



Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

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Travis A. Voyles
Acting Secretary of Natural and Historic Resources

Michael S. Rolband, PE, PWD, PWS Emeritus
Director
(804) 698-4020

September 30, 2022

Manuchehr Mirzaiee
M&M Property Investment, LLC.

VIA ELECTRONIC MAIL

**RE: Long-Term Stewardship Report
Emporia Foundry, Inc.
EPA ID VAD023720105**

Dear Mr. Mirzaiee:

The Department of Environmental Quality, Office of Remediation Programs (Department) has prepared the attached report following the Long-Term Stewardship inspection performed on September 16, 2022 at the Emporia Foundry, Incorporated site located in Emporia, Virginia. The inspection found no outstanding items in regard to compliance of engineering and institutional controls.

However, based on previous discussions with EPA and our review of the UECA, DEQ verified that previously owner and Grantor of the UECA, Emporia Foundry, filed site plats which included coordinates that are not geographically accurate. We are providing an electronic version of the corrected plats with this submittal and also provided you a hardcopy during the site visit. We recommend that the UECA be updated in the Court records to reflect the correct plats. However, due to the accurate depiction of the activity and use limitations available in the Statement of Basis and geospatial PDF provided on the EPA webpage, as well as accurate written description in the UECA covenant, this error does not impair the effectiveness of the remedy.

You may contact me to discuss any questions. I can be reached at 804-659-1392 or by email at [tara.mason@deq.virginia.gov]



Respectfully,

A handwritten signature in blue ink that reads "Tara D. Mason".

Tara Mason
Corrective Action Team Lead

ecc: Jacqueline Morrison, John Hopkins, Caitlin Elverson - EPA Region III
Shawn Weimer, DEQ-PRO

Attachment



Long-Term Stewardship Assessment Report
Emporia Foundry, Inc.
EPA ID VAD023720105

Prepared by: Tara Mason

Date: September 16, 2022

Introduction: Long-term stewardship (LTS) refers to the activities necessary to ensure that engineering controls (ECs) are maintained and that institutional controls (ICs) continue to be observed. The purpose of the EPA Region 3 LTS program is to periodically assess the efficacy of the implemented remedies (i.e., ECs and ICs) and to update the community on the status of the RCRA Corrective Action facilities. The assessment is conducted in two parts, consisting of a record review and a field inspection, to ensure that the remedies are implemented and maintained in accordance to the final decision.

The RCRA Corrective Action Program has identified key elements of effective Long-Term Stewardship for Corrective Action cleanups. The LTS Report took into consideration the following elements while preparing this report:

- Element 1 – Legal Authorities
- Element 2 – Information Regarding Engineering and Institutional Controls
- Element 3 – Long-Term Facility Oversight, Monitoring, and Maintenance
- Element 4 – Recordkeeping and Tracking
- Element 5 – Meaningful Engagement and Consultation
- Element 6 – Funding
- Element 7 – Enforcement
- Element 8 – Enforceable Mechanisms
- Element 9 – Dedicated Resources

Site Background: The Emporia Foundry facility is located in an industrial area at 620 Reese Street in Emporia, Virginia. The facility consists of 20.16 acres and lies between multi-family residential areas to the North, and commercial/industrial areas to the South and East. The Facility manufactured gray-iron, municipal castings by mold-casting methods for use by municipal governments and the construction industry. Manufactured castings include manhole covers, manhole cover receptacles, and drain grates. The Facility has ceased operations and closed the Facility and transferred ownership.

The foundry site contains a closed hazardous waste landfill, approximately 3.8 acres; the landfill contains characteristic wastes under the RCRA. The landfill, a regulated unit, is bounded on the north and east by Little Metcalf Branch, on the south by CSX Railroad tracks, and on the west by a drainage ditch.

Between 1965 and 1975, foundry wastes consisting of cupola slag, spent casting sand, and spent steel shot were spread at the landfill. Between January 1975 and December 1981, cupola baghouse dust was included with other wastes. Between January 1982 and the fall of 1982, foundry waste without cupola baghouse dust was spread on the site, and by December of 1982, the landfill disposal operations ceased. Closure activities consisted of regrading the landfill, improving drainage, and the application of a clay cap to perimeter slopes. The Permittee performed post-closure care for the closed landfill from February 1984 to February 2014 (30 years after the date the closure was certified).

The termination of post-closure care was approved on August 28, 2014. VDEQ's final remedy determined that no further actions to remediate soil, groundwater, or indoor air contamination are necessary to protect human health and the environment given current and reasonably anticipated future land use. However, the Facility must maintain certain property mechanisms known as Institutional Controls (ICs) and Engineering Controls (ECs).

The Agency's Corrective Action Objective for Facility soils is to control exposure to the hazardous waste constituents remaining in soils at SWMU 1 (Former Waste Oil Tank), SWMU 3 (hazardous waste landfill), and the Riparian Buffer by requiring compliance with and maintenance of land use restrictions at the Facility. Groundwater is not contaminated above drinking water standards. Thus, no further action is needed to protect human health and the environment in regard to groundwater.

The Facility was sold to M&M Property Investment, LLC on December 12, 2017 with plans for redevelopment but due to unforeseen circumstances remains undeveloped.

Element 1: Legal Authorities

The remedy was imposed by a Class 2 Modification of the Facility's Hazardous Waste Management Permit on March 30, 2015. An Environmental Covenant compliant with the Uniform Environmental Covenant Act (UECA) was recorded on September 24, 2015, thus the Facility's Permit was allowed to expire in October 2015. The UECA serves the authority for enforcing the final remedy at the site. DEQ is listed as the Agency in Covenant.

Element 2: Information Regarding Engineering and Institutional Controls

The following controls are required as part of the CA remedy:

Associated Tax Parcel	Restriction	Applies to Polygon
<u>PARCEL 1:</u> (Tax Parcel 144-3-1A)	1. Restriction Area I on Exhibit B shall not be used for residential purposes or for children's (under the age of 16) daycare facilities, schools or playground purposes.	Restriction Area I (SWMU-1)
<u>PARCEL 2:</u> (Tax Map No. 144-3-1B)	<p>1. The soil cap of the closed Landfill shown on Exhibit A and the vegetated soil cover of the Riparian Buffer shown as Restriction Area II on Exhibit B shall be inspected annually. The inspection shall include examination of the cover integrity. The inspection procedures shall be based on the inspection checklist attached to the Statement of Basis. (The Statement of Basis is attached hereto as Exhibit C.)</p> <p>2. The Landfill and the Riparian Buffer shall not be used for residential purposes or for children's (under the age of 16) daycare facilities, schools or playground purposes.</p> <p>3. All earth moving activities including excavation, drilling and construction activities that would result in direct exposure to soil or disturbance of the soil on the Landfill, or the Riparian Buffer are prohibited without approval by the Agency of a Materials Management Plan. Any identified disturbances in the landfill cap or soil cover shall be repaired.</p>	Restriction Area II (Riparian Buffer) and Landfill (SWMU-5)

Associated Tax Parcel	Restriction	Applies to Polygon
<u>PARCEL 3 (Tax Parcel 144-A-4).</u>	<p>1. The soil cap of the closed Landfill shown on Exhibit A shall be inspected annually. The inspection shall include examination of the cover integrity. The inspection procedures shall be based on the inspection checklist attached to the Statement of Basis. (The Statement of Basis is attached hereto as Exhibit C.)</p> <p>2. The Landfill shall not be used for residential purposes or for children's (under the age of 16) daycare facilities, schools or playground purposes.</p> <p>3. All earth moving activities including excavation, drilling and construction activities that would result in direct exposure to soil or disturbance of the soil on the Landfill are prohibited without approval by the Agency of a Materials Management Plan. Any identified disturbances in the landfill cap shall be repaired.</p>	Landfill (SWMU-5)

Element 3 – Long-Term Facility Oversight, Monitoring and Maintenance and Element 4 – Recordkeeping and Tracking

The UECA requires that the soil cap of the closed Landfill and the vegetated soil cover of the Riparian buffer be inspected annually. The inspection shall include examination of the cover integrity. The inspection procedures shall be based on the inspection checklist attached to the Facility's Statement of Basis and recorded with the UECA covenant.

In addition, the UECA requires by March 1 of the fifth year following the recordation of the Covenant, the Facility is required to submit written documentation stating whether or not the activity and use limitations in the covenant are being observed. The Department received the first documentation on July 21, 2021. A Certified Professional Engineer inspected the restriction areas and indicated that the facility was in compliance with the Activity & Use Limitations.

The Facility is not located in the 0.2% Annual Chance Flood Area or area with Area Indicated as Future Conditions 1% Annual Chance Flood Hazard as indicated on [FEMA's National Flood Hazard Layer \(NFHL\) Viewer](#). We did not observe any issues related to the site's proximity.

Mapping: The [EPA Facility website](#) has been updated with a Geospatial PDF showing the use restriction boundaries. The map was field-verified, and no issues were noted. However, EPA and DEQ discovered that the plats recorded with the UECA do not reflect accurate coordinates where tabulated. DEQ provided the Facility with the corrected copies of the Plats. A UECA amendment should be pursued to replace the existing plats with the corrected plats.

Element 5 – Meaningful Engagement and Consultation

DEQ discussed the property with the City of Emporia Department of Economic Development. The City provided DEQ with a summary of upcoming developments in the City of Emporia and encourages the property owner to engage with the City in potential opportunities.

Element 6 – Funding

Financial Assurance: Financial Assurance is not required for this Facility since there is only monitoring and maintenance of activity and use limitations required.

Element 7 – Enforcement

Enforcement authority of the environmental covenant can be found in VA Code §10.1-1247.

The UECA designates Emporia Foundry, Inc. as the Holder of the Covenant. The Holder is obligated to maintain stewardship and to enforce the environmental covenant in court. The Holder acts as a monitor of the property to ensure the restrictions under the covenant are followed. The Holder can file suit in court in accordance with VA Code §10.1-1246 if the requirements of the covenant are not being followed. In 2021, DEQ was officially notified that a property sale had been recorded on January 8, 2018 to new owner, M&M Property Investment. As owner, M&M Property Investment is required to maintain the UECA covenant's activity and use limitations.

DEQ is the Agency listed in the Covenant. In addition to its existing authority under RCRA, DEQ can file a civil action for injunctive or other equitable relief for violation of a UECA covenant. In addition, EPA, without limitation, reserves its right to take administrative enforcement action under RCRA or other federal law for violations.

Element 8 – Enforceable Mechanisms

An Environmental Covenant compliant with the Uniform Environmental Covenant Act (UECA) was recorded on September 24, 2015, thus the Facility's Permit was allowed to expire October 2015. The UECA serves the authority for enforcing the final remedy at the site. DEQ is listed as the Agency in Covenant.

Element 9 – Dedicated Resources

The EPA Performance Partnership Grant Workplan provides for Long-Term Stewardship activities. The Programmatic goal is to evaluate 20% of facilities with remedies older than 10 years.

Long-term Stewardship Site Visit: On September 12, 2022

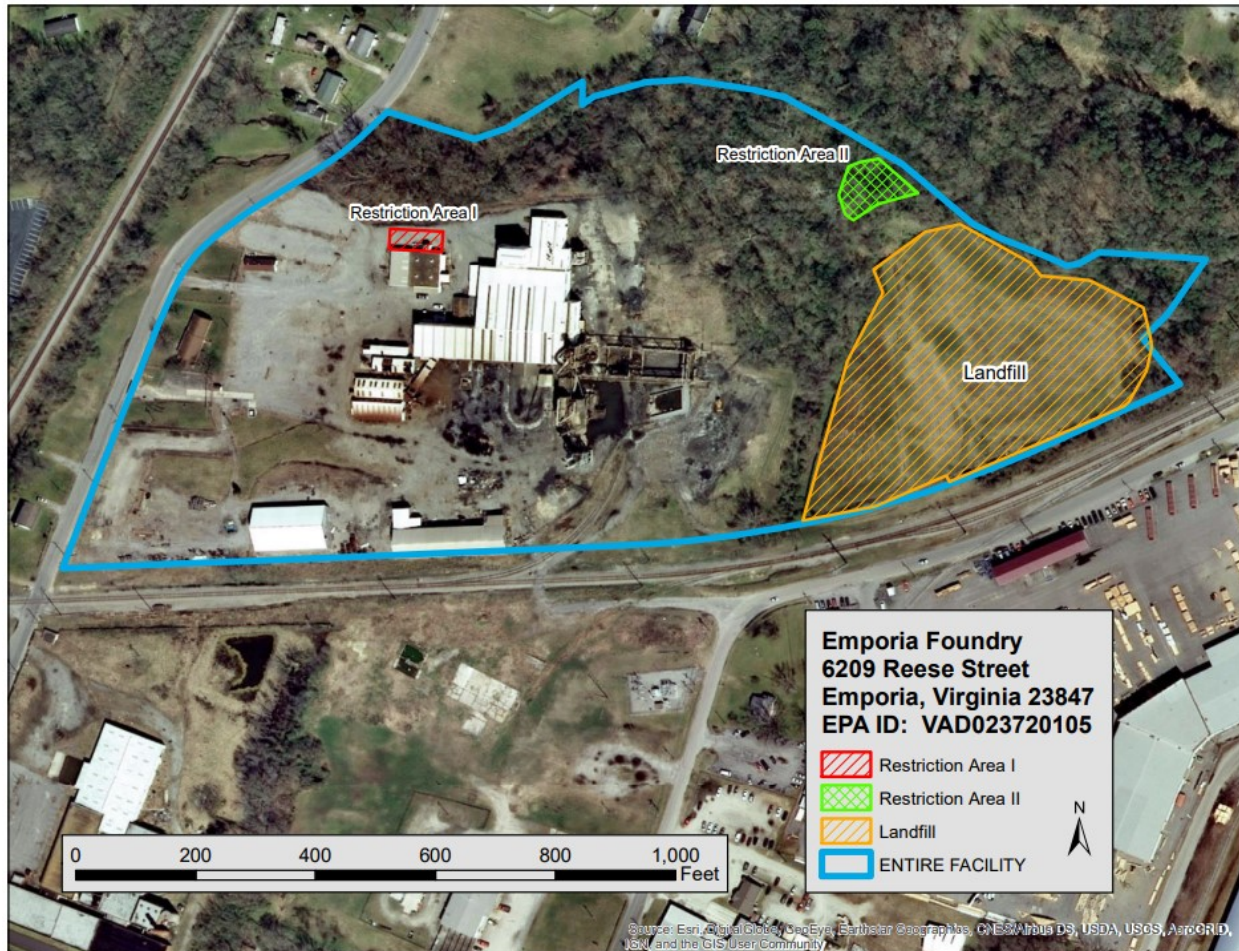
DEQ conducted a long-term stewardship site visit to discuss and assess the status of the implemented remedies at the site. The attendees were:

Name	Organization
Tara Mason	DEQ-CO
Manuchehr Mirzaiee	M&M Investment
April NiMary	DEQ-CO

Follow-up Activities: As discussed in Element 3 above, the UECA Covenant should be amended to correct coordinates provided in tabular form on the figures. An environmental covenant can be amended only if the amendment is signed by The Agency, the current owner (unless waived by the agency), each person that originally signed the covenant (unless the person waived in a signed record the right to consent or a court finds that the person no longer exists or cannot be located or identified with the exercise of reasonable diligence), and except as otherwise stated, the holder.

Conclusion: The engineering and institutional controls selected are implemented and remain intact and undamaged. No EC/IC deficiencies have been identified.

DEQ Long-Term Stewardship Facility Geospatial PDF
Emporia Foundry – Emporia, Virginia



Select Site Photos
Photos by: Tara Mason
September 16, 2022

Restriction Area I



Restriction Area II



VADEQ - Long Term Stewardship Checklist
Emporia Foundry, Incorporated
VAD023720105

September 16, 2022
Tara Mason

DEQ Personnel

Tara Mason, Corrective Action Team Lead

Apol, Niv, May, ORP

Facility Representatives

Manucheh ~~R~~ MIRZAEI
(703) 560-0111
PARS25C@GMAIL.COM

Selected Remedies:

Compliance with and Maintenance of Institutional and Engineering Controls (ICs and ECs)

AULs:

Associated Tax Parcel	Restriction	Applies to Polygon
PARCEL 1: (Tax Parcel 144-3-1A)	1. Restriction Area I on Exhibit B shall not be used for residential purposes or for children's (under the age of 16) daycare facilities, schools or playground purposes.	Restriction Area I (SWMU-1)
PARCEL 2: (Tax Map No. 144-3-1B)	1. The soil cap of the closed Landfill shown on Exhibit A and the vegetated soil cover of the Riparian Buffer shown as Restriction Area II on Exhibit B shall be inspected annually. The inspection shall include examination of the cover integrity. The inspection procedures shall be based on the inspection checklist attached to the Statement of Basis. (The Statement of Basis is attached hereto as Exhibit C.) 2. The Landfill and the Riparian Buffer shall not be used for residential purposes or for children's (under the age of 16) daycare facilities, schools or playground purposes. 3. All earth moving activities including excavation, drilling and construction	Restriction Area II (Riparian Buffer) and Landfill (SWMU-5)

Associated Tax Parcel	Restriction	Applies to Polygon
	activities that would result in direct exposure to soil or disturbance of the soil on the Landfill, or the Riparian Buffer are prohibited without approval by the Agency of a Materials Management Plan. Any identified disturbances in the landfill cap or soil cover shall be repaired.	
<u>PARCEL 3 (Tax Parcel 144-A-4).</u>	<p>1. The soil cap of the closed Landfill shown on Exhibit A shall be inspected annually. The inspection shall include examination of the cover integrity. The inspection procedures shall be based on the inspection checklist attached to the Statement of Basis. (The Statement of Basis is attached hereto as Exhibit C.)</p> <p>2. The Landfill shall not be used for residential purposes or for children's (under the age of 16) daycare facilities, schools or playground purposes.</p> <p>3. All earth moving activities including excavation, drilling and construction activities that would result in direct exposure to soil or disturbance of the soil on the Landfill are prohibited without approval by the Agency of a Materials Management Plan. Any identified disturbances in the landfill cap shall be repaired.</p>	Landfill (SWMU-5)

<u>Surface and Subsurface IC Review and Assessment Questions:</u>	<u>Yes</u>	<u>No</u>	<u>Notes</u>
• Is the facility being used for residential purposes?		X	
• Have there been recent construction or earth-moving activities or future plans for such?		X	

<u>Engineered Cap or Cover Review and Assessment Questions:</u>	<u>Yes</u>	<u>No</u>	<u>Notes</u>
• Have vegetative landfill caps (SWMU-5) been properly maintained?			Engineer provided inspection report per UFGA requirement
• Does vegetative cover in Riparian Buffer area remain intact?	X		
• Have any repairs been necessary? (i.e. regrading, filling, root removal)		X	
• Is the leachate collection system operating and effectively preventing groundwater contamination?			NA

<u>Miscellaneous EC Review and Assessment Questions:</u>	<u>Yes</u>	<u>No</u>	<u>Notes</u>
• Is the security fence intact?	✓		Not required in remedy.
• Is the appropriate signage posted?	✓		Not required in remedy.

Additional Notes:

DEQ will follow up with owner regarding contact with County for potential development and information regarding what's "in place" in residential restriction area.
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<u>IC Review and Assessment Questions:</u>	<u>Yes</u>	<u>No</u>	<u>Notes</u>
• Have the ICs specified in the remedy been fully implemented? Implementation mechanism in place?	X		Corrective Action Permit Modification 3/30/2015 to incorporate remedy. UECA recorded Greenville Circuit Court, 9/24/2015, thus Permit allowed to expire on 10/26/2015.
• Do the ICs provide control for the entire extent of contamination (entire site or a specific portion)?	X		
• Are the ICs eliminating or reducing exposure of all potential receptors to known contamination?	X		
• Are the ICs effective and reliable for the activities (current and future) at the property to which the controls are applied?	X		
• Have the risk of potential pathway exposures addressed under Corrective Action changed based on updated screening levels and new technologies?		X	
• Are modifications to the IC implementation mechanism needed? (i.e. UECA Covenant, Permit or Order)	X		
• Are there plans to develop or sell the property?		X	No current offers Interest in development by owner.
• Have all reporting requirements been met?	X		
<u>Groundwater Remedy Review and Assessment Questions:</u>	<u>Yes</u>	<u>No</u>	<u>Notes</u>
• For wells where groundwater monitoring is no longer required, have the wells be decommissioned?	X		Well Abandonment report provided 9/2/2015

- Discussed cap inspection / cover maintenance requirements associated w/ VECA and future owner vs. tenant responsibility.
- Discussed ideal redevelopment opportunities.
- Owner looking to develop and bring income rather than sell.
- No success with potential offers to lease, etc.
- Property was purchased at auction, unaware of liabilities at purchase.

PLAT OF SURVEY FOR
CLOSED HAZARDOUS
WASTE LANDFILL
EMPORIA FOUNDRY, INC.

CITY OF EMPORIA, VIRGINIA
SCALE 1" = 80'
OCTOBER 7, 2014
LEGAL REF. : D.B. 85 PG. 299
D.B. 187 PG. 46
D.B. 96 PG. 340
D.B. 134 PG. 81
PLAT REF. : P.B. 7 PG. 56
P.B. 7 PG. 33
P.B. 3 PG. 8

PORTION OF TAX MAP SEC. 144-((3))-1B
& 144-((A))-4

Point	Northing	Easting
GEO MON	3416719.160	11761483.100

NOTES :
1.) CITY APPROVAL NEEDED
BEFORE RECORDATION.
2.) THIS PLAT IS SUBJECT TO ALL EASEMENTS,
AGREEMENTS, AND RIGHT-OF-WAYS OF RECORD
PRIOR TO THE DATE OF THIS PLAT.
3.) LANDFILL OCCURS INSIDE THE FENCE LINE.



REESE STREET 40' R/W
P.C. SPIKE FD.

TIE LINE
S87°34'02"W 948.97'

TIE LINE
S81°27'00"W 292.44'

NORFOLK, FRANKLIN & DANVILLE RAILROAD
100' R/W

3.82 ACRES
LANDFILL

Course	Bearing	Distance
L1	N 15°36'17" E	275.62'
L2	N 27°21'59" E	128.90'
L3	N 22°22'41" W	41.26'
L4	N 53°50'57" E	106.50'
L5	N 77°31'48" E	59.30'
L6	S 61°22'57" E	133.21'
L7	S 38°59'54" E	28.81'
L8	S 84°37'25" E	81.89'
L9	S 63°13'56" E	100.28'
L10	S 13°14'33" E	57.52'
L11	S 02°25'21" E	10.86'
L12	S 12°37'40" W	39.34'
L13	S 29°43'09" W	59.65'
L14	S 51°22'47" W	10.64'
L15	S 66°09'41" W	138.71'
L16	S 66°49'29" W	178.24'
L17	N 25°07'31" W	11.91'
L18	S 66°24'19" W	129.47'
L19	S 78°50'08" W	122.74'

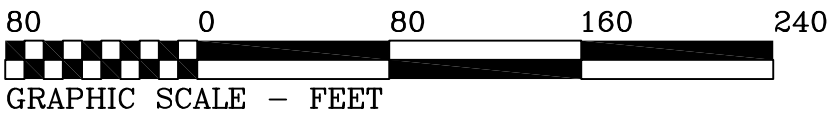
Point	Northing	Easting
103	3414180.717	11767614.659
104	3414221.756	11767738.366
105	3414232.541	11767733.308
106	3414291.902	11767902.224
108	3414444.804	11768075.591
109	3414156.952	11767494.245
110	3414422.477	11767568.387
111	3414536.892	11767627.639
112	3414575.041	11767611.933
113	3414637.865	11767697.926
114	3414650.670	11767755.829
115	3414586.869	11767872.763
116	3414564.478	11767890.893
117	3414556.806	11767972.420
118	3414511.640	11768061.956
119	3414455.652	11768075.132
120	3414406.415	11768066.991
121	3414354.607	11768037.417
122	3414347.964	11768029.102

FLOOD NOTE : ZONED X - Areas determined to
be outside the 0.2% annual chance floodplain.

COMMUNITY-PANEL NUMBER : 510047 0158 C
EFFECTIVE DATE : JULY 7, 2009

" LEGEND "

● --- REBAR SET
⊗ --- REBAR FOUND
IPF --- IRON PIPE FOUND
R/W --- RIGHT OF WAY
C --- CENTERLINE
LP --- LIGHT POLE
E --- OVERHEAD LIGHT LINE
T.M.S. - TAX MAP SECTION



I HEREBY CERTIFY THAT THIS BOUNDARY SURVEY, TO THE BEST OF
MY KNOWLEDGE AND BELIEF IS CORRECT AND COMPLIES WITH MINIMUM
PROCEDURES AND STANDARDS ESTABLISHED BY THE VIRGINIA STATE
BOARD OF ARCHITECTS, PROFESSIONAL ENGINEERS, LAND SURVEYORS,
AND CERTIFIED LANDSCAPE ARCHITECTS.

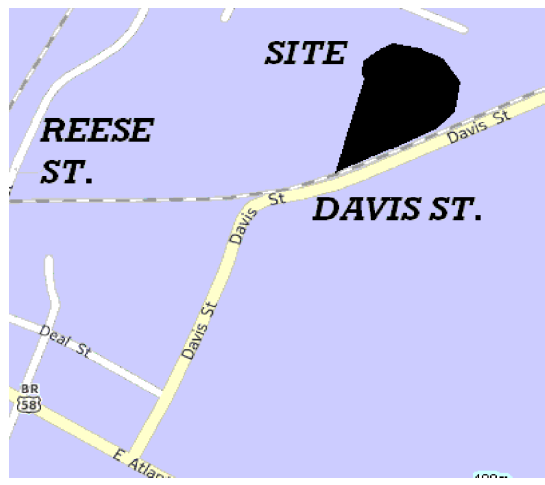
JAMES T. BRADLEY, L. S. 001995

COPY

JAMES T. BRADLEY, L. S.
3389 LAKE GASTON DRIVE
GASBURG, VA. 23857
434-577-9650

FILE : FOUN1014-B

VICINITY MAP - NO SCALE



NOTES :
1.) CITY APPROVAL NEEDED
BEFORE RECORDATION.

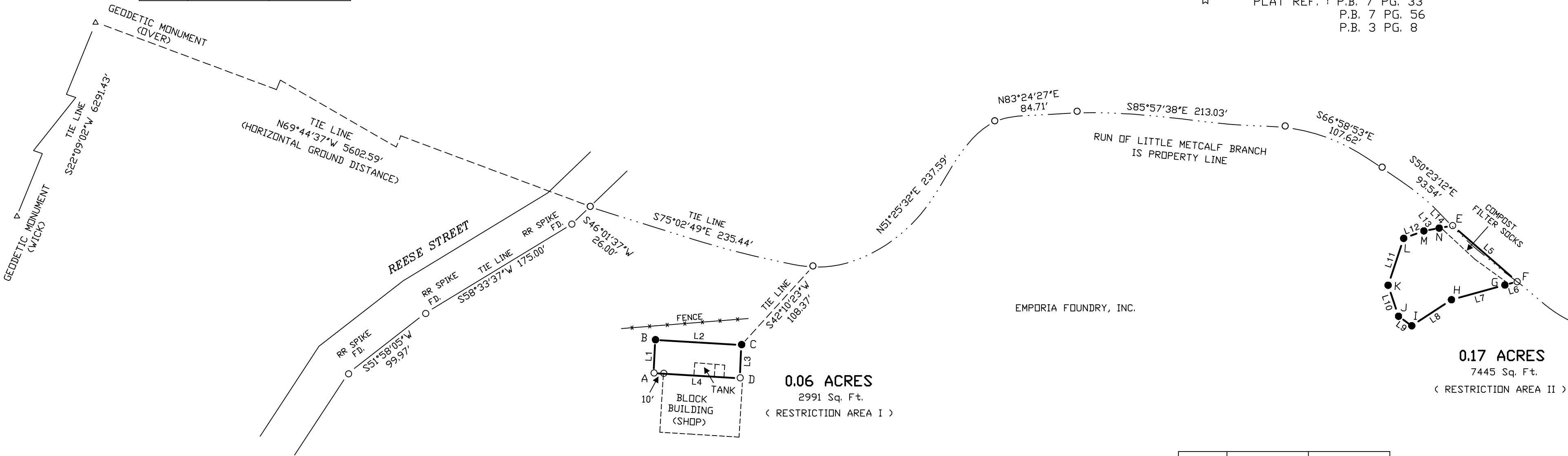
2.) THIS PLAT IS SUBJECT TO ALL EASEMENTS,
AGREEMENTS, AND RIGHT-OF-WAYS OF RECORD
PRIOR TO THE DATE OF THIS PLAT.

PLAT REVISED : NOVEMBER 20, 2014
TO SHOW RESTRICTION AREAS I AND II.
RESTRICTION AREA I IS A PORTION
OF TAX MAP SEC. 144-((3))-1A
RESTRICTION AREA II IS A PORTION
OF TAX MAP SEC. 144-((3))-1B

PLAT FOR
EMPORIA FOUNDRY, INC.
RESTRICTION AREAS
CITY OF EMPORIA, VIRGINIA
SCALE 1" = 80'
JUNE 17 , 2014
LEGAL REF. : D.B. 96 PG. 340
D.B. 87 PG. 46
PLAT REF. : P.B. 7 PG. 33
P.B. 7 PG. 56
P.B. 3 PG. 8



Point	Northing	Easting
GEO MON	3416719.160	11761483.100



Point	Northing	Easting
A	3414609.411	11766804.408
B	3414643.326	11766805.919
C	3414638.371	11766893.903
D	3414604.463	11766892.393

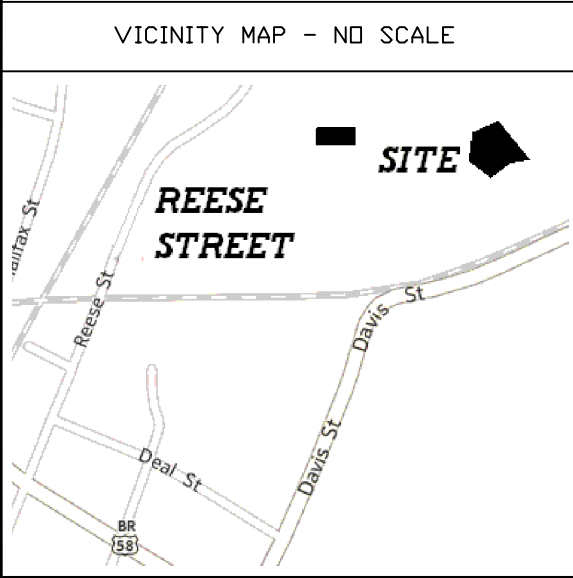
Course	Bearing	Distance
L1	N 02°33'00" E	33.95'
L2	S 86°46'37" E	88.12'
L3	S 02°33'00" W	33.94'
L4	N 86°46'52" W	88.12'

Point	Northing	Easting
E	3414759.821	11767620.170
F	3414702.607	11767686.083
G	3414699.164	11767673.548
H	3414684.173	11767618.966
I	3414657.609	11767578.366
J	3414667.309	11767564.897
K	3414698.950	11767554.238
L	3414746.803	11767570.161
M	3414754.427	11767590.769
N	3414757.295	11767606.400

Course	Bearing	Distance
L5	S 49°02'28" E	87.28'
L6	S 74°38'32" W	13.00'
L7	S 74°38'32" W	56.60'
L8	S 56°48'15" W	48.52'
L9	N 54°14'26" W	16.60'
L10	N 18°37'06" W	33.39'
L11	N 18°24'17" E	50.43'
L12	N 69°41'51" E	21.97'
L13	N 79°36'13" E	15.89'
L14	N 79°36'13" E	14.00'

FLOOD NOTE : ZONED X - Areas determined to
be outside the 0.2% annual chance floodplain.

COMMUNITY-PANEL NUMBER : 510047 0158 C
EFFECTIVE DATE : JULY 7, 2009

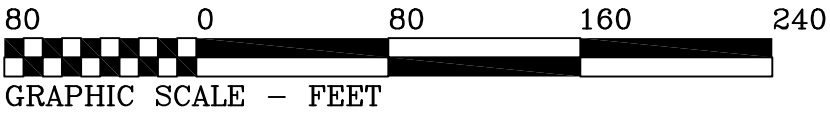


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FILE : FOUND614-A