



Environmental & Mine Permitting Services

March 6, 2020

Ms. Heather Steven
Project Manager/Land Use Planner
County of San Diego
Planning & Development Services
5510 Overland Avenue, Suite 310,
San Diego, Ca 92123

**RE: Cottonwood Sand Mine Major Use Permit and Reclamation Plan.
3121 Willow Glen Drive
Additional Hazards
PDS2018-MUP-18-023, PDS2018-RP-18-001**

Ms. Steven:

Please accept this letter in support of our Major Use Permit (MUP) application for the Cottonwood Sand Mine located at 3121 Willow Glen Drive, El Cajon, CA 92020. This letter provides a description of the type of additional hazards materials that are present on the property or will be included as part of the proposed project.

Project Materials

Small quantities of diesel and gasoline fuels for emergency use will be maintained onsite and are anticipated to be 2 five-gallon cans of diesel and 1 five-gallon can of gasoline, if needed. These cans will be stored in a fire-proof locker contained within a metal cargo container located in the processing area for storage. Containment around the fire locker will be installed to prevent any leaks or accidental spills from reaching the ground.

Other petroleum hydrocarbons that will be present will include lubricating oils and grease. It is anticipated that one 25-gallon drums of each product will be stored onsite within the same cargo container as the fuel.

Proper labeling, as required, will be placed on the cargo container, fire locker and drums. Quantities of stored hydrocarbons on the project will be maintained below reportable quantities as required by the local County Certified Unified Public Agency (CUPA)

No other hazardous substances will be stored onsite.

Mobile equipment on the project will be maintained by private vendors. As such, any waste material produced from maintenance activities, such as waste oil, will be removed by the vendor upon leaving the site at the end of the workday.

Existing Materials

Petroleum Hydrocarbons

Petroleum hydrocarbons on the property consist of fuels and lubricants used for the operation of the golf course's landscape maintenance equipment. All materials of this type are stored in the maintenance and repair facility located on the Ivanhoe golf course and southeast of the clubhouse. All these materials will be removed from the property according to State and County regulations. All removal permits will be obtained prior to any demolition activities occurring. These activities are expected to be completed in advance of mineral extraction during the second phase of the sand project and will be completed under inspection by the County and/or the local Fire Department.

Three above ground storage tanks (ASTs) currently exist at the golf course in the maintenance facility area used by the golf club. Two tanks are used to store diesel fuel and the third tank stores gasoline that is used to power the landscape maintenance equipment necessary to the operation of the golf courses. After underground fuel tanks were removed from the property in 1989, the ASTs were installed under permit from the County of San Diego.

Petroleum based lubricants are also utilized at the maintenance facility in small quantities. These materials will also be removed and disposed of in accordance with State and County regulations.

Pesticides and Fertilizers

Pesticides, fungicides and fertilizers are used at the golf course in the overall landscaping maintenance program at the golf course. These are used to control insect infestations, fungi and molds that can damage or kill turf grasses that provide the golf play surface while fertilizers are utilized to provide nutrients to the turf grasses. All materials of this type are purchased when needed, applied as soon as possible to keep storage to a minimum and, when stored, are kept in a secured room at the maintenance facility

Application is completed by certified pesticide technicians twice per year in the spring and fall when turf grasses are aerated and re-seeded. Small quantities are maintained on site to treat unexpected outbreaks.

Rodents that occur on the property are controlled using physical traps rather than the use of rodenticides. This prevents potential impacts to other animal species and avoids pollution of ground or surface water.

Structures

Several structures used by the golf course are present on the project property. These include metal and wooden buildings at the maintenance facility, an on-course restroom for each golf course and the clubhouse. There is also an old residential building located west of Steele Canyon. All these structures will be demolished as the mine phases advance to the east.

Due to the age of the physical structures on the site, there is the potential that asbestos containing materials (ACMs) and lead (Pb) were utilized in the construction of the structures. All structures related to the golf course will eventually be demolished during the sand extraction project. Prior to demolition, each structure will be surveyed for ACMs and Pb by certified individuals. After the results of the surveys are provided, demolition permits will be obtained through the County of San Diego's, Planning & Development Services Building Division. If ACM's or Pb are present in the structure scheduled for demolition, a licensed abatement contractor will remove these materials from the structure prior to the demolition contractor dismantling the structure. ACMs and Pb based materials will be disposed as required by regulation.

After ACMs and Pb are removed, demolition of the structure, including the removal of any existing septic tanks, will be completed in accordance with the requirements of the permit. All construction debris will be recycled or disposed offsite as required by the permit.

Schedule

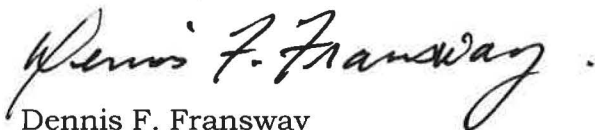
All petroleum-based liquids and lubricants plus pesticides, fungicides and fertilizers will be removed from the golf course shortly after the golf course closes operations. Demolition of structures will occur during the following sand mine project phases:

- Phase 1 Old residential structure, Lakes Course restroom.
- Phase 2 Maintenance facility, clubhouse
- Phase 3 Ivanhoe Course restroom.

We believe this addresses the request for information about additional hazards on the property.

Sincerely,

EnviroMINE, Inc.



Dennis F. Fransway
Senior Scientist