



REPORT DATE: December 19, 2023
MID-ATLANTIC PROJECT #: R3950.00

NESHAP ASBESTOS SURVEY REPORT

PENDER STREET PARK

300 Pender Street South, Wilson, Wilson County, North Carolina

ENGINEERING & ENVIRONMENTAL SOLUTIONS

PREPARED FOR:

City of Wilson
PO Box 10
Wilson, North Carolina 27894

PREPARED BY:

Mid-Atlantic Associates, Inc.
409 Rogers View Court
Raleigh, North Carolina 27610

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1.0 INTRODUCTION

Mid-Atlantic Associates, Inc. (Mid-Atlantic) conducted a National Emissions Standards for Hazardous Air Pollutants (NESHAP, Environmental Protection Agency (EPA) regulation 40 CFR 61, Subpart M) asbestos survey of a single-story commercial structure located at 300 Pender Street South in Wilson, Wilson County, North Carolina (the "Subject Property"). A Site Map illustrating the location of the Subject Property is provided as [Drawing 1](#). The objective of our scope of services was to identify the potential presence of asbestos-containing materials (ACMs) at the Subject Property. This asbestos survey was completed as part of future planned demolition activities at the Subject Property.

2.0 DEFINITIONS

2.1 Asbestos-Containing Material

Friable: Friable asbestos-containing material (ACM) is defined by the Asbestos NESHAP as any material containing more than one percent (>1%) asbestos as determined using Polarized Light Microscopy (PLM) analysis or equivalent NESHAP approved methods, that, when dry, can be crumbled, pulverized, or reduced to powder by hand pressure.

Non-friable: Non-friable ACM is any material containing >1% asbestos as determined using PLM analysis or equivalent NESHAP approved methods, that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure. EPA also defines two categories of non-friable ACM, Category I and Category II. Category I non-friable ACM includes packings, gaskets, resilient floor coverings, and asphalt roofing products. Category II includes any material other than those included in Category I which do not meet the definition of friable.

Regulated Asbestos-Containing Material: Regulated Asbestos-Containing Material (RACM) is categorized as friable ACM, Category I non-friable ACM that has become friable, Category I non-friable ACM that will be or has been subjected to sanding, grinding, cutting or abrading, or Category II non-friable ACM that has a high probability of becoming or has become crumbled, pulverized, or reduced to powder by the forces expected to act on the material in the course of demolition or renovation operations.

Trace ($\leq 1\%$) Asbestos Containing Material: Materials that contain $\leq 1\%$ asbestos are not considered "asbestos-containing material" under the NESHAP standard; however, materials containing $\leq 1\%$ asbestos are covered by the Occupational Safety and Health Administration's (OSHA's) asbestos construction standard (29 CFR 1926.1101).

PLM Point-Count: When a friable or non-friable asbestos-containing material is estimated to contain less than 10 percent asbestos by a method other than point counting, such as visual estimation, the EPA recommends that the determination be repeated using point

counting techniques with PLM. Where binders or like materials are present, appropriate sample preparation methods such as gravimetric reduction must be followed to eliminate the effects of interfering substances.

Non-friable Organically Bound: Five bulk materials have been categorized by the EPA that are very difficult to analyze by Polarized Light Microscopy (PLM). These materials are dominantly non-friable and fall into the following categories: Vinyl material (i.e. floor tiles, sheetings), viscous matrix products (i.e. caulks/sealants, adhesives, coatings, joint compound/spackle), cementitious material (i.e. pipes, sheetings), asphaltic roofing materials (i.e. shingles, roof rollings), and miscellaneous products (i.e. frictions plates, gaskets). The EPA recommends that these materials be analyzed by Transmission Electron Microscopy (TEM) when PLM results are inconclusive (EPA600/R-93/116, Appendix D).

2.2 Asbestos Survey

Asbestos Survey: An asbestos survey requires destructive sampling to determine the presence, location, condition, and estimated quantity of ACM in or on a structure, building, or facility for the purpose of general hazard awareness, due diligence, future renovation, or future demolition activities. An asbestos survey is performed when there is no information, or insufficient information, as to the existence of ACM in or on a structure, building, or facility. An asbestos survey satisfies the EPA NESHAP requirements for renovation or demolition to “thoroughly inspect the affected facility” or the requirements of governmental agencies for issuance of a building demolition permit. An asbestos survey is comprehensive and satisfies the NESHAP requirements for complete building demolition activities unless otherwise noted as a "limited asbestos survey".

2.3 Limited Asbestos Survey

Limited Asbestos Survey: A limited asbestos survey requires destructive sampling to determine the presence, location, condition, and estimated quantity of ACM in or on a structure, building, facility, or remnant structure for the purpose of general hazard awareness, due diligence, or future renovation activities. A limited asbestos survey is determined when limitations are encountered in or on a structure, building, facility, or remnant structure that may prevent the identification of ACM in or on a structure, building, facility, or remnant structure. A limited asbestos survey is not comprehensive and may not satisfy the NESHAP requirements for complete building demolition activities; however, a limited asbestos survey may satisfy the requirements of governmental agencies for issuance of a building permit for specific building renovation activities.

3.0 DESCRIPTION OF BUILDING

One approximately 1,800-square foot single-story commercial structure was located on the Subject Property during this assessment. The commercial structure was vacant during our survey and is utilized by the City of Wilson for the storage of common recreational games/tools.

The commercial structure consisted of vinyl siding over a wood frame construction with a sloped asphalt shingle over felt paper roof. Interior finishes generally consisted of plywood walls, drop ceiling tiles, and concrete floors with areas finished with floor tile.

4.0 FIELD ACTIVITIES

The field work for this NESHAP asbestos survey was conducted by Mr. Colton Gotshall (North Carolina Asbestos Building Inspector Accreditation No. 13317) on December 12, 2023. The survey was conducted in general accordance with the sample collection protocols established in EPA regulation 40 CFR 763, Asbestos Hazard Emergency Response Act (AHERA). A summary of survey activities is provided below.

4.1 Visual Assessment

Mid-Atlantic's survey activities began with a visual observation of the commercial structure to identify apparent homogeneous areas (HAs) of suspect ACM. An HA consists of building materials that appear similar throughout in terms of color, texture, use, and date of application. This asbestos survey was performed on visually accessible areas on the interior, exterior, and roof of the structure. Building materials identified as concrete, glass, wood, masonry, metal or rubber are not considered suspect ACM.

4.2 Physical Assessment

A physical assessment of each homogeneous area of suspect ACM was conducted to investigate the friability and condition of the materials at the time of this asbestos survey. Friability was assessed by physically touching suspect materials. For more detailed information on friable and non-friable building materials, please refer to [Section 2.0 - Definitions](#) of this report.

4.3 Sample Collection

Based on results of the visual observation, bulk samples of suspect ACM were collected in general accordance with AHERA protocols. Random samples of suspect materials were collected in each homogeneous area. After collection, samples were placed in sealable containers and labeled with unique sample numbers using an indelible marker. Sample locations were then recorded in the field in order to identify the locations of

ACM once the laboratory results were generated. During this asbestos assessment, we collected 14 bulk samples of suspect ACM from 7 HAs. The Asbestos Survey Form and Analytical Results are included as [Appendix A](#).

4.4 Sample Analysis

Suspect ACM samples were submitted under chain of custody control to the Eurofins CEI Labs, Inc. (ECEI) laboratory in Cary, North Carolina for analysis. The suspect ACM samples were analyzed by Polarized Light Microscopy (PLM) with dispersion staining techniques per EPA methodology (40 CFR 763, Subpart F). The percentage of asbestos, where applicable, was determined by microscopical visual estimation. ECEI is accredited under the National Voluntary Laboratory Accreditation Program (NVLAP Accreditation No. 101768-0).

A comprehensive list of building materials sampled, locations, friability, and estimated quantities can be found in the Asbestos Survey Form and Analytical Results included as [Appendix A](#). A copy of the ECEI analytical report is included in [Appendix B](#). General photographs of the Subject Property are included in [Appendix C](#). A copy of the North Carolina Asbestos Inspector's Certification is included in [Appendix D](#).

5.0 FINDINGS

Laboratory analysis of the samples collected during this assessment did not identify asbestos-containing materials.

6.0 REGULATORY OVERVIEW

The asbestos NESHAP regulates asbestos fiber emissions (prohibits the release of asbestos fibers to the atmosphere during renovation or demolition activities) and asbestos waste disposal practices. NESHAP requires the identification and classification of existing building materials prior to demolition or renovation activity. The EPA recommends that all Regulated ACM (RACM) be removed by a certified asbestos contractor prior to any renovation or demolition activities that may impact the material. In the absence of planned renovation/demolition activities, the EPA recommends that ACM be managed in place whenever asbestos is identified in a building. Any damaged ACM should be removed, repaired, encapsulated, or enclosed. ACM that is not damaged may be managed in place in accordance with a written Operations and Maintenance Program.

In North Carolina, asbestos activities are regulated by the North Carolina Health Hazards Control Unit (HHCU). The HHCU requires that any asbestos-related activity conducted in a public building be performed by personnel licensed by the State of North Carolina. According to the guidelines, RACM must be removed prior to conducting any renovation or demolition activities which will disturb those materials. The owner or operator must provide the HHCU with written notification of planned removal activities at least ten working days prior to the commencement of asbestos abatement activities. Removal of

RACM must be conducted by a State of North Carolina licensed asbestos abatement contractor. In addition, third party air monitoring must be performed following the abatement.

The OSHA Asbestos standard for construction (29 CFR 1926.1101) regulates workplace exposure to asbestos. The OSHA standard requires that employee exposure to airborne asbestos fibers is maintained below 0.1 asbestos fibers per cubic centimeter of air (0.1 f/cc). The OSHA standard classifies construction and maintenance activities which could disturb ACM and specifies work practices and precautions which employers must follow when engaging in each class of regulated work. States which administer their own Federally approved OSHA programs may require additional precautions.

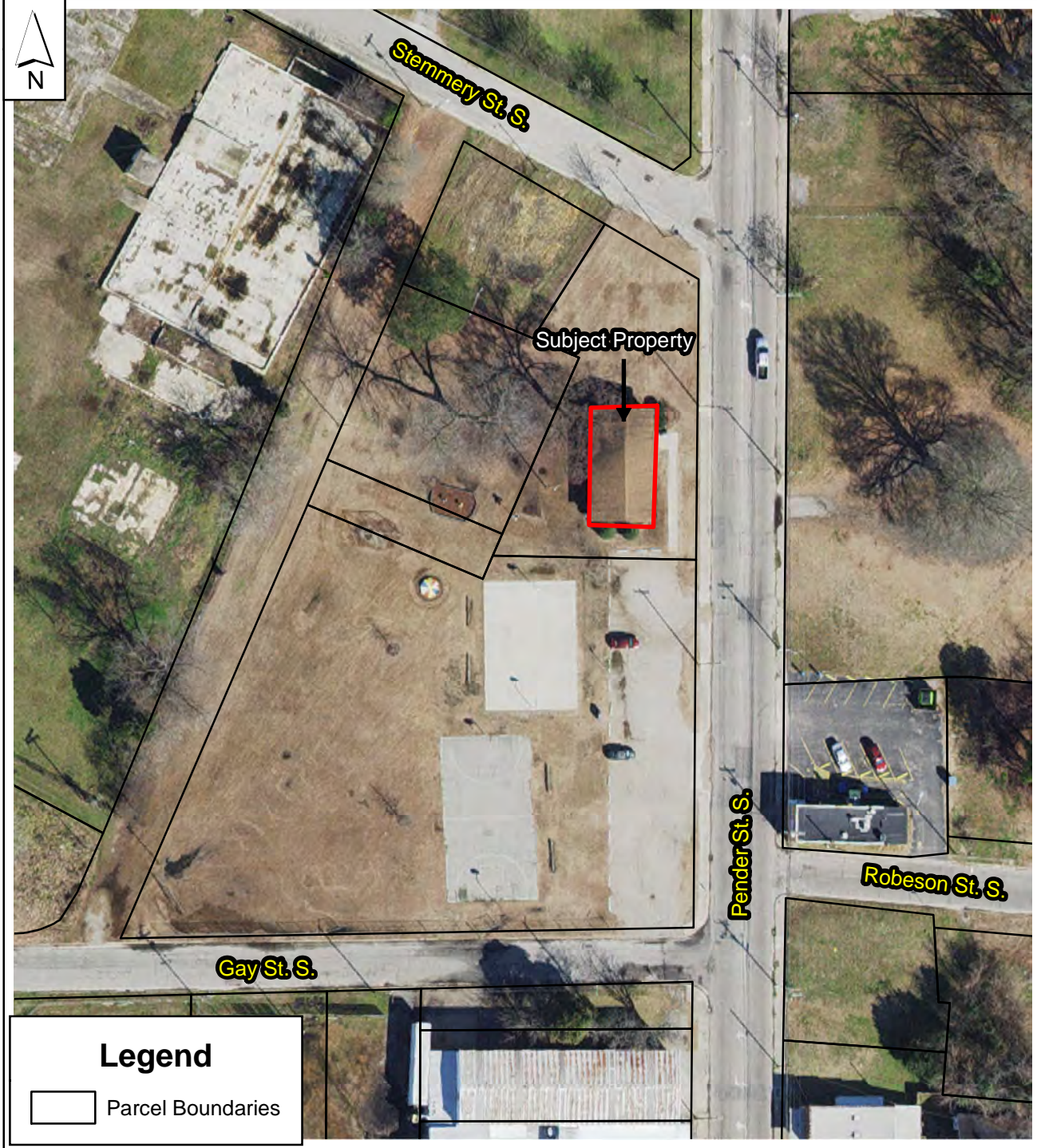
7.0 LIMITATIONS

The potential exists for additional suspect ACM to be exposed during demolition and/or renovation activities. Such materials should be sampled and analyzed for asbestos content prior to any renovation and/or demolition activities that could impact these materials.

This NESHAP asbestos survey was conducted in a manner consistent with the level of care and skill ordinarily exercised by members of the profession currently practicing under similar conditions in the same locale. The results, findings, and recommendations expressed in this report are based on conditions observed during our survey. The information contained in this report is relevant to the date on which this survey was performed and should not be relied upon to represent conditions at a later date. This report has been prepared on behalf of and exclusively for use by the City of Wilson for specific application to their project. This report is not a bidding document.

Contractors or consultants reviewing this report must draw their own conclusions regarding further investigation or any remediation deemed necessary. Mid-Atlantic does not warrant the work of regulatory agencies, laboratories or other third parties supplying information which may have been used in the preparation of this report. No warranty, expressed or implied, is made.

DRAWING



Legend


Parcel Boundaries

REFERENCES:

1. 2021 AERIAL IMAGERY FROM NC ONEMAP
2. COUNTY INFORMATION FROM WILSON COUNTY GIS
3. MID-ATLANTIC FIELD NOTES

SCALE: 1:1,000



	SITE MAP PENDER STREET PARK 300 PENDER STREET SOUTH WILSON, NORTH CAROLINA		DRAWN BY: CAG	DATE: DECEMBER 2023
			DRAFT CHECK:	JOB NO: R3950.00
			ENG. CHECK:	GIS NO: 04G-R3950.00-1
			APPROVAL: DMM	DWG NO: 1

APPENDIX A - ASBESTOS SURVEY FORM AND ANALYTICAL RESULTS

ASBESTOS SURVEY FORMS AND ANALYTICAL RESULTS

Inspector name: Colton Gotshall
 License Number: (NC) 13317
 Survey Date: 12/12/2023

Project Name: Pender Street Park
 Project Number: R3950.00
 Location: 300 Pender Street South
Wilson, North Carolina

Sample Number	Homogeneous Material	Sample Location	Condition	Quantity *	Friability	Results
1-1	2' x 4' Pinhole & Fissure Ceiling Tile	Main Area	Good	1,800 ft ²	Non-Friable	None Detected
1-2		Main Area				None Detected
2-1	4" Black Covebase	Main Area	Good	220 ft	Non-Friable	None Detected
2-2		Main Area				None Detected
3-1	12" x 12" Red Floor Tile over Tan Mastic	Main Area	Good	1,800 ft ²	Non-Friable	None Detected
3-2		Main Area				None Detected
4-1	12" x 12" Black Floor Tile over White Mastic	Main Area	Good	10 ft ²	Non-Friable	None Detected
4-2		Main Area				None Detected
5-1	Tan HVAC Mastic	North Exterior	Good	20 ft	Non-Friable	None Detected
5-2		North Exterior				None Detected
6-1	White Exterior Window Frame Caulk	West Exterior	Good	18 ft (2 Windows)	Non-Friable	None Detected
6-2		West Exterior				None Detected
7-1	Black Shingle over Black Felt Paper	Roof	Good	1,800 ft ²	Non-Friable	None Detected
7-2		Roof				None Detected

Condition: Based on a percentage of the building material remaining intact at time of survey.

Friability: Classification of building material's ability to become broken, crushed, or pulverized with hand pressure at time of survey.

* Quantities are estimated.

NOTES:

APPENDIX B - LABORATORY ANALYTICAL RESULTS

December 18, 2023

Mid-Atlantic Associates, Inc.
409 Rogers View Court
Raleigh, NC 27610

CLIENT PROJECT: Pender Street Park, R3950.00
CEI LAB CODE: B2325720

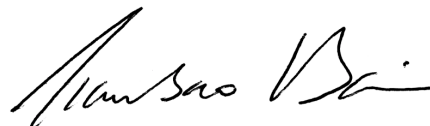
Dear Customer:

Enclosed are asbestos analysis results for PLM Bulk samples received at our laboratory on December 13, 2023. The samples were analyzed for asbestos using polarizing light microscopy (PLM) per the EPA 600 Method.

Sample results containing >1% asbestos are considered asbestos-containing materials (ACMs) per EPA regulatory requirements. The detection limit for the EPA 600 Method is <1% asbestos by weight as determined by visual estimation.

Thank you for your business and we look forward to continuing good relations.

Kind Regards,



Tianbao Bai, Ph.D., CIH
Laboratory Director

ASBESTOS ANALYTICAL REPORT
By: Polarized Light Microscopy

Prepared for

Mid-Atlantic Associates, Inc.

CLIENT PROJECT: Pender Street Park, R3950.00

LAB CODE: B2325720

TEST METHOD: EPA 600 / R93 / 116 and EPA 600 / M4-82 / 020

REPORT DATE: 12/18/23

TOTAL SAMPLES ANALYZED: 14

SAMPLES >1% ASBESTOS:



CEI

Asbestos Report Summary

By: POLARIZING LIGHT MICROSCOPY

PROJECT: Pender Street Park, R3950.00

LAB CODE: B2325720

METHOD: EPA 600 / R93 / 116 and EPA 600 / M4-82 / 020

Client ID	Layer	Lab ID	Color	Sample Description	ASBESTOS %
1-1		B2325720.01	White	Ceiling Tile	None Detected
1-2		B2325720.02	White	Ceiling Tile	None Detected
2-1		B2325720.03A	Black	Covebase	None Detected
		B2325720.03B	Brown	Mastic	None Detected
2-2		B2325720.04A	Black	Covebase	None Detected
		B2325720.04B	Brown	Mastic	None Detected
3-1		B2325720.05A	Red,Orange	Floor Tile	None Detected
		B2325720.05B	Tan	Mastic	None Detected
3-2		B2325720.06A	Red,Orange	Floor Tile	None Detected
		B2325720.06B	Tan	Mastic	None Detected
4-1		B2325720.07A	Black	Floor Tile	None Detected
		B2325720.07B	White	Mastic	None Detected
4-2		B2325720.08A	Black	Floor Tile	None Detected
		B2325720.08B	White,Yellow	Mastic	None Detected
5-1		B2325720.09	Tan	HVAC Mastic	None Detected
5-2		B2325720.10	Tan	HVAC Mastic	None Detected
6-1		B2325720.11	White	Exterior Window Frame Caulk	None Detected
6-2		B2325720.12	White	Exterior Window Frame Caulk	None Detected
7-1	Layer 1	B2325720.13	Black,Brown	Shingle	None Detected
	Layer 2	B2325720.13	Black	Felt Paper	None Detected
7-2	Layer 1	B2325720.14	Black,Brown	Shingle	None Detected
	Layer 2	B2325720.14	Black	Felt Paper	None Detected

ASBESTOS BULK ANALYSIS

By: POLARIZING LIGHT MICROSCOPY

Client: Mid-Atlantic Associates, Inc.
 409 Rogers View Court
 Raleigh, NC 27610

Lab Code: B2325720
Date Received: 12-13-23
Date Analyzed: 12-18-23
Date Reported: 12-18-23

Project: Pender Street Park, R3950.00

ASBESTOS BULK PLM, EPA 600 METHOD

Client ID Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS				ASBESTOS %
			Fibrous		Non-Fibrous		
1-1 B2325720.01	Ceiling Tile	Heterogeneous	60%	Cellulose	5%	Paint	None Detected
		White	20%	Fiberglass	15%	Perlite	
		Fibrous Loosely Bound					
1-2 B2325720.02	Ceiling Tile	Heterogeneous	60%	Cellulose	5%	Paint	None Detected
		White	20%	Fiberglass	15%	Perlite	
		Fibrous Loosely Bound					
2-1 B2325720.03A	Covebase	Homogeneous			90%	Vinyl	None Detected
		Black			10%	Binder	
		Non-fibrous Bound					
B2325720.03B	Mastic	Homogeneous	<1%	Cellulose	100%	Mastic	None Detected
		Brown Non-fibrous Bound					
2-2 B2325720.04A	Covebase	Homogeneous			90%	Vinyl	None Detected
		Black			10%	Binder	
		Non-fibrous Bound					
B2325720.04B	Mastic	Homogeneous	<1%	Cellulose	100%	Mastic	None Detected
		Brown Non-fibrous Bound					
3-1 B2325720.05A	Floor Tile	Homogeneous			100%	Vinyl	None Detected
		Red,Orange					
		Non-fibrous Bound					

ASBESTOS BULK ANALYSIS

By: POLARIZING LIGHT MICROSCOPY

Client: Mid-Atlantic Associates, Inc.
 409 Rogers View Court
 Raleigh, NC 27610

Lab Code: B2325720
Date Received: 12-13-23
Date Analyzed: 12-18-23
Date Reported: 12-18-23

Project: Pender Street Park, R3950.00

ASBESTOS BULK PLM, EPA 600 METHOD

Client ID Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS		ASBESTOS %
			Fibrous	Non-Fibrous	
B2325720.05B	Mastic	Homogeneous Tan Non-fibrous Bound	100%	Mastic	None Detected
3-2 B2325720.06A	Floor Tile	Homogeneous Red,Orange Non-fibrous Bound	100%	Vinyl	None Detected
B2325720.06B	Mastic	Homogeneous Tan Non-fibrous Bound	100%	Mastic	None Detected
4-1 B2325720.07A	Floor Tile	Homogeneous Black Non-fibrous Bound	100%	Vinyl	None Detected
B2325720.07B	Mastic	Homogeneous White Non-fibrous Bound	100%	Mastic	None Detected
4-2 B2325720.08A	Floor Tile	Homogeneous Black Non-fibrous Bound	100%	Vinyl	None Detected
B2325720.08B	Mastic	Heterogeneous White, Yellow Non-fibrous Bound	100%	Mastic	None Detected

Unable to separate white and yellow mastics for analysis.

ASBESTOS BULK ANALYSIS

By: POLARIZING LIGHT MICROSCOPY

Client: Mid-Atlantic Associates, Inc.
 409 Rogers View Court
 Raleigh, NC 27610

Lab Code: B2325720
Date Received: 12-13-23
Date Analyzed: 12-18-23
Date Reported: 12-18-23

Project: Pender Street Park, R3950.00

ASBESTOS BULK PLM, EPA 600 METHOD

Client ID Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS				ASBESTOS %
			Fibrous		Non-Fibrous		
5-1 B2325720.09	HVAC Mastic	Homogeneous Tan Non-fibrous Bound	100%		Mastic		None Detected
5-2 B2325720.10	HVAC Mastic	Homogeneous Tan Non-fibrous Bound	100%		Mastic		None Detected
6-1 B2325720.11	Exterior Window Frame Caulk	Homogeneous White Non-fibrous Bound	98%		Caulk	2%	None Detected
6-2 B2325720.12	Exterior Window Frame Caulk	Homogeneous White Non-fibrous Bound	98%		Caulk	2%	None Detected
7-1 Layer 1 B2325720.13	Shingle	Heterogeneous Black,Brown Fibrous Bound	20%	Fiberglass	55%	Tar Gravel	None Detected
Layer 2 B2325720.13	Felt Paper	Homogeneous Black Fibrous Bound	70%	Cellulose	30%	Tar	None Detected
7-2 Layer 1 B2325720.14	Shingle	Heterogeneous Black,Brown Fibrous Bound	20%	Fiberglass	55%	Tar Gravel	None Detected

ASBESTOS BULK ANALYSIS

By: POLARIZING LIGHT MICROSCOPY

Client: Mid-Atlantic Associates, Inc.
 409 Rogers View Court
 Raleigh, NC 27610

Lab Code: B2325720
Date Received: 12-13-23
Date Analyzed: 12-18-23
Date Reported: 12-18-23

Project: Pender Street Park, R3950.00

ASBESTOS BULK PLM, EPA 600 METHOD

Client ID	Lab	Lab	NON-ASBESTOS COMPONENTS				ASBESTOS
Lab ID	Description	Attributes	Fibrous	Non-Fibrous		%	
Layer 2 B2325720.14	Felt Paper	Homogeneous Black Fibrous Bound	70%	Cellulose	30%	Tar	None Detected

LEGEND: Non-Anth = Non-Asbestiform Anthophyllite
Non-Trem = Non-Asbestiform Tremolite
Calc Carb = Calcium Carbonate

METHOD: EPA 600 / R93 / 116 and EPA 600 / M4-82 / 020

REPORTING LIMIT: <1% by visual estimation

REPORTING LIMIT FOR POINT COUNTS: 0.25% by 400 Points or 0.1% by 1,000 Points

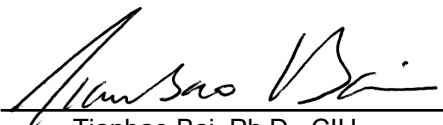
REGULATORY LIMIT: >1% by weight

Due to the limitations of the EPA 600 method, nonfriable organically bound materials (NOBs) such as vinyl floor tiles can be difficult to analyze via polarized light microscopy (PLM). EPA recommends that all NOBs analyzed by PLM, and found not to contain asbestos, be further analyzed by Transmission Electron Microscopy (TEM). Please note that PLM analysis of dust and soil samples for asbestos is not covered under NVLAP accreditation. *Estimated measurement of uncertainty is available on request.*

This report relates only to the samples tested or analyzed and may not be reproduced, except in full, without written approval by Eurofins CEI. Eurofins CEI makes no warranty representation regarding the accuracy of client submitted information in preparing and presenting analytical results. Interpretation of the analytical results is the sole responsibility of the client. Samples were received in acceptable condition unless otherwise noted. This report may not be used by the client to claim product endorsement by NVLAP or any other agency of the U.S. Government.

Information provided by customer includes customer sample ID and sample description.

ANALYST: 
Samantha Card

APPROVED BY: 
Tianbao Bai, Ph.D., CIH
Laboratory Director



APPENDIX C - PHOTOGRAPHS



General view of the commercial structure on the Subject Property



General view of the interior of the commercial structure on the Subject Property

APPENDIX D - ASBESTOS INSPECTOR CERTIFICATION

**North Carolina
Asbestos Accreditation**



Colton A Gotshall
4045 Needham Rd
Bailey, NC 27807

138941

EXPIRATION			
01-31-2024			
DOB	SEX	HT	WT
03-31-1995	M	6'0"	200
CLASS	#		EXP
INSPECTOR	13317		01-24