GOVERNMENT OF THE DISTRICT OF COLUMBIA
OFFICE OF THE CHIEF TECHNOLOGY OFFICER

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April 12, 2002

Mary Cuthbert
Chairperson ANC 8C
3325 Martin Luther King Jr. Avenue, SE
Washington, DC 20032

Reference: Letter to the Board of Zoning dated April 8th, 2002
Subject: UCC Consolidated PUD and Map Amendment, Zoning Commission Case No. 01-36C

Dear Ms. Cuthbert,

The UCC project team has been forwarded your letter submitted to the Zoning Commission dated April 8, 2002 requesting a postponement of the zoning hearing scheduled for April 18, 2002. In response to the referenced letter, and your phone conversation with Roger Richmond on April 3, 2002, I would like to submit the attached copy of the independent study conducted by URS Corporation regarding the incinerator ash located on the proposed site of the UCC parking and landscape.

The URS Corporation is an environmental and archaeological firm which has been contracted by the District of Columbia to complete the independent assessment of the incinerator ash and to complete an archaeological assessment of the property. The URS corporation has also been contracted to develop a specification regarding the disturbance of any of the incinerator ash. The specification will identify procedures and guidelines consistent with applicable rules, regulations and environmental policy, for the monitoring of air quality and treatment of any incinerator ash that is disturbed. I will forward the specification for your review once it is complete.

If it is desirous of the your ANC and/or the Ward 8 community that another independent assessment of the incinerator ash be completed, the District is eager to work with the community to address this request. The UCC project team is currently trying to obtain a copy of the George Washington University / Green Peace report referenced in your letter, but has been unsuccessful in obtaining a copy to date. Any assistance that you can provide in this regard would be greatly appreciated.

As you are aware, the UCC project has initiated a rather extensive community outreach effort consisting of seventeen (17) meetings attended, as well as several individual meetings and telephone conferences with Ward 8 community members including yourself. We look forward to continuing to work with the community to resolve and address issues related to the UCC project.

Respectfully submitted,

John Lecker
UCC Project Manager

ZONING COMMISSION
District of Columbia
Case 01-36C
Exhibit 24

Enclosures – Final Report Sampling and Chemical Analysis Results – Ash Fill Area (9 Pages)

cc: Renee Lucas, Calvin Lockridge, Barbara Kemp, Richard Clark, Virginia Major, Kenneth Johnson, Alberto Bastida, File C100-300

ZONING COMMISSION
District of Columbia
CASE NO.01-36C
EXHIBIT NO.24

RECEIVED
JAN 2002

URS

January 10, 2002

Mr. Dave Talley
Jacobs Facilities, Inc.
1111 19th Street, NW
Washington, DC 20036

Subject: **Final Report**
Sampling and Chemical Analysis Results – Ash Fill Area
Proposed Parking Lot for Unified Communications Center
Washington, D.C.
Subcontract Number F5-257422-S-01-0001

Dear Mr. Talley:

URS Group, Inc. (URS) is pleased to present to Jacobs Facilities, Inc. (Jacobs) the results of the analyses of soil/ash samples collected in the ash fill area of the proposed parking lot for the Unified Communications Center (UCC) on the campus of St. Elizabeths Hospital in Washington, D.C. It is URS's understanding that some of the existing fill material at the site may be excavated in order to construct the proposed UCC. Therefore, the purpose of this work is to characterize the ash fill material in the vicinity of the project for disposal and identify constituents present in the ash fill material. In order to characterize the fill material, URS collected two field samples of the ash fill material for laboratory analysis.

Previous reports indicate that the fill area on the subject property consists of non-hazardous incinerator ash from the Benning Road incinerator, placed on site from 1977 to 1989. Boring data indicates the fill area is up to 35 feet thick. The ash placement was authorized under two Revocable Licenses for Real Property (October 1977 and October 1982) issued to the District of Columbia Government, Department of Environmental Services by the United States of America, represented by St. Elizabeths Hospital, National Institute of Mental Health, Public Health Service, Department of Health, Education and Welfare. The licenses authorized the disposal of incinerator ash to be supplemented with dirt. Paper, trash, concrete and wood were not allowed to be disposed on site; however, boring data indicates some of these materials have been disposed along with the ash. According to previous reports, a site investigation conducted by EPA in 1991 found no immediate risks to human health or the environment and identified the site as having a low priority for cleanup.

FIELD ACTIVITIES AND SAMPLE COLLECTION

In accordance with the Scope of Work (SOW) dated November 30, 2001, a Jacobs Project Manager, Don Eischens, identified six sampling locations within the proposed UCC excavation area. URS marked these sampling locations and designated them Sample Location 1 through 6 (see Figure 1). URS utilized a hand auger to reach the sample depths shown in Figure 1. The

URS Corporation
200 Orchard Ridge Drive, Suite 101
Gaithersburg, MD 20878
Tel: 301.258.9780

URS

samples were collected at depths where the soil appeared to contain ash. Surface aggregate and densely packed fill material prevented hand auger advancement to the proposed collection depth of 12" – 18" at Sample Locations 1, 2, 3, 5, and 6. Samples collected from Sample Locations 1, 2, 3, 5, and 6 were combined to form a composite sample. The composite sample was analyzed for hazardous waste characteristics of toxicity by metals and organic compounds under the Resource Conservation and Recovery Act (RCRA). RCRA characteristics were investigated to characterize the fill material for disposal. One discrete sample was collected at Sample Location 5 and split into two jars. The discrete sample was analyzed for semi-volatile organic compounds (SVOCs) and 13 priority pollutant metals. Sample Location 4 was advanced to a depth of 16" and only trace amounts of ash were identified, therefore no sample was collected from Sample Location 4.

In order to limit cross-contamination, equipment used for sample collection was washed in an Alconox (biodegradable cleaner) and distilled water solution and rinsed with distilled water between sample locations. After collecting the samples, URS placed the samples with ice and they were picked up by Phase Separation Science, Inc. (PSS), an analytical laboratory subcontracted to URS. The samples were handled using industry standard chain of custody procedures.

LABORATORY ANALYSIS RESULTS

PSS conducted the analysis for the 13 priority pollutant metals on December 12, 2001, seven metals were detected. The analysis for SVOCs was performed on December 11, 2001, one SVOC was detected. The RCRA characteristics analysis was performed on December 12, 13 and 14, 2001. All RCRA characteristic parameters were below detection limits. The results of the soil sample laboratory analyses are included in Appendix A.

CONCLUSIONS

Based on the analyses collected, the following conclusions regarding the ash waste within the Jacobs defined limits have been reached:

- The ash waste when removed and disposed would not be classified as a RCRA hazardous waste for metals, pesticides/herbicides, volatile organic compounds, or semivolatile organic compounds.

- Of the constituents (seven metals and one SVOC) detected in the discrete grab sample from Sample Location 5, only the concentration of Arsenic exceeds the US EPA Region Risk-Based Concentration (RBC) Screening Level for residential soil (currently 0.43 mg/kg). However, the level detected does not exceed the RBC for commercial soil, currently 3.8 mg/kg.

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LIMITATIONS

This site investigation was intended to characterize the incinerator ash fill material located on St. Elizabeths campus in the area of the proposed Unified Communications Center. The investigation can only identify contamination to the extent that it was known or suspected through observation or usage on the subject site. The attached analytical results only represent the characteristics of the soil/ash at the locations sampled and are not necessarily representative of the soil/ash at other locations on the subject site. It is possible that the disposal facility will require additional waste characterization testing at the time of disposal.

There is no investigation thorough enough to preclude the presence of materials on the subject site that presently, or in the future, may be considered hazardous. Because regulatory evaluation criteria are constantly changing, concentrations of contaminants present and considered to be acceptable may, in the future, become subject to different regulatory standards and require remediation.

Opinions and judgement expressed herein, which are based on our understanding and interpretation of current regulatory standards, should not be construed as legal opinions. Even the most comprehensive sampling and testing program, using the best available techniques, may derive inferences from samples that are not truly representative.

This report has been prepared solely for the use of Jacobs Facilities and the UCC project. No third party shall have the right to rely on URS opinions rendered in connection with the services or in this document without URS's written consent and the third party's agreement to be bound to the same conditions and limitations as Jacobs.

If you have any questions regarding the content of this letter, or if you require additional information, please do not hesitate to contact Chuck Georgius at (301) 670-3333.

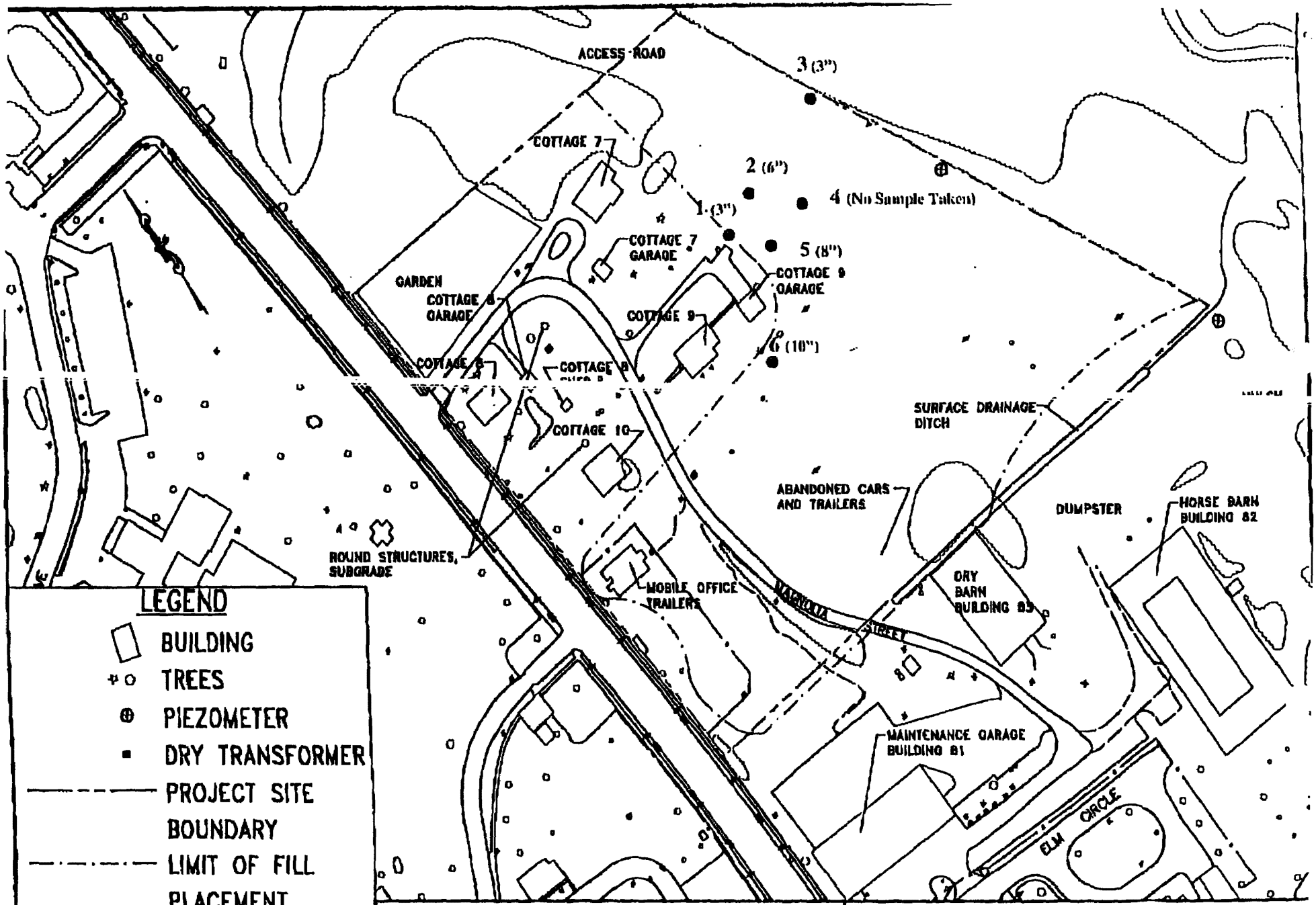
Very truly yours,

URS Corporation

Charles R. Georgius Jr.

Charles R. Georgius, Jr., CHMM
Project Manager

Attachments: Figure 1 – Sketch of Current Site Conditions and Sample Locations
Appendix A – Laboratory Analysis Results



CLIENT	JACOBS FACILITIES
PROJ	Proposed UCC, St. Elizabeths Hospital, Washington DC
REVISION NO	DES BY
SCALE AS SHOWN	DR BY
	CHK BY

TITLE: Soil/Ash Sample Locations (and sample depth)

URS

PROJ NO 60-7200161

FIGURE 1

Apr-16-02 08:33 From- T-680 P.006/011 F-678

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PHASE SEPARATION SCIENCE, INC.

ANALYTICAL CHEMISTRY • ENVIRONMENTAL SCIENCE

CERTIFICATE OF ANALYSIS
No. 01120718-01
URS Corporation - Gaithersburg
December 14, 2001

Project: UCC-Jacobs Facilities
Site Location: S.E., Washington, D.C.
Project Number: 89-F2001016.00
Matrix: Soil

Date Sampled: 12/07/01
Date Received: 12/07/01

Sample ID: [redacted]		Result	Unit	Method	POL	Prepared	Analyzed
Priority Pollutant Metals							
Antimony	<	2.5	mg/kg	EPA 200.8	2.5	12/10/01	12/12/01
Arsenic		1.4	mg/kg	EPA 200.8	0.5	12/10/01	12/12/01
Beryllium	<	2.5	mg/kg	EPA 200.8	2.5	12/10/01	12/12/01
Cadmium	<	2.5	mg/kg	EPA 200.8	2.5	12/10/01	12/12/01
Chromium		15	mg/kg	EPA 200.8	2.5	12/10/01	12/12/01
Copper		24	mg/kg	EPA 200.8	2.5	12/10/01	12/12/01
Lead		28	mg/kg	EPA 200.8	2.5	12/10/01	12/12/01
Mercury		0.2	mg/kg	EPA 200.8	0.1	12/10/01	12/14/01
Nickel		54	mg/kg	EPA 200.8	2.5	12/10/01	12/12/01
Selenium	<	2.5	mg/kg	EPA 200.8	2.5	12/10/01	12/12/01
Silver	<	2.5	mg/kg	EPA 200.8	2.5	12/10/01	12/12/01
Thallium	<	2.5	mg/kg	EPA 200.8	2.5	12/10/01	12/12/01
Zinc		22	mg/kg	EPA 200.8	2.5	12/10/01	12/12/01
Semi-Volatile Organic Compounds							
Acenaphthene	<	4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01
Acenaphthylene	<	4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01
Anthracene	<	4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01
Benzo (a) anthracene	<	4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01
Benzo (b) fluoranthene	<	4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01
Benzo (k) fluoranthene	<	4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01
Benzoic acid	<	24750	ug/kg	EPA 8270	24750	12/11/01	12/11/01
Benzo (g,h,i) perylene	<	4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01
Benzo (a) pyrene	<	4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01
Benzyl alcohol	<	9900	ug/kg	EPA 8270	9900	12/11/01	12/11/01
Bis (2-chloroethoxy) methane	<	4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01
Bis (2-chloroethyl) ether	<	4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01
Bis (2-chloroisopropyl) ether	<	4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01
Bis (2-ethylhexyl) phthalate	<	4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01
4-bromophenyl phenyl ether	<	4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01
Butyl benzyl phthalate	<	4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01
4-Chloroaniline	<	4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01
4-Chloro-3-methylphenol	<	4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01
2-Chloronaphthalene	<	4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01
2-Chlorophenol	<	4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01
4-Chlorophenyl phenyl ether	<	4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01
Chrysene	<	4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01
Dibenzo (a,h) anthracene							

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ANALYTICAL CHEMISTRY • ENVIRONMENTAL SCIENCE

CERTIFICATE OF ANALYSIS
No. 01120718-01 Page 2 of 3
URS Corporation - Gaithersburg
December 14, 2001

Project: UCC-Jacobs Facilities
Site Location: S.E., Washington, D.C.
Project Number: 89-F2001016.00
Matrix: Soil

Date Sampled: 12/07/01
Date Received: 12/07/01

Sample ID: [redacted]	Result	Unit	Method	PQL	Prepared	Analyzed
Semi-Volatile Organic Compounds						
Di-n-butyl phthalate	< 4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01
Dibenzofuran	< 4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01
1,2-Dichlorobenzene	< 4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01
1,3-Dichlorobenzene	< 4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01
1,4-Dichlorobenzene	< 4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01
3,3-Dichlorobenzidine	< 4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01
2,4-Dichlorophenol	< 12450	ug/kg	EPA 8270	12450	12/11/01	12/11/01
Diethyl phthalate	< 4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01
2,4-Dimethylphenol	< 4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01
Dimethyl phthalate	< 4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01
4,6-Dinitro-2-methylphenol	< 12450	ug/kg	EPA 8270	12450	12/11/01	12/11/01
2,4-Dinitrophenol	< 4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01
2,4-Dinitrotoluene	< 4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01
2,6-Dinitrotoluene	< 4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01
Di-n-octyl phthalate	< 4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01
Fluoranthene	< 4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01
Fluorene	< 4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01
Hexachlorobenzene	< 4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01
Hexachlorobutadiene	< 4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01
Hexachlorocyclopentadiene	< 4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01
Hexachloroethane	< 4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01
Indeno (1,2,3-cd) pyrene	< 4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01
Isophorone	< 4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01
2-Methylnaphthalene	< 4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01
2-Methylphenol	< 4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01
4-Methylphenol	< 4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01
Naphthalene	< 4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01
2-Nitroaniline	< 12450	ug/kg	EPA 8270	12450	12/11/01	12/11/01
3-Nitroaniline	< 12450	ug/kg	EPA 8270	12450	12/11/01	12/11/01
Nitrobenzene	< 4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01
2-Nitrophenol	< 4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01
4-Nitrophenol	< 12450	ug/kg	EPA 8270	12450	12/11/01	12/11/01
N-Nitrosodiphenylamine	< 4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01
N-Nitroso-di-n-propylamine	< 4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01
Pentachlorophenol	< 12450	ug/kg	EPA 8270	12450	12/11/01	12/11/01
Phenanthrene	< 4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01
Phenol	< 4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01

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CERTIFICATE OF ANALYSIS
No. 01120718-01 Page 3 of 3
URS Corporation - Gaithersburg
December 14, 2001

Project: UCC-Jacobs Facilities
Site Location: S.E., Washington, D.C.
Project Number: 89-F2001016.00
Matrix: Soil

Date Sampled: 12/07/01
Date Received: 12/07/01

Sample ID: Sample Location		Result	Unit	Method	PQL	Prepared	Analyzed
Semi-Volatile Organic Compounds							
Pyrene	e	870	ug/kg	EPA 8270	4950	12/11/01	12/11/01
1,2,4-Trichlorobenzene	<	4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01
2,4,5-Trichlorophenol	<	12450	ug/kg	EPA 8270	12450	12/11/01	12/11/01
2,4,6-Trichlorophenol	<	4950	ug/kg	EPA 8270	4950	12/11/01	12/11/01

Notes/Comments:

PQL - Practical Quantitation Limit
Results reported on an as received basis
e - estimated value, less than quantitation limit

Reviewed By: Matt Cohen
Quality Assurance Chemist

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CERTIFICATE OF ANALYSIS
No. 01120718-02 Page 1 of 2
URS Corporation - Gaithersburg
December 14, 2001

Project: UCC-Jacobs Facilities
Site Location: S.E., Washington, D.C.
Project Number: 89-F2001016.00
Matrix: Soil

Date Sampled: 12/07/01
Date Received: 12/07/01

Sample ID: [redacted]	Result	Unit	Method	Limits	Extracted	Analyzed
TCLP Metals						
Arsenic	< 0.5	mg/L	1311/200.8	5	12/10/01	12/12/01
Barium	< 10	mg/L	1311/200.8	100	12/10/01	12/12/01
Cadmium	< 0.1	mg/L	1311/200.8	1	12/10/01	12/12/01
Chromium	< 0.5	mg/L	1311/200.8	5	12/10/01	12/12/01
Lead	< 0.5	mg/L	1311/200.8	5	12/10/01	12/12/01
Mercury	< 0.1	mg/L	1311/200.8	0.2	12/10/01	12/14/01
Selenium	< 0.1	mg/L	1311/200.8	1	12/10/01	12/12/01
Silver	< 0.5	mg/L	1311/200.8	5	12/10/01	12/12/01
TCLP Herbicides						
2,4,5-TP(Silvex)	< 100	ug/L	1311/8151	1000	12/10/01	12/14/01
2,4-D	< 100	ug/L	1311/8151	10000	12/10/01	12/14/01
TCLP Pesticides						
Lindane	< 5	ug/L	1311/8081	400	12/10/01	12/13/01
Heptachlor	< 5	ug/L	1311/8081	8	12/10/01	12/13/01
Heptachlor Epoxide	< 5	ug/L	1311/8081	8	12/10/01	12/13/01
Endrin	< 5	ug/L	1311/8081	20	12/10/01	12/13/01
Methoxychlor	< 5	ug/L	1311/8081	10000	12/10/01	12/13/01
Toxaphene	< 25	ug/L	1311/8081	500	12/10/01	12/13/01
Chlordane	< 25	ug/L	1311/8081	30	12/10/01	12/13/01
TCLP Semi-Volatiles						
o-Cresol	< 20	ug/L	1311/8270	200000	12/10/01	12/12/01
p-Cresol	< 20	ug/L	1311/8270	200000	12/10/01	12/12/01
m-Cresol	< 20	ug/L	1311/8270	200000	12/10/01	12/12/01
2,4-Dinitrotoluene	< 20	ug/L	1311/8270	130	12/10/01	12/12/01
Hexachloroethane	< 20	ug/L	1311/8270	3000	12/10/01	12/12/01
Hexachlorobenzene	< 20	ug/L	1311/8270	130	12/10/01	12/12/01
Nitrobenzene	< 20	ug/L	1311/8270	2000	12/10/01	12/12/01
Pentachlorophenol	< 100	ug/L	1311/8270	100000	12/10/01	12/12/01
Pyridine	< 20	ug/L	1311/8270	5000	12/10/01	12/12/01
2,4,5-Trichlorophenol	< 20	ug/L	1311/8270	400000	12/10/01	12/12/01
2,4,6-Trichlorophenol	< 20	ug/L	1311/8270	2000	12/10/01	12/12/01
	< 20	ug/L	1311/8270	500	12/10/01	12/12/01

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CERTIFICATE OF ANALYSIS
No. 01120718-02 Page 2 of 2
URS Corporation - Gaithersburg
December 14, 2001

Project: UCC-Jacobs Facilities
Site Location: S.E., Washington, D.C.
Project Number: 89-F2001016.00
Matrix: Soil

Date Sampled: 12/07/01
Date Received: 12/07/01

Sample ID: [redacted]	Result	Unit	Method	Limits	Extracted	Analyzed
TCLP Volatiles						
Benzene	< 100	ug/L	1311/8260	500	12/10/01	12/12/01
Carbon Tetrachloride	< 100	ug/L	1311/8260	500	12/10/01	12/12/01
Chloroform	< 100	ug/L	1311/8260	6000	12/10/01	12/12/01
1,2-Dichloroethane	< 100	ug/L	1311/8260	500	12/10/01	12/12/01
Tetrachloroethene	< 100	ug/L	1311/8260	700	12/10/01	12/12/01
Vinyl Chloride	< 100	ug/L	1311/8260	200	12/10/01	12/12/01
2-Butanone	< 200	ug/L	1311/8260	200000	12/10/01	12/12/01
Chlorobenzene	< 100	ug/L	1311/8260	100000	12/10/01	12/12/01
1,4-Dichlorobenzene	< 100	ug/L	1311/8260	7500	12/10/01	12/12/01
1,1-Dichloroethene	< 100	ug/L	1311/8260	700	12/10/01	12/12/01
Trichloroethene	< 100	ug/L	1311/8260	500	12/10/01	12/12/01

Notes/Comments:
Results reported on an as received basis

Reviewed By: Matt Cohee
Quality Assurance Chemist

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Washington, DC 20036
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(202) 912-8046 Fax

Office of the Chief Technology Officer
(OCTO)
UCC Project Office

Fax

To: ALBERTO BASTIDA From: DORIS Jackson

Fax: 727-6022 Pages: 11

Phone: Date: 4-16-02

Re: Case No. 01-36C CC:

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• Comments:

Mr. Bastida,

I am also mailing this document to you through USPS regular mail.

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