

**ENVIRONMENTAL SAMPLING LETTER
NORTHSHORE UTILITY DISTRICT HEADQUARTERS
KENMORE, WASHINGTON
PREPARED FOR
NORTHSHORE UTILITY DISTRICT**



**NELSON GEOTECHNICAL
ASSOCIATES, INC.**
GEOTECHNICAL ENGINEERS & GEOLOGISTS

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February 26, 2001

Mr. Dan Olson, Manager
Northshore Utility District
6830 NE 185th Street
Kenmore, Washington 98028

Environmental Sampling Letter
Northshore Utility District Headquarters
Kenmore, Washington
NGA File No. 303100N

Dear Mr. Olson:

This letter presents the results of our environmental sampling services at your headquarters and service center site.

INTRODUCTON

The site is located at 18520 – 68th Avenue NE, in Kenmore, Washington. You have requested that we evaluate the ground water in existing wells on the site on a semi-annual basis, to fulfill an agreement made with the Washington Department of Ecology (Ecology). We have been provided with reports and letters by Dames and Moore, dated July 19, September 22, November 20, and December 27, 1995, and a letter from Ecology, dated July 9, 1997, for our use in preparing this letter.

Dames and Moore previously installed four wells on the property as part of their surface and subsurface characterization at the site. The site is currently occupied by two remodeled buildings and one new structure, which make up your headquarters and service center. Ecology has reviewed the reports for this site and has required that the existing four wells be sampled on a semi-annual basis for three years. Each ground water sample is to be analyzed for total petroleum hydrocarbons as gasoline, diesel, and heavy oil (TPH-G, TPH-D, TPH-O) and benzene, ethylbenzene, and xylene (BETX). This letter presents the results of the fifth semi-annual ground water sampling. The first four samplings were conducted by

Nelson-Couvrette and Associates, Inc. The sampling is now being conducted by Nelson Geotechnical Associates, Inc.

SCOPE

The purpose of our services is to provide environmental sampling analysis of ground water samples, and report our findings.

Specifically, the services to be provided by NGA are as follows:

1. Review the previous environmental reports for the project.
2. Purge and sample the four monitoring wells on the property.
3. Analyze each of the four samples for:
 - Gasoline by WTPH-G
 - Diesel and Heavy Oil by WTPH-D extended
 - BETX by EPA Method 8020
4. Document our results in a short letter.
5. Provide consultation and additional environmental services, as requested.

GROUND WATER SAMPLING

Ground water samples were collected on February 9, 2001, in general accordance with the Guidance for Site Checks and Site Assessments for Underground Storage Tanks (Ecology, 1992). The well locations are shown on the Site Plan in Figure 1. Typically, one to two well volumes of ground water are purged from each well prior to sampling. In this case, the amount of ground water purged prior to sampling was limited due to recharge conditions. Monitoring Well 1 (MW-1), and MW-3 were bailed dry after purging two plus well volumes prior to sampling. Four plus well volumes were purged from MW-2 and MW-4 prior to sampling. Ground water samples were obtained using disposable polyethylene bailers dedicated to each well to avoid cross-contamination of wells. Samples were chilled and maintained under chain of custody until delivered to a subcontracted analytical laboratory.

GROUND WATER CONDITIONS

The existing wells installed by Dames and Moore were converted from above ground completions to flush-mount completions during the remodeling of the Northshore Utility District facility. This involved

cutting the wells off below existing grade and installing flush-mounted monuments. The elevations of the wells were measured relative to an assigned datum of 100 feet in order to correlate water level data. Elevations were measured utilizing standard differential elevation techniques with the aid of self-leveling level. Ground water level measurements obtained during our most recent sampling are presented in **Table 1.**

TABLE 1 – GROUND WATER ELEVATIONS					
Well I.D.	Date	Ground Surface Elevation ¹ (feet)	Top of Casing Elevation (feet)	Depth to Ground Water ² (feet)	Ground Water Elevation (feet)
MW-1	1-19-99	NR ⁵	NR ⁵	NR ⁵	NR ⁵
MW-1	7-28-99	98.93 ³	98.65 ³	2.04	96.61 ⁴
MW-1	1-27-00			1.41	97.24
MW-1	7-27-00			2.49	96.16
MW-1	2-9-01			1.81	96.84
MW-2	1-19-99	NR ⁵	NR ⁵	NR ⁵	NR ⁵
MW-2	7-28-99	99.29 ³	98.63 ³	2.10	96.53 ⁴
MW-2	1-27-00			1.17	97.46
MW-2	7-27-00			3.28	95.35
MW-2	2-9-01			1.06	97.57
MW-3	1-19-99	NR ⁵	NR ⁵	NR ⁵	NR ⁵
MW-3	7-28-99	100.30 ³	100.03 ³	3.07	96.96 ⁴
MW-3	1-27-00			1.96	98.07
MW-3	7-27-00			4.15	95.88
MW-3	2-9-01			1.40	98.63
MW-4	1-19-99	NR ⁵	NR ⁵	NR ⁵	NR ⁵
MW-4	7-28-99	97.82 ³	96.99 ³	3.10	93.89 ⁴
MW-4	1-27-00			2.89	94.10
MW-4	7-27-00			3.17	93.82
MW-4	2-9-01			2.88	94.11

¹ From an arbitrary bench mark elevation of 100 feet.

² Measured from top of casing.

³ Surveyed on July 28, 1999.

⁴ Corrected ground water elevation due to mathematical error. These numbers supercede letter dated October 27, 1999.

⁵ Elevations Not Recorded.

Water level measurements obtained from the existing monitoring wells indicate that ground water is present at depths of approximately 1.06 to 2.88 feet below the ground surface and the inferred ground water migration direction is generally to the west northwest.

The ground water gradient and inferred flow directions are based on simplifying assumptions and should be viewed as a generalized estimation based on limited data. Ground water conditions may vary, depending on seasonal variations in precipitation, changes in site utilization, and other factors.

QUANTITATIVE ANALYSIS

The concentration of petroleum hydrocarbons existing in the subsurface materials were quantified by testing for:

1. Gasoline by WTPH-G
2. Diesel and Heavy Oil by WTPH-D extended
3. BETX by EPA method 8020

The results of ground water sampling indicate concentrations of total petroleum hydrocarbons (TPH) as gasoline, BETX, and heavy oil were below Model Toxics Control Act (MTCA) Method A action levels. Concentrations of TPH as diesel were above MTCA Method A action levels in MW-1 and MW-2 and below MTCA Method A action levels in MW-3 and MW-4. A summary of analytical laboratory results on ground water is presented in **Table 2**. Analytical laboratory certificates are attached. MTCA Method A action levels for ground water are presented in the last row of **Table 2**. Previous results by NCA and by Dames and Moore are summarized in **Table 2**.

TABLE 2 – WATER SAMPLE ANALYSIS								
Well I.D.	Date Sampled	WTPH-G (ppb)	Benzene (ppb)	Ethylbenzene (ppb)	Tolulene (ppb)	Xylenes (ppb)	WTPH-Diesel (ppb)	WTPH-Heavy Oil (ppb)
*MW-1	10-23-95	120	<0.50	<0.50	0.58	<1.0	1,500	NA
MW-1	1-19-99	ND	ND	ND	ND	ND	952	ND
MW-1	7-28-99	ND	ND	ND	ND	ND	1,110	ND
MW-1	1-27-00	ND	ND	ND	ND	ND	399	ND
MW-1	7-27-00	ND	ND	ND	ND	ND	1,050	ND
MW-1	2-9-01	ND	ND	ND	ND	1.07	1,030	ND
*MW-2	10-23-95	<20	<0.50	<0.50	<0.50	<0.50	1,200	NA
MW-2	1-19-99	ND	ND	ND	ND	ND	854	874
MW-2	7-28-99	ND	ND	ND	ND	ND	1,310	ND
MW-2	1-27-00	79.8	ND	ND	ND	ND	2,080	ND
MW-2	7-27-00	ND	ND	ND	ND	ND	1,410	ND
MW-2	2-9-01	ND	ND	ND	ND	ND	1,780	ND
*MW-3	10-23-95	73	0.81	<0.50	0.78	2.6	1,000	NA
MW-3	1-19-99	ND	ND	ND	ND	ND	331	ND
MW-3	7-28-99	ND	ND	ND	ND	ND	343	ND
MW-3	1-27-00	ND	ND	ND	ND	ND	ND	ND
MW-3	7-27-00	ND	ND	ND	ND	ND	ND	ND
MW-3	2-9-01	ND	ND	ND	ND	ND	ND	ND
*MW-4	10-23-95	120	<0.50	<0.50	9.2	<1.0	7,100	NA
MW-4	1-20-99	ND	ND	ND	ND	ND	331	ND
MW-4	7-28-99	ND	ND	ND	ND	1.05	348	ND
MW-4	1-27-00	ND	ND	ND	ND	ND	326	ND
MW-4	7-27-00	ND	ND	ND	ND	ND	426	ND
MW-4	2-9-01	ND	ND	ND	ND	ND	401	ND
MTCA Action Levels		1,000.0	5.0	30.0	40.0	20.0	1,000.0	1,000.0

* Sampling and analysis performed by Dames and Moore

NA – Not Analyzed

ND – Analyte not detected at or above detection limit concentrations listed in the analytical laboratory reports.

Shaded results are above MTCA Method A action levels.

USE OF THIS LETTER

This letter has been provided for Northshore Utility District and their agents, for their use on this project. The results and conclusions presented in this letter are professional opinions based on testing accomplished for this study and should not be considered a warranty of subsurface conditions.

Within the limitations of scope, schedule, and budget for our services, we have strived to take care that our work has been done in accordance with generally accepted practices in this area at the time this letter was prepared. No other conditions, expressed or implied, should be understood.

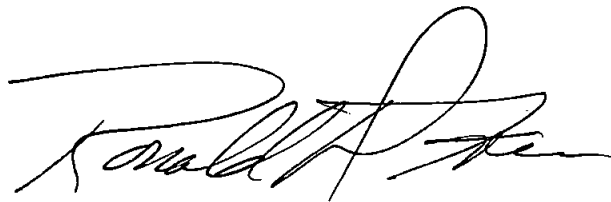
It has been a pleasure to provide service to you on this project. If you have any questions or require further information, please call.

Sincerely,

NELSON GEOTECHNICAL ASSOCIATES, INC.



Bala Dodoye-Alali
Staff Geologist



Ronald D. Free, PG
Project Geologist



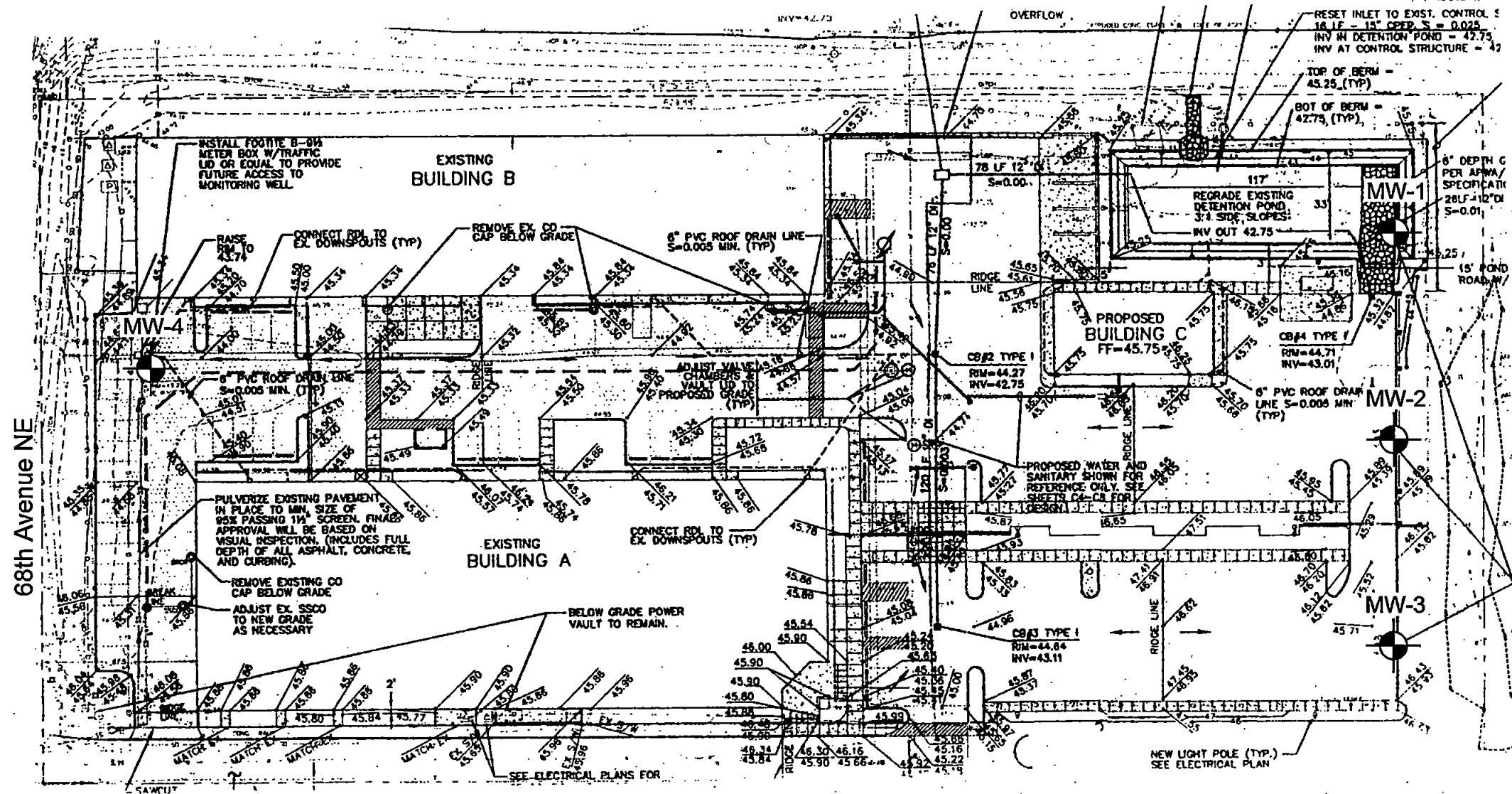
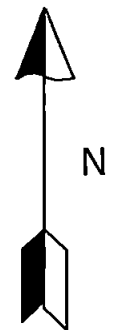
David L. Nelson, PG
Principal

BAD:RDF:DLN:dlh

Two Copies Submitted
One Figure
Attachment – Laboratory Certificates
cc: Mr. John Lillie - Ecology, NW Region

NELSON GEOTECHNICAL ASSOCIATES, INC.

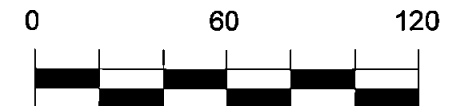
Site Plan



LEGEND



MW-1
NUMBER AND APPROXIMATE LOCATION OF MONITORING WELL



Scale: 1 inch = 60 feet

Reference: Site Plan created from a storm drainage and grading plan by Penhallegon Associates Consulting Engineers, Inc., titled "Service Center", dated July 1997.

NGA NELSON GEOTECHNICAL ASSOCIATES, INC.
GEOTECHNICAL ENGINEERS & GEOLOGISTS

Northshore Utility District
Headquarters

FILE NO.
303100N

FIGURE
1



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 Woodinville WA, 98072

Project: Northshore Utility District
 Project Number: 303100N
 Project Manager: Ron Free

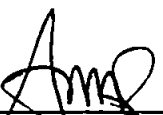
Reported:
 02/16/01 13:54

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
MW-1/2/01	B1B0179-01	Water	02/09/01 09:55	02/09/01 12:21
MW-2/2/01	B1B0179-02	Water	02/09/01 10:35	02/09/01 12:21
MW-3/2/01	B1B0179-03	Water	02/09/01 11:05	02/09/01 12:21
MW-4/2/01	B1B0179-04	Water	02/09/01 11:40	02/09/01 12:21

North Creek Analytical - Bothell

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.


 Amar Gill, Project Manager

North Creek Analytical, Inc.
Environmental Laboratory Network



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Nelson Geotechnical Associates, Inc. Project: Northshore Utility District
 17311-135th Ave NE, #A-500 Project Number: 303100N
 Woodinville WA, 98072 Project Manager: Ron Free Reported:
 02/16/01 13:54

**Gasoline Range Hydrocarbons (Toluene to Dodecane) and BTEX by WTPH-G and EPA 8021B
 North Creek Analytical - Bothell**

Analyte	Result	Reporting		Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
		Limit								

MW-1/2/01 (B1B0179-01) Water Sampled: 02/09/01 09:55 Received: 02/09/01 12:21

Gasoline Range Hydrocarbons	ND	50.0	ug/l	1	1B11001	02/11/01	02/12/01	WTPH-G/8021B		
Benzene	ND	0.500	"	"	"	"	"	"	"	"
Toluene	ND	0.500	"	"	"	"	"	"	"	"
Ethylbenzene	ND	0.500	"	"	"	"	"	"	"	"
Xylenes (total)	1.07	1.00	"	"	"	"	"	"	"	"
Surrogate: 4-BFB (FID)	99.2 %	50-150			"	"	"	"	"	"
Surrogate: 4-BFB (PID)	96.7 %	50-150			"	"	"	"	"	"

MW-2/2/01 (B1B0179-02) Water Sampled: 02/09/01 10:35 Received: 02/09/01 12:21


Gasoline Range Hydrocarbons	ND	50.0	ug/l	1	1B11001	02/11/01	02/12/01	WTPH-G/8021B		
Benzene	ND	0.500	"	"	"	"	"	"	"	"
Toluene	ND	0.500	"	"	"	"	"	"	"	"
Ethylbenzene	ND	0.500	"	"	"	"	"	"	"	"
Xylenes (total)	ND	1.00	"	"	"	"	"	"	"	"
Surrogate: 4-BFB (FID)	97.5 %	50-150			"	"	"	"	"	"
Surrogate: 4-BFB (PID)	94.6 %	50-150			"	"	"	"	"	"

MW-3/2/01 (B1B0179-03) Water Sampled: 02/09/01 11:05 Received: 02/09/01 12:21

Gasoline Range Hydrocarbons	ND	50.0	ug/l	1	1B11001	02/11/01	02/12/01	WTPH-G/8021B		
Benzene	ND	0.500	"	"	"	"	"	"	"	"
Toluene	ND	0.500	"	"	"	"	"	"	"	"
Ethylbenzene	ND	0.500	"	"	"	"	"	"	"	"
Xylenes (total)	ND	1.00	"	"	"	"	"	"	"	"
Surrogate: 4-BFB (FID)	95.6 %	50-150			"	"	"	"	"	"
Surrogate: 4-BFB (PID)	96.5 %	50-150			"	"	"	"	"	"

North Creek Analytical - Bothell

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Page 2 of 7



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Project: Northshore Utility District
 Project Number: 303100N
 Project Manager: Ron Free

Reported:
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Gasoline Range Hydrocarbons (Toluene to Dodecane) and BTEX by WTPH-G and EPA 8021B
North Creek Analytical - Bothell

Analyte	Result	Reporting		Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
		Limit								
MW-4/2/01 (B1B0179-04) Water Sampled: 02/09/01 11:40 Received: 02/09/01 12:21										
Gasoline Range Hydrocarbons	ND	50.0		ug/l	1	1B11001	02/11/01	02/12/01	WTPH-G/8021B	
Benzene	ND	0.500		"	"	"	"	"	"	
Toluene	ND	0.500		"	"	"	"	"	"	
Ethylbenzene	ND	0.500		"	"	"	"	"	"	
Xylenes (total)	ND	1.00		"	"	"	"	"	"	
Surrogate: 4-BFB (FID)	97.3 %	50-150				"	"	"	"	
Surrogate: 4-BFB (PID)	96.5 %	50-150				"	"	"	"	

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Project: Northshore Utility District
 Project Number: 303100N
 Project Manager: Ron Free

Reported:
 02/16/01 13:54

Diesel Hydrocarbons (C12-C24) and Heavy Oil (C24-C36 by WTPH-D (extended))
North Creek Analytical - Bothell

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
MW-1/2/01 (B1B0179-01RE1) Water Sampled: 02/09/01 09:55 Received: 02/09/01 12:21									
Diesel Range Hydrocarbons	1.03	0.250	mg/l	1	1B15002	02/15/01	02/15/01	WTPH-D	
Heavy Oil Range Hydrocarbons	ND	0.750	"	"	"	"	"	"	
Surrogate: 2-FBP	85.4 %	50-150			"	"	"	"	
Surrogate: Octacosane	94.5 %	50-150			"	"	"	"	
MW-2/2/01 (B1B0179-02RE1) Water Sampled: 02/09/01 10:35 Received: 02/09/01 12:21									
Diesel Range Hydrocarbons	1.78	0.250	mg/l	1	1B15002	02/15/01	02/15/01	WTPH-D	
Heavy Oil Range Hydrocarbons	ND	0.750	"	"	"	"	"	"	
Surrogate: 2-FBP	89.5 %	50-150			"	"	"	"	
Surrogate: Octacosane	97.3 %	50-150			"	"	"	"	
MW-3/2/01 (B1B0179-03RE1) Water Sampled: 02/09/01 11:05 Received: 02/09/01 12:21									
Diesel Range Hydrocarbons	ND	0.250	mg/l	1	1B15002	02/15/01	02/15/01	WTPH-D	
Heavy Oil Range Hydrocarbons	ND	0.750	"	"	"	"	"	"	
Surrogate: 2-FBP	81.1 %	50-150			"	"	"	"	
Surrogate: Octacosane	95.1 %	50-150			"	"	"	"	
MW-4/2/01 (B1B0179-04RE1) Water Sampled: 02/09/01 11:40 Received: 02/09/01 12:21									
Diesel Range Hydrocarbons	0.401	0.250	mg/l	1	1B15002	02/15/01	02/15/01	WTPH-D	
Heavy Oil Range Hydrocarbons	ND	0.750	"	"	"	"	"	"	
Surrogate: 2-FBP	94.7 %	50-150			"	"	"	"	
Surrogate: Octacosane	105 %	50-150			"	"	"	"	

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Amar Gill, Project Manager

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Nelson Geotechnical Associates, Inc. 17311-135th Ave NE, #A-500 Woodinville WA, 98072	Project: Northshore Utility District Project Number: 303100N Project Manager: Ron Free	Reported: 02/16/01 13:54
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Gasoline Range Hydrocarbons (Toluene to Dodecane) and BTEX by WTPH-G and EPA 8021B - Quality Control

North Creek Analytical - Bothell

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch 1B11001: Prepared 02/11/01 Using EPA 5030B (P/T)

Blank (1B11001-BLK1)

Gasoline Range Hydrocarbons	ND	50.0	ug/l							
Benzene	ND	0.500	"							
Toluene	ND	0.500	"							
Ethylbenzene	ND	0.500	"							
Xylenes (total)	ND	1.00	"							
Surrogate: 4-BFB (FID)	46.4		"	48.0		96.7	50-150			
Surrogate: 4-BFB (PID)	45.6		"	48.0		95.0	50-150			

LCS (1B11001-BS1)

Gasoline Range Hydrocarbons	518	50.0	ug/l	500		104	70-130			
Surrogate: 4-BFB (FID)	47.8		"	48.0		99.6	50-150			

Duplicate (1B11001-DUP1)

Source: B1B0179-02

Gasoline Range Hydrocarbons	ND	50.0	ug/l		ND			14.2	25	
Surrogate: 4-BFB (FID)	45.8		"	48.0		95.4	50-150			

Matrix Spike (1B11001-MS1)

Source: B1B0179-02

Benzene	8.90	0.500	ug/l	10.0	ND	89.0	70-130			
Toluene	8.69	0.500	"	10.0	ND	86.9	70-130			
Ethylbenzene	9.28	0.500	"	10.0	ND	90.8	70-130			
Xylenes (total)	27.5	1.00	"	30.0	ND	90.6	70-130			
Surrogate: 4-BFB (PID)	46.6		"	48.0		97.1	50-150			


Matrix Spike Dup (1B11001-MSD1)

Source: B1B0179-02

Benzene	9.36	0.500	ug/l	10.0	ND	93.6	70-130	5.04	15	
Toluene	9.30	0.500	"	10.0	ND	93.0	70-130	6.78	15	
Ethylbenzene	9.99	0.500	"	10.0	ND	97.8	70-130	7.37	15	
Xylenes (total)	29.5	1.00	"	30.0	ND	97.2	70-130	7.02	15	
Surrogate: 4-BFB (PID)	47.3		"	48.0		98.5	50-150			

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 Portland 9405 SW Nimbus Avenue, Beaverton, OR 97008-7132
 503.906.9200 fax 503.906.9210
 Bend 20332 Empire Avenue, Suite F-1, Bend, OR 97701-5711
 541.383.9310 fax 541.382.7588

Nelson Geotechnical Associates, Inc. 17311-135th Ave NE, #A-500 Woodinville WA, 98072	Project: Northshore Utility District Project Number: 303100N Project Manager: Ron Free	Reported: 02/16/01 13:54
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**Diesel Hydrocarbons (C12-C24) and Heavy Oil (C24-C36 by WTPH-D (extended) - Quality Control
 North Creek Analytical - Bothell**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch 1B15002: Prepared 02/15/01 Using EPA 3510C/600 Series

Blank (1B15002-BLK1)

Diesel Range Hydrocarbons	ND	0.250	mg/l							
Heavy Oil Range Hydrocarbons	ND	0.750	"							
Surrogate: 2-FBP	0.264		"	0.320		82.5	50-150			
Surrogate: Octacosane	0.315		"	0.320		98.4	50-150			

LCS (1B15002-BS1)

Diesel Range Hydrocarbons	1.72	0.250	mg/l	2.00		86.0	60-140			
Surrogate: 2-FBP	0.290		"	0.320		90.6	50-150			

Duplicate (1B15002-DUP1)

Source: B1B0179-02RE1

Diesel Range Hydrocarbons	1.71	0.250	mg/l		1.78			4.01	30	
Heavy Oil Range Hydrocarbons	ND	0.750	"		ND			2.38	30	
Surrogate: 2-FBP	0.496		"	0.586		84.6	50-150			
Surrogate: Octacosane	0.542		"	0.586		92.5	50-150			

North Creek Analytical - Bothell

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

Amad Gill, Project Manager

**North Creek Analytical, Inc.
 Environmental Laboratory Network**



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Nelson Geotechnical Associates, Inc.
17311-135th Ave NE, #A-500
Woodinville WA, 98072

Project: Northshore Utility District
Project Number: 303100N
Project Manager: Ron Free

Reported:
02/16/01 13:54

Notes and Definitions

DET Analyte DETECTED
ND Analyte NOT DETECTED at or above the reporting limit
NR Not Reported
dry Sample results reported on a dry weight basis
RPD Relative Percent Difference

North Creek Analytical - Bothell

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Amar Gill, Project Manager

North Creek Analytical, Inc.
Environmental Laboratory Network

CHAIN OF CUSTODY REPORT

Work Order #: **BIB0179**

CLIENT: **Nelson Geotechnical Associates**
 REPORT TO: **Ron Free**
 ADDRESS: **17311-135TH AVE. NE, Suite A-500**
Woodinville, WA 98072
 PHONE: **425-486-1669** FAX: **425-481-2510**

INVOICE TO: **SAME**
 P.O. NUMBER: **303100N**

TURNAROUND REQUEST in Business Days*

Organic & Inorganic Analyses
 10 7 5 4 3 2 1 <1

STD. Petroleum Hydrocarbon Analyses
 5 4 3 2 1 <1

STD. **OTHER** Please Specify _____

*Turnaround Requests less than standard may incur Rush Charges.

PROJECT NAME: **NSUD**
 PROJECT NUMBER: **303100N**
 SAMPLED BY: **RDF/BAD**

REQUESTED ANALYSES

CLIENT SAMPLE IDENTIFICATION	SAMPLING DATE/TIME	WTPHG-Asst	WTPHD-Ext.															
1. MW-1/2/01	2/9/01 9:55A	X	X															
2. MW-2/2/01	2/9/01 10:35A	X	X															
3. MW-3/2/01	2/9/01 11:05A	X	X															
4. MW-4/2/01	2/9/01 11:40A	X	X															
5.																		
6.																		
7.																		
8.																		
9.																		
10.																		
11.																		
12.																		
13.																		
14.																		
15.																		

MATRIX (W, S, O)	# OF CONT.	COMMENTS	NCA WO ID
W	5	3V0A, 20% _g	01
W	5	3V0A, 20% _g	02
W	5	3V0A, 20% _g	03
W	5	3V0A, 20% _g	04

RELINQUISHED BY: **Ronald J. Free**
 PRINT NAME: **RONALD J. Free** FIRM: **NCA**
 DATE: **2-9-01** TIME: **12:21**

RECEIVED BY: **S. YAMAMUCHI**
 PRINT NAME: **S. YAMAMUCHI** FIRM: **NCA**
 DATE: **2/9/01** TIME: **12:21**

ADDITIONAL REMARKS:
 COC REV 3/99