

DISPLAY THIS CARD ON PRINCIPAL FRONTAGE OF WORK

CITY OF PORTLAND

BUILDING DEPARTMENT

Please Read Application And Notes, If Any, Attached

PERMIT

Permit Number: 090730

This is to certify that RAWCLIFFE JERRY K & SUE N D JTS
has permission to 52"xx24' Diameter Pool, Renewal of expired permit 08-0853
AT 390 SUMMIT ST CE 382A A009001

provided that the person or persons, firm or corporation accepting this permit shall comply with all of the provisions of the Statutes of Maine and of the Ordinances of the City of Portland regulating the construction, maintenance and use of buildings and structures, and of the application on file in this department.

Apply to Public Works for street line and grade if nature of work requires such information.

Notification of inspection must be given and written permission procured before this building or part thereof is lath or other work is used-in. 2 HOURLY NOTICE IS REQUIRED.

PERMIT ISSUED
A certificate of occupancy must be procured by owner before this building or part thereof is occupied.
JUL 17 2009
CITY OF PORTLAND

OTHER REQUIRED APPROVALS

Fire Dept. _____
Health Dept. _____
Appeal Board _____
Other _____
Department Name

Thomas N. Mackley 7/15/09
Director - Building & Inspection Services

PENALTY FOR REMOVING THIS CARD

City of Portland, Maine - Building or Use Permit Application

389 Congress Street, 04101 Tel: (207) 874-8703, Fax: (207) 874-8716

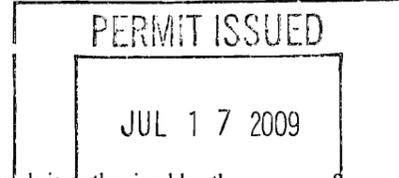
Permit No: 09-0730	Issue Date:	CBL: 382A A009001
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Location of Construction: 390 SUMMIT ST	Owner Name: RAWCLIFFE JERRY K & SUSAN	Owner Address: 390 SUMMIT ST	Phone: 207-878-6854
Business Name:	Contractor Name:	Contractor Address:	Phone:
Lessee/Buyer's Name	Phone:	Permit Type: Swimming Pools	Zone: R3

Past Use: Single Family Home	Proposed Use: Single Family Home - 52"xx24' Diameter Pool, <u>Renewal</u> of expired permit # 08-0853	Permit Fee: \$30.00	Cost of Work: \$900.00	CEO District: 5
Proposed Project Description: 52"xx24' Diameter Pool, Renewal of expired permit # 08-0853		FIRE DEPT: <input type="checkbox"/> Approved <input type="checkbox"/> Denied	INSPECTION: Use Group: R3 Type: SB IRC 2003 Signature: <i>Jm 7/15/09</i>	
		PEDESTRIAN ACTIVITIES DISTRICT (P.A.D.) Action: <input type="checkbox"/> Approved <input type="checkbox"/> Approved w/Conditions <input type="checkbox"/> Denied Signature: _____ Date: _____		

Permit Taken By: lmd	Date Applied For: 07/14/2009	Zoning Approval
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<p>1. This permit application does not preclude the Applicant(s) from meeting applicable State and Federal Rules.</p> <p>2. Building permits do not include plumbing, septic or electrical work.</p> <p>3. Building permits are void if work is not started within six (6) months of the date of issuance. False information may invalidate a building permit and stop all work..</p>	Special Zone or Reviews <input type="checkbox"/> Shoreland <input type="checkbox"/> Wetland <input type="checkbox"/> Flood Zone <input type="checkbox"/> Subdivision <input type="checkbox"/> Site Plan Maj <input type="checkbox"/> Minor <input type="checkbox"/> MM <input type="checkbox"/> Date: <i>Jm 7/15/09</i>	Zoning Appeal <input type="checkbox"/> Variance <input type="checkbox"/> Miscellaneous <input type="checkbox"/> Conditional Use <input type="checkbox"/> Interpretation <input type="checkbox"/> Approved <input type="checkbox"/> Denied Date: _____	Historic Preservation <input checked="" type="checkbox"/> Not in District or Landmark <input checked="" type="checkbox"/> Does Not Require Review <input type="checkbox"/> Requires Review <input type="checkbox"/> Approved <input type="checkbox"/> Approved w/Conditions <input type="checkbox"/> Denied Date: <i>Jm</i>
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CERTIFICATION

I hereby certify that I am the owner of record of the named property, or that the proposed work is authorized by the owner of record and that I have been authorized by the owner to make this application as his authorized agent and I agree to conform to all applicable laws of this jurisdiction. In addition, if a permit for work described in the application is issued, I certify that the code official's authorized representative shall have the authority to enter all areas covered by such permit at any reasonable hour to enforce the provision of the code(s) applicable to such permit.

SIGNATURE OF APPLICANT	ADDRESS	DATE	PHONE
RESPONSIBLE PERSON IN CHARGE OF WORK, TITLE		DATE	PHONE



Pool Installation/Construction Permit Application

If you or the property owner owes real estate or personal property taxes or user charges on any property within the City, payment arrangements must be made before permits of any kind are accepted.

Location/Address of Construction: <u>390 Summit Str, Portland ME.</u>		
Total Square Footage of Proposed Structure <u>Deck 50ft² Pool ≈ 450ft² (24' round)</u>		Square Footage of Lot <u>40567</u>
Tax Assessor's Chart, Block & Lot Chart# Block# Lot# <u>382A 4009001</u>	Owner: <u>Rawcliffe, Jerry K. & Susan D. JTS</u>	Telephone: <u>207-878-6854</u> with 207-828-3614
Lessee/Buyer's Name (If Applicable)	Applicant name, address & telephone: <u>Jerry R. Rawcliffe</u> <u>390 Summit Str</u> <u>Portland, Maine 04103</u>	Cost Of Work: \$ <u>≈ 9009</u> Fee: \$ _____
Dimensions of pool: <u>52" high x 24' Diameter</u> above or below ground: <u>Aboveground</u>		
Dimensions of decking and/or any platforms, sheds, or other structures: <u>Est 50ft sq. Deck space 20' off barrier fence</u>		
Contractor's name, address & telephone: <u>NA</u>		
Who should we contact when the permit is ready: <u>Jerry Rawcliffe</u> Mailing address: _____ Phone: <u>207-878-6854</u>		
<i>code page</i> <u>15230/12</u>		

Please submit all of the information outlined in the pool application checklist. Failure to do so could result in the automatic denial of your permit.

In order to be sure the City fully understands the full scope of the project, the Planning and Development Department may request additional information prior to the issuance of a permit. For further information visit us on-line at www.portlandmaine.gov, stop by the Building Inspections office, room 315 City Hall or call 874-8703.

I hereby certify that I am the Owner of record of the named property, or that the owner of record authorizes the proposed work and that I have been authorized by the owner to make this application as his/her authorized agent. I agree to conform to all applicable laws of this jurisdiction. In addition, if a permit for work described in this application is issued, I certify that the Code Official's authorized representative shall have the authority to enter all areas covered by this permit at any reasonable hour to enforce the provisions of the codes applicable to this permit.

Signature of applicant: <u>Jerry Rawcliffe</u>	Date: <u>7/11/08</u> 7/9/09
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This is not a permit; you may not commence ANY work until the permit is issued.

City of Portland, Maine - Building or Use Permit
 389 Congress Street, 04101 Tel: (207) 874-8703, Fax: (207) 874-8716

Permit No: 09-0730	Date Applied For: 07/14/2009	CBL: 382A A009001
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Location of Construction: 390 SUMMIT ST	Owner Name: RAWCLIFFE JERRY K & SUSAN	Owner Address: 390 SUMMIT ST	Phone: 207-878-6854
Business Name:	Contractor Name:	Contractor Address:	Phone:
Lessee/Buyer's Name	Phone:	Permit Type: Swimming Pools	

Proposed Use: Single Family Home - 52"xx24' Diameter Pool, Renewal of expired permit # 08-0853	Proposed Project Description: 52"xx24' Diameter Pool, Renewal of expired permit # 08-0853
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Dept: Zoning	Status: Approved with Conditions	Reviewer: Tom Markley	Approval Date: 07/15/2009
Note:			Ok to Issue: <input checked="" type="checkbox"/>
1) This permit is being approved on the basis of plans submitted. Any deviations shall require a separate approval before starting that work.			
Dept: Building	Status: Approved with Conditions	Reviewer: Tom Markley	Approval Date: 07/15/2009
Note:			Ok to Issue: <input checked="" type="checkbox"/>
1) Pool and barrier installation shall meet the code requirements in Appendix G of the IRC 2003			
2) Separate permits are required for any electrical, plumbing, sprinkler, fire alarm or HVAC or exhaust systems. Separate plans may need to be submitted for approval as a part of this process.			
3) Application approval based upon information provided by applicant. Any deviation from approved plans requires separate review and approval prior to work.			

BUILDING PERMIT INSPECTION PROCEDURES

Please call 874-8703 or 874-8693 (ONLY)

to schedule your inspections as agreed upon

Permits expire in 6 months, if the project is not started or ceases for 6 months.

The Owner or their designee is required to notify the inspections office for the following inspections and provide adequate notice. Notice must be called in 48-72 hours in advance in order to schedule an inspection:

By initializing at each inspection time, you are agreeing that you understand the inspection procedure and additional fees from a "Stop Work Order" and "Stop Work Order Release" will be incurred if the procedure is not followed as stated below.

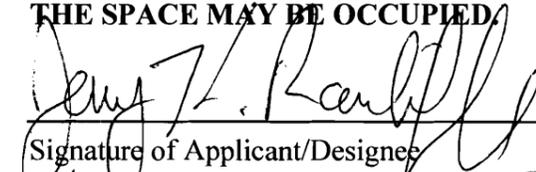
A Pre-construction Meeting will take place upon receipt of your building permit.

 X **Final inspection required at completion of work.**

Certificate of Occupancy is not required for certain projects. Your inspector can advise you if your project requires a Certificate of Occupancy. All projects DO require a final inspection.

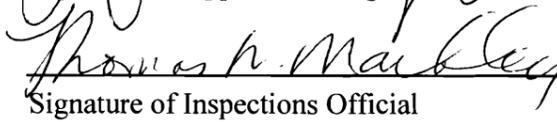
If any of the inspections do not occur, the project cannot go on to the next phase, REGARDLESS OF THE NOTICE OR CIRCUMSTANCES.

CERIFICATE OF OCCUPANICES MUST BE ISSUED AND PAID FOR, BEFORE THE SPACE MAY BE OCCUPIED.



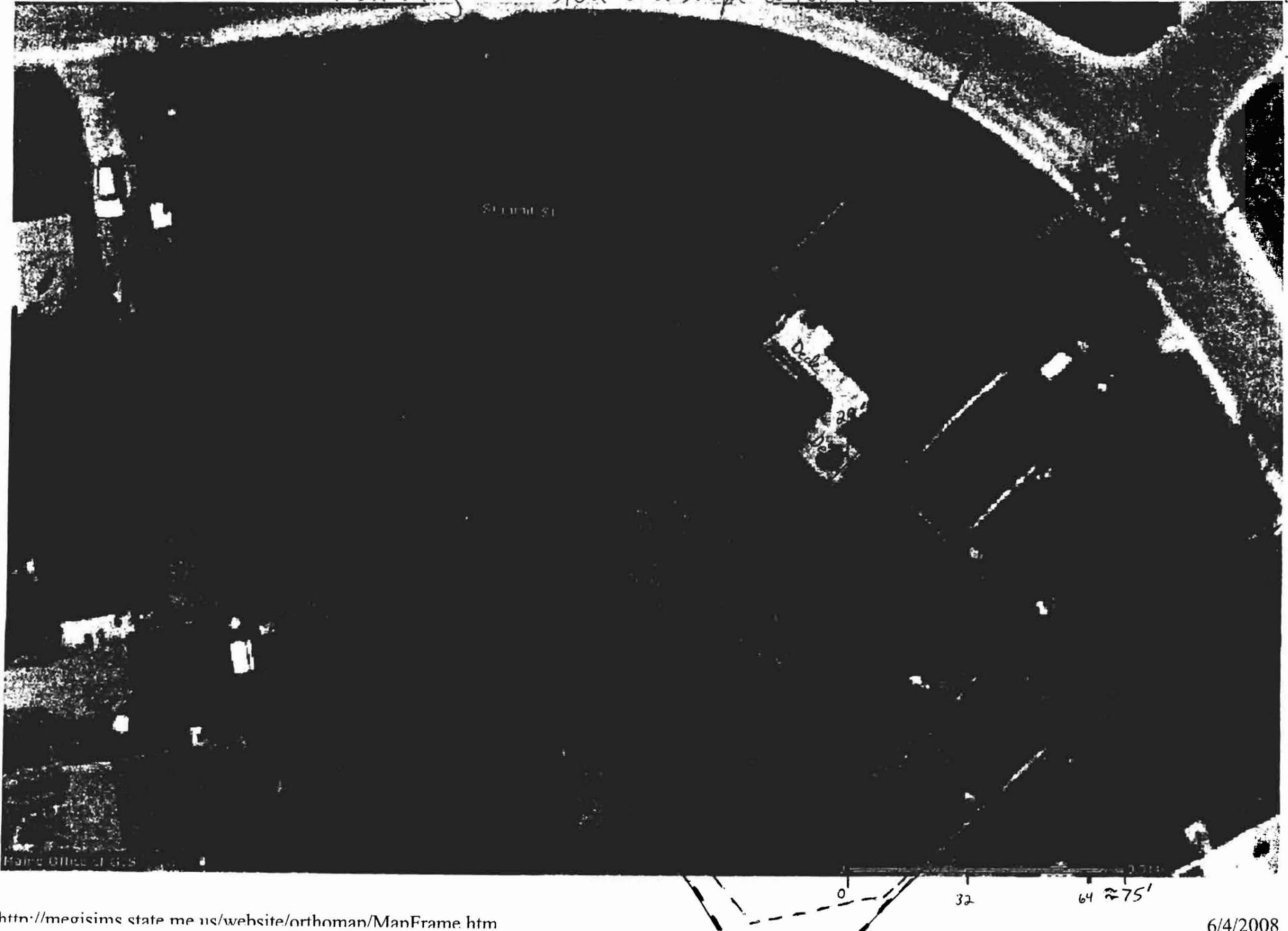
Signature of Applicant/Designee

 7/17/09
Date



Signature of Inspections Official

 7/15/09
Date



SECTION AG105 BARRIER REQUIREMENTS

AG105.1 Application. The provisions of this chapter shall control the design of barriers for residential swimming pools, spas and hot tubs. These design controls are intended to provide protection against potential drownings and near-drownings by restricting access to swimming pools, spas and hot tubs.

❖ This section describes the provisions for barriers around residential swimming pools, hot tubs, and spas. A swimming pool or similar facility creates an attractive temptation to children, including very young children and infants who do not know how to swim. The installation of an effective barrier can help reduce the number of children who die or are injured as the result of open access to a swimming pool, spa, or hot tub.

AG105.2 Outdoor swimming pool. An outdoor swimming pool, including an in-ground, aboveground or on-ground pool, hot tub or spa shall be provided with a barrier which shall comply with the following:

1. The top of the barrier shall be at least 48 inches (1219 mm) above grade measured on the side of the barrier which faces away from the swimming pool. The maximum vertical clearance between grade and the bottom of the barrier shall be 2 inches (51 mm) measured on the side of the barrier which faces away from the swimming pool. Where the top of the pool structure is above grade, such as an aboveground pool, the barrier may be at ground level, such as the pool structure, or mounted on top of the pool structure. Where the barrier is mounted on top of the pool structure, the maximum vertical clearance between the top of the pool structure and the bottom of the barrier shall be 4 inches (102 mm).
2. Openings in the barrier shall not allow passage of a 4-inch-diameter (102 mm) sphere.
3. Solid barriers which do not have openings, such as a masonry or stone wall, shall not contain indentations or protrusions except for normal construction tolerances and tooled masonry joints.
4. Where the barrier is composed of horizontal and vertical members and the distance between the tops of the horizontal members is less than 45 inches (1143 mm), the horizontal members shall be located on the swimming pool side of the fence. Spacing between vertical members shall not exceed 1.75 inches (44 mm) in width. Where there are decorative cutouts within vertical members, spacing within the cutouts shall not exceed 1.75 inches (44 mm) in width.
5. Where the barrier is composed of horizontal and vertical members and the distance between the tops of the horizontal members is 45 inches (1143 mm) or more, spacing between vertical members shall not exceed 4 inches (102 mm). Where there are decorative cutouts within vertical members, spacing within the cutouts shall not exceed 1.75 inches (44 mm) in width.
6. Maximum mesh size for chain link fences shall be a 2.25-inch (57 mm) square unless the fence is provided

with slats fastened at the top or the bottom which reduce the openings to not more than 1.75 inches (44 mm).

7. Where the barrier is composed of diagonal members, such as a lattice fence, the maximum opening formed by the diagonal members shall not be more than 1.75 inches (44 mm).
8. Access gates shall comply with the requirements of Section AG105.2, Items 1 through 7, and shall be equipped to accommodate a locking device. Pedestrian access gates shall open outward away from the pool and shall be self-closing and have a self-latching device. Gates other than pedestrian access gates shall have a self-latching device. Where the release mechanism of the self-latching device is located less than 54 inches (1372 mm) from the bottom of the gate, the release mechanism and openings shall comply with the following:
 - 8.1. The release mechanism shall be located on the pool side of the gate at least 3 inches (76 mm) below the top of the gate, and
 - 8.2. The gate and barrier shall have no opening greater than 0.5 inch (12.7 mm) within 18 inches (457 mm) of the release mechanism.
9. Where a wall of a dwelling serves as part of the barrier one of the following conditions shall be met:
 - 9.1. The pool shall be equipped with a powered safety cover in compliance with ASTM F1346; or
 - 9.2. All doors with direct access to the pool through that wall shall be equipped with an alarm which produces an audible warning when the door and its screen, if present, are opened. The alarm shall sound continuously for a minimum of 30 seconds immediately after the door is opened and be capable of being heard throughout the house during normal household activities. The alarm shall automatically reset under all conditions. The alarm system shall be equipped with a manual means, such as touchpad or switch, to temporarily deactivate the alarm for a single opening. Such deactivation shall last for not more than 15 seconds. The deactivation switch(es) shall be located at least 54 inches (1372 mm) above the threshold of the door; or
 - 9.3. Other means of protection, such as self-closing doors with self-latching devices, which are approved by the governing body, shall be acceptable so long as the degree of protection afforded is not less than the protection afforded by Item 9.1 or 9.2 described above.
10. Where an aboveground pool structure is used as a barrier or where the barrier is mounted on top of the pool structure, and the means of access is a ladder or steps, then:
 - 10.1. The ladder or steps shall be capable of being secured, locked or removed to prevent access, or
 - 10.2. The ladder or steps shall be surrounded by a barrier which meets the requirements of Section AG105.2, Items 1 through 9. When the ladder or steps are secured, locked or removed, any opening created shall not allow the passage of a 4-inch-diameter (102 mm) sphere.

- ❖ This section provides prescriptive requirements for the construction of the swimming pool barrier.
 1. The barrier height requirement of 48 inches (1219 mm) above the ground is based on reports that document the ability of children under the age of 5 to climb over barriers that are less than 48 inches (1219 mm) in height. The basis for the 4-inch (102 mm) criterion for an opening between the barrier and the top of the pool frame is the same as for guard construction as addressed in Section R312. Refer to Commentary Figure AG105.2(1).
 2. The general provision is applicable only when one of the conditions addressed in Items 4, 5, 6, and 7 is not present. For example, a chain-link fence would be regulated by the requirements of Item 6, which reduces the general opening criterion of 4 inches (102 mm) to 2.25 inches (57 mm). The basis for the 4-inch (102 mm) criterion is the same as for guard construction per Section R312. It is based on studies of the body measurements of children 13 to 18 months old.
 3. This provision reduces the potential for gaining a foothold and climbing the barrier.
 4. The more stringent 1.75-inch (44 mm) provision for spacing between vertical members applies when the spacing between horizontal members is less than 45 inches (1143 mm). It acknowledges the potential for a child to gain both a handhold and a foothold on closely spaced horizontal members and reduces the potential for a child to gain a foothold by limiting the space between the vertical members on the same barrier. If the horizontal members are spaced less than 45 inches (1143 mm) apart, they must also be located on the swimming pool side of the fence as shown in Commentary Figure AG105.2(2) so that they are not available to be used to climb the barriers.
 5. This requirement is the counterpart to Item 4 in that it permits the opening in the barrier to be 4 inches (102 mm) provided the vertical spacing of the horizontal members equals or exceeds 45 inches (1143 mm) as illustrated in Commentary Figure AG105.2(2). It is consistent with Item 2, which limits openings in the barrier to a 4-inch (102 mm) diameter. The spacing of horizontal members 45 inches (1143 mm) apart precludes them from being used by small children to climb the barrier.
 6. The 2¹/₄-inch (57 mm) dimension is intended to reduce the potential for a child to gain a foothold [see Figure AG105.2(3)]. The mesh size is permitted to be larger than 2¹/₄-inches (57 mm) square if slats are used to reduce the mesh opening to 1³/₄ inches (44 mm) in order to decrease the potential for a child to obtain a foothold or handhold.
 7. A slightly larger opening is permitted for barriers composed of diagonal members other than chain link fences, on the basis that such barriers would be more difficult to gain a foothold and handhold on than a chain link fence. The 1.75-inch (44 mm) dimension is consistent with Items 4, 5 and 6.
 8. A gate represents the same potential hazard relative to climbing as do the other portions of the barrier: therefore, it must be constructed in accordance with applicable Items 1 through 7. Additionally, since the gate also represents a potential breach of the barrier because the gate can be opened, the code provides prescriptive details for the construction and operation of the gate. A self-closing pedestrian gate must open away from the pool because if the latch fails to operate, a child pushing on the gate will not gain immediate access to the pool. Pushing on the gate may also engage the latch. Large, nonpedestrian gates are not required to be self-closing because of prohibitive cost and maintenance concerns coupled with the fact that these gates are typically operated by persons other than small children. The 54-inch (1372 mm) latch height requirement limits the potential for small children to reach and activate the latch. If the latch is located lower than 54 inches (1372 mm), the code's prescriptive location requirements preclude the latch from being activated by small children who are not on the pool side of the gate.
 9. Many residential settings with backyard pools use the dwelling as a portion of the barrier required around the pool, such as where the fence bounding the property terminates at the dwelling. This limits access to the pool by unsupervised children around the perimeter of the fence, but there is still a potential for children to access the pool from within the dwelling. Indeed, almost half the children involved in drowning or near-drowning accidents gained access to the pool from the dwelling.

The provisions of this section restrict such access by small children and are applicable to all doors in walls that form a portion of the barrier required around swimming pools.

Protection of such door openings to pool areas can be achieved in any one of the methods described in Items 9.1 through 9.3. The first alternative does not require protection of the exterior door itself but limits access to the pool by means of a power safety cover. The performance criteria specified when this option is selected assures that the power safety cover is an adequate and

reliable barrier to the pool. In Item 9.2, the alarm is configured to allow adults who are accessing the house to open the door, enter the house, and deactivate the system to prevent a false alarm. The touchpad permitted to deactivate the system is required to be mounted 54 inches (1372 mm) above the floor, which is presumed to be beyond the reach of small children.

Item 9.3 permits doors to pool areas to be protected by devices that render the door self-closing and self-latching. Any other requirements would be performance based, as the code only requires equivalency with Items 9.1 or 9.2. One possible criterion could require the release mechanism for the latching device to be located a minimum of 54 inches (1372 mm) above the floor, which is presumed to be beyond the reach of small children. In addition, doors protected by the method specified in Item 9.3 should probably open away from the pool area. This is so that if the door failed to latch, a child outside the pool area pushing against the door would cause it to close and not swing to an open position.

10. The code permits the wall of the pool itself to serve as the barrier to the pool, provided that the wall extends at least 48 inches (1219 mm) above the finished ground level around the perimeter of the pool. Unless capable of being secured, locked, or removed, the ladder must be surrounded by a complying barrier to limit access to the ladder.

AG105.3 Indoor swimming pool. All walls surrounding an indoor swimming pool shall comply with Section AG105.2, Item 9.

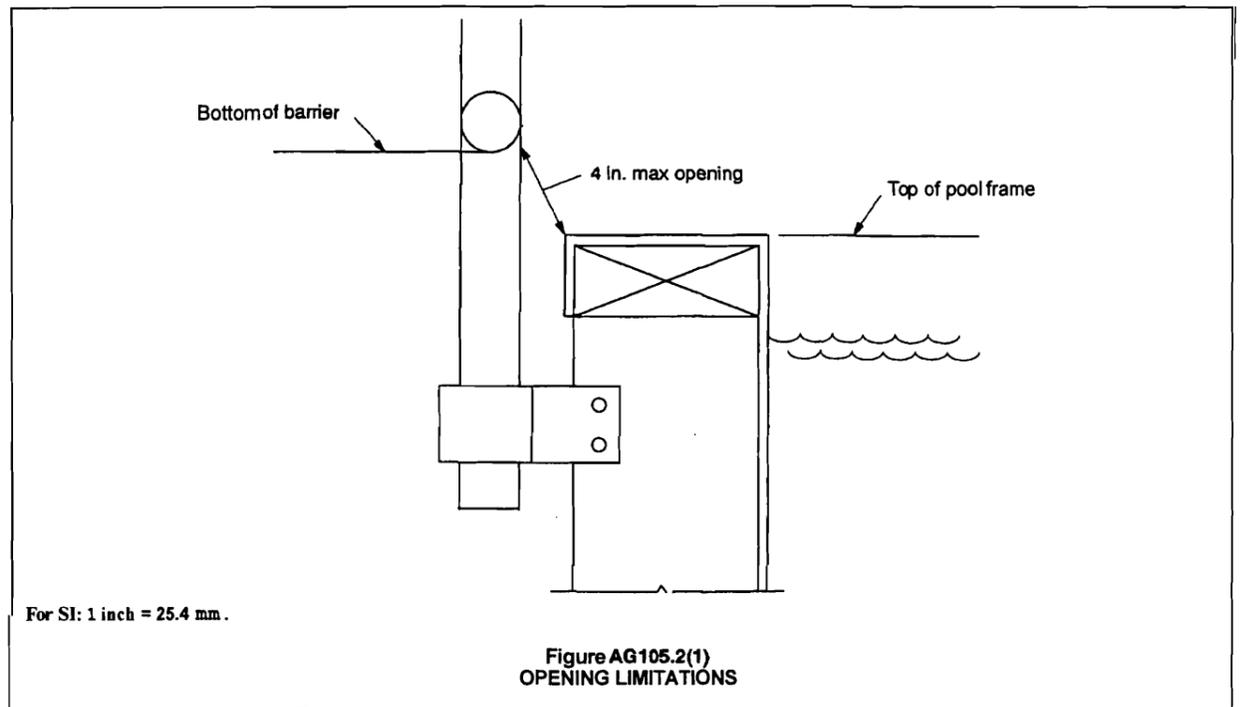
❖ Indoor pools represent the same hazards as outdoor pools. For this reason, the walls and doors surrounding an indoor swimming pool are regulated in the same manner as an exterior wall of a dwelling where the wall is used as a barrier for an outdoor pool. The provisions of Section AG105.2, Item 9 apply in their entirety.

AG105.4 Prohibited locations. Barriers shall be located so as to prohibit permanent structures, equipment or similar objects from being used to climb the barriers.

❖ The purpose of a swimming pool barrier would be defeated if children could climb on benches, planters, pumps, and similar permanent features adjacent to the barrier and gain access to the pool area. Therefore, the area adjacent to the barrier must be carefully designed and constructed to avoid such a condition. This provision is performance in character and must be reviewed on a case-by-case basis.

AG105.5 Barrier exceptions. Spas or hot tubs with a safety cover which complies with ASTM F 1346, as listed in Section AG108, shall be exempt from the provisions of this appendix.

❖ The provisions of this appendix chapter are not applicable to spas and hot tubs where an approved safety cover serves as the protective barrier. The requirements of ASTM F 1346 contain a number of criteria so that the safety cover can provide an equivalent level of

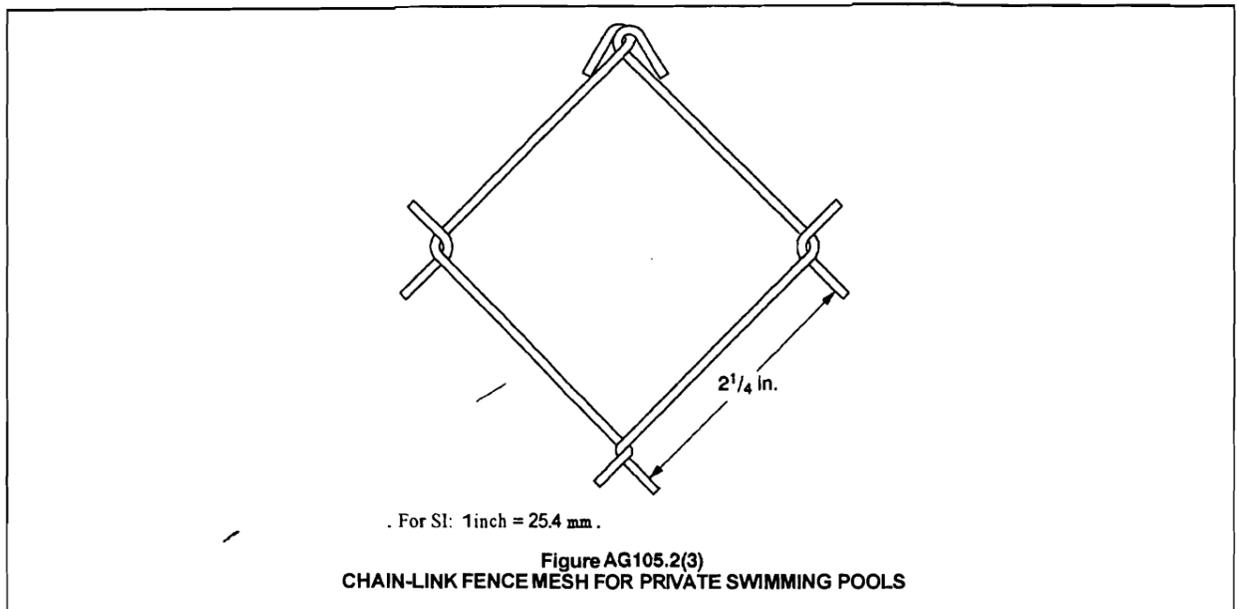
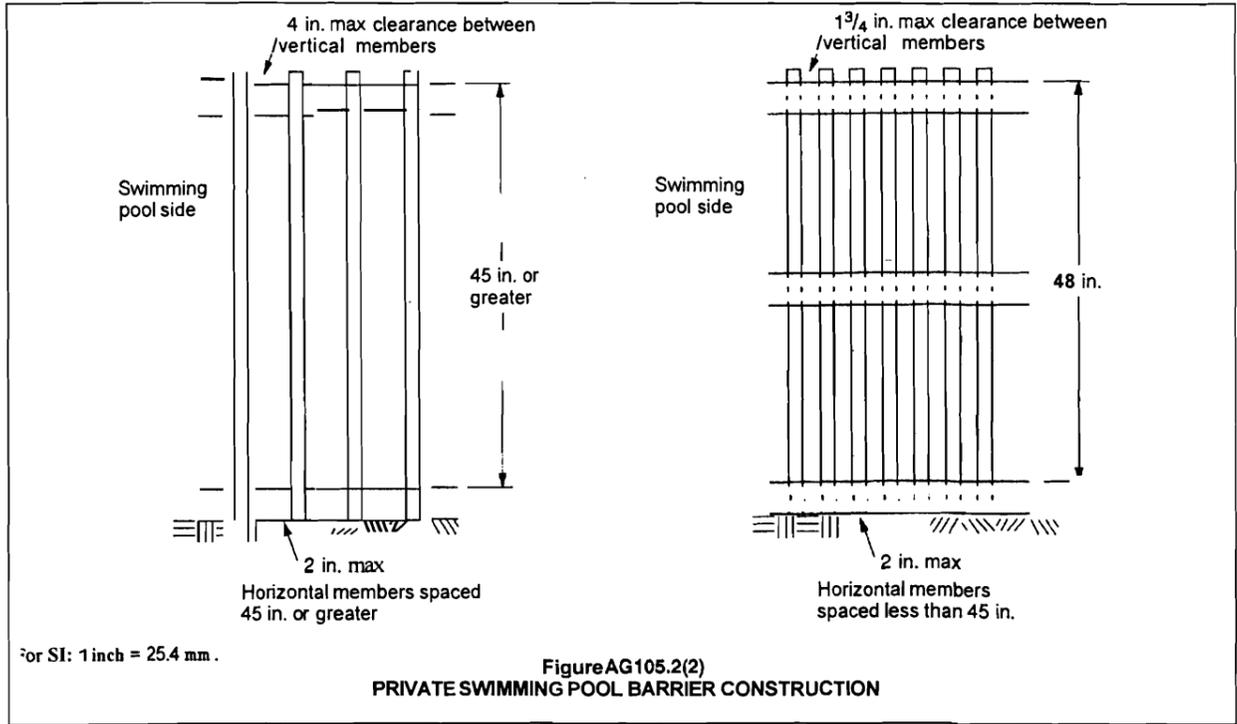


protections that provided by a swimming pool enclosure barrier. The following requirements are representative of several of the specifications found in the standard:

1. There should be a means of fastening the safety cover to the hot tub or spa, such as key locks, combination locks, special tools or similar devices that will prohibit children from removing or operating the cover. The fastening mechanism, design, and location are vital components that help prevent a child's entry to the water.

2. The safety cover should have a label that provides a warning and message regarding the risk of drowning. The label is also very important for

2. The safety cover should have a label that provides a warning and message regarding the risk of drowning. The label is also very important for



the transfer of information to second owners and temporary users.

3. The cover should have been tested to demonstrate that it is capable of supporting the weight of one child [50 pounds (23 kg)] and one adult [225 pounds (102 kg)] so an adult and a child can be supported during a rescue operation.
4. There should be no openings in the cover itself or at any point where the cover joins the surface of the hot tub or spa that would allow a child's head to pass through. The 4-inch (102 mm) spacing for guards in Section R312 and openings in pool enclosures of Section AG105.2 are also applicable.
5. Safety covers are to be installed in accordance with the manufacturer's instructions.

Legend

THE FIRST ABOVE GROUND SWIMMING POOL WITH A FULL 52" WALL

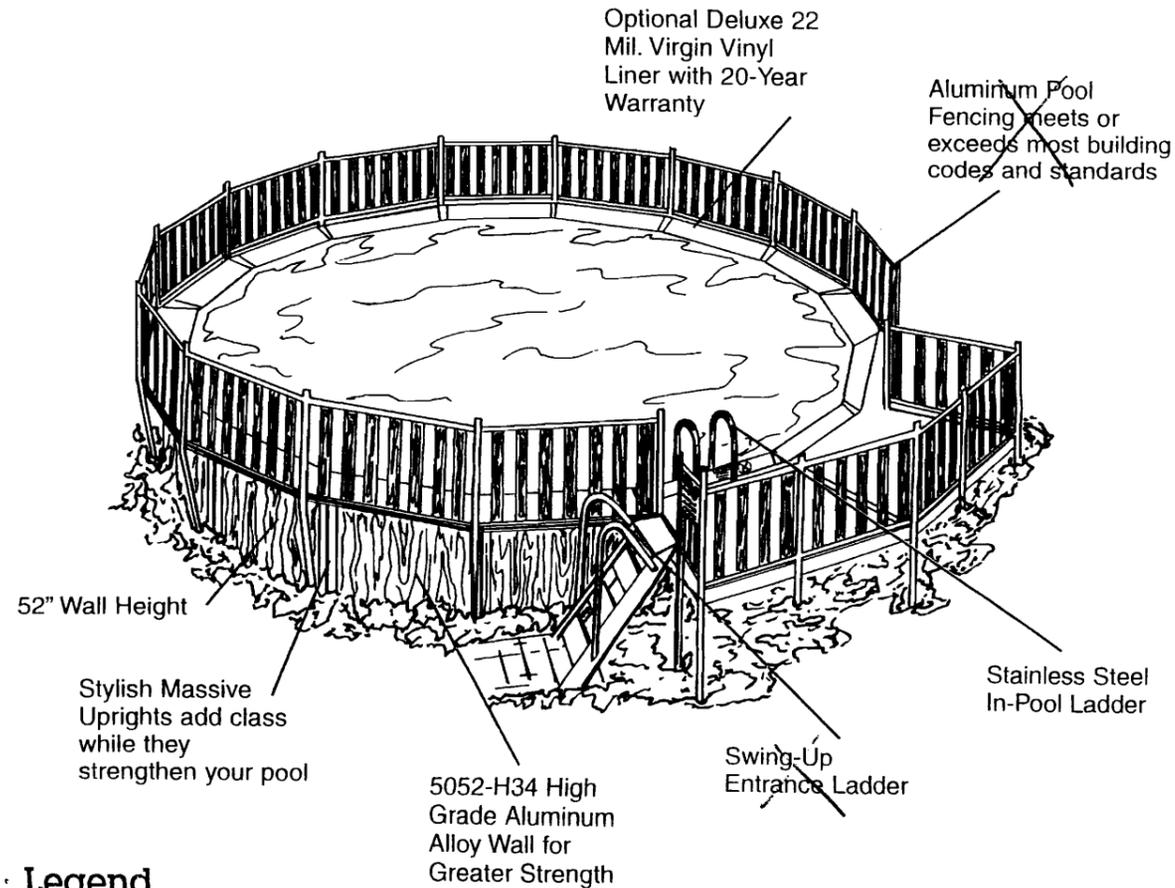
The Legend with its designer-inspired wall patterns on the outside and wear resistant coating on the inside, offers beauty and extreme durability. That, coupled with many exclusive features built into the Legend pool place it far above any competitive pool. Stainless steel and aluminum hardware offer long lasting beauty and resistance to weathering. And, the super strong extruded heavy duty aluminum uprights with 7" slip resistant coping provide the best support available. The Legend includes a 40 year warranty.

Choose the optional liner that's right for you:

- Deluxe 22 Mil. Virgin Vinyl Liner with 20 year warranty.
- Standard 20 Mil. Liner with 15 year warranty.

Check the Legend options for your pool:

- Extruded Aluminum Fence...Solid chevron fence...meets or exceeds most building codes and standards including NSPI, SBCC, BOCA and UBC.
- Promenade Walk...Large 15" slip resistant extruded aluminum walkway available on a limited number of sizes.
- Sun Deck...Welded and carpeted at the factory.
- Sun Deck Entrance Ladder...Made of prepainted extruded aluminum. Swings up and latches for security.
- Deluxe Stainless Steel Pool Ladder...In-pool ladder with cast aluminum anchor flanges.



Legend

POOL SPECIFICATIONS:

SIZE*	SQ. FT.	NORMAL USE GALLONS	MAXIMUM GALLONS
15'	177	5,076	5,738
18'	254	7,284	8,232
21'	346	9,922	11,214
24'	452	12,959	14,650
27'	573	16,428	18,559
30' **	707	20,300	22,900

Specifications
Subject to Change
Without Notice



*Overall Water Dimensions

**See dealer for color selection

T1893-79-G

Johnny Weissmuller

ALL ABOVE GROUND POOLS ARE NON-DIVING POOLS

ABB Environmental Services, Inc.

PROJECT
Detail of Barrier Fence + Gate

COMP BY	JOB NO.
CHK BY	DATE

Diagram of proposed barrier fence

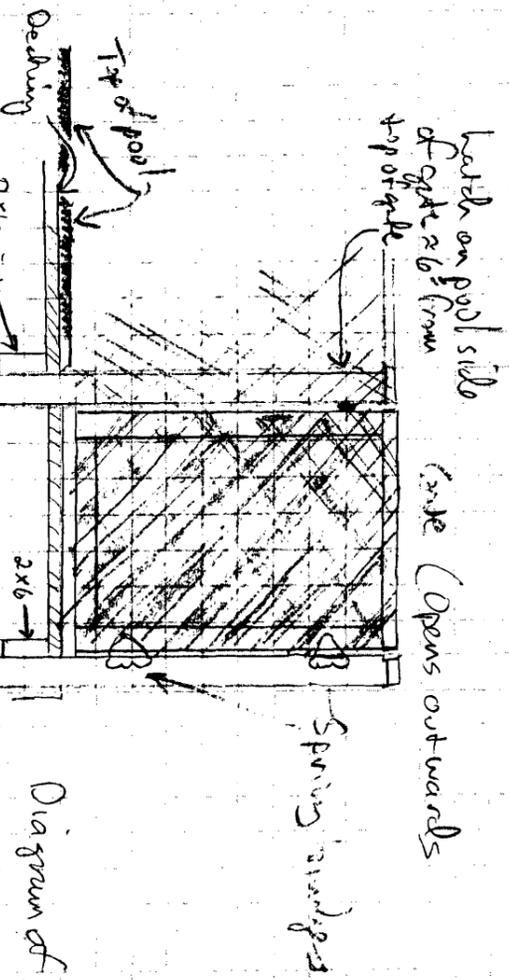
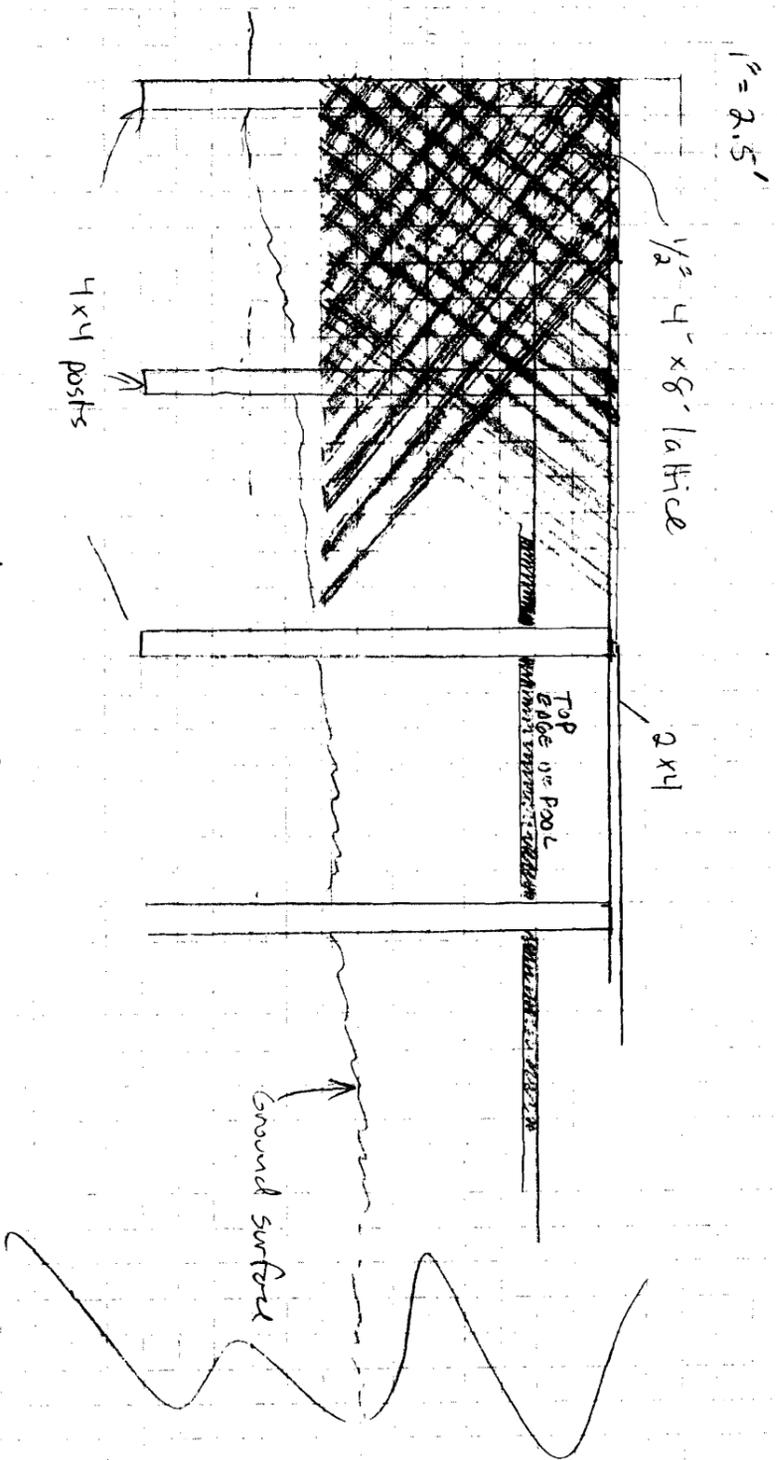


Diagram of proposed gate

ABB Environmental Services, Inc.

PROJECT
SIDE VIEW

COMP BY	JOB NO.
CHK BY	DATE

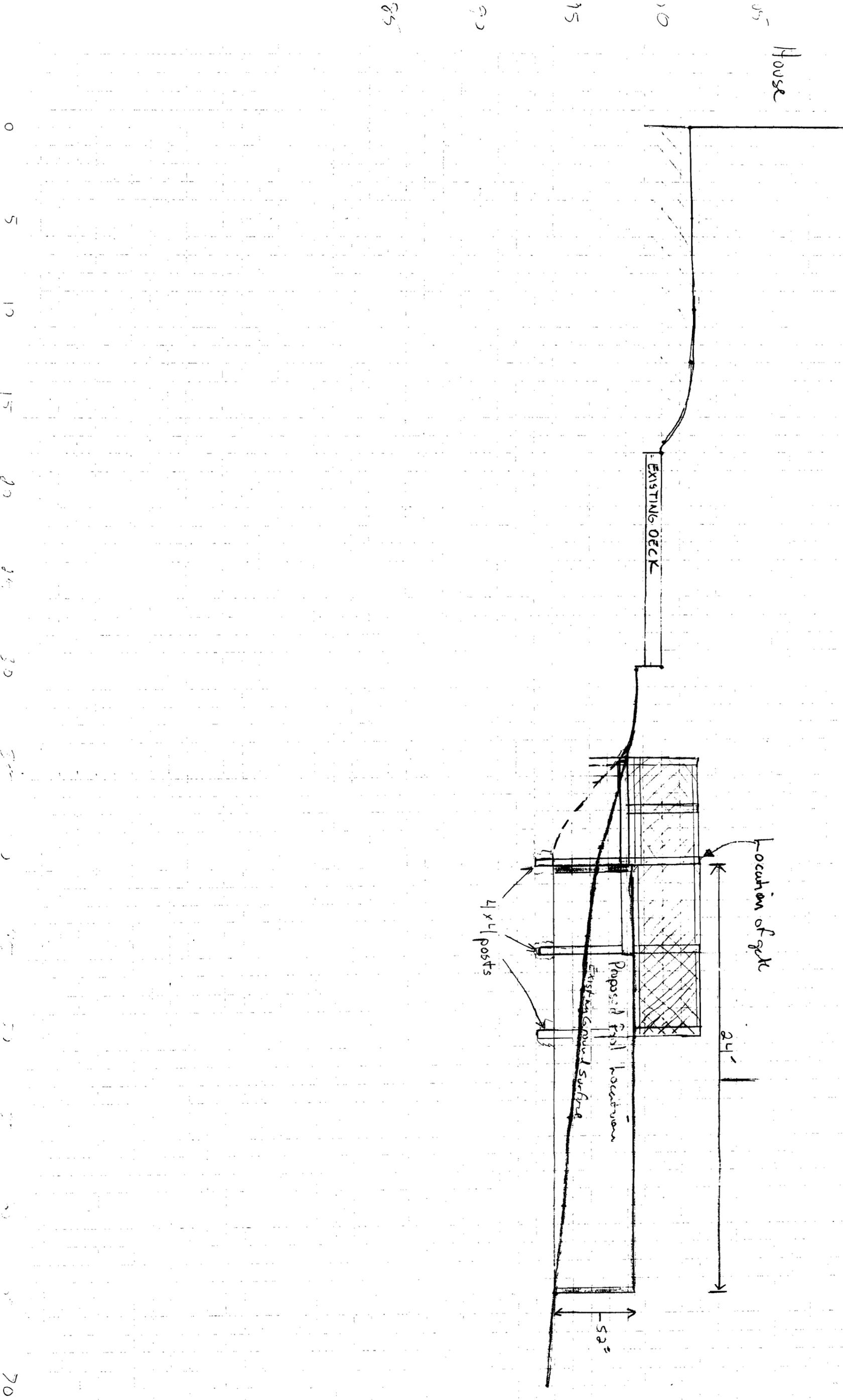
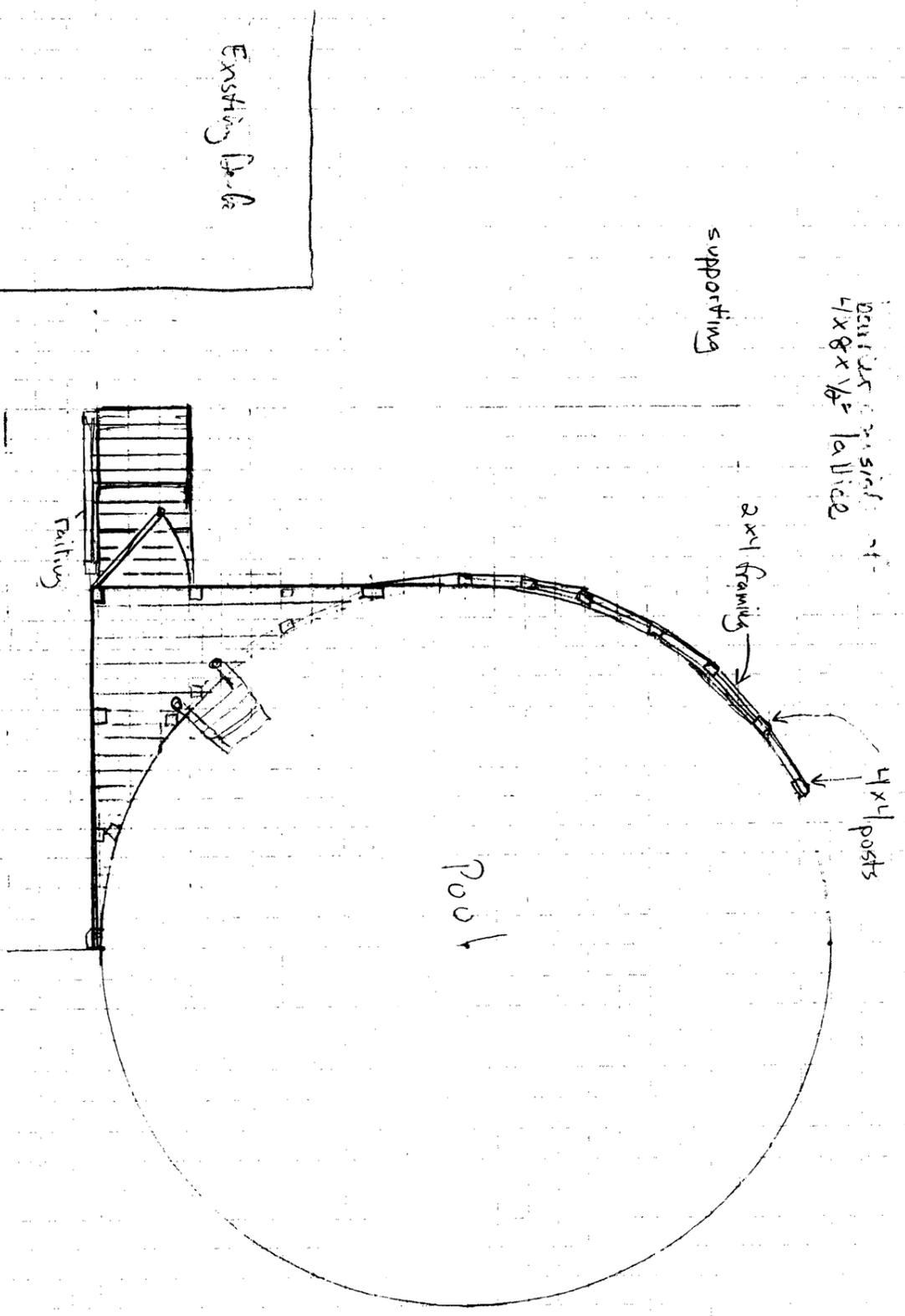


ABB Environmental Services, Inc.

PROJECT
PLAN VIEW

COMP BY JOB NO.
CHK BY DATE

Setbacks - 10 FT all around



8	8' Lumber Super Posts	1200	3,000	24,000
8	4x4x10 Posts	1800	72,000	
8	4x8 1/2 inch Lattice	1500	120,000	
14	2x4		49,000	
13	2x6		60,000	
30+14+8	= 52 Posts		100,000	
Handys	2x4x2		5,000	
Handys	2x4x2		12,000	
Nails	14x2		28,000	
Screws	30x1		30,000	
			<u>415,000</u>	

6" x 10
1" x 10
10 (sq) x 20 ft