SEPA ENVIRONMENTAL CHECKLIST

Purpose of checklist:

Governmental agencies use this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

Instructions for applicants:

This environmental checklist asks you to describe some basic information about your proposal. Please answer each question accurately and carefully, to the best of your knowledge. You may need to consult with an agency specialist or private consultant for some questions. <u>You may use "not applicable" or</u> "does not apply" only when you can explain why it does not apply and not when the answer is unknown. You may also attach or incorporate by reference additional studies reports. Complete and accurate answers to these questions often avoid delays with the SEPA process as well as later in the decision-making process.

The checklist questions apply to <u>all parts of your proposal</u>, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

Instructions for Lead Agencies:

Please adjust the format of this template as needed. Additional information may be necessary to evaluate the existing environment, all interrelated aspects of the proposal and an analysis of adverse impacts. The checklist is considered the first but not necessarily the only source of information needed to make an adequate threshold determination. Once a threshold determination is made, the lead agency is responsible for the completeness and accuracy of the checklist and other supporting documents.

Use of checklist for nonproject proposals:

For nonproject proposals (such as ordinances, regulations, plans and programs), complete the applicable parts of sections A and B plus the <u>SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS (part D)</u>. Please completely answer all questions that apply and note that the words "project," "applicant," and "property or site" should be read as "proposal," "proponent," and "affected geographic area," respectively. The lead agency may exclude (for non-projects) questions in Part B - Environmental Elements –that do not contribute meaningfully to the analysis of the proposal.

A. Background [HELP]

1. Name of proposed project, if applicable:

Burlington Environmental Kent Facility – Implementation of Cleanup Action Plan

2. Name of applicant:

Burlington Enviornmental LLC, a wholly owned subsidiary of Clean Earth

3. Address and phone number of applicant and contact person:

Laura Dell'Olio, Clean Earth 20245 77th Ave S Kent, WA 98032

Hideo Fujita, Washington State Department of Ecology 3190 160th Ave SE Bellevue, WA 98008

4. Date checklist prepared:

November 13th, 2020

5. Agency requesting checklist: Washington State Department of Ecology (Ecology)

6. Proposed timing or schedule (including phasing, if applicable): Schedule to be determined once draft Cleanup Action plan is approved.

7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.

No.

8. List any environmental information you know about that has been prepared, or will be

prepared, directly related to this proposal.

A Draft Cleanup Action Plan was prepared for public review in 2020. The draft Cleanup Action Plan was prepared following a Remedial Investigation/Feasibility Study. Documents associated with the Remedial Investigation/Feasibility Study are identified in the Cleanup Action Plan.

An Agreed Order will be prepared to require implementation of the Cleanup Action Plan. The Cleanup Action Plan will be an attachment to the Agreed Order. The Agreed Order, with attached Cleanup Action Plan is being provided to the public for comment which is anticipated in Spring 2021. A Draft Public Participation Plan has also been prepared for public comment. Once the comment period closes and the Agreed Order and Cleanup Action Plan are finalized, Burlington Environmental will prepare monitoring and engineering documents as decribed in the Cleanup Action Plan.

9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.

Burlington Environmental's proposed action is described in the draft Agreed Order, the Cleanup Action Plan, and the Public Participation Plan. These are the only "government approvals" pending at this time that are being provided to the public for comment.

10. List any government approvals or permits that will be needed for your proposal, if known.

Other than Ecology's finalization of the Agreed Order, Public Participation Plan, and Cleanup Action Plan, and future documents required by the Agreed Order and Cleanup Action Plan, it is anticipated that the following approvals will be needed:

• Ecology Start Cards for Wells

11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)

The project will consist of implementing the Cleanup Action Plan. The selected remedy includes:

- Active treatment of remaining contaminated source soils in active areas of the Site as they become accessible or at Site closure.
- Maintaining pavement or concrete surface cover.
- Groundwater monitoring using groundwater wells to monitor natural attenuation of chemicals present in groundwater.

General – Access limitations (such as fencing) and institutional controls will be implemented. Deed restrictions will be required of the land owner to maintain the integrity of the monitoring systems and limit public access and non-residential uses.

No new uses are proposed for the property and operation as a transfer, storage, and disposal facility for waste is expected to continue. The project and Site are approximately 267,640 square feet.

12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.

20245 77th Avenue South Kent, WA Northwest corner of South 206th St. and 77th Avenue South. SE-1-22N-4E Parcel 6314400200

Legal description:

O'BRIEN STATION GARDEN TRACTS TRACT 10 & E 79.76 FT OF TRACT 9 LESS POR SD TRACT 10 LY SELY OF ARC OF CURVE BEING CONCAVE TO NW HAVING RADIUS OF 25 FT & BEING TANGENT TO W LINE OF E 5 FT OF SD TRACT 10 & BEING TANGENT TO N LINE OF S 5 FT OF SD TRACT 10 BEING CONV TO CITY OF KENT BY DEED UNDER RECORDING NO 7909110460 -- AS DESC & DELINEATED PER CITY OF KENT LOT LINE ADJUSTMENT NO LL-93-5 RECORDING NO 9304151423

A vicinity map is provided as Figure 1.

B. Environmental Elements [HELP]

1. Earth [help]

a. General description of the site:

(circle one): Flat, rolling, hilly, steep slopes, mountainous, other _____

b. What is the steepest slope on the site (approximate percent slope)?

The site is covered with asphalt, concrete, or gravel. It is generally flat and the steepest grade is associated with ramps at no more than 6 percent. Ramps are used to move between the east and west halfs of the site with the 10-day lot being a lower elevation than the area with active waste handling operations.

c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils.

The site is covered in buildings, concrete, pavement, and small vegetated areas. The Cleanup Action Plan identifies six hydrogeologic units that occur with increasing depths within the cleanup area. The hydrogeologic units of primary interest include the shallow fill, upper silt and clay aquitard, silty sand intermediate aquifer, lower silt aquitard, lower sand aquifer, and deep silt aquitard. Soils in these units generally consist of alternating sand and silty/clayey layers.

- d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.
 No
- e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill. Small excavations to remove contaminated source soils as they become available will occur under the Cleanup Action Plan. Specifics of area and quanities are unknown at this time because additional sampling will be necessary prior to excavation and backfilling of the remedial areas.
- f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe.

Erosion is possible, but unlikely because work wold occur in small finite areas and proper temporary erosion and sediment controls would be implemented.

- g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)? No changes to surface materials.
- h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any: Proper temporary erosion and sediment controls would be implemented for any land disturbing activities.

2. Air [help]

a. What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known.

CO2 emmissions would be emitted from the drill rig during installation of three new monitoring wells and heavy equipment during any small remedial excavations on the site. The quantity of CO2 emitted is unknown. No additional emmissions beyond these tasks are expected.

b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.

Not applicable, proposed work does not require off site work.

- c. Proposed measures to reduce or control emissions or other impacts to air, if any: No proposed measures to reduce emissions since the quantity is expected to be minimal in order to complete the scope of work.
- 3. Water [help]
- a. Surface Water: [help]
 - Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.

A drainage ditch runs along the northern border of the western half of the site. This ditch drains to Mill Creek and into Springbrook Creek. Several miles north of the site, Springbrook Creek flows into the Black River, Which joins the Duwamish River and flows to Puget Sound. The Green River is 1.4 miles west of the site.

- 2) Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.
 A groundwater monitoring well will be installed within 200 feet of the northern ditch, but will not be located in the ditch.
- 3) Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.

Not applicable. There is no work related to surface water or wetlands.

- 4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known. No surface water withdrawals or diversions required.
- 5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.

No, FEMA labels the site as Zone X with minimal risk and out of the flood zone.

6) Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge. No

b. Ground Water: [help]

- 1) Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give general description, purpose, and approximate quantities if known. Groundwater will be withdrawn from the existing groundwater monitoring well network for monitoring purposes related to selected remedy in the Cleanup Action Plan. The exisiting well network is shown on Figure 2 and an estimated 10 gallons will be withdrawn from each well per year. Groundwater will be containerized and handled as waste by the facility. No discharges to groundwater will occur as part of this proposal nor will any groundwater be withdrawn from a well for drinking water.
- 2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals...; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.

Not Applicable, no discharges into the gound.

- c. Water runoff (including stormwater):
 - 1) Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.

The stormwater that falls onto the west side of the site accumulates into the stormwater detention pond and bioswale where stormwater infiltrates. Stormwater on the east side of the facility (active waste operations) is collected through catchments and sumps, and is then treated and discharged to King County sanitary sewer.

- 2) Could waste materials enter ground or surface waters? If so, generally describe. No
- 3) Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.

No

d. Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any:

Not Applicable, work will not impact the above items.

4. Plants [help]

a. Check the types of vegetation found on the site:

- _x__deciduous tree: alder, maple, aspen, other
- _x__evergreen tree: fir, cedar, pine, other
- _x__shrubs
- _x__grass
- ____pasture
- ____crop or grain
- _____ Orchards, vineyards or other permanent crops.
- _x__ wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other
- ____water plants: water lily, eelgrass, milfoil, other
- ____other types of vegetation
- **b.** What kind and amount of vegetation will be removed or altered? No vegetation will be removed or altered.
- **c.** List threatened and endangered species known to be on or near the site. No threatened or endangered species observed onsite.
- d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any:

No proposed landscaping

e. List all noxious weeds and invasive species known to be on or near the site. No noxious weeds or invasive species observed onsite.

5. Animals [help]

a. <u>List</u> any birds and <u>other</u> animals which have been observed on or near the site or are known to be on or near the site.

Birds and animals that have been observed on or near the site are listed below:

birds: songbirds, seagulls, crows mammals: none observed fish: none.

- **b.** List any threatened and endangered species known to be on or near the site. No threatened or endangered species observed onsite.
- c. Is the site part of a migration route? If so, explain.

The site is not a significant part of any known migration route.

d. Proposed measures to preserve or enhance wildlife, if any: No proposed measures necessary.

e. List any invasive animal species known to be on or near the site.

No invasive animal species known to be on or near the site.

6. Energy and Natural Resources [help]

a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

The completed project does not require energy.

b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.

No.

c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any: Not applicable, no impacts to energy consumption from this proposal.

7. Environmental Health [help]

a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur as a result of this proposal? If so, describe.

The proposed Cleanup Action Plan has been designed to protect human health and the environment from site related contamination. That is, its very purpose is to clean-up the site so that current and future receptors are better protected.

While the actions are being constructed/implemented there are several safety concerns for site workers. These will be addressed in a health and safety plan. There are also possible, though highly unlikely, public safety concerns that will be considered and addressed as part of the design phase of the proposed actions and therefore, controlling access to the site areas will be the primary safeguard.

The primary contaminants of concern consist of metals in groundwater and volatile organic compounds, semi-volatile organic compounds, petroleum hydrocarbons and metals in soil. Additional details, including specific compounds, are provided below.

A Health and Safety Plan specific to the project will be developed and followed to mitigate potential hazards.

1) Describe any known or possible contamination at the site from present or past

uses.

The primary sources of contaminants of concern at the Site are releases from tanks and piping and constituents spilled at the Site resulting in soil and groundwater impacts. Groundwater concentrations at the Site continue to be monitored and have been mostly non-detect for volatile organic compounds. As the site is predominantly covered with buildings, concrete, or pavement, constituents detected in surface soil are unlikely to be mobilized in fugitive dust; and constituents detected in soil are also unlikely to leach to groundwater unless the industrial development is removed in the future (outside of the scope of this SEPA). Soil contaminants of concern identified in the Cleanup Action Plan included <u>volatile organic compounds (benzene and vinyl chloride)</u>, polycyclic aromatic hydrocarbons (benzo(a)pyrene, benzo(b)fluoranthene, and chrysene), total petroleum hydrocarbons, arsenic, and cyanide. Soil data indicate that the tank farm may be the primary source for releases to the soil and groundwater. Groundwater contaminants of concern included arsenic and iron. The lateral and vertical extent of these contaminants of concern appear to be limited, and primarily present in the tank farm area, and they do not appear to be migrating from the site at concentrations exceeding cleanup levels.

- 2) Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity. The proposal is not affected by the exisiting groundwater and soil contamination or underground utilities including liquid and gas transmission pipelines.
- 3) Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.

The proposal does not require toxic or hazardous chemicals to be used, stored, or produced.

- 4) Describe special emergency services that might be required. The proposal does not required special emergency services.
- **5) Proposed measures to reduce or control environmental health hazards, if any:** The Cleanup Action Plan is proposed in order to monitor natural degradation of and control areas of known contamination. No additional measures are proposed, other than adherence to the site health and safety plan, and no additional health hazards are anticipated.

b. Noise

 What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)? No noise in the area will affect the project. 2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site.

The proposal would produce short term noise related to construction equipment and trucks, but the noise generated would be less than that of noise generated by other industrial facilities in the immediate vicinity. No long term noise will be produced as part of this proposal.

3) Proposed measures to reduce or control noise impacts, if any:

Not applicable, as noise will be minimal compared to surrounding facilities.

8. Land and Shoreline Use [help]

a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.

The site is located on a 6.25-acre parcel of land that can be divided into two areas: (1) the waste management facility on the eastern 3 acres of the Site, and (2) the 10-day hazardous waste transfer yard on the western 3.25 acres of the Site (Figure 2). The site is located in a heavily industrial area of the City of Kent (the City), in an area zoned M3 for general industrial land use by the City.

The properties surrounding the Site are other commercial and industrial facilities. The City's Comprehensive Plan adopted the implementation of zoning regulations under the Growth Management Act (Chapter 36.60A. RCW), which designated a manufacturing/industrial center and discourages and limits land uses other than manufacturing, high technology, and warehousing within the boundaries of the center. The proposed project will not affect current land uses on nearby or adjacent properties.

b. Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses as a result of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use?

Aerial photographs from 1936 indicate the property was used as farmland until 1980 when the property was cleared of all buildings and crops, regraded and prepared for use as industrial property.

 Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how: No

c. Describe any structures on the site.

Buildings on site to facilitate current operation of the transfer, storage, and disposal facility, include a waste storage area, an office building, and a tank farm with secondary containment areas.

d. Will any structures be demolished? If so, what?

The proposal does not require any structures be demolished.

e. What is the current zoning classification of the site?

The site is current zoned M3 for general industrial use via the City of Kent Washington.

f. What is the current comprehensive plan designation of the site?

The comprehensive plan states that the site will remain zoned M3 for general industrial use.

- **g.** If applicable, what is the current shoreline master program designation of the site? Not applicable, inland project.
- h. Has any part of the site been classified as a critical area by the city or county? If so, specify.

No part of the site is classified as critical area.

- **i.** Approximately how many people would reside or work in the completed project? The future number of occupants and/or workers is not known at this time; however, the proposed action does not involve changes to operations at the facility or redevelopment the property for other uses prior to completion of site cleanup.
- j. Approximately how many people would the completed project displace? Zero
- **k.** Proposed measures to avoid or reduce displacement impacts, if any: Not applicable, no displacement impacts.
- I. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any: Comprehensive plan for City of Kent confirmed site will remain zoned for industrial use.
- m. Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any: Not applicable, no impacts.

9. Housing [help]

- a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.
 Zero
- Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.
 Zero
- **c.** Proposed measures to reduce or control housing impacts, if any: Not applicable, no housing impacts.

10. Aesthetics [help]

- a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed? Not applicable, no proposed structures.
- **b.** What views in the immediate vicinity would be altered or obstructed? Not applicable, no proposed structures.
- **b.** Proposed measures to reduce or control aesthetic impacts, if any: Not applicable, no proposed structures.

11. Light and Glare [help]

a. What type of light or glare will the proposal produce? What time of day would it mainly occur?

Not applicable, no light or glare generated from the project.

b. Could light or glare from the finished project be a safety hazard or interfere with views?

Not applicable, no light or glare generated from the project.

- **c.** What existing off-site sources of light or glare may affect your proposal? Not applicable, no off-site sources of light or glare are currently known.
- **d.** Proposed measures to reduce or control light and glare impacts, if any: Not applicable, see above.

12. Recreation [help]

a. What designated and informal recreational opportunities are in the immediate vicinity?

Not applicable, general area is zoned industrial

- b. Would the proposed project displace any existing recreational uses? If so, describe. No
- c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any: Not applicable, no impacts to recreation.

13. Historic and cultural preservation [help]

a. Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers ? If so, specifically describe.

No historic buildings or structures located on or near site.

- b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources. None have been identified on the project site.
- c. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc.

Not applicable, no historic buildings are structures located near the site.

d. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.

Not applicable, no historic buildings are structures located near the site

14. Transportation [help]

- a. Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any.
 The site is located at the northwest corner of the junction of 77th Ave South and South 206th St. in Kent, Washington.
- b. Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop?

No

- c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate? Not applicable, no change to parking.
- d. Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private). No
- e. Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.
- f. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates?

No additional vehicular trips would be generated by this completed project.

- g. Will the proposal interfere with, affect or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe. No
- **h.** Proposed measures to reduce or control transportation impacts, if any: Not applicable, see above.

15. Public Services [help]

a. Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe.

The proposal would not increase need for public services.

b. Proposed measures to reduce or control direct impacts on public services, if any. Not applicable, no impacts to public services.

16. Utilities [help]

- a. Circle utilities currently available at the site: electricity natural gas water refuse service telephone sanitary sever septic system, other _____
- c. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.

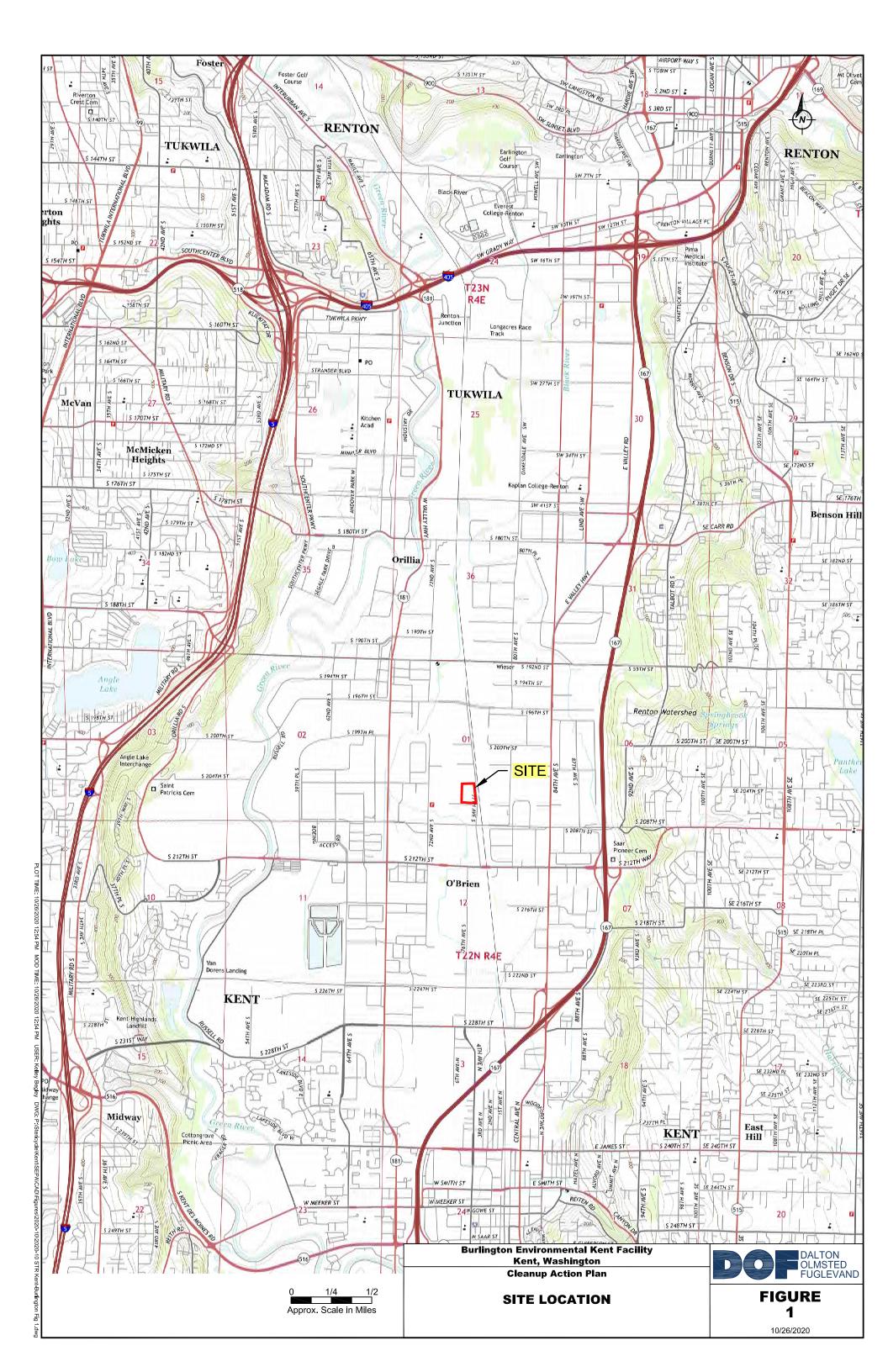
No additional utilities proposed

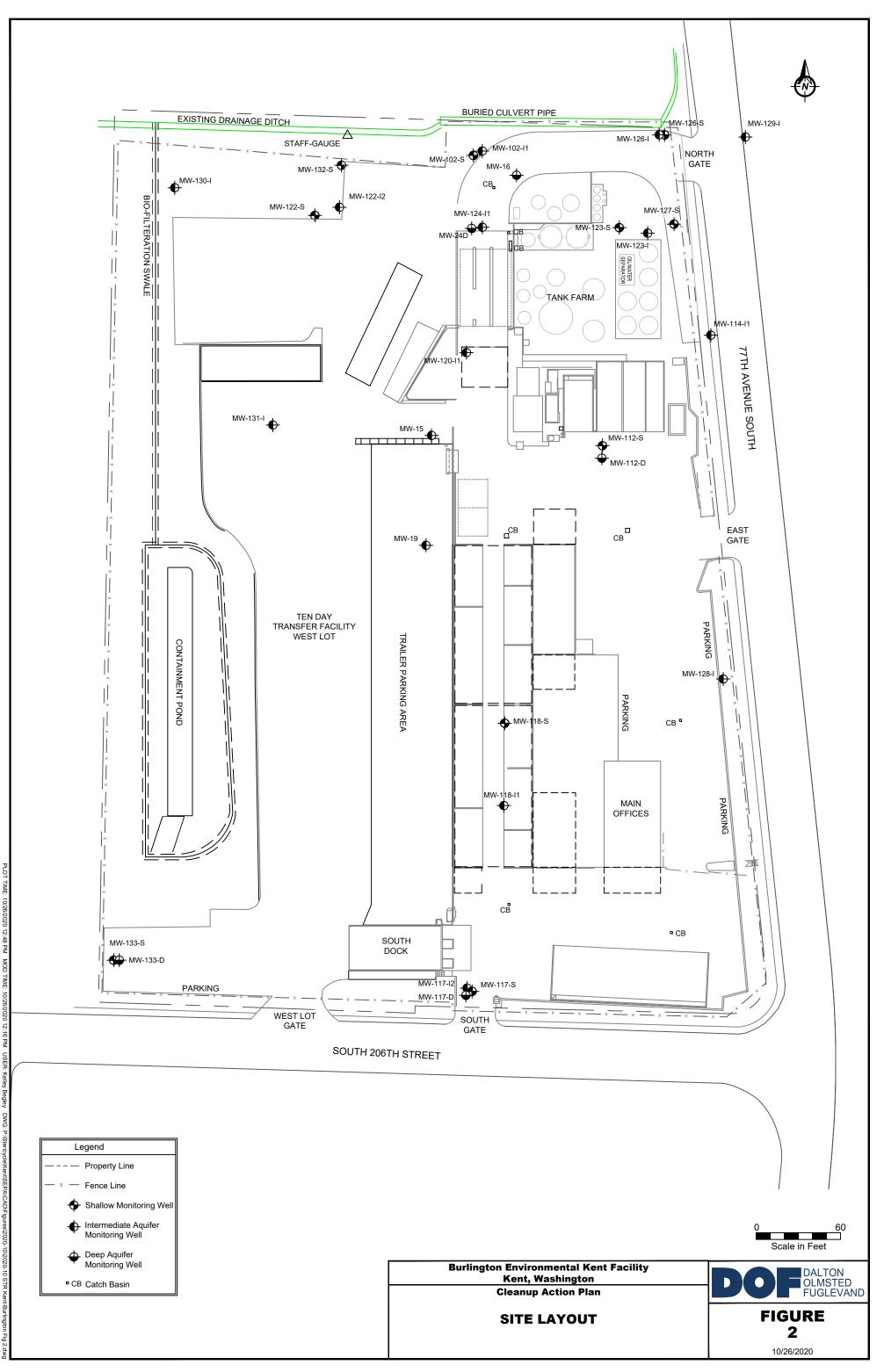
C. Signature [help]

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature:	Z Z	
	Laura Dell'Olio	
Position and Age	and Agency/Organization Senior Project Manager, CleanEarth	

Date Submitted: 5/17/2021





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