AIRD BERLIS

Eileen P. K. Costello
Direct: 416.865.4740
E-mail: ecostello@airdberlis.com

December 11, 2020

Our File No.: 145227

Email: clerks@guelph.ca

City Clerk's Office
City of Guelph
1 Carden Street
Guelph, ON
N1H 3A1

Attention: Mayor and Members of Council

Dear Sir/Madam:

Re: 264 Crawley Road – Notice of Intention to Designate under Section 29, Part IV, of the Ontario Heritage Act, 2020-227

Please be advised that Aird & Berlis LLP acts on behalf of Industrial Equities Guelph Corporation, the owner of the property at 264 Crawley Road (the "subject property"). Our client has owned the subject property for over 15 years and has responsibly maintained, insured, managed and provided security to the property since that time at great cost, even absent a designating by-law requiring it to do so. Due to the non-availability of sewage services, the home has been unoccupied for over 12 years. On behalf of our clients, we object to the proposed designation of the subject property pursuant to Part IV of the Ontario Heritage Act ("OHA")

We appreciate the opportunity to provide correspondence in advance of Council's consideration of this item on December 14th, 2020. This is particularly important as the staff report on this matter has not included nor responded to significant issues which were raised at the meeting of Heritage Guelph when this staff recommendation was considered on November 9, 2020. These issues, which in our respectful submission militate against the designation of this property, are outlined below.

The Subject Property Cannot be Serviced

The subject property is not currently serviced by the City of Guelph and introducing the required adequate municipal servicing to support permitted industrial uses is not feasible. This matter was raised at the meeting of Heritage Guelph and City staff did not address the issue, either at that meeting or in the report to Council.

Accordingly, our client retained an independent consultant to consider the issue of servicing. The report prepared by IBI Group, dated November 23, 2020, concluded as follows:

> ***Given our analysis, we conclude that there is no municipal sanitary infrastructure within proximity to the site that could be feasibly extended to service 264 Crawley Road, and that according to City policy, a private septic system cannot be utilized to service the industrial zoned property.***

Despite our client's good faith and sustained attempts, the identification of a sustainable adaptive reuse for the structure on the property has proven elusive and continues to do so. It is important to note that the existing Industrial B1 Zoning is restrictive and that the City's own rules require full municipal services. As determined in the IBI Group report, there is no municipal sanitary infrastructure within proximity to the site that could be feasibly extended to service 264 Crawley Road, and that according to City policy, a private septic system cannot be utilized to service the industrial zoned property.

The lack of servicing has resulted in the property remaining vacant for 12 years and there is no reasonable prospect of it being occupied for non-residential purposes.

Additionally, and as the photographs attached to this correspondence demonstrate, the subject property is not large (approximately ½ acre) and the area around the farmhouse is limited; accordingly, even if sewer services could be made available, there is insufficient room to accommodate required parking and loading facilities as would be required for any permitted industrial use. The existing farmhouse structure is not conducive to facilitate an industrial use and any expansion of the existing farmhouse to facilitate such use would not be consistent with the designation proposed by staff as substantial alterations would be required to heritage attributes on the farmhouse.

The Context of the Property was not considered Important by the City

The original approvals for the subject property contemplated (through the severance development agreement) the relocation of the farmhouse to another location. This is no longer an option as the route to move the house (through what is now the warehouse site) has been developed and the agreement has since expired.

The Heritage Committee and the City previously agreed that the house could be relocated. The more generous list of uses which had been approved for the adjacent property (i.e. a restaurant) were only applicable if the structure was moved to these adjacent lands. Given that moving the house has been approved by the City previously the current location is clearly not considered intrinsic to its value.

The Context of the Property has Irrevocably Changed

The subject property was part of a larger land holding (approximately 300 acres) that was subdivided in 2008 and which has seen the development of the area for industrial uses, in accordance with the City's in-force OP and by-laws.

The property is zoned B1 which is an industrial zone and, as can be ably seen from a site visit, the property is surrounded by an industrial warehousing facility.

As the photos attached to this correspondence ably demonstrate, the immediate context of the subject property is clearly industrial with contemporary built form and expansive parking and loading/shipping facilities necessary to support the approved warehouse use. The subject property is surrounded to the immediate north and both side yards with this use, separated only by a substantial retaining wall and fencing, neither of which are sympathetic to the cultural heritage value which may reside in the farmhouse structure.

The result of the City's approval and logical development of the adjoining business park resulted in a number of properties along Crawley Road, (now only 3) without options for sewer services which make any designation and reuse a practical impossibility.

Residential Use of the Subject Property is Not Viable

We also acknowledge that a residential use for the house on a private septic system was permitted by a prior decision of the Committee of Adjustment (Application Number A-6/08, dated January 29, 2008). However, in our respectful submission a residential use located between the Hanlon Expressway and an industrial trucking and loading area is clearly not a viable use.

Further, as part of the development of the subdivision in 2008, the existing tile bed and septic tank were removed. Any residential use would therefore require a new tile bed and septic tank installation which would be inconsistent with the City's broader objectives related to groundwater protection.

We were surprised to hear Mr. Robinson opine at the Heritage Guelph meeting that a residential use would be an appropriate use for this property. Given the lack of consideration shown by staff to this matter, which in our view is clear based on a site visit, our client retained HGC Engineering an independent noise consultant, to asses the environmental noise condition for the subject property. The conclusion reached in their report dated December 7, 2020 was:

> ***The property is impacted by both provincial highway road traffic noise and stationary (industrial) noise. Through a review of relevant noise guidelines, site observations, acoustical measurements, and modelling, it is concluded that the use of the property for residential purposes would not comply with the guidelines for separation distances between noise sensitive uses and industries, would require significant noise mitigation measures, and would still impose risks for the continued operation of the neighbouring industrial uses.***

In our view it is unreasonable to expect that a residential use of the subject property, given the servicing constraints and industrial context, would be feasible. To the extent that such a use was contemplated by staff in considering the recommendation to designate this would further militate against designation in our view.

A Part IV Designation Creates Additional Legal Obligations

In addition to the concerns noted above, it must be observed and appreciated by Members of Council that a Part IV designation of the subject property will immediately create potential legal liability and financial obligations for our client which, in our view, are unreasonable given the restrictions on an adaptive reuse. As Members of Council are aware, the City of Guelph has a Property Standards By-law with provisions specific to properties designated pursuant to Part IV of the OHA. These provisions create a higher standard of maintenance and other obligations that do not exist for owners of properties which are not designated, including exposure to fines.

While our client has maintained the property in good condition, to date this is not an obligation which can continue without end, particularly as the adaptive reuse of the structure and its use as

a residence have been frustrated by the City's own approvals of adjacent uses and the lack of sewage services make occupancy of the home in any way impossible.

This leads us to ask: is it fair and reasonable to expose property owners to the threat of legal liability and financial penalty when the property cannot be used in a sustainable manner and has remained vacant for over 12 years as a result of a lack of servicing?

Conclusion and Request

The recommendation by City staff to proceed with a Part IV designation of the subject property given the above obstacles to a reasonable adaptive reuse of the farmhouse is unreasonable in our respectful opinion. Designating a structure without any consideration to the limitations on any adaptive reuse cannot be considered good heritage planning.

For all these reasons our client respectfully requests that City Council:

1. refuse the recommendation by staff to designate the property at 264 Crawley pursuant to Part IV of the OHA; and/or

2. grant the demolition permit application filed by Industrial Equities Guelph on condition that the owner of the subject property:

    a. prepares archival plans and photographs of the farmhouse structure prior to demolition; and

    b. provides this documentation to the City of Guelph.

Finally, our client remains willing to undertake a selective demolition process of the farmhouse structure and to provide elements of the building to either the City or such individual persons as may be interested in receiving same.

,
Yours truly,

AIRD & BERLIS LLP

Eileen P.K. Costello
Partner

EPKC:lm
Encl.
c: Industrial Equities Guelph, Mark Cowie
Astrid Clos, Land Use Planner

HGC ENGINEERING

Howe Gastmeier Chapnik Limited
2000 Argentia Road, Plaza One, Suite 203
Mississauga, Ontario, Canada L5N 1P7
t: 905.826.4044

December 7, 2020

Via email: mmidgley@cowiecapital.com

Matthew Midgley
Director of Operations and Construction
Cowie Capital
161 Bay Street, Suite 3930
Toronto, ON M5J 2S1

Re: Assessment of Environmental Noise Impact
264 Crawley Road, Guelph, Ontario
HGC Engineering Project Number 02000882

Dear Mr. Midgely,

As requested, HGC Engineering has conducted a study of environmental noise impacting the property located at 264 Crawley Road in the City of Guelph. The purpose of our study is to assess the implications of the existing dwelling on the property being used for residential uses. The property is impacted by both provincial highway road traffic noise and stationary (industrial) noise. Through a review of relevant noise guidelines, site observations, acoustical measurements, and modelling, it is concluded that the use of the property for residential purposes would not comply with the guidelines for separation distances between noise sensitive uses and industries, would require significant noise mitigation measures, and would still impose risks for the continued operation of the neighbouring industrial uses.

Additional explanation of our findings is outlined below.

Description of Property and Surrounding Area

The property is a 2-storey single detached building and is located on the northeast side of Crawley Road and Highway 6. Figure 1 shows the aerial imagery of the property and the surrounding area. We understand that the building is of heritage interest and is currently on industrially zoned lands. HGC Engineering visited the property on December 2, 2020. The area around the site is surrounded by designated and zoned industrial lands. To the southwest of the property is a provincial highway (Highway 6) located approximately 85 m away from the closest façade to the northbound road centreline. To the immediate northeast, and surrounding the property on two sides, is a distribution and warehousing facility (Medline Industries Inc.) along with its associated outdoor truck parking and loading area. Based on information from Medline personnel, the facility operates 24 hours a day and has frequent trucking activities during daytime and nighttime hours. Sound emissions from the highway and loading activities at the Medline facility were audible at the site property during our site visit.

Transportation Noise Impact

Guidelines for acceptable levels of road traffic noise impacting residential land uses are provided in the Ontario Ministry of Environment, Conservation, and Parks (MECP) publication NPC-300, “Environmental Noise Guideline Stationary and Transportation Sources – Approval and Planning”, and is also referenced in

City of Guelph's guideline for compatibility of land uses and noise generating sources, titled 'Guelph Noise Control Guidelines'. The NPC-300 guideline provides indoor sound level limits for noise sensitive indoor spaces, namely 45 dBA during the daytime and 40 dBA during the nighttime, and outdoor limits for outdoor living areas, namely 55 dBA during the daytime with an allowable exceedance range of 5 dBA.

To assess the levels of road traffic noise which will impact the site in the future, sound level predictions were made using STAMSON version 5.04, a computer algorithm developed by the MECP. Road traffic noise data for Highway 6, obtained from published traffic volumes by the Ontario Ministry of Transportation (MTO), was projected 10 years into the future with an annual growth rate of 2.5% and was used to predict sound levels at prediction locations shown in Figure 2.

Table 1: Future Road Traffic Sound Levels and MECP Road Traffic Noise Criteria

Prediction Location	Description	Daytime Predicted $L_{EQ\text{-}16\ hr}$	Nighttime Predicted $L_{EQ\text{-}8\ hr}$
[A]	Southwest façade facing Highway 6	66 dBA	61 dBA
[B]	Northwest façade flanking Highway 6	63 dBA	58 dBA
[C]	Southeast façade flanking Highway 6	63 dBA	59 dBA
[OLA]	Backyard outdoor amenity area	57 dBA	--

During the site visit, we measured a sound level of 64 dBA at the southwest façade at daytime, with the highway noted to be clearly audible. To meet the indoor noise limits in this case, MECP guidelines would require that noise control measures in the form of central air conditioning and upgraded window glazing construction should be provided, along with applicable warning clauses in the property and tenancy agreements.

Stationary (Industrial) Noise Impact

MECP Guidelines D-1, 'Land Use Compatibility' and D-6 'Compatibility Between Industrial Facilities and Sensitive Land Uses' were prepared to address the potential incompatibility of industrial land uses and noise sensitive land uses in relation to land use approvals under the Planning Act. Guideline D-6 suggests certain potential zones of influence of industries for which adverse effects may be experienced, depending on the characterization of that industry as either Class I, II or III. Furthermore, in order to minimize the potential for land use conflicts, the MECP recommends that certain minimum separation distances be respected.

Table 2: D-6 Guideline Zone of Influence and Minimum Separation Distances

Industry Class	Zone of Influence Distance	Minimum Separation Distance
Class I	70 m	20 m
Class II	300 m	70 m
Class III	1000 m	300 m

As the adjacent Medline facility has frequent trucking and loading activities during both daytime and nighttime hours, it is suitable to be characterized as either a Class II, which can feature shift operations and frequent trucking movement with the majority during daytime hours, or a Class III industry, which can feature continuous movement of products throughout the day and night. The common property line is immediately adjacent to the vehicle tarmac of Medline facility and is 45 m away from the loading bays at the facility façade, which does not meet the recommended minimum separation distances.

The feasibility of using the property for residential purposes is also based on the anticipated adverse effects from the industrial uses, subject to site specific noise studies performed in accordance with guideline

NPC-300. A preliminary analysis of stationary noise impact from the Medline facility was conducted using a computational model made on acoustical modelling software (CADNA/A Version 2021) and based on site operation information obtained from Medline personnel, measured sound levels of various activities at the site, and previously measured sound levels of trucking activities by HGC Engineering personnel in similar past projects.

MECP guidelines categorize sounds from industry into non-impulsive sounds, which are steady and slowly varying in nature, such as those generated from an idling truck, and impulsive sounds, which are instantaneous or short-duration pressure pulses, such as those generated by coupling of trailers, forklifts driving in and out of trailers, and metal garbage/recycling bin drop-offs. Based on site observations and experience with similar facilities, impulsive sounds are expected to be frequent with more than 9 impulses in an hour.

NPC-300 provides exclusionary minimum sound level limits which are used to establish compliance with the operation of stationary sources and to settle noise-related incidents reported to the MECP through the Ontario Environmental Protection Act. The applicable exclusionary minimum limits are shown in Table 3 below along with modelling results taken at the façade facing the Medline facility.

Table 3: Preliminary Stationary Noise Modelling Results and Exclusion Minimum Limits

Prediction Location	Non-Impulsive Sound Levels L_{EQ}	Non-Impulsive Exclusion Limits L_{EQ} (Day/Evening/Night)	Impulsive Sound Level L_{LM}	Impulsive Exclusion Limits L_{LM} (Day/Evening/Night)
[D]	58 dBA	50 / 50 / 45 dBA	56 dBAI	50 / 50 / 45 dBAI

The results show sound levels exceeding the MECP exclusion limits by up to 13 dBA.

Conclusions and Recommendations

The property does not meet the recommended minimum separation distances for noise sensitive land uses next to industrial facilities, and a preliminary analysis of sound emission from stationary sources demonstrates sound levels exceeding the MECP exclusion limits. The use of the property for residential purposes is not recommended as it would require significant noise mitigation measures and, even then, would impose risks for the continued operation of neighbouring industrial uses under MECP noise guidelines.

We trust that this is sufficient information for your present needs. Please do not hesitate to call if you have any further questions or require additional information.

Yours truly,
HOWE GASTMEIER CHAPNIK LIMITED

Harry Cai, BEng, EIT

Brian Howe, MEng, MBA, LLM, PEng

Encl: Figure 1: Aerial Imagery Showing Property and Surrounding Area
Figure 2: Aerial Imagery Showing Prediction Locations

Figure 1: Aerial Imagery Showing Property and Surrounding Area

Figure 2: Aerial Imagery Showing Prediction Locations

IBI GROUP
101 – 410 Albert Street
Waterloo ON N2L 3V3 Canada
tel 519 585 2255
ibigroup.com

November 23, 2020

Mark Cowie
Industrial Equities Guelph Corp
161 Bay Street, Suite 3930
Toronto, ON M5J 2S1

email: mark.cowie@cowiecapital.com

Dear Mr. Cowie:

SOUTHGATE BUSINESS PARK
264 CRAWLEY ROAD – POTENTIAL MUNICIPAL SANITARY SERVICING

As requested, we have reviewed the potential municipal sanitary servicing of the existing 264 Crawley Road, Guelph.

BACKGROUND

IBI Group, under the direction of Mr. John Perks, MBA, P.Eng. as senior Engineer, has been the Engineer of record for the municipal engineering (design and construction) of the Southgate Business Park.

The Southgate Business Park includes approximately 200 acres of land south of Clair Road West, east of Crawley Road (having frontage onto the Hanlon), and north of Maltby Road West. Southgate Drive, to date, has been extended approximately 1,400m south of Clair Road West, with plans to ultimately extend it to Maltby Road West.

EXISTING CONDITIONS

An existing home of "Heritage Interest" currently exists on 264 Crawley Road. Historically this property was serviced by a private septic system and a private water well.

The septic system was decommissioned with the development of the adjacent lands in circa 2009, and the residence on 264 Crawley Road has remained unoccupied since that date due to no sanitary service being available.

Within existing and proposed Southgate Drive there is municipal sanitary sewer that services the adjacent industrial lands. The southern portions of Southgate Drive will require a sanitary pumping station that will pump northerly into the existing Southgate Drive sanitary sewer. There are also possible plans to extend the municipal sanitary along Maltby Road West.

To our knowledge, there are no plans to extend municipal sanitary along Crawley Road, nor would it be financially justifiable given there are only two residential properties that might utilize the sewer in addition to 264 Crawley Road. All remaining undeveloped land with frontage onto Crawley Road are zoned industrial, are owned by Industrial Equities Guelph Corporation, and also have frontage onto Southgate Drive. These lands have been planned and designed to be serviced by the proposed municipal servicing on the future extension of Southgate Drive. A final property on Crawley Road is the two acre home/office located at the northeastern corner of

Crawley and Maltby which is presumably serviced by private servicing (i.e., water well and septic system) as no existing municipal infrastructure exists at that location.

Finally, it is noted that Crawley Road has significant elevation relief (over 6.5m), and has significant "rolling" vertical alignment along its length which would make extension of a sanitary sewer challenging, if not impossible.

MUNICIPAL SANITARY SERVICING ANALYSIS

We have been asked to review the feasibility of providing municipal sanitary servicing to the 264 Crawley Road property. The only existing or proposed municipal sanitary sewer in proximity to 264 Crawley Road is the existing sanitary sewer on Southgate Drive. Existing private development land lies between 264 Crawley Road and Southgate Drive, and accordingly a sanitary sewer could not be extended directly to the subject property from Southgate Drive.

As a possibility, a sanitary sewer could be extended from the existing Southgate Drive sanitary sewer along the temporary "service easement" to Crawley Road (approx. 360m), and then northerly along Crawley Road to the subject property (approx. 300m). This route was analyzed based on the existing ground elevations and sanitary inverts. Assuming a minimum slope of 0.5%, it was found that there would be a significant length along the route where there would be insufficient cover on the sanitary, and in fact the sewer would be above ground elevation by upwards of 2m in the worst-case location (near Crawley Road) which is obviously not feasible. Refer to attached redlined plan.

Even if the sanitary was feasible to construct (which it is not), the capital construction cost would be significant and leave the municipality with a long length of sanitary sewer to maintain for the benefit of a single residential user. In our opinion this would not be economically justifiable.

Finally, we were provided a City of Guelph letter dated July 16, 2018 (see attached). This letter indicates that 264 Crawley Road is zoned Industrial and consequently states that private septic systems cannot be used to service the site.

CONCLUSIONS:

Given our analysis, we conclude that there is no municipal sanitary infrastructure within proximity to the site that could be feasibly extended to service 264 Crawley Road, and that according to City policy, a private septic system cannot be utilized to service the industrial zoned property.

We trust this information assists and meets your requirements for your review of 264 Crawley Road.

Should you have any questions or concerns, please do not hesitate to contact the undersigned.

Yours truly,

IBI GROUP

John Perks, MBA, P.Eng.
Associate Director

JRP/ms

Attachment

cc: Ms. Astrid Clos (via email: astrid.clos@ajcplanning.ca)

PRELIMINARY LETTER

To:	Thomas Lees/Matthew Midgley
Date:	Monday July 16, 2018
Email:	guelph@selfstor.ca
From:	Pat Sheehy
Division:	Building Services
Re:	264 Crawley Rd Mechanical Permit 18 004539 PH

Please be advised of the outstanding issues concerning the application for the above noted permit:

The subject property is zoned B.1 Industrial in the Zoning By-law. Section 4.10 of the Zoning By-law requires: No land shall be Used or built upon and no Building or Structure shall be erected, Used or expanded for any purpose unless all Municipal Services including sanitary sewers, storm sewers and drains, water mains, electric power lines and roads are Available and Adequate.

The proposed permit for a private septic system can only be approved for Zoning in conjunction with Committee of Adjustment decision A-6/08 that allows only the residential re-use of the lands. There is no indication that the property is going to be reused for residential, therefore the permit application cannot be approved for zoning at this time. If contemplating industrial use of the lands, then full municipal services are required.

This permit has been placed in order to be reviewed but cannot be issued until our review is complete, the above noted items are received, paid and/or resolved and all other applicable law is complied with. If other items arise during our review, they will be forwarded to you in the form of a refusal letter.

Sincerely,

Patrick Sheehy

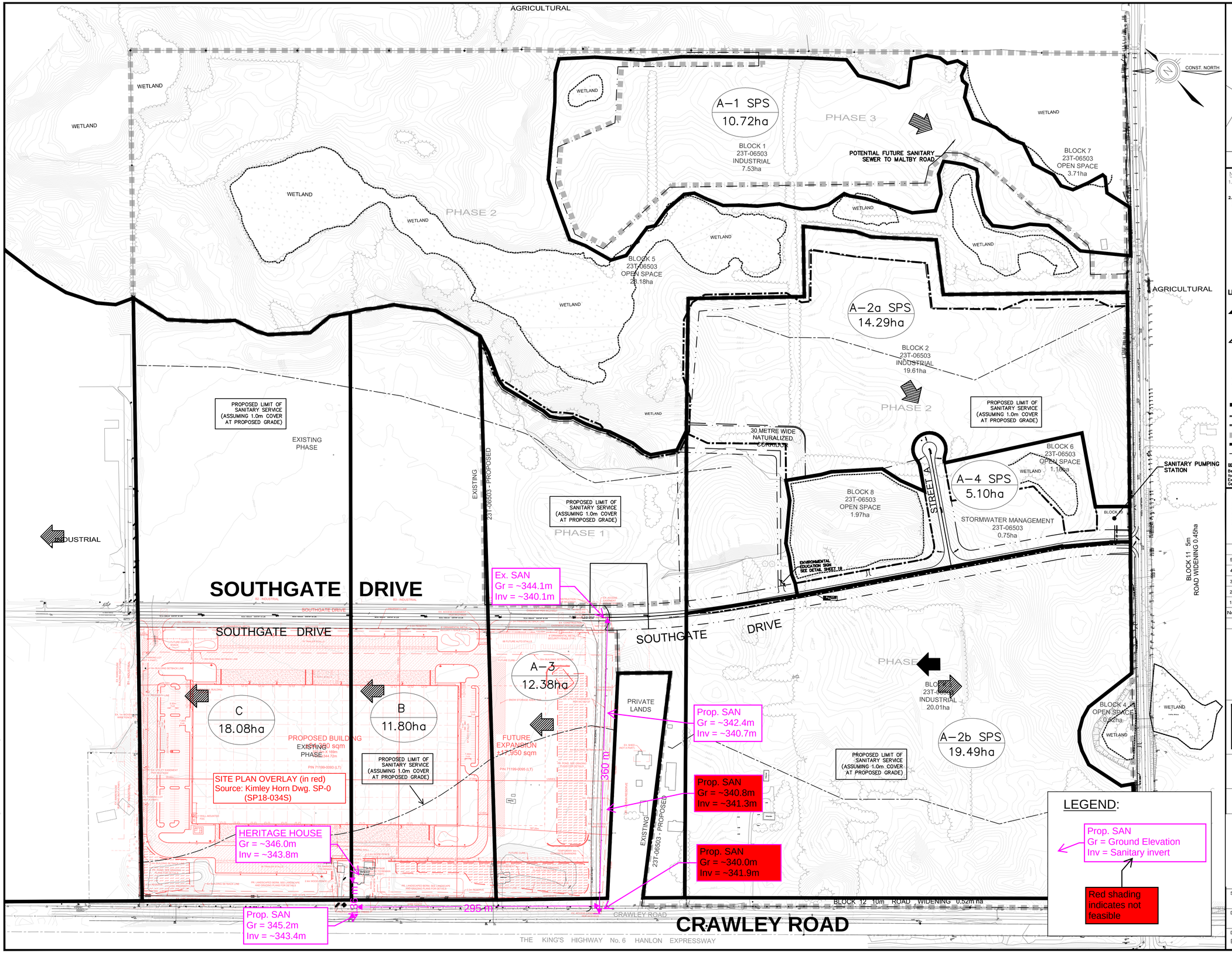
Patrick Sheehy
Program Manager-Zoning

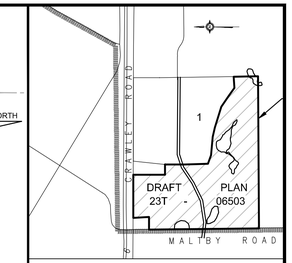
Building Services
Location: 1 Carden Street – 3rd Floor

T 519-837-5615 x 2338
F 519-822-4632
E patrick.sheehy@guelph.ca

City Hall:
1 Carden St.
Guelph, Ontario
N1H 3A1

T 519-837-5615
TTY 519-826-9771
guelph.ca





KEY PLAN Scale : NOT TO SCALE

NOTES:

1. ALL WORK TO BE DONE IN ACCORDANCE WITH THE STANDARDS AND SPECIFICATIONS OF THE CITY OF GUELPH, AND ONTARIO PROVINCIAL STANDARDS, EXCEPT WHERE NOTED.
2. THE CONTRACTOR SHALL NOTIFY THE CITY OF GUELPH AND THE ENGINEER AT LEAST 48 HOURS PRIOR TO COMMENCING CONSTRUCTION.

LEGEND:

- PUMPED FLOW
- GRAVITY FLOW
- A-2 SPS – SANITARY CATCHMENT AREA NUMBER
- 36.64ha – AREA (ha)
- SANITARY CATCHMENT AREA BOUNDARY
- GRCA FLAGGED FEATURES (NOVEMBER 2005)
- BUFFER LIMIT
- PHASING LINE
- DEVELOPMENT LIMIT
- PROPERTY LINE

BENCHMARK – BMR2 (NEW 1981) ELEV. =332.685

Benchmark plate set 81.01.20 on Nly end on conc. base of directory sign for "Hanlon Industrial Park" On S. Ely side of Laird Road near Hanlon Expy. Plate is 0.80m above ground. Elevation: City datum 92.03 Geodetic 1091.49 Geodetic Metric 332.685

THE POSITION OF POLES, LINES, CONDUITS, WATERMAINS, SEWERS AND OTHER UNDERGROUND UTILITIES AND STRUCTURES IS NOT NECESSARILY SHOWN ON THE CONTRACT DRAWINGS, AND WHERE SHOWN, THE ACCURACY OF THE POSITION OF SUCH UTILITIES AND STRUCTURES IS NOT GUARANTEED. BEFORE STARTING WORK, THE CONTRACTOR SHALL INFORM HIMSELF OF THE EXACT LOCATION OF ALL SUCH UTILITIES AND STRUCTURES, AND SHALL ASSUME ALL LIABILITY FOR DAMAGE TO THEM.

No.	DATE	DESCRIPTION	BY:	CHKD.
5	DEC.16/13	SIXTH SUBMISSION	PMC	JRP
4	JUN.24/13	FIFTH SUBMISSION	PCK	JRP
3	OCT.2/12	FOURTH SUBMISSION	PCK	JRP
2	DEC.19/11	THIRD SUBMISSION	PCK	JRP
1	OCT.18/11	SECOND SUBMISSION	PCK	JRP

ISSUES/REVISIONS

CITY OF Guelph Making a Difference

ENGINEERING SERVICES

IBI GROUP
379 QUEEN STREET SOUTH
KITCHENER, ONTARIO
N2G 1W6
(519) 745-9455
www.ibigroup.com

SOUTHGATE BUSINESS PARK

OVERALL CONTRIBUTING SANITARY DRAINAGE AREAS

264 CRAWLEY ROAD SANITARY SERVICING ANALYSIS

November 17, 2020

SCALE: HOR: 1:2000		CONSULTANT DRAWING No. KE-1743	
DATE DRAWN: NOVEMBER 25, 2010		CITY CONTRACT No. XX	
DESIGN BY: E. CERIĆ	CHECKED BY: J. PERKS	CITY REFERENCE No. XX	SHEET 8

LAST SAVED BY: patrickcoulter DATE: Jan 08, 2014-12:05pm
FILE NAME: 174-3E-Phase II-P&P FOR PLOTTING.dwg LAYOUT NAME: 08-Sanitary

El MI

a -AL

MAERSK

s•einfit
Or/
so It:
7rgS

A TRANSPORT LIMITED