2013. Tricloroethylene (TCE) and Drinking Water, 2p.

United States Army Corps of Engineers, 2010. Long-Term Monitoring Report for 2010, 13p

TPH:MPC:fal Enclosures

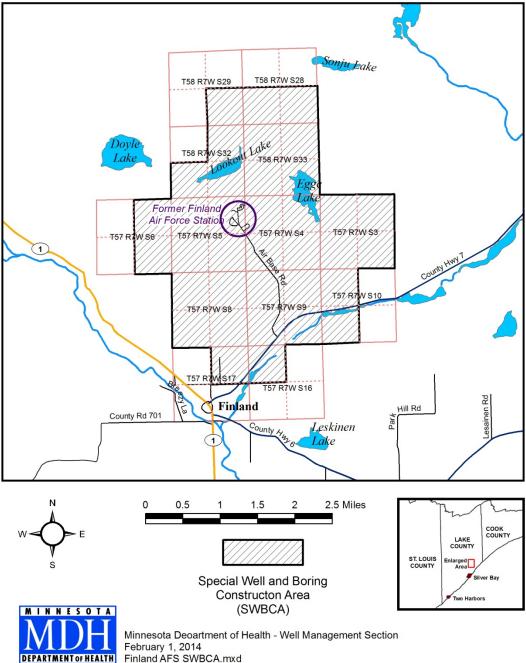


Figure 1. Special Well and Boring Construction Area Former Finland Air Force Station, Lake County

Finland AFS SWBCA.mxd

Figure 2

ELL LOCATION		· · ·			DEPARTMENT OF HEALTH	MINNESOTA L	
unly Name			WELL		BORING RECORD	566	6974
Lake >		05		Manago	la Blakdes Chapter 1931		
Crystal Bay	nahip No. Pange No. 57 07	Beation No. Fr	notion als	NE.		e Work Completed 8-3-95	
xues Number, Breat Name, City			Fire Numb	and the second se	DRILLING METHOD		
100 Airbase Ro	ad. Finland	MAN			Cable Tool C Driven Auger XD Holery	C Dug	
ow exact location of wall in east	ton grid with "X".	· · · · · · · · · · · · · · · · · · ·	may of well	location.	X air		
N	5560	3	roadu und i		DRILLING FLUID		
					water	and the second secon	
					Little X Domestic C Monitoria		ng/Ceoling Ani/Commercial
	1					munity PWB 🛛 Rem	
					CASING Drive Shos? Lit Yes	and the second se	HOLE DIAM.
	1 January				A Binni OC Trivended	Neided	
	T				C Planic C		
					CASING DIAMETER WEIGHT	۵	1
OPERTY OWNER'S NAM	E					19.45 MAR	6n n n1015
lestern Develo	pment Corpor	ation				bs/R_	in. to fL
perly owner's mailing eddress		n address indicated	spove.		in, to ft		in. to it.
501 Universit					SCREEN NONE	OPEN HOLE	Lin K
Hinneapolis, M	N 55414				· Type		
					SistGauza	Lengih	
					Set betweenR. andR.	_k. FITTINGS:	
L OWNER'S NAME					STATIC WATER LEVIEL	and explore . Data measu	umeri
		•			PUMPING LEVEL (below land surface)		
<u>finlandia LLC</u>	Versit then property owner	's actives indicate	d alcove.		%. #ter		41 p.p.n/H
e ovner's mailing address il di	Recent then property owner		d aleove.	4 5		hrs, pumping	<u>41 p.p.n/h</u>
at conners mailing address # di 1501 Universit;	Normal than property courses y Ave. South		d aleove.		WELL HEAD COMPLETION	Model	
et connerts mailing address # dl 1501 Universit;	Normal than property courses y Ave. South		d aleces.		WELL HEAD COMPLETION	Model	
et conner's mailing address # di 1501 Universit;	Normal than property courses y Ave. South		d aleovs.		WELL HEAD COMPLETION Philose adapter menulphturer Casing Protection As geets (Environmental Wells and Borings ONL GROUTING IMPORIMATION	Model	
towners mailing address # di 1501 Universit 1inneapolis M	Merent then property owned y Ave. South N 55414	east #30	-1	1	Beneficial States		we gradii
tonners mailing address # di 1501 Universit 1inneapolis M	Merent then property owned y Ave. South N 55414			τύ	WELL HEAD COMPLETION Philose adapter menulphturer Casing Protection As geets (Environmental Wells and Borings ONL GROUTING IMPORIMATION	Model W 12 in, abo Y)	yne gradie yn Bolidis Bertlanike Dyde, 2 blege
tonners mailing address # di 1501 Universit 1inneapolis M	Merent then property owned y Ave. South N 55414	east #30	-1	τό	Example Completion Section 2.1 Se		yn gradia yn Bolidis Bertlanke yde, bege yde, bege
formers mailing address H di 1501 Universit, 1inneapolis M GEOLOGICAL MATERIAL	Merent then property owned y Ave. South N 55414	east #30	-1	то	Example ComPLETION WELL HEAD COMPLETION Philes adapter menufecturer Cashg Protection Acgred (Swiderments' Wells and Borings ONL GROUTING INFORMATION Well grouted? XD Yes D No Grout Measurel XD Yes Tom10	Middel Y) ₩ 12 in; abo Y) = Concrete = Hig DR f f	yne gradie yn Bolidis Bertlanike Dyde, 2 blege
Tommer's mailing address H di 1501 Universit, dinneapolis M geological Material loamy clay	Merent then property owned y Ave. South N 55414 s color red/brown	east #30	F.FROM	8	Example Completion Section 2.1 Se	Middel Y) ₩ 12 in; abo Y) = Concrete = Hig DR f f	yn gradia yn Bolida Bertlanke yde, bege yde, bege yde, bege
atowner's mailing address H off 1501 Universit, Minneapolis M GEOLOGICAL MATERIAL <u>loamy clay</u> ledge	y Ave. South N 55414 s color red/brown red	east #30	F FROM	<u>8</u> 63	K. after WELL HEAD COMPLETION WELL HEAD COMPLETION Philes adapter menufecturer Cashig Protection Acgreate (Sinvermental Walls and Bortrops ONL GROUTING INPORTATION Well grouted? Xi Yes No Grout Measurel X Nest cement Bentonin from1 mon1 mon1 MEANEET KNOWN SOURCE OF CONTAMINATION	Model ₩ 12 in, abo Y) = Concrete I Hig t tt Ndirection	yn gradia yn Bolida Bertlanke yde, bege yde, bege yde, bege
towner's mailing address H di 1501 Universit, 1000000000000000000000000000000000000	y Ave. South N 55414 <u>s</u> color <u>red/brown</u> red light red	east #30	F FROM 0 8 63	8 63 140	S. after WELL HEAD COMPLETION WELL HEAD COMPLETION Philese adapter smartufacturer Casing Protection Aggeds (Environmental Wells and Borings ONL GROUTING INFORMATION Well grouted? XD Yes D No Grout Measural XD Nest comment D Bentonin YomD fromD fromD MEANEET KNOWN SOLIFICE OF CONTAMINATIO	Model ₩ 12 in, abo Y) = Concrete I Hig t tt Ndirection	yn gradia yn Bolida Bertlanke yde, bege yde, bege yde, bege
towner's mailing address H dt 1501 Universit, 1inneapolis M GEOLOGICAL MATERIAL 10amy clay ledge 1edge 1edge	y Ave. South N 55414 <u>s</u> colon <u>red/brown</u> red light red gneen/red	east #30 HARDNESS OF MATERIAL S M M MS M	F FROM 0 8 63 140	8 63 140 460	ELL HEAD COMPLETION Philes adapter manufecturer Cashig Protection Acquete (Environments Wells and Borings ONL GROUTING INFORMATION Well grouted? XD Yes D No Grout Measurel XD Yes D No Grout Measurel XD Yes D No Grout Measurel XD Yes D No Trom NEANEET KNOWN SOURCE OF CONTAMINATIO Meal deinfected upon completion?	Model ₩ 12 in, abo Y) = Concrete I Hig t tt Ndirection	yh Bolida Bertlanke yde, bege yde, bege yde, bege
towner's mailing address H dt 1501 Universit, 10000 CAL MATERIAL 10000 Clay 10000 Clay 10000 Clay 10000 Clay 10000 Clay 10000 Clay	y Ave. South N 55414 <u>s</u> colon <u>red/brown</u> red light red green/red red	east #30 Handness of Material S M M MS M M	F FROM 0 8 63 140 460	8 63 140 460 505	ELL HEAD COMPLETION Philes adapter manufecturer Cashig Protection Acquete (Sindermants) Wells and Borrigs ONL GROUTING INPORTATION Well grouted? XD Yes D No Grout Meanshall XD Yes D No Grout Meanshall XD Yes D No Trom10 NEAREET KNOWN SOURCE OF CONTAMINATIO 10 NEAREET KNOWN SOURCE OF CONTAMINATIO 10 PUMP By Not Installed Manufapturer's name	Model Y) ₩ 12 in, abo Y)	yh Solida Bertlanke yde, bege yde, bege yde, bege yde, bege yde, bege
I owner's mailing address # di 501 Universit; linneapolis M acological MATERIAL loamy clay ledge ledge ledge ledge ledge	y Ave. South N 55414 <u>s</u> colon <u>red/brown</u> red light red gneen/red	east #30 Handness of Material S M M MS M M	F FROM 0 8 63 140	8 63 140 460		Model ₩ 12 in, abo Y) = Concrete I Hig t tt Ndirection	ve gradia yh Solida Bertlanka yde, bege yde, bege yde, bege lyps
t commerce mailing address H dt 1501 Universit; 1000 Cal Material 1000 Clay 1000 Clay	y Ave. South N 55414 B COLOR red/brown red light red gneen/red gneen/red gneen/red	HARCHESS OF MATERIAL S M MS M M M M	Г Г Г Г Г Г Г Г Г Г Г Г Г Г	8 63 140 460 505 568 580 940			ve gradia yh Solidis Bertianike yos, Dibigs yos, Dibigs yos, Oibegs oibe
formers mailing address # di .501 Universit; finneapolis M GEOLOGICAL MATERIAL loamy clay ledge ledge ledge ledge ledge ledge ledge ledge	y Ave. South N 55414 B COLOR red/brown red light red green/red red green/red red	east #30 Material S M MS M M M M M M M M M M	FROM 0 8 63 140 460 505 568 580 940	8 63 140 460 505 568 580 940 978			ve gradia yh Solidis Bertianike yos, Dibigs yos, Dibigs yos, Oibegs oibe
t owner's mailing address it di .501 Universit; finneapolis M GEOLOGICAL MATERIAL Indany Clay ledge ledge ledge ledge ledge ledge ledge ledge ledge ledge ledge	y Ave. South N 55414 B COLOR red/brown red light red green/red red light red light red	east #30 Material S M MS M M M M M M M	Г Г Г Г Г Г Г Г Г Г Г Г Г Г	8 63 140 460 505 568 580 940			yh Bolida Bertlanke yde, bege yde, bege yde, bege yde, bege lype lype
I owner's mailing address if di 501 Universit; 10 Inneapolis M BEOLOGICAL MATERIAL 10 AMY Clay 10 AMY Cl	y Ave. South y Ave. South S 55414 s color red/brown red light red green/red red light red green/red red light red black red	east #30 Material S M MS M M M M M M M M M M	FROM 0 8 63 140 460 505 568 580 940	8 63 140 460 505 568 580 940 978			yh Bolida Bertlanke yde, bege yde, bege yde, bege yde, bege lype lype
I owner's mailing address if di 501 Universit, 10 Inneapolis M BEOLOGICAL MATERIAL 10 Any clay 10 Any cl	y Ave. South y Ave. South S 55414 s color red/brown red light red green/red red light red green/red red light red black red	east #30 Material S M MS M M M M M M M M M M	Г	8 63 140 505 568 580 940 978 1015			yh Bolida Bertlanke yde, bege yde, bege yde, bege yde, bege lype lype
i omero malleg addres K di 501 Universit, 10 neapolis M GEOLOGICAL MATERIAL 10 any clay 10 age 10 age	y Ave. South N 55414 B COLOR red/brown red light red green/red red light red green/red red light red green/red red light red green/red red	east #30	63 140 505 568 580 940 978	8 63 140 505 568 580 940 978 1015		Model If 12 in; abo Y) If In; In; abo In; In; abo	yh Bolida Bertlanke yde, bege yde, bege yde, bege yde, bege lype lype
ADOITIONAL E	y Ave. South N 55414 B COLOR red/brown red light red green/red red light red green/red red light red green/red red light red green/red red	east #30	63 140 505 568 580 940 978	8 63 140 505 568 580 940 978 1015		Model If 12 in; abo Y) If In; In; abo In; In; abo	yh Bolida Bertlanke yde, bege yde, bege yde, bege yde, bege lype lype
ADDITIONAL E	y Ave. South N 55414 B COLOR red/brown red light red green/red red light red green/red red light red green/red red light red green/red red	east #30	63 140 505 568 580 940 978	8 63 140 505 568 580 940 978 1015		Model W12 in; abo Y) In: In: <	yh Bolida Bertlanke yde, bege yde, bege yde, bege yde, bege jype jype
ADDITIONAL E	y Ave. South N 55414 B COLOR red/brown red light red green/red red light red green/red red light red green/red red light red green/red red	east #30	63 140 505 568 580 940 978	8 63 140 505 568 580 940 978 1015		Model W12 in, abo Y) In	yh Bolida Bertlanke yde, bege yde, bege yde, bege yde, bege jype jype
ADDITIONAL E	y Ave. South N 55414 B COLOR red/brown red light red green/red red light red green/red red light red green/red red light red green/red red	east #30	63 140 505 568 580 940 978	8 63 140 505 568 580 940 978 1015		Model W12 in, abo Y) In	ne gradia ph Solida Bertlanka yde, bege yde, bege yde, bege bege type Na Re Re Re Re Re Re Re Re Re Re Re Re
ADDITIONAL E	y Ave. South N 55414 B COLOR red/brown red light red green/red red light red green/red red light red green/red red light red green/red red	east #30	63 140 505 568 580 940 978	8 63 140 505 568 580 940 978 1015		Model W12 in, abo Y) In	ne gradia ph Solida Bertlanka yde, bege yde, bege yde, bege bege type Na Re Re Re Re Re Re Re Re Re Re Re Re
ADDITIONAL E	y Ave. South N 55414 B COLOR red/brown red light red green/red red light red green/red red light red green/red red light red green/red red	east #30	63 140 505 568 580 940 978	8 63 140 505 568 580 940 978 1015		Model W12 in, abo Y) If 12 in, abo R. R. No HP Vo R. Capaciton No No No No AP Variation No <	ne gradia ph Solida Bertlanka yde, bege yde, bege yde, bege bege type Na Re Re Re Re Re Re Re Re Re Re Re Re
ADDITIONAL C ADDITIONAL C	y Ave. South N 55414 B COLOR red/brown red light red green/red red light red green/red red light red green/red red light red green/red red	east #30	63 140 505 568 580 940 978	8 63 140 505 568 580 940 978 1015		Model W12 in; abo Y) In: In: <	we gradie yh Solida Bertlanke yde,bege yde,bege yde,bege yde,bege yde,bege yde,bege yde,bege
ADDITIONAL E ADDITIONAL E MARKE ELEVATON, S MARKE ELEVATON, S	y Ave. South N 55414 B COLOR red/brown red light red green/red red light red green/red red light red green/red red light red green/red red	east #30 Material S M MS M M M M M M M M M M	63 140 505 568 580 940 978	8 63 140 505 568 580 940 978 1015			we gradie yh Bolidis Bertianke yde,bege yde,bege yde,bege yde,bege yde,bege yde,bege
ADDITIONAL D TO THIS DO MARKE ELEVATION, S MAR 1 C DATA REC	y Ave. South N 55414 B COLOR red/brown red light red green/red red light red green/red red light red green/red red light red green/red red	HANDNESS OF MATERIAL S M M M M M M M M M M M M M M M M M M	63 140 505 568 580 940 978	8 63 140 460 505 568 580 940 978 1015			we gradin yh Solidis Bertionike yds. bags stags yyps stags

o