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*Commonwealth Environmental Associates, Inc.*

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7411 Iron Bridge Rd. • Richmond, VA 23237 • 804.275.9320 • Fax: 804.275.9322

April 12, 2019

Food Lion, Inc.  
P.O. Box 1330  
Salisbury, North Carolina 28144

Attn: Mr. Charles McLendon

Re: Asbestos Survey Findings Report  
Store 1458  
30214 Sussex Highway  
Laurel, Delaware  
CEA Project No. 43518

Dear Mr. McLendon:

Commonwealth Environmental Associates, Inc. (CEA) is pleased to submit this Asbestos Survey for the above referenced site. These services have been performed in accordance with our standard terms and limitations.

Purpose of Study

To obtain representative samples of suspect asbestos containing materials (ACM) for laboratory analysis from Store 1458 in anticipation of a possible future remodel.

Scope of Services

Our scope of services for this project included the following:

- The identification and representative sampling of suspect asbestos building materials within the retail building by asbestos inspectors certified in Virginia.
- Submission of samples to CEI located in Cary, North Carolina for bulk asbestos analyses utilizing polarized light microscopy (PLM).
- Preparations of this findings report presenting identified asbestos containing materials, bulk asbestos analysis, pertinent QA/QC information and any conclusions and recommendations.

### Asbestos Inspection

CEA asbestos inspectors performed a site visit on March 30, 2019 to identify and collect samples of suspected asbestos containing materials (ACM) within the retail building. CEA identified the sampling areas as homogenous and sampled accordingly. Materials identified and sampled in the study area included drop ceiling tile, dry wall / compound, vinyl floor tile, hardboard ceiling tile, ceramic tile grout / glue, vinyl baseboard mastic, caulking and duct mastic. Caulking was sampled on the exterior of the structure. The building has a rubber / vinyl membrane roof which was not sampled or penetrated during this study. The materials collected during this study and the associated laboratory analysis is presented as Table 1 in Attachment A.

Materials noted at the site and not sampled during this study included plastics, natural wood products, silicon, foam, glass and concrete.

### Laboratory Analysis

CEA submitted the twenty-seven (27) samples collected within the study area of Store 1458 to CEI located in Cary, North Carolina for PLM analysis. Including the laboratory separated samples, thirty-five (35) samples were analyzed during this study. Of the thirty-five (35) samples analyzed, none were reported to contain asbestos. The EPA defines asbestos containing materials as any material containing 1% or greater asbestos fiber content. OSHA defines asbestos containing material as any material containing any detectable percentage of asbestos. Certificates of Analysis are presented as Attachment B. A map illustrating sample locations is presented as Attachment C.

### Conclusions and Recommendations

Based on CEA's inspection on March 30, 2019 of the area of Store 1458 slated for a possible future renovation and laboratory analysis of the suspected ACM samples collected at the site, asbestos was identified in none of the thirty-five (35) samples collected from the materials identified as suspect ACM and analyzed during this study.

Commonwealth Environmental Associates, Inc. appreciates the opportunity to provide asbestos inspection services for this project. If you should have any questions, please do not hesitate to contact our office at (804) 275-9320.

Sincerely,

**COMMONWEALTH ENVIRONMENTAL ASSOCIATES, INC.**

A handwritten signature in black ink, appearing to be 'Richard Gandara', with a long horizontal stroke extending to the right.

By:

Richard Gandara  
Asbestos Inspector

Delaware License No. PM-834

Attachments: A – Tables  
B - Certificates of Analyses  
C - Map

### Asbestos Limitations for Inspection, Bulk Sampling and Analysis Reports

This report has been prepared for the exclusive use of Food Lion, Inc. and/or their agents. This report has been prepared in accordance with generally accepted environmental practices. No other warranty, expressed or implied, is made. Our conclusions and recommendations are based, in part, upon information provided to us by others and our site observations. We have not verified the completeness or accuracy of the information provided by others.

Our observations and recommendations are based upon conditions readily visible during the site at the time of our site visit, and upon current industry standards. During CEA's inspection, all accessible areas were visually surveyed for the presence of suspect asbestos-containing materials. Inaccessible areas, such as behind solid ceilings or behind solid walls were not surveyed. Areas inspected for suspect asbestos-containing materials were limited to those designated by the scope of services. All samples were collected by individuals who have completed EPA approved asbestos inspector/management planner courses. Samples were collected and submitted for analysis via polarized light microscopy at CEA's NVLAP accredited laboratory.

CEA, by the virtue of providing the services described in this report, does not assume the responsibility of the person(s) in charge of the site, or otherwise undertake responsibility for reporting to any local, State, or Federal public agencies any conditions at the site that may present a potential danger to public health, safety, or the environment. It is the Client's responsibility to notify the appropriate local, state, or federal public agencies as required by law, or otherwise to disclose, in a timely manner, any information that may be necessary to prevent any danger to public health, safety, or the environment.

Under this scope of services, CEA assumes no responsibility regarding response actions (O&M plan, encapsulation, abatement, removal, etc.) initiated as a result of these findings. Response actions are the sole responsibility of the Client and should be conducted in accordance with local, State, and/or Federal requirements, and should be performed by appropriate licensed-asbestos personnel, as warranted.

**ATTACHMENT A**

**TABLES**

TABLE 1 Asbestos Sample Results Store 1458 Laurel, Delaware					
Sample	Sample Description	Sample Location	Condition	Friable	Asbestos (%)
1458-1	Ceiling Tile	Display Area/Break Room	N/A	N/A	None Detected
1458-2	Ceiling Tile	“	N/A	N/A	None Detected
1458-3	Drywall	Interior	N/A	N/A	None Detected
1458-4	Drywall	“	N/A	N/A	None Detected
1458-5	Joint Compound	Interior	N/A	N/A	None Detected
1458-6	Joint Compound	“	N/A	N/A	None Detected
1458-7	Joint Compound	“	N/A	N/A	None Detected
1458-8	Floor Tile (White)	Display Area/Break Room/Office	N/A	N/A	None Detected
1458-8	Yellow Mastic	“	N/A	N/A	None Detected
1458-9	Floor Tile (White)	“	N/A	N/A	None Detected
1458-9	Yellow Mastic	“	N/A	N/A	None Detected
1458-10	Floor Tile (Yellow)	Display Area	N/A	N/A	None Detected
1458-10	Yellow Mastic	“	N/A	N/A	None Detected
1458-11	Floor Tile (Yellow)	“	N/A	N/A	None Detected
1458-11	Yellow Mastic	“	N/A	N/A	None Detected
1458-12	Floor Tile (Dark Gray)	Produce	N/A	N/A	None Detected
1458-12	Yellow Mastic	“	N/A	N/A	None Detected
1458-13	Floor Tile (Dark Gray)	“	N/A	N/A	None Detected
1458-13	Yellow Mastic	“	N/A	N/A	None Detected
1458-14	Floor Tile (Copper)	“	N/A	N/A	None Detected
1458-14	Yellow Mastic	“	N/A	N/A	None Detected
1458-15	Floor Tile (Copper)	“	N/A	N/A	None Detected

**TABLE 1**  
**Asbestos Sample Results**  
**Store 1458**  
**Laurel, Delaware**

1458-15	Yellow Mastic	“	N/A	N/A	None Detected
1458-16	Hardboard Ceiling Tile	Deli	N/A	N/A	None Detected
1458-17	Hardboard Ceiling Tile	“	N/A	N/A	None Detected
1458-18	Ceramic Tile Grout	Bathrooms/Deli	N/A	N/A	None Detected
1458-19	Ceramic Tile Grout	“	N/A	N/A	None Detected
1458-20	Gray Mastic	Steel HVAC Ducts	N/A	N/A	None Detected
1458-21	Gray Mastic	“	N/A	N/A	None Detected
1458-22	Green Ceiling Tile	Produce	N/A	N/A	None Detected
1458-23	Green Ceiling Tile	“	N/A	N/A	None Detected
1458-24	Gray Ceiling Tile	“	N/A	N/A	None Detected
1458-25	Gray Ceiling Tile	“	N/A	N/A	None Detected
1458-26	Caulking (Black)	Exterior Windows & Door Frames	N/A	N/A	None Detected
1458-27	Caulking (Black)	“	N/A	N/A	None Detected

**ATTACHMENT B**  
**CERTIFICATES OF ANALYSES**

April 11, 2019

Commonwealth Environmental Associates, Inc.  
7411 Iron Bridge Road  
Richmond, VA 23237

**CLIENT PROJECT:** Store 1458 - 30214 Sussex Hwy - Laurel, DE, 43518  
**CEI LAB CODE:** A197303

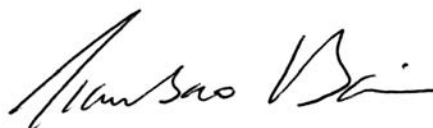
Dear Customer:

Enclosed are asbestos analysis results for PLM Bulk samples received at our laboratory on April 3, 2019. 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

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## **ASBESTOS ANALYTICAL REPORT**

### **By: Polarized Light Microscopy**

Prepared for

**Commonwealth Environmental Associates, Inc.**

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CLIENT PROJECT: Store 1458 - 30214 Sussex Hwy - Laurel, DE, 43518

LAB CODE: A197303

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

REPORT DATE: 04/11/19

TOTAL SAMPLES ANALYZED: 27

# SAMPLES >1% ASBESTOS:



CEI

# Asbestos Report Summary

By: POLARIZING LIGHT MICROSCOPY

**PROJECT:** Store 1458 - 30214 Sussex Hwy - Laurel, DE, 43518 **LAB CODE:** A197303

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

Client ID	Layer	Lab ID	Color	Sample Description	ASBESTOS %
1458-1		A103345	White	Ceiling Tile	None Detected
1458-2		A103346	White	Ceiling Tile	None Detected
1458-3		A103347	White	Drywall	None Detected
1458-4		A103348	White	Drywall	None Detected
1458-5		A103349	White	Joint Compound	None Detected
1458-6		A103350	White	Joint Compound	None Detected
1458-7		A103351	White	Joint Compound	None Detected
1458-8		A103352A	Off-white	Floor Tile	None Detected
		A103352B	Yellow	Mastic	None Detected
1458-9		A103353A	Off-white	Floor Tile	None Detected
		A103353B	Yellow	Mastic	None Detected
1458-10		A103354A	Tan	Floor Tile	None Detected
		A103354B	Yellow	Mastic	None Detected
1458-11		A103355A	Tan	Floor Tile	None Detected
		A103355B	Yellow	Mastic	None Detected
1458-12		A103356A	Gray	Floor Tile	None Detected
		A103356B	Yellow	Mastic	None Detected
1458-13		A103357A	Gray	Floor Tile	None Detected
		A103357B	Yellow	Mastic	None Detected
1458-14		A103358A	Brown	Floor Tile	None Detected
		A103358B	Yellow	Mastic	None Detected
1458-15		A103359A	Brown	Floor Tile	None Detected
		A103359B	Yellow	Mastic	None Detected
1458-16		A103360	White	Drywall	None Detected
1458-17		A103361	White	Drywall	None Detected
1458-18		A103362	White	Mud	None Detected
1458-19		A103363	White	Mud	None Detected
1458-20		A103364	Gray	Duct Mastic	None Detected
1458-21		A103365	Gray	Duct Mastic	None Detected
1458-22		A103366	White	Ceiling Tile	None Detected
1458-23		A103367	White	Ceiling Tile	None Detected

# Asbestos Report Summary

By: POLARIZING LIGHT MICROSCOPY

**PROJECT:** Store 1458 - 30214 Sussex Hwy - Laurel, DE, 43518      **LAB CODE:** A197303

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

Client ID	Layer	Lab ID	Color	Sample Description	ASBESTOS %
1458-24		A103368	White	Ceiling Tile	None Detected
1458-25		A103369	White	Ceiling Tile	None Detected
1458-26		A103370	Brown	Caulking	None Detected
1458-27		A103371	Brown	Caulking	None Detected

# ASBESTOS BULK ANALYSIS

By: POLARIZING LIGHT MICROSCOPY

**Client:** Commonwealth Environmental Associates, Inc.  
7411 Iron Bridge Road  
Richmond, VA 23237

**Lab Code:** A197303  
**Date Received:** 04-03-19  
**Date Analyzed:** 04-11-19  
**Date Reported:** 04-11-19

**Project:** Store 1458 - 30214 Sussex Hwy - Laurel, DE, 43518

## ASBESTOS BULK PLM, EPA 600 METHOD

Client ID Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS				ASBESTOS %
			Fibrous		Non-Fibrous		
1458-1 A103345	Ceiling Tile	Heterogeneous	35%	Cellulose	30%	Perlite	None Detected
		White	10%	Fiberglass	20%	Binder	
		Fibrous			5%	Paint	
		Bound					
1458-2 A103346	Ceiling Tile	Heterogeneous	35%	Cellulose	30%	Perlite	None Detected
		White	10%	Fiberglass	20%	Binder	
		Fibrous			5%	Paint	
		Bound					
1458-3 A103347	Drywall	Heterogeneous	15%	Cellulose	60%	Gypsum	None Detected
		White			25%	Binder	
		Fibrous					
		Bound					
1458-4 A103348	Drywall	Heterogeneous	15%	Cellulose	60%	Gypsum	None Detected
		White			25%	Binder	
		Fibrous					
		Bound					
1458-5 A103349	Joint Compound	Heterogeneous			60%	Calc Carb	None Detected
		White			35%	Binder	
		Non-fibrous			5%	Paint	
		Bound					
1458-6 A103350	Joint Compound	Heterogeneous			60%	Calc Carb	None Detected
		White			35%	Binder	
		Non-fibrous			5%	Paint	
		Bound					
1458-7 A103351	Joint Compound	Heterogeneous			60%	Calc Carb	None Detected
		White			35%	Binder	
		Non-fibrous			5%	Paint	
		Bound					

# ASBESTOS BULK ANALYSIS

By: POLARIZING LIGHT MICROSCOPY

**Client:** Commonwealth Environmental Associates, Inc.  
7411 Iron Bridge Road  
Richmond, VA 23237

**Lab Code:** A197303  
**Date Received:** 04-03-19  
**Date Analyzed:** 04-11-19  
**Date Reported:** 04-11-19

**Project:** Store 1458 - 30214 Sussex Hwy - Laurel, DE, 43518

## ASBESTOS BULK PLM, EPA 600 METHOD

Client ID Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS		ASBESTOS %
			Fibrous	Non-Fibrous	
<b>1458-8</b> A103352A	Floor Tile	Heterogeneous		60% Vinyl	None Detected
		Off-white		40% Binder	
		Non-fibrous			
		Bound			
A103352B	Mastic	Heterogeneous		100% Mastic	None Detected
		Yellow			
		Non-fibrous			
		Bound			
<b>1458-9</b> A103353A	Floor Tile	Heterogeneous		60% Vinyl	None Detected
		Off-white		40% Binder	
		Non-fibrous			
		Bound			
A103353B	Mastic	Heterogeneous		100% Mastic	None Detected
		Yellow			
		Non-fibrous			
		Bound			
<b>1458-10</b> A103354A	Floor Tile	Heterogeneous		60% Vinyl	None Detected
		Tan		40% Binder	
		Non-fibrous			
		Bound			
A103354B	Mastic	Heterogeneous		100% Mastic	None Detected
		Yellow			
		Non-fibrous			
		Bound			
<b>1458-11</b> A103355A	Floor Tile	Heterogeneous		60% Vinyl	None Detected
		Tan		40% Binder	
		Non-fibrous			
		Bound			

# ASBESTOS BULK ANALYSIS

By: POLARIZING LIGHT MICROSCOPY

**Client:** Commonwealth Environmental Associates, Inc.  
7411 Iron Bridge Road  
Richmond, VA 23237

**Lab Code:** A197303  
**Date Received:** 04-03-19  
**Date Analyzed:** 04-11-19  
**Date Reported:** 04-11-19

**Project:** Store 1458 - 30214 Sussex Hwy - Laurel, DE, 43518

## ASBESTOS BULK PLM, EPA 600 METHOD

Client ID Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS		ASBESTOS %
			Fibrous	Non-Fibrous	
A103355B	Mastic	Heterogeneous Yellow Non-fibrous Bound		100% Mastic	None Detected
<b>1458-12</b> A103356A	Floor Tile	Heterogeneous Gray Non-fibrous Bound	60% 40%	Vinyl Binder	None Detected
A103356B	Mastic	Heterogeneous Yellow Non-fibrous Bound		100% Mastic	None Detected
<b>1458-13</b> A103357A	Floor Tile	Heterogeneous Gray Non-fibrous Bound	60% 40%	Vinyl Binder	None Detected
A103357B	Mastic	Heterogeneous Yellow Non-fibrous Bound		100% Mastic	None Detected
<b>1458-14</b> A103358A	Floor Tile	Heterogeneous Brown Non-fibrous Bound	60% 40%	Vinyl Binder	None Detected
A103358B	Mastic	Heterogeneous Yellow Non-fibrous Bound	90% 5% 5%	Mastic Non-Fibrous Debris Silicates	None Detected

# ASBESTOS BULK ANALYSIS

By: POLARIZING LIGHT MICROSCOPY

**Client:** Commonwealth Environmental Associates, Inc.  
7411 Iron Bridge Road  
Richmond, VA 23237

**Lab Code:** A197303  
**Date Received:** 04-03-19  
**Date Analyzed:** 04-11-19  
**Date Reported:** 04-11-19

**Project:** Store 1458 - 30214 Sussex Hwy - Laurel, DE, 43518

## ASBESTOS BULK PLM, EPA 600 METHOD

Client ID Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS				ASBESTOS %
			Fibrous		Non-Fibrous		
1458-15 A103359A	Floor Tile	Heterogeneous			60%	Vinyl	None Detected
		Brown Non-fibrous Bound			40%	Binder	
A103359B	Mastic	Heterogeneous			90%	Mastic	None Detected
		Yellow Non-fibrous Bound			5% 5%	Non-Fibrous Debris Silicates	
1458-16 A103360	Drywall	Heterogeneous	13%	Cellulose	60%	Gypsum	None Detected
		White Fibrous Bound	2%	Fiberglass	25%	Binder	
1458-17 A103361	Drywall	Heterogeneous	13%	Cellulose	60%	Gypsum	None Detected
		White Fibrous Bound	2%	Fiberglass	25%	Binder	
1458-18 A103362	Mud	Heterogeneous			70%	Calc Carb	None Detected
		White Non-fibrous Bound			30%	Binder	
1458-19 A103363	Mud	Heterogeneous			70%	Calc Carb	None Detected
		White Non-fibrous Bound			30%	Binder	
1458-20 A103364	Duct Mastic	Heterogeneous			80%	Mastic	None Detected
		Gray Non-fibrous Bound			20%	Binder	

# ASBESTOS BULK ANALYSIS

By: POLARIZING LIGHT MICROSCOPY

**Client:** Commonwealth Environmental Associates, Inc.  
7411 Iron Bridge Road  
Richmond, VA 23237

**Lab Code:** A197303  
**Date Received:** 04-03-19  
**Date Analyzed:** 04-11-19  
**Date Reported:** 04-11-19

**Project:** Store 1458 - 30214 Sussex Hwy - Laurel, DE, 43518

## ASBESTOS BULK PLM, EPA 600 METHOD

Client ID Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS				ASBESTOS %
			Fibrous		Non-Fibrous		
1458-21 A103365	Duct Mastic	Heterogeneous			80%	Mastic	None Detected
		Gray			20%	Binder	
		Non-fibrous					
		Bound					
1458-22 A103366	Ceiling Tile	Heterogeneous	35%	Cellulose	30%	Perlite	None Detected
		White	10%	Fiberglass	20%	Binder	
		Fibrous			5%	Paint	
		Bound					
1458-23 A103367	Ceiling Tile	Heterogeneous	35%	Cellulose	30%	Perlite	None Detected
		White	10%	Fiberglass	20%	Binder	
		Fibrous			5%	Paint	
		Bound					
1458-24 A103368	Ceiling Tile	Heterogeneous	35%	Cellulose	30%	Perlite	None Detected
		White	10%	Fiberglass	20%	Binder	
		Fibrous			5%	Paint	
		Bound					
1458-25 A103369	Ceiling Tile	Heterogeneous	35%	Cellulose	30%	Perlite	None Detected
		White	10%	Fiberglass	20%	Binder	
		Fibrous			5%	Paint	
		Bound					
1458-26 A103370	Caulking	Heterogeneous			80%	Caulk	None Detected
		Brown			20%	Binder	
		Non-fibrous					
		Bound					
1458-27 A103371	Caulking	Heterogeneous			80%	Caulk	None Detected
		Brown			20%	Binder	
		Non-fibrous					
		Bound					

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

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

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**REPORTING LIMIT:** <1% by visual estimation

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

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**REGULATORY LIMIT:** >1% by weight

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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.*

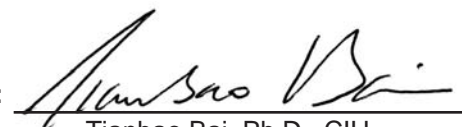
This report relates only to the samples tested or analyzed and may not be reproduced, except in full, without written approval by Eurofins CEI. Eurofins CEI makes no warranty representation regarding the accuracy of client submitted information in preparing and presenting analytical results. Interpretation 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, location, volume and area as well as date and time of sampling.

**ANALYST:** \_\_\_\_\_

  
Kyle Demsko

**APPROVED BY:** \_\_\_\_\_

  
Tianbao Bai, Ph.D., CIH  
Laboratory Director



Commonwealth Environmental Associates, Inc.

7411 Iron Bridge Rd. • Richmond, VA 23237 • 804.275.9320 • Fax: 804.275.9322

A197303  
A103345-  
A103371

10F1

27

ASBESTOS SAMPLING CHAIN OF CUSTODY RECORD

Project #: 43518 Project Name: Store 1458 - 30214 Tuxter Hwy - Laurel, DE  
Samplers: \_\_\_\_\_ Project MGR: \_\_\_\_\_  
Lab Name: \_\_\_\_\_ Lab Contact: \_\_\_\_\_  
Lab Address: \_\_\_\_\_

				ANALYSIS	
Sample ID	Date	Sample Location	# of Containers	Bulk PLM	Other
1458	3/30/19	Store 1458	1	X	
-1					
-2					
-3					
-4					
-5					
-6					
-7					
-8					
-9					
-10					
-11					
-12					
-13					
-14					
-15					
-16					
-17					
-18					
-19					
-20					
-21					
-22					
-23					
-24					
-25					
-26					
-27					
-28					
-29					
-30					

EUROFINS CET, INC.  
SAMPLES ACCEPTED

NA

Relinquished By: _____ (Signature)	Date/Time /	Received By: _____ (Signature)	Date/Time /
Relinquished By: _____ (Signature)	Date/Time /	Received By: _____ (Signature)	Date/Time /
Relinquished By: _____ (Signature)	Date/Time /	Received By: _____ (Signature)	Date/Time /

017 4/3 19:30

Turn Around Time: ☒ Regular ☐ Priority ☐ Other \_\_\_\_\_

Notes: \_\_\_\_\_

**ATTACHMENT C**

**MAP**

