

EnviroSound Consulting Geotechnical and Environmental Consulting

February 28, 2014

RECEIVED

ESC13-E002 Page No. 1

Ms. Maureen Sanchez Department of Ecology 3190 160th Avenue SE Bellevue, Washington 98008-5452

MAR 0.3 2014 DEPT OF ECOLOGY TCP - NWRO

Subject:

Department of Ecology Letter of November 27, 2013

L & E Auto Salcs

Naval Avenue & 2101 Burwell Place

Bremerton, Washington VCP No.: NW2785

Dear Ms. Sanchez:

EnviroSound Consultants (EnviroSound) have prepared this letter in response to the referenced letter regarding the subject property in which you requested that a Remedial Investigation (R. I.) be performed. We will be repeating some of the data provided in the referenced report as part of our response and providing additional figures for the site to hopefully clarify answers to your review.

We offer the following:

- A general summary of former and current site uses was provided in the EnviroSound report. We have recently obtained the preliminary historical document generated by DLH Environmental (DLH) which is included as an attachment to this report. The site was utilized by a taxi cab company during the 1950's. The three underground storage tanks (USTs) were utilized for fueling the cabs. The small garage on the site was used for servicing the cabs with a waste oil tank in the garage itself. Historical air photos from 1956 and 1963 show a pump island on the subject property. Upon the cab company leaving the property, the pump islands were removed and the USTs were left in place. The site was then utilized as a used car lot with minor maintenance performed in a garage on the site where an underground waste oil tank and hydraulic lift were located. The existing building on the site was constructed during 1953.
- Soils on the site are described in each of the reports. Test pits by EnviroSound were located in areas of previous sampling by DLH. The bucket on the track hoe was 3.0 feet in width, providing a large sampling area as well as a visible classification of soils. We have attached test pit logs for the EnviroSound test pits. Locations of the test pits are shown on Figure 2. No boring logs were generated by DLH Consulting; however soil descriptions are included in both reports noting that the bottom of the UST excavation was terminated in clay soils. Figure 4 was generated from Google Earth to provide another perspective of the excavated areas and boring and test pit locations.
- Sampling results adjacent to parallel streets were non-detect or below action levels. Power and telephone lines are overhead. The only underground utility is a septic drain line which is located

on the northeast corner of the property. Boring B-4 was located in this area with non-detect analysis for NWTPII-IICID at 15 feet in depth. Underground utilities are shown on Figure 5 which is a revision of a previous figure by DLH.

- Regarding groundwater at the site, no groundwater was encountered in the DLII borings to a
 depth of 20 feet. No groundwater or groundwater scepage was encountered in exploratory test
 pits excavated to 15 feet. The nearest well to the subject site is approximately 200 yards to the
 north at 2101 West 6th Avenue. The depth to water at that location is 72 feet. Test pits TP-3 and
 TP-4 encountered clay soils at depths of 14.0 and 14.5 feet, and clay soils were encountered in
 the bottom of the gasoline UST excavation. Clay soils would tend to limit the vertical migration
 of the gas from the USTs.
- Regarding your recommendations for sampling depths for the cluster of 3 USTs, we are slightly confused. You are requesting deeper sampling to determine potential vertical depths of contamination beneath the tanks, yet you are discounting the deeper soil samples EnviroSound collected below the actual elevated results as well as multiple samples collected under the USTs by DLH. In addition, soil sample results from borings B4-15, B5-15, and B5-20 by DLH were below cleanup levels at depths of 15 and 20 feet in close proximity to the UST excavation. Table 2 shows a correlation between EnviroSound and DLH sample results.
- Soil sample 82210-Pipes was collected above UST 3, which was removed along with soil both
 above and below the UST. At the time the sample was collected it was not known that an UST
 was located beneath the sample.
- As discussed in the historical summary of the site, which is attached to this letter, records with Kitsap County indicate that the three USTs on the northeast portion of the site were for gasoline only thus warranting the analysis that was performed.
- Regarding your comments on the Waste Oil UST, the test pit locations are approximate.
 EnviroSound samples N-SL01 and B-SL02 were taken below the level of contamination to
 define the vertical extent of the contaminated level as you have requested for both UST
 excavations. No visibly stained soils were encountered during the excavation of the former
 Waste Oil Tank by EnviroSound. Table 1 shows a correlation between the EnviroSound and
 DLH sample results.
- Soil sample ESC-B1-SL03 was collected at approximately 7.0 feet below the existing grade to show that the elevated levels of the sample collected at 6.0 feet by DLH did not extend deeper. No stained soil was observed in the soils of the test pit to the terminated depth of 8.0 feet. A sample collected by DLH at 10.0 feet below grade was also non-detect for NWTPII-IICID. In addition, a soil sample collected below the hydraulic lift by DLH at a depth of 7.0 feet was below the detection level for NWTPII-Dx. This sample location was just south of boring B-1 (Figure 4).
- Terrestrial Ecological Evaluation: The site vicinity has been developed since the 1920's with single-family residences and commercial businesses. The subject property is approximately 1.0

mile from the Puget Sound. There are no streams or creeks in close proximity to the site and there are no forested areas with wildlife adjacent to the site, which would qualify the site to be excluded from the evaluation.

Table 1. Summary of Soil Diesel and Oil Results Comparison of DLH and EnviroSound Sample Results 2101 Burwell Place, Bremerton, Washington

Location	Sample Number	Sampling Depth	Diesel (mg/kg)	Lube Oil (mg/kg)
Former	81910-B+4*	8.0 feet	5,600	13,000
Hydraulic Lift	ESC-N-SL01	9.0 feet	< 25	< 50
Former	81910-N*	4.0 feet	7,100	27,000
Waste Oil UST	ESC-B-SL02	5.0 feet	< 25	< 50
*	B1-6*	6.0 feet	250	2,500
B-1	ESC-B1-SL03	7.0 feet	< 25	< 50
	81910*	8.0 feet	< 50	< 250
MTCA	Method A Cleanup L	.evels	2,000.	2,000.

* Samples reported by DLH (2010)

Concentrations listed in milligrams per kilogram (mg/kg), or parts per million (ppm). Standards are MTCA Mothod A Soil Cleanup Levels from Chapter 173-200 WAC.

Table 2. Summary of Soil Gas and BTEX Results Comparison of DLH and EnviroSound Sample Results 2101 Burwell Place, Bremerton, Washington

Location	Sample Number	Sampling Depth	Benzene	Ethyl- benzene	Toluene	Xylenes	Gas
A	101110-S-14*	14.0 feet	<0.02	0.47	0.35	4.3	140
South USTs	ESC-S14-SL05	15.0 feet	< 0.02	<0.03	< 0.05	< 0.05	< 3
WLICT-	101110-W-14*	14.0 feet	<2.0	72	68	420	5,700
West USTs	ESC-W-SL05	15.0 feet	< 0.02	< 0.03	< 0.05	< 0.05	< 3
MTCA Method	d A Cleanup Leve	els	0.03	7	6	9	**30/100

Notes: * Samples reported by DLH (2010)

Concentrations listed in milligrams per kilograms (mg/kg), or parts per million (ppm).

**Gasoline cleanup levels in soil is 30 mg/kg if benzene is present, and 100 mg/kg if benzene is not present. Standards are MTCA Method A Soil Cleanup Levels from Chapter 173-200 WAC.

Summary

The subject site is 0.25 acres in size and has been assigned a ranking of 5 by Ecology. The relatively fine grained nature of the soils would tend to slow the migration of contamination and research indicates that the depth to groundwater on the site at a minimum would be greater than 50 feet.

Former Fuel USTs.

The source of contamination in the form of the three USTs has been removed, as has 75.95 tons of impacted soil. EnviroSound collected samples below previously collected samples by DLH to determine the vertical extent of contamination with corresponding sample results shown on Table 1. Samples collected from borings placed around the USTs during the Phase II ESA by DLII were below detection levels for NWTPII-Dx at depths ranging from 15 to 20 feet and no petroleum-impacted soils were observed in test pits logged by EnviroSound adjacent to the UST excavation.

Former Garage

The source of contamination in the form of the waste oil tank and the hydraulic lift have been removed along with some of the petroleum-impacted soils. No stained soils were observed in the EnviroSound test pit excavated in the former waste oil tank location. Soil samples collected by EnviroSound at depths of 5 and 9 feet were below the detection level for NWTPH-Dx as shown in Table 1.

EnviroSound test pit TP-2 excavated in the area of DLH boring B-1 did not encounter any petrolcum stained soils and the sample collected at 7.0 feet was below the action level for NWTPH-Dx.

In summary, it is our opinion that DLH conducted sufficient work to identify and remove the sources of contamination and associated impacted soil from the site; that EnviroSound conducted sufficient work to confirm the removal of the impacted soil from the site; and that there is no potential impact to groundwater at the site. However, if any specific questions remain regarding potential areas of concern, a targeted investigation specific to that question would be the most cost-effective means to work toward achieving a No Further Action designation for the site.

Should you have any questions or concerns, which have not been addressed, or if we may be of additional assistance, please call our office at (360) 698-5950.

Sincerely,

Shawn E. Williams, L.G.

Senior Environmental Geologist

Sha E Millian

ce: Frick N Frack Holdings Inc.



Map adapted from Kitsap parcel search 5/2013

Not to Scale



FIGURE 1. Vicinity Map
Project Name: Burwell Place
Location: Bremerton, Washington
Project: ESC13—E002
Client: Frick N Frack Holdings LLC
Date: February 2014

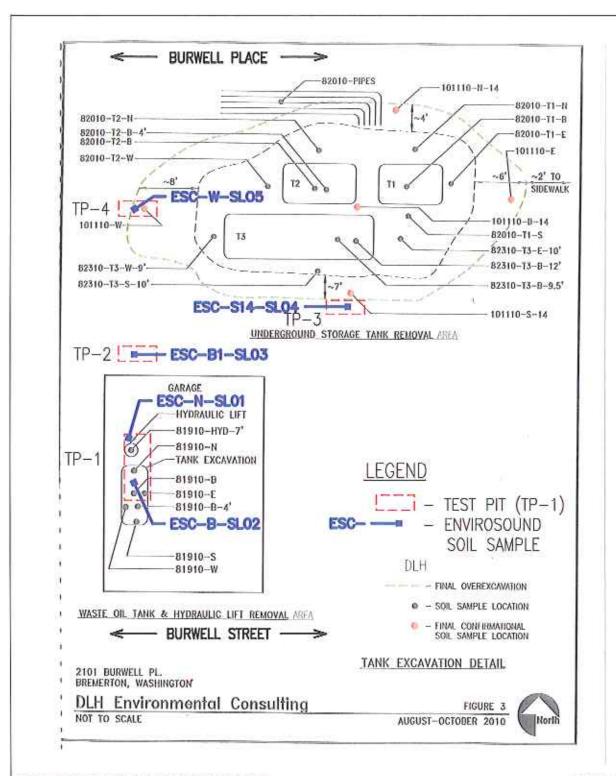


Figure Provided by DLH Environmental Consulting

Not to Scale



FIGURE 2. Site Map.

Project Name: Burwell Place Location: Bremerton, Washington

Project: ESC13-E002

Client: Frick N Frack Holdings LLC

Date: February 2014





Map adapted from Kitsap parcel search 5/2013

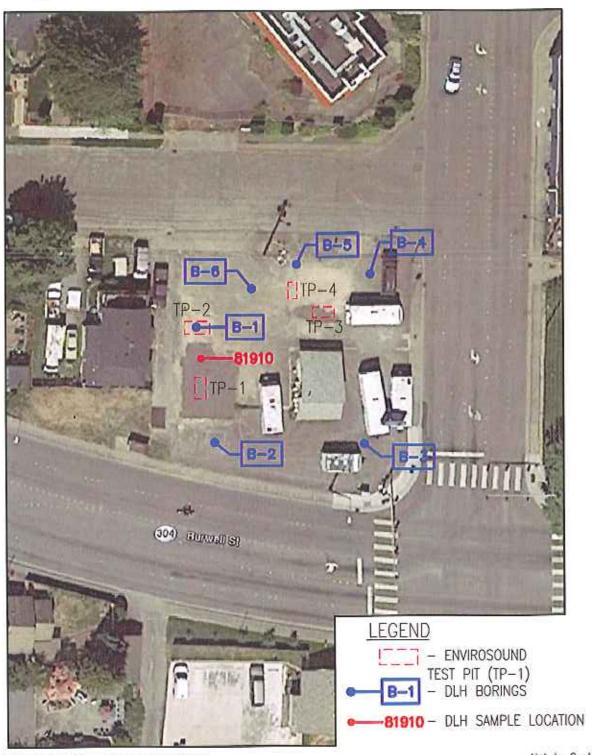
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Project Name: Burwell Place Location: Bremerton, Washington Project: ESC13-E002 Client: Frick N Frack Holdings LLC

Date: February 2014





Map adapted from Google Earth 05/04/2013

Not to Scale



FIGURE 4. Aerial Site Plan

Project Name: Burwell Place Location: Bremerton, Washington Project: ESC13-E002 Client: Frick N Frack Holdings LLC Date: February 2014



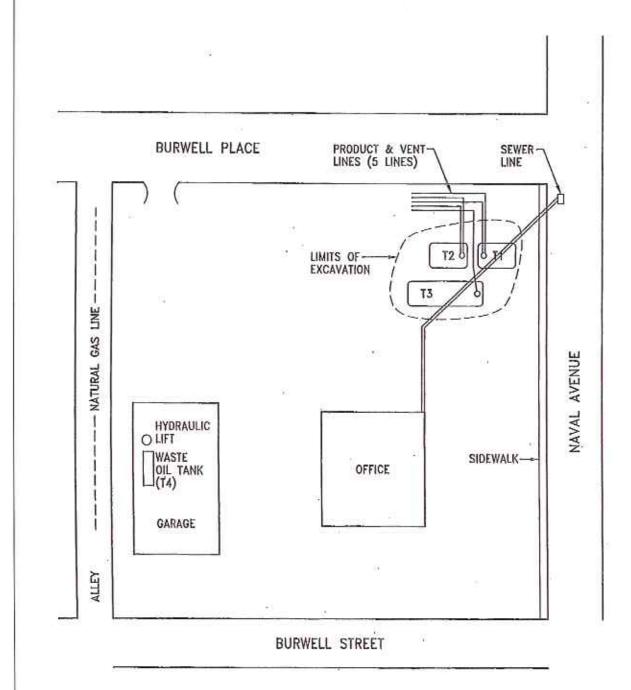


Figure provided by DLH Environmental Consulting

Not to Scale



FIGURE 5. Site Utilities
Project Name: Burwell Place
Location: Bremerton, Washington
Project: ESC13-E002
Client: Frick N Frack Holdings LLC
Date: February 2014



Project Name; L & E Auto Client: Frick N Frack Holdings Project Number: ESC13-E002 Test Pit Elevation: @ '

Test Pit Location: Inside Garage building footprint.

Depth to Groundwater: Not Encountered

DEPTH (FT.)	USGS Classification	VISUAL PHYSICAL DESCRIPTION	SAMPLE NO.	SAMPLE TIME	SAMPLE DEPTH (FT.)	LABORATORY TESTING RESULTS FOR SAMPLE
	SM	0.0'-2.5' Loose, grayish tan, claycy sandy SILT, (Fill?) moist				
		Becomes more dense at 3.0°		\$0 m 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0		
		4.0'-9.5' Medium dense, grayish tan, slightly sandy SILT, trace clay, moist	SI.01	0900	4.5	
	SM		SL02	0915	8.5	
			, , Luz	0713	0.0	
		TD 9.5°				
		No stained soils. No petroleum odors. No groundwater scepage encountered. Minimal sloughing.				

Excavation Contractor: Johnson Brothers Excavation Equipment: Track hoc

Operator: Tom

Excavation Date: 2/22/13 ESC Representative: SEW

Project Name: L & E Auto Client: Frick N Frack Holdings Project Number: ESC13-E002

Test Pit Elevation: @ '
Test Pit Location: North of Garage building. Depth to Groundwater: Not Encountered

DEPTH (FT.)	USGS Classification	VISUAL PHYSICAL DESCRIPTION	SAMPLE NO.	SAMPLE TIME	SAMPLE DEPTH (FT.)	LABORATORY TESTING RESULTS FOR SAMPLE
5	SM	0- 0.5° Asphalt. Base Coarse. 0.5°-2.5° Loose mix of Topsoil, mottled tan and gray clayey SILT, (Fill?) moist Becomes more dense at 4.0°				
	SM	6.0'-8.0' Medium dense slightly sandy SH.T, trace clay, moist.	SL03	0930	7.0	
0		TD 8.0' No groundwater seepage encountered. Minimal sloughing.				
5		<u>\$</u> 4				

Excavation Contractor: Johnson Brothers Excavation Equipment:Track hoc

Operator: Tom

Excavation Date: 3/28/13 ESC Representative: SEW

Project Name: L & E Auto Client: Frick N Frack Holdings Project Number: ESC13-E002

Test Pit Elevation: @ 'Test Pit Location: South Portion of former USTs.

Depth to Groundwater: Not Encountered

DEPTH (FT.)	USGS Classification	VISUAL PHYSICAL DESCRIPTION	SAMPLE NO.	SAMPLE TIME	SAMPLE DEPTH (FT.)	LABORATORY TESTING RESULTS FOR SAMPLE
	SM	0-0.5' Gravel Area. 0.5'-2.0' Loose mix of mottled (an and gray clayey SILT, (Fill?) moist				
		2.0'-14.5' Medium dense, reddish tan, slightly sandy SILT, trace clay, moist.				
	SM					
	CL	14.5'-16.0' Medium dense, reddish tan, slightly sandy, silty CLAY, moist.	SL04	1015	15.0	
		TD 16.0° No groundwater secpage encountered. Minimal sloughing. No soil staining observed.				

Excavation Contractor: Johnson Brothers

Excavation Equipment:Track hoe

Operator: Tom

Excavation Date: 3/28/13 ESC Representative: SEW

Project Name: L & E Auto Client: Frick N Frack Holdings Project Number: ESC13-E002 Test Pit Elevation: @'

Test Pit Location: West Portion of former USTs.

Depth to Groundwater: Not Encountered

	DEPTH (FT.)	USGS Classification	VISUAL PHYSICAL DESCRIPTION	SAMPLE NO.	SAMPLE TIME	SAMPLE DEPTH (FT.)	LABORATORY TESTING RESULTS FOR SAMPLE
	-	SM	0- 0.5' Gravel Area. 0.5'-2.0' Loose mix of mottled tan and gray clayey SILT, (Fill?) moist				1
			2.0'-14.0' Medium dense slightly sandy SILT, trace clay, moist.				
		SM					
							J.
	ŀ	CL	15'-16' Medium dense, reddish tan, slightly sandy, silty, CLAY, moist,	SL05	1030	15.0	
E			TID 16.0°				
			No groundwater seepage encountered. Minimal sloughing. No soil staining observed. No petroleum odors.				

Excavation Contractor: Johnson Brothers Excavation Equipment:Track hoe

Operator: Tom

Excavation Date: 3/28/13 ESC Representative: SEW

Appendix A

DLH Environmental Consulting 2400 NW 80th Street #114 Seattle Washington, 98117

May 5, 2010

Harry Romberg 11538 17th Avenue NE Seattle, WA 98125

RE:

Historical evaluation L&E Auto Sales site 2101 Burwell Place

Bremerton, Washington 98312

Mr. Romberg

DLH has completed a limited historical evaluation of the L&E Auto Sales site located at 2101 Burwell Place in Bremerton, Washington.

The purpose of the evaluation was to identify information with regard to the status of a former gasoline station that was located at the site.

Although at one time the current Lessee of the property removed one pump island no data with regard to the underground storage tanks was known.

The following resources were researched:

- 1) Washington State Department of Ecology files
- 2) City of Bremerton Files (Appendix A)
- 3) Kitsap County Files (Appendix B)
- 4) Historical aerial photographs (Appendix C)

FINDINGS:

WashIngton State Department of Ecology (WDOE) Files

No information was found under the current address of the subject site or based on the parcel number for the site. Adjacent properties were also researched and no data was

found. It is known that there was a Mobile gasoline station located across the street to the north. However, there was no data in the WDOE files with regard to that station. The closest gasoline station file was an ARCO site located at 2101- 6th Avenue located several blocks to the north. WDOE files indicate that the station was closed in 1992. Copies of those files are available through a Public Record's Request.

City of Bremerton Files

The City of Bremerton had limited permit files and Business Licence files. The major data included permitting for the add-ons to existing buildings and sign permits. No data with regard to a gasoline station or underground fuel storage tanks was found.

Kitsap County Files

Kitsap county indicated that there were three tanks on site. 1 ea 1000-gallon tank and 2ea 2000- gallon tanks. The site Information sheet shows that the tanks were crossed out which could indicate that the tanks had been removed. However, no other confirmational data was found.

Historical aerial photographs

Historical photos dated 1956, 1963, 1971, 1977, 1985, 1989, 1993, 1997, and 2003 were reviewed. The 1956 and 1963 photographs were purchased and enlarged. The 1956 photo graph shows that there were three pump island located on the property.

Other site data

Based on interviews with the current lessee there is one underground waste oil tank located in the small garage on the west side of the site. The tank was pumped dry recently and the material properly disposed of. There are several large oil stains in the garage and large cracks in the concrete floor.

CONCLUSIONS

Based on the aerial photographs and the Kitsap County files it appears that there were three pump islands and three underground fuel storage tanks (UST's) associated with the former gasoline station. Given that there is no data with regard to the removal of the UST's and given that there were three pump Islands It is possible that the tanks were removed but we have no information with regard to the underlying soils associated with the UST's or the three pump Islands.

RECOMMENDATIONS

Based on the limited data it is recommended that the subsurface soils in and around the former pump island location be obtained for laboratory analysis tested using a GeoProbe. The other option would be to excavate several small trenches using a backhoe to access the subsurface soils and to explore the area for former tanks. In addition, due to the nature of leaks in old underground tanks, the waste oil tank should be removed to reduce any future liabilities with regards to any leaks from that tank.

If you have any questions, please call me at your convenience (206) 632-3123.

Sincerely,

DLH ENVIRONMENTAL CONSULTING

Donna L Hewitt

Geologist

Environmental Consultant

DLH Environmental Consulting 2400 NW 80th Street #114 Seattle Washington, 98117

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Sincerely,

DLH ENVIRONMENTAL CONSULTING

Donna L Hewitt

Geologist

Environmental Consultant

APPENDIX A CITY OF BREMERTON FILES

BREMERTON PERMIT CENTER

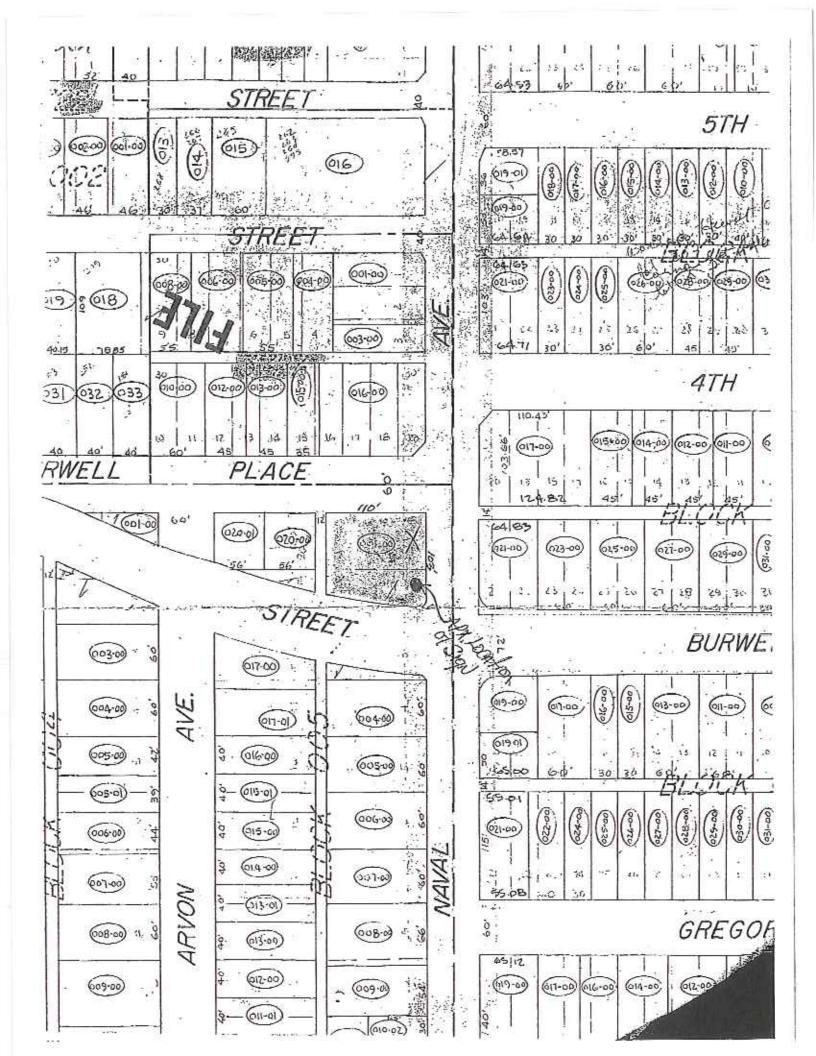
286 4th Street, Bremerton, WA 98337 Phone: (360) 478-5275 FAX: (360) 478-5278 BUILDING PERMIT

Permit No: 96-0232 Job Addr: 227 NAVAL AVE Status: PENDING Location: RANDY'S CAR CORNER Applied: 04/10/1996 Parcel No: 3778005-001-0002 Issued: Expires: Applicant: SPURLING RANDY 405-1955 227 NAVAL AVE BREMERTON WA 98312 Owner: SPURLING RANDY 227 NAVAL AVE BREMERTON WA 98312 Lic #: Exp: Contractor: Subcontr: Desc: ADDITIONAL OFFICE SPACE ADDED TO EXISTING OFFICE 69.30 Total Calculated Fee: 123.85 Permit Fees: Valuation * 45.05 Additional Fees: .00 * Plan Check Fees: 3,500.00 Total Permit Fee: Other Fees: 9.50 This permit shall become null and void if the building or work authorized by this permit is not commenced within 180 days from the date of such permit, or if this building or work authorized by such permit is suspended or abandoned at any time after the work is commenced for a period of 180 days. NOTICE - It is the responsibility of the permit holder, not the City of Bremerton or Building Official to see to it that required inspections are made. The permit holder must notify the Building Official when ready for inspections. Fallure of the permit holder to notify the Building Official of required inspections may result in the stoppage of the work until such time that the permit holder can substantiate to the building official that the concealed work meets or exceeds code requirements. Any demolition, testing, or financial burden shall be borne directly by the permit holder. Failure to substantiate code requirements will indemnify the City against any and all responsibility or liability connected with the construction. I hereby certify that I have read and examined this permit and know the same to be true and correct. All provisions of laws and ordinances governing this type of work will be complied with whether specified herein or not. The granting of a permit does not presume to give authority to violate or cancel the provisions of any other state or local law regulating construction or the performance of construction. Signature:______ Date:_____ I certify that I am exempt from the requirements of the state contractor's registration law, under Section 3, Chapter 126, laws of 1967.

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It tenant, property dwiner's name: Striks tenant space ourrently vacant? Yes No If no, explain Will you be sharing this tenant space with another business? Yes No If yes, who? Yes No Yes No If yes, who? Yes No Yes No Yes Yes Yes Yes, while any person be employed at the home other than a resident? Yes No Yes
Continue
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PERMIT CENTER Id: ROUT130 Keyword: UACT User: VAL 04/17/96 Activity document routing maintenance. BLDG PERMIT-NO MECH/PLB Permit No: 96-0232 Applicant: SPURLING RANDY Status: PENDING Address: 227 NAVAL AVE Route: 1 Current Route Line: 7 of Packet Units Description Station Status Received Assigned Complete BUILDING PLAN CK STRT-B-VW Approved 04/10/96 04/10/96 04/10/96 BUILD BUILD BUILDING BLDG -SE Approved 04/10/96 04/11/96 04/16/96 1 LAND USE PLNG -JA Ap Cond. 04/10/96 04/11/96 04/16/96 BUILD 2 Approved 04/10/96 04/11/96 04/16/96 BUILD 3 PUBLIC WORKS PUBWKS-NL 4 UTILITIES UTIL -NL Approved 04/10/96 04/11/96 04/16/96 BUILD BUILD 5 FIRE FIRE -SR Ap Cond. 04/10/96 04/11/96 04/16/96 BUILD BUILDING PLAN CK END-B -VW Ap Cond. 04/10/96 04/17/96 04/17/96

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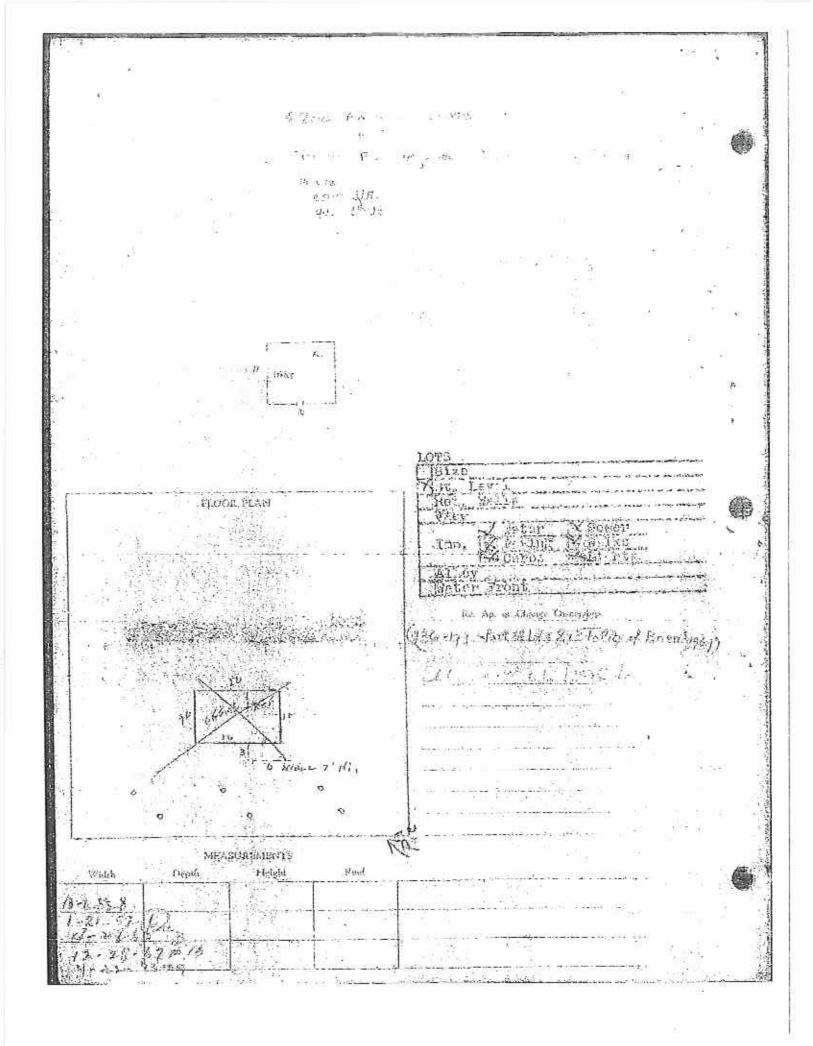
APPENDIX B KITSAP COUNTY FILES

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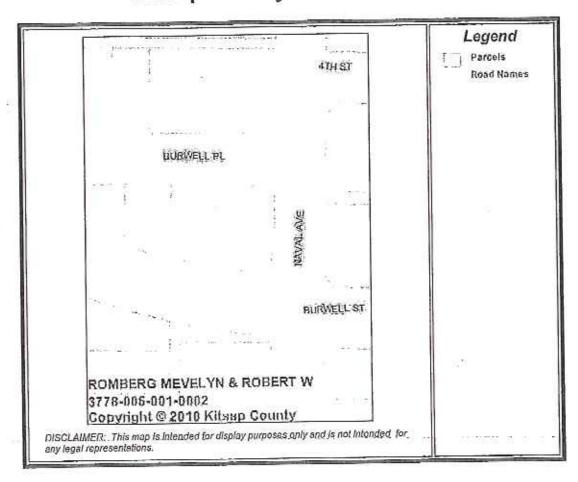
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Kitsap County Parcel Search



[Click here to Print]

Property Report

Tax Account No	. Proce	ss No. Situs A	ddress		
3778-005-001-0	002 1917	509 2101 B	URWELL PL		
Property Class:	550- Retail, autom	otive			
Parcel Inform	ation		CONTRACTOR STATE	23(24)22(32)33(33)47)	771071 270 2 Ve 2 27 20 E
Tax Code Area:	0010	# of Buildings:	1	Acres:	.25
Jurisdiction:	BREMERTON	View Rating:			A
Sec-Twp-Rng:	14 24N 1E	Zoning;	City	Status:	A - Active
Neighborhood:	8100502	Last Inspected:	02/25/09		
Taxpayer Info		LYN & ROBERT V	V	NO COMPANY TO THE REAL PROPERTY.	36 Mary 12 No. 40 (1977) 24-71
Mailing	==0 	- Let 15		48	
Address:	11538 17TH AVE N	(E			
	OT ATTITUTE	WA	98125		

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Sq Footage					
<u>Fl</u> oor	Area		Living Area		
Basement:*				* Could be basement or lower level garage	
Lower Level:				_	
Above Ground:	-		336		
Total:	336		336		
- 16.1			7		
Porch/Deck:			=	FF	
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Garage:				THE REPORT OF THE PARTY OF THE	
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<u>Attributes</u>			Fireplace(s)		
Bedroom(s)			**		
Half Bath(s)	1		Sewer	N	
Full Bath(s)	0		Water	Y	
Heat Source	336 sf			22	
ENGINEERING FOR	TENNE SAFATANA	Con services species.	CONTRACTOR OF THE PARTY OF THE		
Other					
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Imp. (Cont)	Paving	,			
Land Desc.	LCLi	nited Comml,			
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^{*} Could be basement or lower level garage. ** May include wood, gas, or pellet stove.

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Floor	Area		Living Area	* Could be basement or lower level garage
Basement:* Lower Level:				Could be basement of tower level garage
Above Ground	336		336	1
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Bedroom(s)			Fireplace(s)	
Half Bath(s)	1		Sewer	N
Full Bath(s)	0		Water	Y
Heat Source	336 sf]	
Other Improvements Imp. (Cont) Land Desc. Land (Cont)	Paving,	Gen Purpose Fran		ave , Carport
Land (Cont)	-			

^{*} Could be basement or lower level garage. ** May include wood, gas, or pellet stove.

Sales History

Tax Account No.	Process No.	Situs Address
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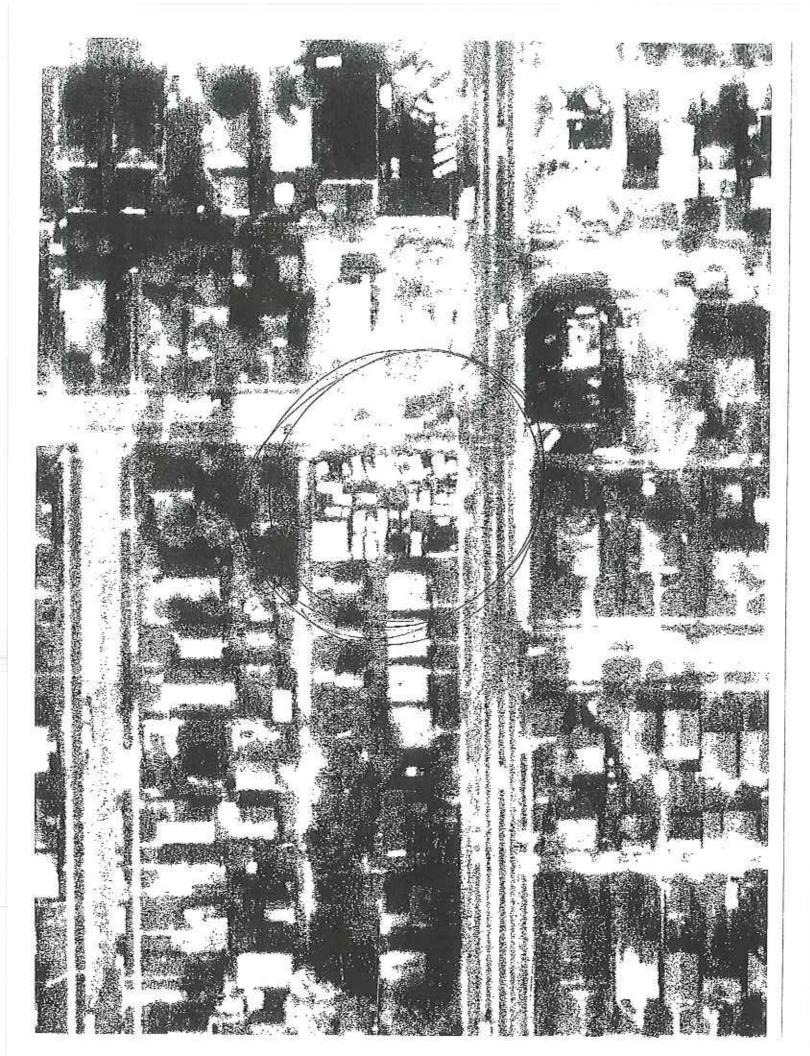
Sale Date:	Sale Price:	Excise Number:	Instrument:	Screening Code:
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01-OCT-73	20000	197396545	W	v

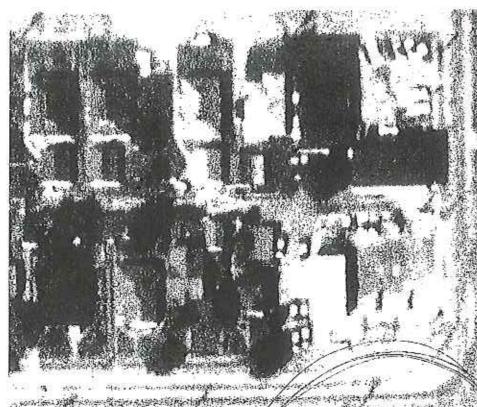
Sales History

Tax Account No.	Process No.	Situs Address
3778-005-001-0002	1917509	2101 BURWELL PL

Sale Date:	Sale Price:	Excise Number:	Instrument:	Screening Code:
27-SEP-85	450	198505602	W	4
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APPENDIX C HISTORICAL AERIAL PHOTOGRAPHS





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www.gerometric.com

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