



Elise Rothschild
Director

County of San Diego

Amy Harbert
Assistant Director

Department of Environmental Health
Hazardous Materials Division
PO Box 129261, San Diego, CA 92112-9261
Phone: (858) 505-6700; FAX: (858) 505-6788
Toll Free: (800) 253-9933
www.sdcdeh.org

COTTONWOOD GOLF COURSE
3121 Willow Glen Dr
El Cajon, CA 92019

OFFICIAL NOTICE

August 9, 2018

Record ID: DEH2003-HUPFP-202521, CERS ID: 10365076

Dear Sir/Madam:

RE: Annual Hazardous Materials Business Plan Certification Not Completed

The Hazardous Materials Division (HMD) is the Certified Unified Program Agency (CUPA) in San Diego County. The HMD, as the CUPA, regulates the hazardous materials business plan statute and regulations.

State law requires that a facility that handles or stores hazardous material(s) at or above reporting levels must annually certify their business plan. The business plan certification is important because up to date chemical inventory information is useful to emergency responders and public health officials in case of a spill or other emergencies.

As of 2015, the entire business plan is required to be submitted annually pursuant to California Health and Safety Code (HSC) Chapter 6.95 section 25508(a)(1)(A). The submittal must be completed using the online California Environmental Reporting System (CERS): <https://cers.calepa.ca.gov>. The business plan certification consists of several components: Facility Information, Hazardous Materials Inventory, Site Map, Emergency Contingency Plan, and Training Plan. Failure to electronically file the business plan as required may result in administrative, civil, or criminal penalties.

The dates of your last submitted business plan from CERS are listed below:

Facility information submitted:	9/22/2017
Inventory and site map submitted:	9/22/2017
Plan submitted:	6/26/2015

Within 30 days of receipt of this Official Notice, please submit your hazardous materials business plan certification using CERS. Failure to complete the certification can result in civil or administrative penalties between \$2,000 and \$5,000 per day of violation.

If you need assistance or believe you have received this notice in error, please contact the **CERS Help Desk at (858) 505-6990.**

To make a phone or in-office appointment to get one-on-one help, visit HMD's CERS information website at: https://www.sandiegocounty.gov/content/sdc/deh/hazmat/hmd_cers.html

Sincerely,

Maryam Dorsey, Chief
Hazardous Materials Division

ecc: DEH2003-HUPFP-202521; HE019

"Environmental and public health through leadership, partnership, and science."

From: [Yousif, Teaba](#)
To: [Paul Mock](#)
Cc: [Rick Adams](#); [Shantel Nemecek](#); [Gerardo Ruiz](#)
Subject: RE: HMD Compliance Inspection Report
Date: Monday, July 29, 2019 11:42:36 AM

Hi Paul,

I have not heard back from you. I am sending out a no RTC letter today. If I do not hear back, I will be out for a re-inspection in next 3 weeks.

Vr,
Teaba Yousif

From: Yousif, Teaba
Sent: Tuesday, June 25, 2019 10:18 AM
To: Paul Mock <pmock@wgoftp.com>
Cc: Rick Adams <radams@wgoftp.com>; Shantel Nemecek <snemecek@wgoftp.com>; Gerardo Ruiz <gruiz@wgoftp.com>
Subject: RE: HMD Compliance Inspection Report

Hi Paul,

I am not accepting most of your corrective action. See below and please respond to questions and comments below each violation.

1. **VIOLATION # 1** HMBP not certified annually as complete and accurate in CERS
Your business activities page is inaccurate. You need to check NO to owning operating underground storage tanks. These are tanks buried below ground (like a gas station). Do you have USTs that we missed? I only observed aboveground tanks. Also, you generate hazardous waste (used oil) so you need to check YES to the hazardous waste generation question.

Underground Storage Tank(s) (UST)	
Does your facility own or operate underground storage tanks?	<input checked="" type="radio"/> Yes
Hazardous Waste	
Does your Facility...	
Does your facility generate Hazardous Waste?	<input type="radio"/> No
If yes, provide an EPA Identification Number (EPA ID).	

Your inventory needs to be corrected (see attached pdf with comments). If you need help call me (858-525-2797). I am in the office all day and can go over CERS with you. Also, I forgot to comment that each item needs federal hazard categories. Some of the items are missing federal haz cat.

Site map is good.

Discard all documents you uploaded in locally required documents in the inventory element. Those are not the type of documents you upload in that section.

For your plans, discard the old contingency plan documents if you are going to resubmit this element.

For APSA, you need to type 1500 gallons for total capacity for petroleum storage and you need the date your SPCC plan was last reviewed.

2. **VIOLATION # 2** Failed to properly close hazardous waste container(s).
Ensure bung caps are closed on the drums. The yellow funnel on top of the drum is not considered closed. Did you pour all the 5 gallon containers into the larger drum?
3. **VIOLATION # 3** Failed to maintain a complete copy of the SPCC Plan at the facility if the facility is normally attended at least four hours per day, or at the nearest field office if the facility is not so attended.
Please attach a copy of your SPCC Plan. I would like to review it.
4. **VIOLATION # 4** Failed to have record of inspections and integrity tests signed by the appropriate supervisor or inspector, keep

written procedures and records of inspections and integrity tests for at least three years, and/or keep comparison I am accepting your RTC statement for this. Ensure you are conducting them monthly and keep those records for future inspections.

5. **VIOLATION # 5** Initial &/or annual employee training not conducted in safety procedures for a hazardous material release or threatened release &/or employee training records not available or not maintained for 3 years.

Are you training ALL employees? Confirm that all employees receive training on topics mentioned in the Health and Safety Code section 25505 below:

(4) Training for all new employees and annual training, including refresher courses, for all employees in safety procedures in the event of a release or threatened release of a hazardous material, including, but not limited to, familiarity with the plans and procedures specified in paragraph (3). These training programs may take into consideration the position of each employee. This training shall be documented electronically or by hard copy and shall be made available for a minimum of three years.

(3) Emergency response plans and procedures in the event of a release or threatened release of a hazardous material, including, but not limited to, all of the following:

(A) Immediate notification contacts to the appropriate local emergency response personnel and to the unified program agency.

(B) Procedures for the mitigation of a release or threatened release to minimize any potential harm or damage to persons, property, or the environment.

(C) Evacuation plans and procedures, including immediate notice, for the business site.

6. **VIOLATION # 6** 3030004 Failed to properly manage, store, label &/or recycle used oil filters &/or used fuel filters.

Did you label the drum with used oil filters as "Used, Drained oil filters" with accumulation start date? Or you don't have any at the moment since they were just picked up?

Contact me if you have questions,
Teaba Yousif

From: Paul Mock <pmock@wgolffp.com>

Sent: Friday, June 21, 2019 3:51 PM

To: Yousif, Teaba <Teaba.Yousif@sdcounty.ca.gov>

Cc: Rick Adams <radams@wgolffp.com>; Shantel Nemecek <snemecek@wgolffp.com>; Gerardo Ruiz <gruiz@wgolffp.com>

Subject: RE: HMD Compliance Inspection Report

Teaba,

I have updated everything in CERS as requested to fulfill compliance of our violations. We did not have a record of inspections for the tanks to satisfy violation number 4. However, since June 1st we have begun inspections. I'll forward you our form once we have a few inspections documented.

Attached is proof of waste oil removal. Also uploaded to CERS.

Waste oil containers were cleaned up and sealed. Also, used oil filters removed and new ones are being placed in a properly closed container. Pictures attached.

I've also attached proof of pesticide handler training that we perform at all our properties. At every property we use to satisfy hazardous material training. I've never been told it doesn't, and this training takes place yearly every October or November in order for us to renew our pesticide business license.

ALSO, I believe that the SPCC requirement is satisfied by our HMBP. At least it has been at all my other properties. Please advise if this is not true.

Thank you!

Paul R Mock Jr.
National Director of Agronomy
Golf Course Superintendent
Western Golf Properties

(949) 838-5792
pmock@wgolffp.com
westerngolfproperties.com

From: Teaba.Yousif@sdcounty.ca.gov <Teaba.Yousif@sdcounty.ca.gov>

Sent: Friday, May 31, 2019 3:50 PM

To: Teaba.Yousif@sdcounty.ca.gov; Rick Adams <radams@wgolfp.com>; Paul Mock <pmock@wgolfp.com>; Shantel Nemecek <snemecek@wgolfp.com>

Subject: HMD Compliance Inspection Report

Dear Gerry Ruiz:

On 05/31/2019, an inspection was conducted at COTTONWOOD GOLF COURSE by the County of San Diego Hazardous Materials Division (HMD). Attached is the inspection report, which you should keep for your records, and any corrective action follow-up. If violations were cited during the inspection, the final page entitled Return to Compliance, should be completed, signed and returned to HMD within 30 calendar days.

Please feel free to contact your inspector, or the HMD Desk at hmdutyeh@sdcounty.ca.gov, or by calling 858-505-6880.

Thank you for your time and compliance.

Respectfully,
Your County of San Diego Hazardous Materials Division

DEH2003-HUPFP-202521

From: Paul Mock
To: Yousif.Teaba
Cc: [Rick Adams](mailto:Rick.Adams)
Subject: FW: HMD Compliance Inspection Report *Pictures*
Date: Monday, July 29, 2019 1:33:43 PM

Teaba,

Here are the pictures I promised.

I'll call you in a few to discuss other items.

Thanks,

Paul R Mock Jr.
National Director of Agronomy
Golf Course Superintendent
Western Golf Properties

(949) 838-5792
pmock@wgolfp.com
westerngolfproperties.com

From: Paul Mock
Sent: Monday, July 29, 2019 1:22 PM
To: Yousif, Teaba <Teaba.Yousif@sdcounty.ca.gov>
Cc: Rick Adams <radams@wgolfp.com>; Shantel Nemecek <snemecek@wgolfp.com>; Gerardo Ruiz <gruiz@wgolfp.com>
Subject: RE: HMD Compliance Inspection Report

Teaba,

Please see my notes below in Red. I'll try to give you a call momentarily as well.

Paul R Mock Jr.
National Director of Agronomy
Golf Course Superintendent
Western Golf Properties

(949) 838-5792
pmock@wgolfp.com
westerngolfproperties.com

From: Yousif, Teaba <Teaba.Yousif@sdcounty.ca.gov>
Sent: Monday, July 29, 2019 11:43 AM
To: Paul Mock <pmock@wgolfp.com>
Cc: Rick Adams <radams@wgolfp.com>; Shantel Nemecek <snemecek@wgolfp.com>; Gerardo Ruiz <gruiz@wgolfp.com>
Subject: RE: HMD Compliance Inspection Report

Hi Paul,

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Vr,
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Completed

Underground Storage Tank(s) (UST)	
Does your facility own or operate underground storage tanks? 	<input checked="" type="radio"/> Yes
Hazardous Waste	
Does your Facility...	
Does your facility generate Hazardous Waste? 	<input type="radio"/> No
If yes, provide an EPA Identification Number (EPA ID).	

Your inventory needs to be corrected (see attached pdf with comments). If you need help call me (858-525-2797). I am in the office all day and can go over CERS with you. Also, I forgot to comment that each item needs federal hazard categories. Some of the items are missing federal haz cat. **I did not see at attached PDF to this email. I added fed haz categories to the three oil ones that were missing them.**

Site map is good. **OK**

Discard all documents you uploaded in locally required documents in the inventory element. Those are not the type of documents you upload in that section. **Completed**

For your plans, discard the old contingency plan documents if you are going to resubmit this element. **Completed**

For APSA, you need to type 1500 gallons for total capacity for petroleum storage and you need the date your SPCC plan was last reviewed. **Completed**

2. **VIOLATION # 2** Failed to properly close hazardous waste container(s).

Ensure bung caps are closed on the drums. The yellow funnel on top of the drum is not considered closed. Did you pour all the 5 gallon containers into the larger drum?

YES ALL 5 GALLONS WERE POURED INTO AND THEN HAULED AWAY – I will forward pictures of this momentarily as soon as Gerry can send it to me.

3. **VIOLATION # 3** Failed to maintain a complete copy of the SPCC Plan at the facility if the facility is normally attended at least four hours per day, or at the nearest field office if the facility is not so attended.

Please attach a copy of your SPCC Plan. I would like to review it.

Why is this area not being satisfied by my HMBP? All of our other properties in the state are satisfied this way? I will call you to discuss.

4. **VIOLATION # 4** Failed to have record of inspections and integrity tests signed by the appropriate supervisor or inspector, keep written procedures and records of inspections and integrity tests for at least three years, and/or keep comparison

I am accepting your RTC statement for this. Ensure you are conducting them monthly and keep those records for future inspections.

Noted – Actively being completed

5. **VIOLATION # 5** Initial &/or annual employee training not conducted in safety procedures for a hazardous material release or threatened release &/or employee training records not available or not maintained for 3 years.

Are you training ALL employees? Confirm that all employees receive training on topics mentioned in the Health and Safety Code section 25505 below:

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- (3) Emergency response plans and procedures in the event of a release or threatened release of a hazardous material, including, but not limited to, all of the following:
- (A) Immediate notification contacts to the appropriate local emergency response personnel and to the unified program agency.
 - (B) Procedures for the mitigation of a release or threatened release to minimize any potential harm or damage to persons, property, or the environment.
 - (C) Evacuation plans and procedures, including immediate notice, for the business site.

I will call you to discuss this part.

6. **VIOLATION # 6** 3030004 Failed to properly manage, store, label &/or recycle used oil filters &/or used fuel filters. Did you label the drum with used oil filters as "Used, Drained oil filters" with accumulation start date? Or you don't have any at the moment since they were just picked up?

I will forward pictures of this momentarily as soon as Gerry can send it to me.

Contact me if you have questions,
Teaba Yousif

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To: Yousif, Teaba <Teaba.Yousif@sdcounty.ca.gov>
Cc: Rick Adams <radams@wgolfp.com>; Shantel Nemecek <snemecek@wgolfp.com>; Gerardo Ruiz <g Ruiz@wgolfp.com>
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Thank you!

Paul R Mock Jr.
National Director of Agronomy
Golf Course Superintendent
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From: Teaba.Yousif@sdcounty.ca.gov <Teaba.Yousif@sdcounty.ca.gov>
Sent: Friday, May 31, 2019 3:50 PM
To: Teaba.Yousif@sdcounty.ca.gov; Rick Adams <radams@wgolfp.com>; Paul Mock <pmock@wgolfp.com>; Shantel Nemecek <snemecek@wgolfp.com>
Subject: HMD Compliance Inspection Report

Dear Gerry Ruiz:

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Please feel free to contact your inspector, or the HMD Desk at hmdutyeh@sdcounty.ca.gov, or by calling 858-505-6880.

Thank you for your time and compliance.

Respectfully,
Your County of San Diego Hazardous Materials Division



Elise Rothschild
Director

County of San Diego

Amy Harbert
Assistant Director

Department of Environmental Health
Hazardous Materials Division
PO Box 129261, San Diego, CA 92112-9261
Phone: (858) 505-6700; FAX: (858) 505-6788
Toll Free: (800) 253-9933
www.sdcdeh.org

7/29/2019

COTTONWOOD GOLF COURSE
3121 WILLOW GLEN DR
EL CAJON, CA 92019

According to our records, documentation or other evidence of corrective action has not been received or is incomplete for violations cited during the Unified Program facility inspection performed on 5/31/2019 at:

COTTONWOOD GOLF COURSE
3121 WILLOW GLEN DR
EL CAJON, CA 92019
Record ID: DEH2003-HUPFP-202521
CERS ID: 10365076

The Hazardous Materials Division (HMD) of the Department of Environmental Health is the Certified Unified Program Agency (CUPA) for the County of San Diego. As the local CUPA, the HMD implements the Unified Program in the County and regulates businesses that manage hazardous materials, hazardous wastes, medical wastes, aboveground petroleum storage tanks, and underground storage tanks.

On 5/31/2019, Teaba Yousif of the HMD inspected your business at 3121 WILLOW GLEN DR, EL CAJON, CA 92019. Our records indicate that the HMD has not received evidence of correction and/or certification of return to compliance as required by the California Health and Safety Code (H&SC) for the violations observed during the inspection. A copy of this inspection is enclosed.

Uncorrected violations from the 5/31/2019 inspection of your business are listed on the reverse of this page. Submit a written response indicating how these violations were corrected, along with any applicable supporting documentation within ten (10) business days (by 8/12/2019). You may use the enclosed Corrective Action Form to show return to compliance as long as you also submit adequate supporting documentation.

If a re-inspection is required to determine compliance, you will be charged a re-inspection fee of \$342. The HMD may initiate formal enforcement actions, including the imposition of substantial penalties, for any significant violations. Violations that are not promptly corrected will result in liability for additional days in violation and additional penalties. Any failure to provide the information requested will also be a factor in determining penalties. For these purposes, "significant violations" include violations that represent a significant threat to human health or safety or the environment, chronic violations, violations committed by a recalcitrant violator, and Class I hazardous waste violations (California Code of Regulations (CCR) 66260.10 and H&SC 25110.8.5).

Violation #	Description of Violation
3030017	Failed to properly close hazardous waste container(s). 22 CCR 66262.34(d)(2); 40 CFR 262.34(d)(2), 265.173
1010008	HMBP not certified annually as complete and accurate in CERS. HSC 25508(a)(1)(A), 25508.2, 19 CCR 2654(b)
1020002	Initial &/or annual employee training not conducted in safety procedures for a hazardous material release or threatened release &/or employee training records not available or not maintained for 3 years. HSC 25505(a)(4); 19 CCR 2659(b)
4010021	Failed to have record of inspections and integrity tests signed by the appropriate supervisor or inspector, keep written procedures and records of inspections and integrity tests for at least three years, and/or keep comparison records. (40 CFR 112.7(e), 112.8(c)(6).) HSC 25270.4.5(a)
4010008	Failed to maintain a complete copy of the SPCC Plan at the facility if the facility is normally attended at least four hours per day, or at the nearest field office if the facility is not so attended. (40 CFR 112.3(e)(1).) HSC 25270.4.5(a)

Mail your response to: County of San Diego
Department of Environmental Health
Hazardous Materials Division
P.O. Box 129261
San Diego, CA 92112-9261

For additional information, contact specialist Teaba Yousif at Teaba.Yousif@sdcounty.ca.gov or (858) 525-2797, or the Hazardous Materials Duty Desk at (858) 505-6880.

Sincerely,

Sande Pence, Chief
Hazardous Materials Division

Enclosures: Compliance Inspection Report
Corrective Action Form to Document Return to Compliance

ecc: Record ID: DEH2003-HUPFP-202521
CERS ID: 10365076

From: Paul Mock
To: [Yousif, Teaba](#)
Cc: [Rick Adams](#); [Shantel Nemecek](#)
Subject: SPCC @ Cottonwood Golf Club
Date: Tuesday, August 6, 2019 11:40:49 AM
Attachments: [CottonwoodGolfClub_SPCC.doc](#)

Teaba,

I wanted to share the attached SPCC for Cottonwood with you. I thought I'd have a chance last week to stop by Cottonwood and go over this with the guys. I also wanted to get you copies of the monthly tank check sign in sheet. Unfortunately I haven't made it down yet. Additionally, when I'm there I'll go through refresher training with everyone and get you a copy of the sign in sheet for that.

I just wanted to get the actual SPCC over to you so you didn't think I forgot about it, or wasn't taking care of it.

I'll forward you some sign in sheets and copies of their inspections once I'm able to make it on property.

I also notice you didn't approve my hazardous materials inventory yet in CERS. Did I do something wrong?

Thanks!

Paul R Mock Jr.
National Director of Agronomy
Golf Course Superintendent
Western Golf Properties

(949) 838-5792
pmock@wgolfp.com
westerngolfproperties.com



COUNTY OF SAN DIEGO

UPFP INSPECTION CHECKLIST

INSPECTION DATE: 05/31/2019
 RECORD ID #: DEH2003-HUPFP-202521
 TIME START: 10:30 AM END: 2:45 PM
 SPECIALIST: Teaba Yousif
 INSPECTION CONTACT: Gerry Ruiz
 TITLE: Superintendent
 PHONE: (619) 933-7300
 E-MAIL: gr Ruiz@wgolfp.com

FACILITY NAME: COTTONWOOD GOLF COURSE
 ADDRESS: 3121 WILLOW GLEN DR
 CITY/ZIP: EL CAJON /92019

FACILITY REFERENCE DATA

ACCELA	CERS
RECORD STATUS: Permit Renewed	EPA ID NUMBER: CAL000427444
PERMIT EXPIRATION DATE: 10/31/2019	FACILITY CERS ID NUMBER: 10365076
BALANCE DUE: \$0.00	CERS LEAD USER: Rick Adams
INSPECTOR: Teaba Yousif	LAST CERS SUBMITTAL DATE: 09/22/2017
INSPECTION TYPE: Routine	ENVIRONMENTAL CONTACT EMAIL: radams@wgolfp.com
INSPECTION STATUS: Pending Corrective Action	ENVIRONMENTAL CONTACT PHONE: 9496329557

FACILITY INFORMATION

INACTIVATION INSPECTION:	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>	HAZARDOUS MATERIALS:	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
CHANGE OF OWNER:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	HAZARDOUS WASTE:	<input checked="" type="checkbox"/>	<input type="checkbox"/>
CHANGE IN BUSINESS TYPE:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	ABOVEGROUND PETROLEUM STORAGE ACT:*	<input type="checkbox"/>	<input checked="" type="checkbox"/>
BUSINESS TYPE: Landscape Maintenance			TOTAL SHELL CAPACITY APSA:	1720	
ISSUE INITIAL INVOICE:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	UNDERGROUND STORAGE TANK:	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ASSESS NON-NOTIFICATION FEE:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	CALARP PROGRAM (CERS):	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ASSESS RE-INSPECTION FEE:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	CALARP PROGRAM LEVEL:	1 <input type="checkbox"/>	2 <input type="checkbox"/>
FACILITY SUBJECT TO BASE FEE:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	MEDICAL WASTE:	<input type="checkbox"/>	<input checked="" type="checkbox"/>
FACILITY SUBJECT TO CUPA FEE:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	MW FACILITY GENERATING OVER 200 LBS PER MONTH:	<input type="checkbox"/>	<input checked="" type="checkbox"/>
UPDATE FACILITY ADDRESS IN AA:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	EPIC PARTICIPANT:	<input type="checkbox"/>	<input checked="" type="checkbox"/>
BUSINESS CLOSE DATE:			NUMBER OF TLV GASES AT THE FACILITY:	0	
HW GENERATOR STATUS :	LOG <input type="checkbox"/>	SQG <input type="checkbox"/>	CESQG <input checked="" type="checkbox"/>	RCRA LOG <input type="checkbox"/>	N/A <input type="checkbox"/>
TIERED PERMIT LEVEL(S) :	CESQT <input type="checkbox"/>	CESW <input type="checkbox"/>	CE-L <input type="checkbox"/>	CE-CL <input type="checkbox"/>	HHW <input type="checkbox"/>
PRIMARY BILLING CODE	Not Applicable		SECONDARY BILLING CODE	Not Applicable	
TERTIARY BILLING CODE	Not Applicable				

INSPECTION SCOPE:*

HAZARDOUS MATERIALS:	GEN HAZMAT <input checked="" type="checkbox"/>	APSA <input type="checkbox"/>	UST <input type="checkbox"/>	HAZARDOUS WASTE:	SQG <input checked="" type="checkbox"/>	LOG <input type="checkbox"/>
MEDICAL WASTE:	LOG <input type="checkbox"/>	LOG - TREATS <input type="checkbox"/>	LOG - ABBREVIATED <input type="checkbox"/>	LOG - TREATS <input type="checkbox"/>	CALARP:	1 <input type="checkbox"/>
	LOG <input type="checkbox"/>	LOG - TREATS <input type="checkbox"/>	LOG - TREATS <input type="checkbox"/>		2 <input type="checkbox"/>	3 <input type="checkbox"/>
	LOG <input type="checkbox"/>	LOG - TREATS <input type="checkbox"/>	LOG - TREATS <input type="checkbox"/>	TIERED PERMITTING:	CESQT <input type="checkbox"/>	CESW <input type="checkbox"/>
	LOG <input type="checkbox"/>	LOG - TREATS <input type="checkbox"/>	LOG - TREATS <input type="checkbox"/>		CA <input type="checkbox"/>	PBR <input type="checkbox"/>
	LOG <input type="checkbox"/>	LOG - TREATS <input type="checkbox"/>	LOG - TREATS <input type="checkbox"/>		CE-L <input type="checkbox"/>	HHW <input type="checkbox"/>
	LOG <input type="checkbox"/>	LOG - TREATS <input type="checkbox"/>	LOG - TREATS <input type="checkbox"/>		CE-CL <input type="checkbox"/>	

CONSENT TO CONDUCT INSPECTION GRANTED BY: INSPECTION CONTACT NAME: Gerry Ruiz TITLE: Superintendent

REMOVE BLANK CHECKLISTS FROM FINAL INSPECTION REPORT REFUSED TO SIGN

TIME ACCOUNTING (Routine)

TOTAL TIME ENTERED: 3.8

Date	Time	Group	Type
05/31/2019	1	HMD Inspection	Report Writing - Record
05/31/2019	0.3	HMD Inspection	Travel Time - Record
05/31/2019	0.5	HMD Inspection	APSA Level 1 - Record
05/31/2019	2	HMD Inspection	HM/HW - Record



COUNTY OF SAN DIEGO

UPFP INSPECTION CHECKLIST

FACILITY NAME: COTTONWOOD GOLF COURSE
 ADDRESS: 3121 WILLOW GLEN DR
 CITY/ZIP: EL CAJON / 92019

INSPECTION DATE: 05/31/2019
 RECORD ID #: DEH2003-HUPFP-202521
 TIME START: 10:30 AM END: 2:45 PM
 SPECIALIST: Teaba Yousif
 INSPECTION CONTACT: Gerry Ruiz
 TITLE: Superintendent
 PHONE: (619) 933-7300
 E-MAIL: gruiz@wgolfp.com

INSPECTION REPORT EMAILS:

Teaba.Yousif@sdcounty.ca.gov,radams@wgolfp.com,pmock@wgolfp.com,snemecek@cottonwoodgolf.com

RECORD COMMENT:

Routine compliance inspection conducted on 5/31/19.

[Large empty area for additional notes or observations]



COUNTY OF SAN DIEGO

COMPLIANCE INSPECTION REPORT

FACILITY NAME: COTTONWOOD GOLF COURSE
 ADDRESS: 3121 WILLOW GLEN DR
 CITY/ZIP: EL CAJON /92019

INSPECTION DATE: 05/31/2019 PAGE 1 OF 9
 RECORD ID #: DEH2003-HUPFP-202521
 TIME START: 10:30 AM END: 2:45 PM
 SPECIALIST: Teaba Yousif
 INSPECTION CONTACT: Gerry Ruiz
 TITLE: Superintendent
 PHONE: (619) 933-7300
 E-MAIL: gruiz@wgolffp.com

On the above date, the County inspected your facility under the authority of the California Health and Safety Code (H&SC), to determine compliance with applicable provisions of the H&SC, the California Code of Regulations (CCR), and the San Diego County Code of Regulatory Ordinances (SDCC). **This report serves as a Notice to Comply (H&SC 25187.8 & 25404.1.2) for any minor violations as defined in H&SC 25404 and 25117.6.** This report may contain both minor and more significant (Class II) violations. Minor violations do not include repeat violations or violations remaining uncorrected for more than 30 days (or as specified below). Minor violations do not include knowing, willful, intentional, or chronic violations; nor do they include violations showing a pattern of neglect or disregard. The remarks below are intended to provide guidance to correct any violations indicated on the attached violation report. You must submit a written response to this report within 30 days (or as specified below) demonstrating that all violations have been corrected or include a written notice of disagreement that clearly states the reason for any disputed violations. Prompt correction can protect you from penalties for a "minor violation". Penalties can be imposed for each day in violation for all other violations even if they are corrected promptly. However, correction within 30 days (or as specified below) will make a penalty less likely.

NOTE: Reinspection fees will be charged if additional inspections are required to determine compliance.

Yes	N/A		Yes	N/A	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Unified Program Facility Permit Current	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Contingency Plan Available <input type="checkbox"/> LQG <input checked="" type="checkbox"/> SQG
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Hazardous Materials Business Plan Available	<input type="checkbox"/>	<input type="checkbox"/>	Employee Training Records Available
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Employee Training is Adequate	<input type="checkbox"/>	<input type="checkbox"/>	Universal Waste Managed Properly
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Waste Disposal Records Available for Review	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Waste Containers <input type="checkbox"/> Closed <input checked="" type="checkbox"/> Labeled
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Emergency Contacts Current <input type="checkbox"/> Updated today	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Waste Containers in Good Condition
<input type="checkbox"/>	<input type="checkbox"/>	Chemical Inventory/Map Current <input type="checkbox"/> Updated today			Permit Expires On <u>10/31/2019</u>

CONSENT TO CONDUCT INSPECTION GRANTED BY: Gerry Ruiz

TITLE: Superintendent

INTRODUCTION:

Routine Inspection

Today, I conducted a routine compliance inspection of Cottonwood Golf Course. Permission to conduct the inspection was granted to me by Gerry Ruiz, Superintendent. Also present during the inspection was Shantel Nemecek, Director of Operations.

This facility is a golf course and is subject to the following:

- 1) Hazardous Materials Business Plan (HMBP) requirements for storing/handling hazardous material/waste in reportable amount (= or > than 55 gallons, 200 cubic ft, or 500 lbs)
- 2) Hazardous Waste Generator requirements
- 3) Aboveground Petroleum Storage Act (APSA) for storing 1320 gallons or greater of Petroleum on site

Based on observations and consolidated manifests that were available for review, this facility appears to be a Small Quantity Generator of Hazardous Waste (<27 gallons/month) at time of inspection.

During the inspection, I observed the following:

- 1) 1x 1000 gallon aboveground tank of Diesel
- 2) 1x 500 gallon aboveground tank of Gasoline
- 3) >500 lbs of fertilizers
- 5) 2x 55 gallon drum of waste oil
- 6) 2x 110 cubic ft of Acetylene
- 7) 2x 124 cubic ft of Oxygen
- 8) 1x 500 gallon aboveground tank of propane
- 9) Used oil filters
- 10) 1x 55 gallon drum of 15w-40 and 1x 55 gallon drum of hydraulic oil (exempt from HMBP reporting)

VIOLATION # 1

1010008 HMBP not certified annually as complete and accurate in CERS. HSC 25508(a)(1)(A), 25508.2, 19 CCR 2654(b)

Classification: Class II

Observations:



Facility submitted full business plan on 9/4/18; however it is not accurate and was not accepted. Facility has > than 1320 gallons of petroleum on site and generates hazardous waste; however, in the business activities page the business certified they do not generate hazardous waste and do not have 1320 gallons or greater of petroleum. During today's inspection, I observed 1x 500 gallon aboveground tank of Gasoline and 1x 1,000 gallon aboveground tank of Diesel. I also observed 2x 55 gallon drums of used oil (1x 55 gallon drum was full and the other appeared to be half full). Also, the inventory contains obsolete federal hazard categories. You must update all federal hazard categories using the new check list. Ensure you un-check obsolete federal hazard categories. You must also update your site map to indicate where the emergency response equipment is located (eye wash stations, spill kits, fire extinguishers, first aid kit etc.) Also correct the physical state of propane as it should be reported as a liquid, not a gas. Temperature and pressure for motor oil should be ambient not above ambient. The pressure for Oxygen should be above ambient, not ambient. The contingency plan is missing the Local Unified Program Agency phone number. You must include the following number for the Local Agency: 858-505-6657.

Corrective Action Due By:06/30/2019

Within 30 days, log onto CERS and update business activities questions, update federal hazard categories, and update your site map. If you need assistance, contact the CERS helpdesk at 858-505-6990 or Teaba Yousif at 858-525-2797 or at teaba.yousif@sdcounty.ca.gov

VIOLATION # 2

3030017 Failed to properly close hazardous waste container(s). 22 CCR 66262.34(d)(2); 40 CFR 262.34(d)(2), 265.173

Classification: Class II

Observations:

During today's inspection, I observed 3x 5 gallon containers and 1x 55 gallon drum of used oil that were not properly closed. All hazardous waste containers not in active use should be closed to prevent release. **This violation is a repeat violation and was cited during your last inspection on 4/7/17.**

Corrective Action Due By:06/30/2019

Immediately close all hazardous waste containers and within 30 days, submit evidence that hazardous waste containers are properly closed.

VIOLATION # 3

4010008 Failed to maintain a complete copy of the SPCC Plan at the facility if the facility is normally attended at least four hours per day, or at the nearest field office if the facility is not so attended. (40 CFR 112.3(e)(1).) HSC 25270.4.5(a)

Classification: Class II

Observations:

Failed to maintain a copy of the Plan on site (applies if facility is manned at least 4 hours/day). CFR 112.3(e)(1) pursuant to HSC 25270.4.5(a)

Corrective Action Due By:06/30/2019

During the inspection, Rick Adams was able to email a copy of the SPCC Plan to the facility. The facility printed out the SPCC Plan and will maintain a copy on site.

VIOLATION # 4

4010021 Failed to have record of inspections and integrity tests signed by the appropriate supervisor or inspector, keep written procedures and records of inspections and integrity tests for at least three years, and/or keep comparison records. (40 CFR 112.7(e), 112.8(c)(6).) HSC 25270.4.5(a)

Classification: Class II

Observations:

Facility is subject to APSA requirements. During today's inspection, I observed 1x 500 gallon aboveground tank of Gasoline and



1x 1,000 gallon aboveground tank of Diesel. Records of inspections, tests and/or written procedures were not available for inspection.

Corrective Action Due By:06/30/2019

Within 30 days submit to my attention, evidence that required inspections and/or tests are being conducted and will be maintained for 3 years.

VIOLATION # 5

1020002 Initial &/or annual employee training not conducted in safety procedures for a hazardous material release or threatened release &/or employee training records not available or not maintained for 3 years. HSC 25505(a)(4); 19 CCR 2659(b)

Classification: Minor

Observations:

This facility is subject to business plan requirements. During today's inspection, I observed reportable quantities of Diesel, Gasoline, Propane, Used oil, Oxygen, Acetylene, and Fertilizer. The facility failed to maintain records of an adequate employee training program for the size of the facility and the nature of the hazardous materials handled. The training program shall, at a minimum, include methods for safe handling of hazardous materials; procedures for coordination with local emergency response organizations; use of emergency response equipment; and emergency response procedures for a release or threatened release of hazardous materials. Training must be conducted annually and records must be maintained for a minimum of 3 years and available for review during future inspections.

Corrective Action Due By:06/30/2019

Within 30 days, submit evidence of employee training and a statement that you are aware training must be conducted annually and that records must be maintained for a minimum of 3 years to Teaba Yousif at 858-525-2797.

VIOLATION # 6

3030004 Failed to properly manage, store, label &/or recycle used oil filters &/or used fuel filters. HSC 25250.22; 22 CCR 66266.130

Classification: Minor

Observations:

During today's inspection, I observed multiple used oil filters sitting on top of a 55 gallon drum of used oil (see photograph). Used oil filters are a hazardous waste and should be in a closed container and labeled as "Used and drained used oil and gasoline filters" with the accumulation start date. Filters must be managed within a year.

Corrective Action Due By:06/30/2019

Immediately place used oil filters in a container and label properly. Submit evidence of corrective action to Teaba Yousif

INSPECTION REMARKS:

- Last manifest reviewed from 5/16/17. Per Gerry Ruiz, Superintendent, the used oil is scheduled to be picked up by World Oil next week. All manifests, consolidated manifests, and bill of lading were available for the past 3 years and were reviewed.
- EPA ID umber CAL000427444 is active.

Helpful Websites:

- For guidance documents on hazardous materials-related topics, go to: http://www.sandiegocounty.gov/content/sdc/deh/hazmat/hmd_publications.html
- For information on the California Environmental Reporting System (CERS), go to: http://www.sandiegocounty.gov/content/sdc/deh/hazmat/hmd_cers.html
- If you have questions on: permit fees, business plan requirements, or hazardous waste regulations, go to: <http://www.sandiegocounty.gov/content/sdc/deh/hazmat.html>
- To find out the latest San Diego County News and receive updates, subscribe to our govdelivery emails:



COUNTY OF SAN DIEGO

SUPPLEMENTAL COMPLIANCE INSPECTION REPORT

INSPECTION DATE: **05/31/2019**
RECORD ID #: **DEH2003-HUPFP-202521**

PAGE **4** OF **9**

<https://public.govdelivery.com/accounts/CASAND/subscriber/new>

If you have any questions regarding this inspection, please contact Teaba Yousif , 858-525-2797,
Teaba.Yousif@sdcounty.ca.gov

INSPECTION PHOTOS



Photograph of 2x 55 gallon drums of used oil and 5 gallon containers of used oil. Also shown, used oil filters on top of one of the 55 gallon drums of used oil.

All regulated businesses are required by law to submit their Unified Program-related information and business updates online through the California Environmental Reporting System (CERS). For additional information about CERS, go to: http://www.sandiegocounty.gov/deh/hazmat/hmd_cers.html

PRINTED NAME OF FACILITY REPRESENTATIVE Shantel Nemecek	SIGNATURE		DATE SIGNED 05/31/2019
TITLE OF FACILITY REPRESENTATIVE Director of Operations			

Department of Environmental Health, Hazardous Materials Division, P.O. Box 129261, San Diego, CA 92112-9261
Phone: (858) 505-6880 <http://www.sdcdeh.org>



COUNTY OF SAN DIEGO

COMPLIANCE INSPECTION REPORT Handlers of Hazardous Materials and Small and Large Quantity Generators of Hazardous Waste

INSPECTION DATE: 05/31/2019 PAGE 5 OF 9
RECORD ID #: DEH2003-HUPFP-202521

FACILITY NAME: * COTTONWOOD GOLF COURSE

ADDRESS: * 3121 WILLOW GLEN DR

CITY/ZIP: * EL CAJON

92019

Each violation checked below is for the section(s) of the California Health and Safety Code (HSC), California Code of Regulations (CCR), or the San Diego County Code (SDCC) indicated in italics. Incorporated provisions of Title 40 of the Code of Federal Regulations (CFR) are noted for reference. All violations must be corrected. Submit documentation of return to compliance to your Specialist. You may use the Corrective Action Form (HM-926) to document your return to compliance. Please call (858) 505-6880 or your Specialist if you have any questions. HMBP = Hazardous Materials Business Plan; CUPA = Certified Unified Program Agency; CERS = California Environmental Reporting System; SQG = Small Quantity Hazardous Waste Generator; LQG = Large Quantity Hazardous Waste Generator

HAZARDOUS MATERIALS REQUIREMENTS

#	VIOLATION DESCRIPTION
<input type="checkbox"/>	1010001 Failed to establish and implement a HMBP. HSC 25505(a) and 25507(a)
<input type="checkbox"/>	1010002 HMBP not submitted to the CUPA in CERS. HSC 25508(a)(1)(A); 27 CCR 15188(a),(b),(d)
<input type="checkbox"/>	1010003 Business Activities &/or Business Owner/Operator page not completed in CERS. 19 CCR 2652(a)(1); SDCC 68.904(b); HSC 25508(a)(1)(A)
<input type="checkbox"/>	1010004 Chemical inventory incomplete or not submitted in CERS. HSC 25505(a)(1); 25507(a); 25508.1(a-b); 19 CCR 2654 (a) or (d)
<input type="checkbox"/>	1010005 Site map not submitted in CERS or not sufficient. HSC 25505(a)(2); 25508.1(f); 19 CCR 2652(a)(3)
<input type="checkbox"/>	1010006 Failed to update HMBP in CERS within 30 days of a substantial change to any portion of the HMBP, including inventory changes or facility information. HSC 25508.1(a-f); 19 CCR 2654(d); SDCC 68.904(c)(6)
1 <input checked="" type="checkbox"/>	1010008 HMBP not certified annually as complete and accurate in CERS. HSC 25508(a)(1)(A), 25508.2, 19 CCR 2654(b)
<input type="checkbox"/>	1010010 Emergency response plan and procedures to mitigate a release or threatened release not adequate, not established or not submitted in CERS. HSC 25505(a)(3), 25508(a)(1)(A); 19 CCR 2658
<input type="checkbox"/>	1010011 Failure to notify property owner in writing that the business is subject to the HMBP program. HSC 25505.1
<input type="checkbox"/>	1010012 Failure to provide a copy of HMBP to the property owner within five working days upon request from property owner. HSC 25505.1
<input type="checkbox"/>	1010014 Failure to submit emergency response plan in CERS, when not meeting agricultural handler exemption. HSC 25507.1(a) and 25508(a)(1)(A); 19 CCR 2670, 2671
<input type="checkbox"/>	1010015 Failure to submit employee training plan in CERS, when not meeting agricultural handler exemption. HSC 25507.1(a) and 25508(a)(1)(A)
<input type="checkbox"/>	1010016 HMBP not established or submitted in CERS, when not meeting the remote site exemption. HSC 25507.2 and 25508(a)(1)(A)
<input type="checkbox"/>	1020001 Employee training and/or plan for safety procedures in the event of a release or threatened release of a hazardous material not adequate, not established or not submitted in CERS. HSC 25505(a)(4), 25508(a)(1)(A); 19 CCR 2658, 2659(a)
<input type="checkbox"/>	1030001 (AWM) Failure of agricultural handler to post warning signs on buildings where pesticides, petroleum, or fertilizers are stored, that are visible from any direction of probable approach, contain all required information, and are in appropriate language. HSC 6.95 25507.1(a)(2); 19 CCR 2670, 2671
5 <input checked="" type="checkbox"/>	1020002 Initial &/or annual employee training not conducted in safety procedures for a hazardous material release or threatened release &/or employee training records not available or not maintained for 3 years. HSC 25505(a)(4); 19 CCR 2659(b)
<input type="checkbox"/>	1040001 Hazardous materials release or threatened release not immediately reported to the CUPA and OES upon discovery. HSC 25510(a); 19 CCR 2631(a)
<input type="checkbox"/>	HMD1001 Unified Program Facility permit not obtained for hazardous materials. SDCC 68.905; 68.906, 68.907
<input type="checkbox"/>	HMD1005 Emergency contact not provided or current in CERS. HSC 25508.1(f); SDCC 68.904(b)
<input type="checkbox"/>	HMD1007 Highly toxic gas (TLV<10 ppm) not disclosed in CERS. SDCC 68.1113(a)
<input type="checkbox"/>	HMD1008 Annual carcinogen/reproductive toxin list not submitted in CERS. SDCC 68.1113(b)
<input type="checkbox"/>	1010017 HMBP not readily available to facility personnel or the CUPA. HSC 25505(c)

HAZARDOUS WASTE REQUIREMENTS FOR SQGS ONLY

#	VIOLATION DESCRIPTION
<input type="checkbox"/>	HMD0226 Did not accumulate waste in a container or tank. 22 CCR 66262.34(d)(2); 40 CFR 262.34(d)(2)
<input type="checkbox"/>	3030007 Failed to properly label/date hazardous waste container &/or tank. 22 CCR 66262.34(f)
<input type="checkbox"/>	3030010 Accumulated waste too long (>180 or 270 days) or (>90 days). HSC 25201(a), 25123.3(h)(1); 22 CCR 66262.34(d); 40 CFR 262.34(e) and/or (f)
<input type="checkbox"/>	3030013 Failed to accumulate hazardous waste in a container that is in good condition. 22 CCR 66262.34(d)(2); 40 CFR 262.34(d)(2), 265.171
<input type="checkbox"/>	3030015 Failed to accumulate or store hazardous waste in a lined &/or compatible container. 22 CCR 66262.34(d)(2); 40 CFR 262.34(d)(2), 265.172
2 <input checked="" type="checkbox"/>	3030017 Failed to properly close hazardous waste container(s). 22 CCR 66262.34(d)(2); 40 CFR 262.34(d)(2), 265.173
<input type="checkbox"/>	3030019 Failed to inspect hazardous waste storage area at least weekly. 22 CCR 66262.34(d)(2); 40 CFR 262.34(d)(2), 265.174
<input type="checkbox"/>	3030022 Failed to properly separate incompatible waste. 22 CCR 66262.34(d)(2); 40 CFR 262.34(d)(2), 265.177
<input type="checkbox"/>	3030030 Failed to maintain &/or operate facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents. 22 CCR 66262.34(d)(2); 40 CFR 262.34(d)(4), 265.31
<input type="checkbox"/>	3030036 Failed to maintain adequate aisle space. 22 CCR 66262.34(d)(2); 40 CFR 262.34(d)(4), 265.35
<input type="checkbox"/>	3010022 Failed to post, next to the telephone, emergency information containing the location of emergency equipment, contact names and phone numbers. 22 CCR 66262.34(d)(2); 40 CFR 262.34(d)(5)(ii)
<input type="checkbox"/>	3020001 Failure to ensure employees are thoroughly familiar with proper waste handling and emergency procedures during normal facility operations and emergencies. 22 CCR 66262.34(d)(2); 40 CFR 262.34(d)(5)(iii)
<input type="checkbox"/>	3030032 Failed to maintain the following emergency response equipment or equivalent: 1) An internal communication or alarm system; 2) A communication device, such as a telephone; 3) Portable fire extinguishers, fire/spill control equipment and decontamination equipment; and 4) Water at adequate volume and pressure. 22 CCR 66262.34(d)(2); 40 CFR 262.34(d)(4), 265.32
<input type="checkbox"/>	3030039 Failed to have an emergency coordinator on the premises or on call, and available during an emergency. 22 CCR 66262.34(d)(2); 40 CFR 262.34(d)(5)(i)
<input type="checkbox"/>	HMD0412 Failed to implement and/or coordinate emergency response measures during an emergency, spill/release. 22 CCR 66262.34(d)(2); 40 CFR 262.34(d)(5)(iv)

HAZARDOUS WASTE TANK SYSTEMS FOR SQGS ONLY

#	VIOLATION DESCRIPTION
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HM-923 (10-18)



COUNTY OF SAN DIEGO

COMPLIANCE INSPECTION REPORT

INSPECTION DATE: 05/31/2019 PAGE 6 OF 9
 RECORD ID #: DEH2003-HUPFP-202521

Hazardous Materials and Hazardous Waste (continued)

- 3030024 Failed to operate uncovered tank to ensure at least 2 ft. of freeboard to prevent overtopping, unless the tank is equipped with a containment structure, a drainage control system, or a diversion structure with a capacity that equals or exceeds the volume of the top 2 ft. of the tank. 22 CCR 66262.34(d)(2); 40 CFR 262.34(d)(3), 265.201(b)(c)
- 3030025 Failed to provide an overfill protection device on continuously fed hazardous waste tank(s). 22 CCR 66262.34(d)(2); 40 CFR 262.34(d)(3), 265.201(b)(4)
- 3030027 Failed to conduct daily tank inspection of discharge control system, monitoring equipment and waste level. 22 CCR 66262.34(d)(2); 40 CFR 265.201(c)(1-3), 262.34(d)(3)
- 3030028 Failed to conduct weekly hazardous waste tank inspection(s) to detect signs of leakage and ensure that the construction materials, fixtures and surrounding areas of the tank are in good condition. 22 CCR 66262.34(d)(2); 40 CFR 265.201(c)(4 & 5), 262.34(d)(3)
- 3050007 Failed to properly remove all waste upon closure, decontaminate, and document the closure of a hazardous waste tank system. 22 CCR 67383.3; 40 CFR 262.34(d)(3), 265.201(f)
- HMD1612 Hazardous waste improperly stored in a tank system causing leaks, corrosion, or failure. 22 CCR 66262.34(d)(2); 40 CFR 262.34(d)(3), 265.201(b)
- HMD1614 Failed to pre-notify the CUPA in writing prior to closing a hazardous waste tank system. 22 CCR 67383.3(a)(1)
- HMD1615 Failed to properly accumulate ignitable or reactive waste in a tank system. 22 CCR 66262.34(d)(2); 40 CFR 262.34(d)(3), 265.201(g)

HAZARDOUS WASTE REQUIREMENTS FOR SQGS AND LOGS

RECORD KEEPING/OPERATIONAL REQUIREMENTS

- | # | <u>VIOLATION DESCRIPTION</u> |
|--------------------------|--|
| <input type="checkbox"/> | HMD0131 Unified Program Facility Permit not obtained &/or maintained for the generation of hazardous waste. SDCC 68.905 |
| <input type="checkbox"/> | HMD0150 Failed to submit complete and accurate Facility Information in CERS. 27 CCR 15188(b-c); SDCC 68.904(b) |
| <input type="checkbox"/> | 3030053 Failed to maintain waste analysis records, analytical records &/or waste determination results for at least 3 years. 22 CCR 66262.40(c) |
| <input type="checkbox"/> | 3010002 Failed to obtain &/or maintain an active EPA ID Number. 22 CCR 66262.12(a) |
| <input type="checkbox"/> | 3010008 Failed to properly complete a uniform hazardous waste manifest. 22 CCR 66262.23(a) |
| <input type="checkbox"/> | 3010009 Failed to submit an Exception Report to DTSC for hazardous waste manifest. HSC 25123.3(h)(2); 22 CCR 66262.42(b), (c), &/or (d) |
| <input type="checkbox"/> | 3010010 Failed to maintain copies of Uniform Hazardous Waste Manifest, consolidated manifest, or Bills of Lading for 3 years. HSC 25160.2(b)(3), 25185(a)(4); 22 CCR 66262.40(a), 66262.23(a)(3) |
| <input type="checkbox"/> | 3010011 Failed to send copy of the uniform hazardous waste manifest to DTSC within 30 days of shipment. 22 CCR 66262.23(a)(4) |
| <input type="checkbox"/> | 3010013 Failed to meet the consolidated manifesting requirements for waste shipment. HSC 25160.2(b)(3) &/or (c) |
| <input type="checkbox"/> | 3010014 Failed to retain at the generator's place of business disposal records of spent lead-acid batteries for at least 3 years. 22 CCR 66266.81(a)(4)(A) &/or (B) |
| <input type="checkbox"/> | 3030006 Failed to determine if a hazardous waste is restricted or prohibited from land disposal and has to be treated. 22 CCR 66268.7(a)(1) |
| <input type="checkbox"/> | 3010016 Failure of recycler who recycles more than 100 kilograms per month of a recyclable material to submit the biennial Recyclable Materials Report (RMR) in CERS when claiming exclusion or exemption. HSC 25143.10(a), (c) &/or (d) |
| <input type="checkbox"/> | HMD0149 Failed to keep disposal receipts for drained used oil filters and/or drained fuel filters for 3 years. HSC 25250.22; 22 CCR 66266.130(c)(5) |
| <input type="checkbox"/> | HMD0152 Failed to report &/or update the required inventory information for hazardous waste(s) generated at the facility in CERS. SDCC 68.904(a)(2) |
| <input type="checkbox"/> | HMD0140 Failed to have Land Disposal Restriction documentation onsite for 3 years. 22 CCR 66268.7(a)(8) |
| <input type="checkbox"/> | 3250005 Failed to obtain a Treatment, Storage and Disposal Facility (TSDF) permit or authorization to store/treat/dispose of hazardous waste. HSC 25201(a) |
| <input type="checkbox"/> | 3050005 Failed to have adequate records demonstrating claim of exemption or exclusion for recyclable materials. HSC 25143.2(f) |
| <input type="checkbox"/> | HMD0142 Failed to notify the CUPA in CERS for onsite hazardous waste treatment/tiered permitting. HSC 25201(a) |
| <input type="checkbox"/> | HMD0138 Manifest signed by the TSDF not available for inspection. 22 CCR 66262.40(a); HSC 25185(a)(4) |
| <input type="checkbox"/> | 3010035 Failure to annually submit notification of generator's intent to remotely consolidate hazardous waste. HSC 25110.10(d) |

DISPOSAL AND TRANSPORTATION

- | # | <u>VIOLATION DESCRIPTION</u> |
|--------------------------|---|
| <input type="checkbox"/> | 3010007 Failed to prepare a hazardous waste manifest for the transport of a waste for off-site transfer, treatment, storage, or disposal. HSC 25160(b)(1) or (2), 25160.2(b)(9); 22 CCR 66262.20(a) |
| <input type="checkbox"/> | 3030005 Failed to make a proper waste determination. 22 CCR 66262.11, 66262.40(c) |
| <input type="checkbox"/> | 3050001 Failed to use a DTSC registered hazardous waste transporter to transport hazardous waste. HSC 25163(a) |
| <input type="checkbox"/> | 3050002 Failed to properly dispose of hazardous waste at an authorized facility. HSC 25189.5(a) |
| <input type="checkbox"/> | HMD0308 Impermissible dilution of hazardous waste. 22 CCR 66268.3(a) |
| <input type="checkbox"/> | HMD0305 Disposed of used oil illegally. HSC 25250.5(a), 25189.5(a) |
| <input type="checkbox"/> | HMD0306 Failed to properly dispose of oil-based paint &/or hazardous waste latex paint liquid. HSC 25217.1, 25189.5(a) |

STORAGE AND HANDLING

- | # | <u>VIOLATION DESCRIPTION</u> |
|--------------------------|--|
| <input type="checkbox"/> | 3030001 Failed to meet the management requirements when handling or storing spent lead-acid batteries. 22 CCR 66266.81(a) |
| <input type="checkbox"/> | 3030003 Failed to properly manage 'damaged' spent lead acid batteries so as to minimize the release of acid and lead and to protect the handlers and the environment. 22 CCR 66266.81(b) |
| 6 | <input checked="" type="checkbox"/> 3030004 Failed to properly manage, store, label &/or recycle used oil filters &/or used fuel filters. HSC 25250.22; 22 CCR 66266.130 |
| | <input type="checkbox"/> 3050004 Generator intentionally contaminated used oil with another hazardous waste other than minimal amounts of fuel. HSC 25250.7(a), (c) |
| | <input type="checkbox"/> HMD0222 Failed to properly label Excluded Recyclable Materials (ERM) accumulated in a container or tank. HSC 25143.9(a) |
| | <input type="checkbox"/> HMD0216 Failed to label hazardous material container within 10 days after the container was discovered to be mislabeled or inadequately labeled. HSC 25124(b)(3)(A); 22 CCR 66262.34(f) |
| | <input type="checkbox"/> HMD0217 Failed to repack and properly label damaged/deteriorated hazardous material container within 96 hours. HSC 25124(b)(3)(B); 22 CCR 66262.34(f) |
| | <input type="checkbox"/> HMD0219 Failed to properly segregate used oil &/or fuel drained from filters. HSC 25250.22(b)(4); 22 CCR 66266.130(c)(6) |
| | <input type="checkbox"/> 3030057 Failed to comply with hazardous waste satellite container regulation. 22 CCR 66262.34(e) |
| | <input type="checkbox"/> HMD0023 Failed to properly empty container, failed to manage non-empty container, or inner liner removed from a container. 22 CCR 66261.7(b), (d), (e) &/or (f) |



COUNTY OF SAN DIEGO

COMPLIANCE INSPECTION REPORT

INSPECTION DATE: 05/31/2019 PAGE 7 OF 9
 RECORD ID #: DEH2003-HUPFP-202521

Hazardous Materials and Hazardous Waste (continued)

- 3030058 Failed to mark date on empty container larger than 5 gallons &/or manage it within one year. 22 CCR 66261.7(f)
- 3030060 Failure of the owner or operator managing laboratory hazardous waste in a laboratory accumulation area to comply with the accumulation, storage, management, training, and/or record-keeping requirements. HSC 25200.3.1(b) and/or (c)

UNIVERSAL WASTE HANDLER REQUIREMENTS

#	VIOLATION DESCRIPTION
<input type="checkbox"/> 3010004	Failed to obtain a California ID Number from DTSC or federal ID Number from USEPA prior to accumulating 5,000 kgs or more of Universal Waste. 22 CCR 66273.32(a-b)
<input type="checkbox"/> HMD0151	Failed to maintain universal waste handler training records for 3 years. 22 CCR 66273.36(c),(d)
<input type="checkbox"/> 3020003	Failed to properly train handlers of universal waste in universal waste management and response procedures. 22 CCR 66273.36(a),(b)
<input type="checkbox"/> 3030008	Failed to properly label or mark Universal Waste container, package, or pallet (excluding CESQUWG) 22 CCR 66273.34
<input type="checkbox"/> 3030011	Failed to properly dispose of Universal Waste within one year. 22 CCR 66273.35(a) &/or (b)
<input type="checkbox"/> HMD0147	Failed to keep records of offsite Universal Waste shipment(s) available for inspection for 3 years. 22 CCR 66273.39(c),(d)(2)
<input type="checkbox"/> 3030051	Failed to meet accumulation, labeling, marking, &/or containment standards for Universal Waste aerosol containers. HSC 25201.16(f)
<input type="checkbox"/> 3040004	Failed to manage universal waste in a manner to prevent release(s) to the environment. 22 CCR 66273.33; 66273.33.5
<input type="checkbox"/> HMD0307	Disposal of universal waste (UW) to an unauthorized point. HSC 25189.5(a); 22 CCR 66273.31(a), 66273.8(b)
<input type="checkbox"/> 3010005	Failure of a universal handler of electronic devices or CRTs from an offsite source to notify DTSC 30 days prior to acceptance. 22 CCR 66273.32(c)
<input type="checkbox"/> 3010020	Failure of a universal waste handler to submit an annual report that includes all required information to DTSC by February 1 of every year. 22 CCR 66273.32(d)
<input type="checkbox"/> 3010006	Failure of the universal waste handler who sends electronic devices or CRTs to any foreign destination to notify DTSC 60 days prior to export and send a copy to the CUPA. 22 CCR 66273.40(a)(3)

CERTIFIED APPLIANCE RECYCLER REQUIREMENTS

#	VIOLATION DESCRIPTION
<input type="checkbox"/> 3010033	Failure to obtain Certified Appliance Recycler certification (CAR) from DTSC. HSC 25211.4
<input type="checkbox"/> 3010034	Failure of certified appliance recycler (CAR) to provide documentation that all materials that require special handling (MRSH) have been properly removed and managed. HSC 25211.2, 25211.3
<input type="checkbox"/> 3030055	Failure of certified appliance recycler (CAR) to properly remove and dispose of all materials that require special handling (MRSH). HSC 25211.3, 25212 (a), (b), and/or (c)



COUNTY OF SAN DIEGO

COMPLIANCE INSPECTION REPORT

INSPECTION DATE: 05/31/2019 PAGE 8 OF 9
 RECORD ID #: DEH2003-HUPFP-202521

Aboveground Petroleum Storage Act (APSA) Program

Each violation checked below is for the section(s) of the California Health and Safety Code (HSC), California Code of Regulations (CCR), or San Diego County Code ("SDCC") indicated in *italics*. Incorporated provisions of Title 40 of the Code of Federal Regulations (CFR) are noted for reference. All violations must be corrected. Submit documentation of return to compliance to your Specialist. You may use a DEH Corrective Action Form (HM-926) or other correspondence to document your return to compliance. Please call (858) 505-6880 or your Specialist if you have any questions.

GENERAL APSA FACILITY REQUIREMENT

(CHAPTER 6.67 OF DIVISION 20 OF THE HSC & SDCC)

#	VIOLATION DESCRIPTION
<input type="checkbox"/> 4010001	Failed to prepare a Spill Prevention, Control, and Countermeasures (SPCC) Plan. HSC 25270.4.5(a), 40 CFR 112.3, 112.6
<input type="checkbox"/> 4030038	Failed to implement the SPCC Plan. HSC 25270.4.5(a), 40 CFR 112.3, 112.6
<input type="checkbox"/> 4010032	Failed to submit a tank facility statement or update/certify Business Plan annually. HSC 25270.6(a)(1) or (a)(2)
<input type="checkbox"/> 4010033	Failed to pay the APSA program fee or obtain Unified Program Facility Permit. HSC 25270.6(b), SDCC 68.905
<input type="checkbox"/> 4040001	Failed to immediately, upon discovery, report a one-barrel (42 gallons) or greater release of petroleum to Cal OES and the CUPA. HSC 25270.8
<input type="checkbox"/> 4010037	Failed to meet conditions of APSA exemption for oil-filled electrical equipment including containment and visual inspection. HSC 25270.2(a)(4)
<input type="checkbox"/> 4030043	Failed to have secondary containment and/or leak detection if piping connected to tank in an underground area (TIUGA) cannot be directly viewed on all sides. (Refer to HSC 6.67 for direct viewing: DOES NOT apply to: 1. Piping connected to a tank that contains new oil/used oil for lubricant or coolant in a motor engine or transmission, or oil-filled operational/manufacturing equipment. 2. Piping connected to a tank used solely in connection with a fire pump or emergency system, legally required by standby system, or optional standby system. 3. Piping connected to a petroleum hazardous waste tank that complies with hazardous waste tank standards (22 CCR Ch. 15, Art. 10) and facility has been issued a unified program facility permit pursuant to HSC 25404.2 for generation, treatment, accumulation, or storage of hazardous waste.) (24CCR Title 9 Section 5703.6.2.2.) HSC 25270.4.5(a), HSC 25270.2(o)(1)(C)(iv)(III)

REQUIREMENTS BASED ON 40 CFR 112.1-112.6

#	VIOLATION DESCRIPTION
<input type="checkbox"/> 4010035	Failed to prepare an appropriate SPCC Plan within six months when the facility no longer meets the conditions of a qualified facility. (40 CFR 112.3(a)(1), 112.3(g), 112.6.) HSC 25270.4.5(a)
<input type="checkbox"/> 4010047	(Qualified Facility only- Tier I or II) Failed to have management, or a Professional Engineer if applicable, certify the SPCC Plan and comply with the certification requirements. (40 CFR 112.6(a)(1), 112.6(b).) HSC 25270.4.5(a)
<input type="checkbox"/> 4010048	(Qualified Facility only- Tier I) Failed to certify the SPCC Plan according to 40 CFR 112.6(a)(1) if a technical change has been made to the facility design, construction, operation, or maintenance. (40 CFR 112.6(a)(2).) HSC 25270.4.5(a)
<input type="checkbox"/> 4010052	(Qualified Facility only- Tier II) Failed to have technical amendment(s) certified by management, or a Professional Engineer if applicable. (40 CFR 112.6(b)(2), 112.6(b)(2)(i).) HSC 25270.4.5(a)
<input type="checkbox"/> 4010054	(Qualified Facility only- Tier I) Failed to include in the SPCC Plan a prediction of direction and total quantity of oil potentially discharged from the facility as a result of each type of major equipment failure. (40 CFR 112.6(a)(3)(i).) HSC 25270.4.5(a)
<input type="checkbox"/> 4030041	(Qualified Facility only- Tier I) Failed to provide bulk storage containers/tanks with adequate sized secondary containment to contain the capacity of the largest container plus freeboard for precipitation; failed to position/locate mobile or portable containers to prevent a discharge. (40 CFR 112.6(a)(3)(ii).) HSC 25270.4.5(a)
<input type="checkbox"/> 4030042	(Qualified Facility only- Tier I) Failed to provide systems or follow procedures to prevent overfills as described in the SPCC Plan; failed to routinely test overflow equipment to ensure proper operation. (40 CFR 112.6(a)(3)(iii).) HSC 25270.4.5(a)
<input type="checkbox"/> 4010003	Failed to have a Professional Engineer certify and review the SPCC Plan. (40 CFR 112.3(d).) HSC 25270.4.5(a)
3 <input checked="" type="checkbox"/> 4010008	Failed to maintain a complete copy of the SPCC Plan at the facility if the facility is normally attended at least four hours per day, or at the nearest field office if the facility is not so attended. (40 CFR 112.3(e)(1).) HSC 25270.4.5(a)
<input type="checkbox"/> 4010010	Failed to make SPCC Plan technical amendment(s) within six months when the facility has had a change in design, construction, operation, or maintenance which affects the facility's discharge potential; failed to implement within six months following preparation of the amendment. (40 CFR 112.5(a), 112.5(b).) HSC 25270.4.5(a)
<input type="checkbox"/> 4010009	Failed to perform and properly document a five-year review of the SPCC Plan. (40 CFR 112.5(b).) HSC 25270.4.5(a)
<input type="checkbox"/> 4010039	Failed to have technical amendments certified by a licensed Professional Engineer. (40 CFR 112.5(c).) HSC 25270.4.5(a)

GENERAL SPCC REQUIREMENTS

BASED UPON 40 CFR 112.7

#	VIOLATION DESCRIPTION
<input type="checkbox"/> 4010012	Failed to prepare a written SPCC Plan in accordance with good engineering practices and any applicable more stringent State rules, regulations, and guidelines; failed to prepare a SPCC Plan that follows the sequence of rule or provides a cross-reference; failed to prepare a SPCC Plan that addresses additional procedures/methods/equipment not fully operational; failed to obtain facility management approval for implementation of the SPCC Plan. (40 CFR 112.7 and 112.7(a)(1).) HSC 25270.4.5(a)
<input type="checkbox"/> 4010014	Failed to include alternative environmental protection to SPCC requirements within SPCC Plan. (40 CFR 112.7(a)(2).) HSC 25270.4.5(a)
<input type="checkbox"/> 4010015	Failed to include in the SPCC Plan an adequate facility diagram, or no facility diagram included. The facility diagram is not required for a Tier I Qualified Facility. (40 CFR 112.7(a)(3).) HSC 25270.4.5(a)
<input type="checkbox"/> 4010016	Failed to adequately describe in the SPCC Plan the physical layout of facility, types of oil and storage capacities, tanks, containers, equipment, mobile refuelers, portable containers, transfer operations, and other required information. (40 CFR 112.7(a)(3), 112.7(a)(3)(i-vi).) HSC 25270.4.5(a)
<input type="checkbox"/> 4010017	Plan does not contain procedures for reporting a discharge, and/or a contact list and phone numbers for the facility response coordinator, National Response Center, cleanup contractors with an agreement for response, and all appropriate Federal, State, and local agencies. (40 CFR 112.7(a)(4).) HSC 25270.4.5(a)
<input type="checkbox"/> 4010018	Discharge response procedures are not adequately organized to be readily accessible in an emergency. (40 CFR 112.7(a)(5).) HSC 25270.4.5(a)
<input type="checkbox"/> 4010019	Failed to include in the SPCC Plan a prediction of the direction, rate of flow, and total quantity of oil that could be discharged for each type of major equipment failure where experience indicates a reasonable potential for equipment failure. (40 CFR 112.7(b).) HSC 25270.4.5(a)
<input type="checkbox"/> 4010020	(General Containment) Failed to provide, or include in the SPCC Plan, the appropriate containment, diversionary structures, or equipment to prevent a discharge that will not escape containment before cleanup occurs, including typical failure mode and most likely quantity of discharge. (40 CFR 112.7(c).) HSC 25270.4.5(a)
<input type="checkbox"/> 4010004	Failed to clearly explain why appropriate containment/diversionary structures are not practicable and/or SPCC Plan claiming impracticability is not certified by a licensed Professional Engineer. (40 CFR 112.7(d).) HSC 25270.4.5(a)
<input type="checkbox"/> 4010005	Failed to prepare an Oil Spill Contingency Plan following the provisions of 40 CFR Part 109 for impracticability claim. (40 CFR 112.7(d)(1).) HSC 25270.4.5(a)
<input type="checkbox"/> 4010006	Failed to provide a written commitment of manpower, equipment, materials when claiming impracticability. (40 CFR 112.7(d)(2).) HSC 25270.4.5(a)



COUNTY OF SAN DIEGO

COMPLIANCE INSPECTION REPORT

INSPECTION DATE: 05/31/2019 PAGE 9 OF 9
 RECORD ID #: DEH2003-HUPFP-202521

APSA Program (continued)

- 4 4010021 Failed to have record of inspections and integrity tests signed by the appropriate supervisor or inspector, keep written procedures and records of inspections and integrity tests for at least three years, and/or keep comparison records. (40 CFR 112.7(e), 112.8(c)(6).) HSC 25270.4.5(a)
- 4020001 Failed to train oil-handling personnel on: operation/maintenance of equipment to prevent discharges; discharge procedure protocols; applicable laws, rules, and regulations; general facility operations; and the contents of the SPCC Plan. (40 CFR 112.7(f)(1).) HSC 25270.4.5(a)
- 4010022 Failed to designate person accountable for discharge prevention who reports to facility management. (40 CFR 112.7(f)(2).) HSC 25270.4.5(a)
- 4010023 Failed to conduct annual discharge prevention briefings to ensure understanding of SPCC plan. (40 CFR 112.7(f)(3).) HSC 25270.4.5(a)
- 4030001 Failed to address security and access control of the oil handling, processing, and storage areas to both prevent acts of vandalism and assist in discovery of discharges. (40 CFR 112.7(g).) HSC 25270.4.5(a)
- 4030002 (For loading/unloading racks) Failure of the secondary containment, and/or rack drainage to flow to a catchment basin, treatment system, or quick drainage system, and hold at least the maximum capacity of the largest single compartment of any tank car or tank truck. (40 CFR 112.7(h)(1).) HSC 25270.4.5(a)
- 4030003 (For loading/unloading racks) Failed to provide an interlocked warning light or physical barriers, warning signs, wheel chocks, or vehicle brake interlock system in the area adjacent to the loading/unloading rack to prevent vehicles from departing before complete disconnection of transfer lines. (40 CFR 112.7(h)(2).) HSC 25270.4.5(a)
- 4030016 Failed to evaluate field-constructed storage tank for brittle fracture or other catastrophe and take appropriate action. (40 CFR 112.7(i).) HSC 25270.4.5(a)
- 4010013 Failure to discuss in the SPCC Plan conformance with SPCC requirements and other effective discharge prevention and containment procedures or any more stringent State rules, regulations and guidelines. (HSC 6.67 25270.4.5(a); 40 CFR 112.7(a)(1), 112.7(j))
- 4030034 (For oil-filled operational equipment) Failed to provide general secondary containment or fulfill alternative requirements to general secondary containment. (40 CFR 112.7(k).) HSC 25270.4.5(a)

SPCC REQUIREMENTS BASED UPON 40 CFR 112.8 & 112.20

REFER TO APSA (HSC CHAPTER 6.67) FOR DEFINITION OF "STORAGE TANK"

- | # | VIOLATION DESCRIPTION |
|----------------------------------|---|
| <input type="checkbox"/> 4010027 | Failed to restrain drainage from diked storage areas by valve(s) or manually activated pump/ejector to prevent discharge. (40 CFR 112.8(b)(1).) HSC 25270.4.5(a) |
| <input type="checkbox"/> 4030005 | Failed to use valves of manual, open-and-closed design, for drainage of diked areas. (40 CFR 112.8(b)(2).) HSC 25270.4.5(a) |
| <input type="checkbox"/> 4030008 | Facility drainage system from undiked areas not designed/equipped to retain oil or return oil to facility and/or failed to ensure catchment basin is not in an area subject to flooding. (40 CFR 112.8(b)(3), 112.8(b)(4).) HSC 25270.4.5(a) |
| <input type="checkbox"/> 4030009 | Failed to provide at least two lift pumps and permanently install at least one pump where drainage waters are treated in more than one treatment unit and such treatment is continuous, and pump transfer is needed. (40 CFR 112.8(b)(5).) HSC 25270.4.5(a) |
| <input type="checkbox"/> 4030012 | Storage tanks not compatible with materials stored or conditions of storage. (40 CFR 112.8(c)(1).) HSC 25270.4.5(a) |
| <input type="checkbox"/> 4030010 | (Sized Containment) Secondary containment not sized to contain the entire capacity of the largest single storage tank plus freeboard for precipitation. (40 CFR 112.8(c)(2).) HSC 25270.4.5(a) |
| <input type="checkbox"/> 4030013 | Failure to ensure diked areas are sufficiently impervious to contain discharged oil. (40 CFR 112.8(c)(2).) HSC 25270.4.5(a) |
| <input type="checkbox"/> 4030006 | Failed to ensure all of the following before allowing drainage of uncontaminated rainwater from diked area: keep bypass valve normally sealed closed, inspect the retained rainwater, and open then reseal bypass valves under responsible supervision. (40 CFR 112.8(c)(3).) HSC 25270.4.5(a) |
| <input type="checkbox"/> 4010026 | Failed to maintain adequate records (or NPDES permit records) of drainage from diked areas. (40 CFR 112.8(c)(3)(iv).) HSC 25270.4.5(a) |
| <input type="checkbox"/> 4030017 | Failed to provide corrosion protection for partially buried storage tanks. (40 CFR 112.8(c)(5).) HSC 25270.4.5(a) |
| <input type="checkbox"/> 4030015 | Failed to test or inspect each aboveground tank or container for integrity on a regular schedule and after material repairs. (40 CFR 112.8(c)(6).) HSC 25270.4.5(a) |
| <input type="checkbox"/> 4030014 | Failed to ensure tanks are inspected and tested by an appropriately qualified person in accordance with industry standards. (40 CFR 112.8(c)(6).) HSC 25270.4.5(a) |
| <input type="checkbox"/> 4010028 | Failed to include in the SPCC Plan procedures to test or inspect each aboveground container for integrity in accordance with industry standards on a regular schedule, after material repairs are made, by qualified personnel; failed to include the frequency and type of testing and inspections based on container size, configuration, and design. (40 CFR 112.8(c)(6).) HSC 25270.4.5(a) |
| <input type="checkbox"/> 4030018 | Failure of steam return/exhaust of internal heating coils, which discharge into an open water course, to be monitored, passed through a settling tank, skimmer, or other separation system. (40 CFR 112.8(c)(7).) HSC 25270.4.5(a) |
| <input type="checkbox"/> 4030019 | Failed to engineer or update each container/tank installation in accordance with good engineering practice to avoid discharges and/or failed to provide at least one of the following devices: audible/visual high liquid level alarm, high liquid level pump cutoff devices, audible or code signal communications between tank gauge and pumping station, or fast response system for determining liquid levels, such as computers, telepulse or direct vision gauges. (40 CFR 112.8(c)(8)(i-iv).) HSC 25270.4.5(a) |
| <input type="checkbox"/> 4030022 | Failed to regularly test liquid level sensing devices to ensure proper operation. (40 CFR 112.8(c)(8)(v).) HSC 25270.4.5(a) |
| <input type="checkbox"/> 4030023 | Failed to observe effluent treatment facilities frequently enough to detect any potential for discharges as described in 40 CFR 112.1(b). (40 CFR 112.8(c)(9).) HSC 25270.4.5(a) |
| <input type="checkbox"/> 4030021 | Failed to promptly correct visible discharges and/or remove any accumulations of oil in diked areas. (40 CFR 112.8(c)(10).) HSC 25270.4.5(a) |
| <input type="checkbox"/> 4030020 | (For mobile or portable storage tanks EXCEPT mobile refuelers) Failed to position or locate mobile or portable storage container, and/or failure to provide secondary containment with sufficient capacity to contain the largest single mobile or portable container/compartment and sufficient freeboard for precipitation. (40 CFR 112.8(c)(11).) HSC 25270.4.5(a) |
| <input type="checkbox"/> 4030025 | Failed to inspect buried piping when exposed for any reason; failed to do additional examination or take corrective action if corrosion damage is identified. (40 CFR 112.8(d)(1).) HSC 25270.4.5(a) |
| <input type="checkbox"/> 4030027 | Failed to provide corrosion protection for buried piping. (40 CFR 112.8(d)(1).) HSC 25270.4.5(a) |
| <input type="checkbox"/> 4030028 | Failed to cap/blank-flange piping connection at transfer point and mark its origin if not in service. (40 CFR 112.8(d)(2).) HSC 25270.4.5(a) |
| <input type="checkbox"/> 4030029 | Failed to design pipe supports to minimize abrasion/corrosion and to allow for expansion/contraction. (40 CFR 112.8(d)(3).) HSC 25270.4.5(a) |
| <input type="checkbox"/> 4030026 | Failed to regularly inspect aboveground valves, piping, and appurtenances. (40 CFR 112.8(d)(4).) HSC 25270.4.5(a) |
| <input type="checkbox"/> 4030030 | Failed to conduct integrity and leak test on buried piping at installation, modification, construction, relocation or replacement. (40 CFR 112.8(d)(4).) HSC 25270.4.5(a) |
| <input type="checkbox"/> 4030031 | Failed to adequately warn vehicles entering facility to protect piping and other transfer operations. (40 CFR 112.8(d)(5).) HSC 25270.4.5(a) |
| <input type="checkbox"/> 4010044 | Failed to complete and maintain at the facility the Substantial Harm Criteria certification form when owner or operator determines that the facility could not be reasonably expected to cause substantial harm to the environment. (40 CFR 112.20(e).) HSC 25270.4.5(a) |



COUNTY OF SAN DIEGO

CORRECTIVE ACTION FORM TO DOCUMENT RETURN TO COMPLIANCE

FACILITY NAME: COTTONWOOD GOLF COURSE
 ADDRESS: 3121 WILLOW GLEN DR
 CITY/ZIP: EL CAJON /92019

INSPECTION DATE: <u>05/31/2019</u>
RECORD ID #: <u>DEH2003-HUPFP-202521</u>
SPECIALIST: <u>Teaba Yousif</u>
INSPECTION CONTACT: <u>Gerry Ruiz</u>
TITLE: <u>Superintendent</u>
PHONE: <u>(619) 933-7300</u>
E-MAIL: <u>gruiz@wgolffp.com</u>

VIOL#	DATE CORRECTED	INDICATE HOW VIOLATIONS WERE CORRECTED (Attach Any Supporting Documentation)	DUE DATE
#1 1010008			06/30/2019
#2 3030017			06/30/2019
#3 4010008			06/30/2019
#4 4010021			06/30/2019
#5 1020002			06/30/2019
#6 3030004			06/30/2019

I certify under penalty of law that this facility has corrected all violations marked on the Compliance Inspection Report/Notice of Violation. I have personally examined and am familiar with the information submitted and believe the information is true, accurate and complete. I am authorized to file this certification for the facility, and am aware that there are significant penalties for submitting false information.

PRINTED NAME OF FACILITY REPRESENTATIVE	SIGNATURE	DATE SIGNED
TITLE OF FACILITY REPRESENTATIVE		

SEND COMPLETED FORM AND SUPPORTING DOCUMENTATION TO THE ADDRESS LISTED BELOW

COUNTY OF SAN DIEGO USE ONLY

REVIEWED BY: _____ DATE: _____

SPECIALIST'S COMMENTS:

- All violations noted on date listed above were corrected
- Based On Information Provided By The Facility
- Based On Field Verification By Specialist
- RTC entered by Specialist on: _____
- RTC entered by Office Assistant on: _____

Department of Environmental Health, Hazardous Materials Division, P.O. Box 129261, San Diego, CA 92112-9261
<http://www.sdcdeh.org> 858-505-6880



HAZARDOUS WASTE
WA

HAZARDOUS WASTE

WED
WATERBORNE OIL



COUNTY OF SAN DIEGO
DEPARTMENT OF ENVIRONMENTAL HEALTH
LAND AND WATER QUALITY DIVISION
MONITORING WELLS
P.O. BOX 129261, SAN DIEGO, CA 92112-9261
619-338-2339/FAX 619-338-2315
www.sdcounty.ca.gov/deh/lwq

**REQUEST FOR RESUBMITTAL
OF YOUR
MONITORING WELL/BORING PERMIT**

**60 DAY DRILLING REPORT
FOR PERMIT LMON104059**

DATE RETURNED: 08/07/2006

The Monitoring Well Program (MWP) is returning your 60-day drilling report for the above-referenced permit because some necessary items were missing.

Please resubmit the complete drilling report with the information checked below to the MWP within fourteen (14) working days. If you have any questions regarding this request, please contact the Monitoring Well Program desk at (619) 338-2339, or by email at: deh.monitoringwells@sdcounty.ca.gov.

- A detailed plot plan drawn to scale showing the location of the site, nearest cross streets, property boundary lines, existing improvements (such as USTs, piping, and/or utilities), and the location of all wells and borings.
- A detailed log for each well/boring describing the density, moisture content, color, grain size distribution, and character of all lithologic units penetrated. The log must include depth of first groundwater, static water level in the completed well(s), date of measurement, field vapor readings.
- A detailed "as built" well construction diagram with the type of casing, screened interval, screen slot size, type of filter pack, depth, location and type of seals, and volumes of materials (cubic feet) used, and surveyed well elevations and locations.
- The types and amounts, in cubic feet, of sealing materials used to backfill each borehole.
- A grain-size analysis of the lithologic unit or units that represent soils adjacent to the perforated portion of the well, if performed.
- All laboratory analysis data and chain of custody for the soil and/or groundwater sampling that accompanied the work under this permit.
- A properly signed copy of the well construction and boring report, as legally required by the California Business and Professions Code. The professional geologist may indicate his or her responsibility for the accuracy and completeness of the logs and accompanying data included in the report by providing an original ("wet") signature or by stamping the report with his or her seal. A civil engineer must indicate his or her responsibility for the accuracy and completeness of the logs and accompanying data included in the report by providing all of the following items: an original signature ("wet"), his or her seal/stamp, the date of signing and sealing/stamping, and the expiration date of the certificate or authority.
- Documentation of well destruction which includes the method used to destroy the monitoring well/boring(s), the type of sealing materials and volumes used (in cubic feet), and the dates the work was started and completed.
- Description of the surface seal construction, which does not comply with the permit conditions.
- Submit a letter of explanation stating why the borings was not backfilled with an approved sealing material as specified in California Well Standards Bulletin 74-90, Part III, Section 19.D and SAM Manual, Section 5, pages 6 & 7. Or submit a corrected boring logs/report signed by the registered professional describing the corrections made to a revised 60-day drilling report.
- Other: Permit application submitted and approved indicated that you will use bentonite to backfill the borehole.

Processed by: ERNIE L. PROFETA, MWP TECHNICIAN
(619) 338-2492



PERMIT #LMON104059
A.P.N. # 518-032-22 et al
EST # NONE

**COUNTY OF SAN DIEGO
DEPARTMENT OF ENVIRONMENTAL HEALTH
LAND AND WATER QUALITY DIVISION
MONITORING WELL PROGRAM
SOIL BORING CONSTRUCTION PERMIT**

SITE NAME: COTTONWOOD GOLF COURSE

SITE ADDRESS: 3121 WILLOW GLEN DR, EL CAJON, CA 92019

PERMIT FOR: 4 SOIL BORINGS

PERMIT APPROVAL DATE: JUNE 16, 2006

PERMIT EXPIRES ON: OCTOBER 13, 2006

RESPONSIBLE PARTY: PREMIER GOLFT PROPERTIES, LP

PERMIT CONDITIONS:

1. As a condition of this permit, the 60-day drilling report must state the Accessor's Parcels (APN's) where each of the borings is located and the site map must show the borings on those parcels.
2. All borings must be sealed from the bottom of the boring to the ground surface with an approved sealing material as specified in California Well Standards Bulletin 74-90, Part III, Section 19.D. Drill cuttings are not an acceptable fill material.
3. All borings must be properly destroyed within 24 hours of drilling.
4. Placement of any sealing material at a depth greater than 30 feet must be done using the tremie method.
5. All water and soil resulting from the activities covered by this permit must be managed, stored and disposed of as specified in the SAM Manual in Section 5, II, E- 4. (http://www.sdcounty.ca.gov/deh/lwg/sam/manual_guidelines.html). In addition, drill cuttings must be properly handled and disposed in compliance with the Stormwater Best Management Practices of the local jurisdiction.
6. Within 60 days of completing work, submit a well construction report, including all well and/or boring logs and laboratory data to the Well Permit Desk. This report must include all items required by the SAM Manual, Section 5, Pages 6 & 7.
7. This office must be given 48-hour notice of any drilling activity on this site and advanced notification of drilling cancellation. Please contact the Well Permit Desk at (619) 338-2339.

APPROVED BY: _____

M Crystal
MARISUE CRYSTAL

DATE: 06/16/2006

NOTIFIED: *v.m. ms g 6/16/06 msc*
DEH: SAM-9075 (4/03)

ok 6/7/06 T104059

Proposed Drill date - 6/20/06



RECEIVED

PERMIT APPLICATION FOR GROUNDWATER AND VADOSE MONITORING WELLS AND EXPLORATORY OR TEST BORINGS

OFFICE USE ONLY PERMIT LMON # 704059 SAM CASE YIN# NONE DATE RECEIVED: 6-7-06 FEE PAID: \$301.50 CHECK # 5905

JUN 7 AM 10:02

A. RESPONSIBLE PARTY Premier Golf Properties, LP Phone (619) 442-9891 Mailing Address 3121 Willow Glen Drive City El Cajon State Ca Zip 92019

B. SITE ASSESSMENT PROJECT NUMBER - IF APPLICABLE # C. CONSULTING FIRM TerraMins, Inc. Mailing Address 14360 St. Andrews Dr. Ste. 4 City Victorville State Ca Zip 92305

D. DRILLING COMPANY Boart Longyear C57# 694686 Contact Name Phil Cramer Mailing Address 7773 W Seldon Ln City Peoria State AZ Zip 85345

E. CONSTRUCTION INFORMATION TYPE OF WELLS/BORINGS TO BE CONSTRUCTED MATERIALS TO BE USED CASING SEAL/BORING BACKFILL PROPOSED CONSTRUCTION

I agree to comply with the requirements of the current Site Assessment and Mitigation Manual, and with all ordinances and laws of the County of San Diego and the State of California pertaining to well/boring construction and destruction. DRILLER'S SIGNATURE Phillip Cramer DATE 6-1-06

Within 60 days of completion, I will furnish the Monitoring Well Permit Desk with a complete and accurate well/boring log. I will certify the design and construction or destruction of the well/borings in accordance with the permit application. PG/RCE SIGNATURE Date June 1, 2006

DEH: SAM-MWP-9060 (Rev. 10/05) Page 1 of 4 6-7-06 T104059 T104059 - L.M. THAT WHEN DRILLING REPORT IS SUBMITTED, IT MUST IDENTIFY THE APN WHERE EACH BORING WAS DRILLED. MSL

F. SITE INFORMATION

1. ASSESSOR'S PARCEL NUMBER 518-030-22 , 518-030-13

Site Name Cottonwood Golf Course

Site Address 3121 Willow Glen Drive City El Cajon Zip 92019-4605

PROPERTY OWNER Premier Golf Properties LP

Phone (619) 442-9891 Ext. _____ Fax (619) 442-9018

Mailing Address 3121 Willow Glen Dr City El Cajon State Ca Zip 92019

NUMBER OF WELLS 1 **TYPE OF WELLS** Borings

2. ASSESSOR'S PARCEL NUMBER 519-010-17 , 518-030-12

Site Name Cottonwood Golf Course

Site Address 3121 Willow Glen Drive City El Cajon Zip 92019-4605

PROPERTY OWNER Premier Golf Properties LP

Phone (619) 442-9891 Ext. _____ Fax (619) 442-9018

Mailing Address 3121 Willow Glen Dr City El Cajon State Ca Zip 92019

NUMBER OF WELLS 1 **TYPE OF WELLS** Borings

3. ASSESSOR'S PARCEL NUMBER 518-012-14 , 518-030-10

Site Name Cottonwood Golf Course

Site Address 3121 Willow Glen Drive City El Cajon Zip 92019-4605

PROPERTY OWNER Premier Golf Properties LP

Phone (619) 442-9891 Ext. _____ Fax (619) 442-9018

Mailing Address 3121 Willow Glen Dr City El Cajon State Ca Zip 92019

NUMBER OF WELLS 1 **TYPE OF WELLS** Borings

4. ASSESSOR'S PARCEL NUMBER 518-030-21 , 518-030-35

Site Name Cottonwood Golf Course

Site Address 3121 Willow Glen Drive City El Cajon Zip 92019-4605

PROPERTY OWNER Premier Golf Properties LP

Phone (619) 442-9891 Ext. _____ Fax (619) 442-9018

Mailing Address 3121 Willow Glen Dr City El Cajon State Ca Zip 92019

NUMBER OF WELLS 1 **TYPE OF WELLS** Borings

Permit Fees In Effect for July 1, 2005 - June 30, 2006

G. FEES (in effect beginning July 1, 2005, through June 30, 2006)

The County Board of Supervisors authorized a 10% credit, for the Fiscal Year ending June 30, 2006, to be applied to the Department of Environmental Health customers. This credit is being provided to qualified fee-based programs that have contributed to the cost reduction/cost containment/cost avoidance efforts initiated by the Department. This fee adjustment, for the Fiscal Year ending June 30, 2006, is applicable to fees and permits due and/or obtained during this period. The 10% is not applicable to enforcement fees or fees relating to non-compliance of permit regulations.

ACTIVITY	FEE SCHEDULE FEE – ONE-TIME FISCAL YEAR 10% CREDIT	AMOUNT
Permit for Well Installations Only (Groundwater Monitoring Wells, Vadose, Vapor Extraction Wells)	\$185.00 for the first monitoring well \$185.00 – 10% <\$18.50> =	_____ x \$166.50 \$ _____
Permit for Well Maintenance Inspection (Valid for three years)	\$100.00 for first well maintenance inspection \$100.00 – 10% <\$10.00> =	_____ x \$ 90.00 \$ _____
Each Additional New Well	\$160.00 for each additional well installation \$160.00 – 10% <\$16.00> = \$ 30.00 for each additional well maintenance inspection \$ 30.00 – 10% <\$ 3.00> =	_____ x \$144.00 \$ _____ _____ x \$ 27.00 \$ _____
Permit for Borings Only (CPT's, Hydropunch, Geoprobos, Temporary Well Points, etc.)	\$185.00 for the first boring \$185.00 – 10% <\$18.50> = \$ 50.00 for each additional boring \$ 50.00 – 10% <\$ 5.00> =	_____ 1 x \$166.50 \$ 166.50 _____ 3 x \$ 45.00 \$ 135.00
Permit for Well Destructions Only	\$185.00 for the first destruction \$185.00 – 10% <\$18.50> = \$120.00 for each additional destruction \$120.00 – 10% <\$12.00> =	_____ x \$166.50 \$ _____ _____ x \$108.00 \$ _____
Permit for any Combination of Well Installations, Borings, & Destructions (except UST backfill permit) Permit for any Combination of Well Installations, Borings, & Destructions (except UST backfill permit)	The first activity will be \$185.00. \$185.00 – 10% <\$18.50> = Additional activities will be as follows: \$160.00 for each additional well \$160.00 – 10% <\$16.00> = \$100.00 for first well maintenance inspection \$100.00 – 10% <\$10.00> = \$ 30.00 for each additional well maintenance inspection \$ 30.00 – 10% <\$ 3.00> = \$ 50.00 for each additional boring \$ 50.00 – 10% <\$ 5.00> = \$120.00 for each well destruction \$120.00 – 10% <\$12.00> =	_____ x \$166.50 \$ _____ _____ x \$144.00 \$ _____ _____ x \$ 90.00 \$ _____ _____ x \$ 27.00 \$ _____ _____ x \$ 45.00 \$ _____ _____ x \$108.00 \$ _____
	TOTAL COST OF PERMIT	\$ 301.50
Permit for Underground Storage Tank Monitoring System in Backfill (i.e. Enhanced Leak Detection)	(Flat Fee) \$320.00 – 10% <\$32.00> =	_____

H. **QUESTIONNAIRE:** Please answer all applicable questions completely. For well destructions, complete only #1 below and submit any required supportive documentation.

1. If wells are to be destroyed, provide a description of method of destruction N/A
-
2. What is the purpose of the well/boring investigation?
- a. Part of an ongoing site assessment case in which DEH or another government regulator is the lead agency.
- b. Part of a Phase I investigation for property ownership transfer or: _____
- c. Geotechnical investigation for proposed construction, land stabilization or: _____
- d. Other: Resource evaluation
-
3. What procedures will be used to prevent the well/boring from providing an avenue to contamination during construction?
- Casing During Drilling
-
4. What field procedures will be utilized to determine if contamination exists?
- Visual inspection: Purpose of boring is to collect samples
-
5. What procedures will be used to determine whether samples will be sent for laboratory testing or archiving?
- Purpose of boring is to collect samples. 10' composites will be sent for physical testing of material
-
6. What constituents will be monitored and tested (Include EPA Laboratory Test Methods to be used)?
- Physical properties of the material will be tested for suitability as construction aggregate resources
-
7. How will samples be transported and preserved? Samples will be sent to the lab in 5-gallon buckets
-
8. What sampling methods will be used? Composite samples over approximately 10' intervals will be collected
-
9. Are you proposing a variation from the methods and/or procedures presented in the requirements for the construction or destruction of Vadose and Groundwater Monitoring Wells (Current SAM Manual Requirements)? If yes, specify these variations and include a well construction diagram and all required supporting documentation. Refer to the SAM Manual Appendix B for monitoring well guidelines (http://www.sdcounty.ca.gov/def/wg/sam/monitoring_well.html). Yes No
-
10. Are you proposing a variation in drilling and destruction of soil borings from the methods and/or procedures specified in the current SAM manual? If yes, specify these variations and include a destruction diagram. Yes No
-
11. What procedures will be used to ensure that the drilling equipment will introduce no contamination? Equipment will be in good working order, continual inspection for leaks will be performed. Any leaks from equipment will be collected and disposed of as required
-
12. What methods will be used to clean sampling equipment? Borings are for collection purposes only
-
13. What cleaning method will be used to clean casing and screen prior to installation? Casings will be pulled and boring will be plugged
-



County of San Diego

GARY W. ERBECK
DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
LAND AND WATER QUALITY DIVISION

RICHARD HAAS
ASSISTANT DIRECTOR

P.O. BOX 129261, SAN DIEGO, CA 92112-9261
619-338-2222/FAX 619-338-2315/1-800-253-9933
www.sdcounty.ca.gov/deh/lwq

PROPERTY OWNER RESPONSIBILITY ACKNOWLEDGEMENT

Proposed locations for subsurface work:

Property Address:

Assessor's Parcel Number (APN):

3121 Willow Glen Dr.

519-010-17, 518-012-14, 518-030-21

El Cajon, Ca. 92019-4605

518-030-35, 518-030-10, 518-030-12

I, Howard Weinberg, authorized agent of

518-030-13, 518-030-22

owner of the property/properties listed above, give my permission to

TerraMins, Inc and Boart Longyear (consulting company, contractor) to conduct the following work at the locations stated above.

Install _____ monitoring wells

Destroy _____ monitoring wells

Drill 4 soil borings

The person who causes to have a monitoring well installed or an existing well destroyed on this property is defined as the *Responsible Party*. San Diego County Code, Section 67.424, states that: "Monitoring wells shall be maintained to meet construction or destruction standards. If a monitoring well does not meet construction or destruction standards, the *Responsible Party* must repair, reconstruct or destroy the monitoring well so it meets the standards. The property owner, if different than the *Responsible Party*, must take the necessary actions to repair, reconstruct or destroy the monitoring well so it meets the standards if the *Responsible Party* does not complete the necessary actions."

A soil boring is used specifically to sample soil and, because there are construction and destruction standards, is included in the definition of a monitoring well even though no maintenance is required. These standards are outlined in the County of San Diego Site Assessment and Mitigation (SAM) Manual and the State of California Well Standards Bulletin 74-90.

I understand that Dinah O. Shumway (registered professional) of TerraMins, Inc. (consulting company) and an authorized signer for Boart Longyear (drilling company) have submitted a signed application to the Department of Environmental Health in which they have agreed to complete the above-stated work according the requirements of the current SAM Manual, all ordinances and laws of the County of San Diego and the State of California pertaining to well/boring construction and destruction.

I also understand that if either the registered professional and/or the licensed drilling company should fail in their responsibilities as defined in San Diego County Code, Section 67.424, I, as the property owner, must take the necessary actions to repair, reconstruct or destroy the monitoring well so it meets the standards if the *Responsible Party* does not complete the necessary actions.

The scope of work covered by this Acknowledgement will expire one year from the date of the property owner's signature below. If an extension of time beyond one year is required to complete the proposed drilling activities or additional work is proposed, a new Property Owner Responsibility Agreement will be required.

Property Owner Signature: _____

Date: 6/2/06

Print Name: Howard Weinberg

Title: Authorized Agent

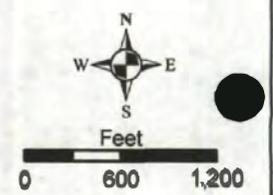
Company: Premier Golf Properties LP

Mailing Address: 3121 Willow Glen Drive, El Cajon, Ca. 92019-4605

Cottonwood Golf Course Exploratory Boring Locations



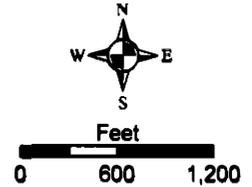
-  Borings
-  Parcels



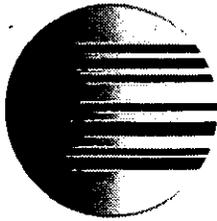
Cottonwood Golf Course Exploratory Boring Locations



-  Borings
-  Parcels



EnviroMINE
Date: June 2006
Source: SanGIS
Topo Basemap: USGS



TerraMins Inc.

Consulting Mining/Economic Geologists

104059

August 25, 2006



Marisue Crystal
County of San Diego
Department of Environmental Health
P.O. Box 129261
San Diego, Ca. 92112-9261

Re: Draft Report: Supplemental Drilling Report: Cottonwood Project
TerraMins Project No. 200611

Dear Ms. Crystal,

This letter is a supplemental drilling report for the Cottonwood exploration project as requested by the San Diego County Department of Environmental Health.

Purpose of the Cottonwood Exploration project

In May 2006, TerraMins, Inc. was retained by Howard Weinberg of Castlegrace Management LLC to perform an assessment of the construction aggregate potential of the fluvial materials (mostly sand) underlying the Cottonwood Golf Courses located south of the town of El Cajon, California.

The purpose of this project was to provide information about the sand resources which will be recovered during the planned renovation of the Cottonwood golf courses. The renovation will include excavation and re-grading of the existing course and the rehabilitation of the Sweetwater drainage including the excavation of several lakes along the Sweetwater drainage. Maximum planned depth of lakes is less than 30'. Maps of the project were provided by the client and additional topographic maps and photos were acquired from other sources. The

tasks performed for this project were primarily limited to the assessment of the quality of the material at the Cottonwood golf course.

Available literature reports that sand resources in the part of the Sweetwater River adjacent to the east of the Cottonwood site extend to 50 feet. This assessment assumed that all the sand within 10 feet of the surface would be available as potential resources; however the ultimate available tonnage of sand which could be recovered by any project undertaken at the course will be determined not only by the natural variations in the fluvial environment, the physical properties of the resource (i.e. including a varying waste factor), but also by the final reclamation plan and design of the new course, the engineer's cut-and-fill determinations, and any limitations that may be required by the local lead agency.

The scope of work for this project included the tasks listed below:

- Research of literature for geologic reports, maps, photos and other relevant data
- Data collection regarding permitting costs and regulations, drilling costs, testing costs and timeframes
- One day field reconnaissance of the area
- Interviews with the current owner of the Cottonwood golf course, and various knowledgeable personnel
- The submittal of a drilling permit application to San Diego County and monitoring the progress of the permit
- One-day drilling at four locations
- Logging and photographing of recovered samples
- Transport of samples to lab for testing
- Preparation of a report to the Client of findings and recommendations
- Submittal of the final drilling report to San Diego County

TerraMins, Inc.

Geology of Aggregate Resources in the Sweetwater River

The State of California Division of Mines and Geology (now the California Geological Survey - CGS) conducted mineral land classification projects in San Diego County which were published in 1982 and 1996. The Mineral Land Classification of aggregate materials in western San Diego County (CDMG Special Report 153, Kohler and Miller, 1982) and the update report (Miller, 1996) both included data on the mineral resources in the Sweetwater River drainage.

The granitic rocks of the Southern California Batholith to the east are the source for the material in the rivers of this part of San Diego County, and the Sweetwater River is a well known source of quality construction aggregate material in the San Diego area.

The CGS divided the Sweetwater into three parts, the "lower" Sweetwater, extending from National City to the Sweetwater Reservoir, the "middle" extending about 5 miles north from the Sweetwater Reservoir to the Jamacha Valley area, and the "upper" extending from the Jamacha Valley area approximately 7 miles. The Cottonwood Golf Course lies to the extreme north end of what is termed the "middle" Sweetwater River.

Groundwater at the Cottonwood Golf Course

At the Cottonwood golf course, subsurface geology can be observed in the large "sand pit" which Cottonwood ground maintenance crews use for various purposes at the course. The pit walls show that the material consists of very clean, cross bedded medium to coarse sands with some thin lenses of black sand beds. Clay beds exposed in the pit are thin (a few inches) and seem to be rare. Groundwater is observed in this pit (located near the center of the course) primarily in the winter season. TerraMins' geologists observed two 10' deep backhoe trenches (in the west end) which had recently been opened on the course which showed similar geology. Groundwater was observed in the bottom of both trenches.

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E-mail: terramins@earthlink.net

The "middle" Sweetwater River channel, which flows through the Cottonwood site, was in fact mined from about 1983 to 1994 for sand resources by a local aggregate producer. This older mining area now forms several ponds which are filled year round by groundwater.

As it enters the east end of the Cottonwood site, the Sweetwater River is artificially located in another likely mining site along the Willow Glenn Road. The channel here is about 15 feet deep and usually has some standing water except in the warmest part of the year.

Aside from the ponds that now occupy the old mining areas at the site, groundwater intersects the surface at various low areas of the golf course, most notably in the marshy area just west of the Steele Canyon road bridge (where water was visible at the surface in early June during our reconnaissance visit). According to knowledgeable Cottonwood staff, the groundwater varies as much as 15 feet annually.

Drilling Results

Drilling was done with a Boart Longyear Sonic 1513 rig with a 3-man crew. The four holes (6" in diameter) required 4 hours to complete (including remobilization). An attempt was made to set the drilling sites at or near areas planned for maximum excavation or removal, with assistance from the coarse superintendent and other coarse personnel to avoid overhead and underground power lines and water lines.

The drilling logs document that the upper 10 feet of the material is generally clean light tan to brown fine-to-medium sand with minor 6" to 8" coarse sand lenses. Some lenses of finer sand and silt also occur in the upper 10 feet. A very stiff clay and silty clay predominates below 10' in all holes. The material as

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E-mail: terramins@earthlink.net

recovered is generally damp to wet but water table seems to occur consistently at 8' to 10' below the surface, confirming surface observations.

The four holes were drilled to collect samples for the assessment of construction aggregate resources which will be recovered during the planned renovation and re-grading of the Cottonwood Golf courses. The material recovered from the exploration drill holes was submitted to the lab for physical testing. The holes were backfilled with clean sand from the course pit. Each hole required about 24 cubic feet (89 cubic yard) of clean sand.

Variance from Standards

The effort to complete the project within a very limited window of time caused several items of the application to be overlooked or incorrectly filled in by the contractors. Several entities were enlisted to complete parts of the application. The original application was submitted with faxed signatures and the County's requirement to secure original signatures from the driller in Reno and the client in Irvine, caused additional delays and resulted in an application that did not reflect some important aspects of the project. Any errors or omissions in the application are inadvertent.

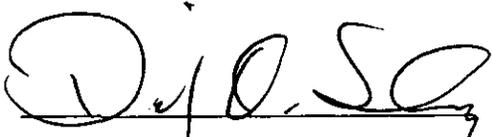
However, we are confident that the environmental characteristics of the Cottonwood Golf course and its underlying groundwater have not been altered by this project. The golf course is located in an area where groundwater intersects the surface at a variety of sites, and undergoes daily watering. The materials above the water table consist of porous sand, silt, and gravel beds. The 6" drill holes were shallow, strictly limited to sampling, and were not open for any appreciable time. The holes were backfilled with clean sand from the course pit (essentially the same material). Future plans for this site call for removal and stockpiling of topsoil, extensive grading, excavation of lakes, and construction of new facilities.

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E-mail: terramins@earthlink.net

Per your request I have included the tentative plan for the location of lakes on the renovated course.

Please phone or e-mail if you have any questions or comments.



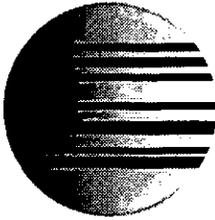
Dinah O. Shumway
Principal Geologist, TerraMins, Inc.
CRG 5818

TerraMins, Inc.

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E-mail: terramins@earthlink.net



Figure 3a Cottonwood Golf Courses Drill Hole Location Map
Showing location of Planned Lakes & Ponds.
Final Report **June 2006**



TerraMins Inc.

Consulting Mining/Economic Geologists

RECEIVED

2006 AUG 4 AM 10 48

August 3, 2006

D. L. H.
MAILROOM

Marisue Crystal
County of San Diego
Department of Environmental Health
P.O. Box 129261
San Diego, Ca. 92112-9261

Re: Report: Boring Exploration Permit #LMON104059, Sweetwater River, Cottonwood Golf Course, El Cajon, San Diego County, California.

Dear Marisue,

This letter is the report of the TerraMins Boring Exploration Project, a required condition upon permit issuance, in conformance with the County's regulations.

Exploration drilling was conducted June 21st, 2006, southeast of the town of El Cajon on the Cottonwood Golf course, along the Sweetwater River. The purpose was to collect samples to assess for construction aggregate suitability. A total of four boreholes were drilled (CSDH - 1, CSDH - 2, CSDH - 3, and CSDH - 4). The borehole location coordinates are identified as Latitude/Longitude on the drill hole log; Figure 1 shows the mapped locations. The Assessor's Parcel Numbers (APN) for the boring locations are CSDH - 1: 51803015, CSDH - 2 & 3: 51801214, CSDH - 4: 51901015.

The attached drill hole logs describe the geology of the exploration boreholes (attachment 2) as required in the SAM Manual Section 5. The depths of the boreholes never exceeded thirty feet and all were backfilled with clean sand, provided to TerraMins from the Cottonwood Golf Course Sand pit.

Attachment 3 provides the physical testing for Aggregate Suitability results for county review.

Please phone or email if you have any questions.

D. O. Shumway

Dinah O. Shumway
Principal Geologist, TerraMins, Inc.
CRG 5818

TerraMins, Inc.

14360 St. Andrews Drive, Suite 4 • Victorville, CA 92395 • Phone: 760-285-5801 • Fax: 760-843-3488
E-mail: terramins@earthlink.net



TerraMins Inc.

Consulting Mining/Economic Geologists

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Victorville, CA 92395

Drill Hole Log

CSDH - 1

Sheet 1 of 1

Project:	Cottonwood	Terramins Project No.:	200611
Location:	El Cajon, Ca.		
Client:	Howard Weinberg		
Location:	Cottonwood Golf Course	Lat/Long: N32 45.198 W116 54.245	Collar Elevation and Datum: 389' 1927 NA
Coordinates:	Depth to Groundwater (ft) 15'	First:	Total Depth (ft): 30'
Drilling Equipment/Method:	Sonic Rig 1513	Static:	Date Started: 6/21/2006
Drilling Contractor:	Travis Osterberg/Boart-LongYear		Date Completed: 6/21/2006
Borehole Diameter:	Casing: 6"	Logged by: Katie Kohl	Checked by: Dinah Shumway

4" Core Barrel

Elevation (feet MSL)	Depth (feet)	Sample No.	Recovery (%)	USCS	Moisture	Material Description / Comments
389	0	CSDH1 0'-9'				Light tan silty sand , subangular to subrounded quartz & feldspar grains; < 1% mica; >10% silt
380	9	CSDH1 9'-15'				Coarse to very coarse sand and gravel with abundant clay lenses; consisting of subrounded to subangular quartz, feldspar, granitic cobbles up to 3"
374	15				▼	Groundwater
					Wet to very wet	Silty clay to abundant brown clay.
359	30					

TerraMins Inc.

Consulting Mining/Economic Geologists

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Victorville, CA 92395

Drill Hole Log

CSDH - 2

Sheet 1 of 1

Project: Cottonwood	TerraMins Project No.: 200611
Location: El Cajon, Ca.	
Client: Howard Weinberg	

Location: Cottonwood Golf Course	Lat/Long: N32 44.725 W116 54.655	Collar Elevation and Datum: 381' 1927 NA
Coordinates: Depth to Groundwater (ft) approx 15'	First:	Total Depth (ft): 30'
Drilling Equipment/Method: Sonic Rig 1513	Static:	Date Started: 6/21/2006
Drilling Contractor: Travis Osterberg/Boart-LongYear		Date Completed: 6/21/2006
Borehole Diameter: Casing: 6"	Logged by: Katie Kohl	Checked by: Dinah Shumway

4" Core Barrel

Elevation (feet MSL)	Depth (feet)	Sample No.	Recovery (%)	USCS	Moisture	Material Description / Comments
381	0	CSDH2 0'-10'				Brown fine silty topsoil sands, tan medium to fine grained quartz and felds with little mica. Red zone at approx 6'.
371	10				▼	Groundwater @ 10'
		CSDH2 10'-20'			Wet to very wet	Coarse to very coarse sand and gravel subrounded, subangular. Thin clay lenses at approx. 13' with abundant mica, >5% silt.
361	20				Very wet	Brownish-red, very stiff, clay.
351	30					

TerraMins Inc.

Consulting Mining/Economic Geologists
 14360 St. Andrews Drive, Suite 4
 Victorville, CA 92395

Drill Hole Log

CSDH - 3

Sheet 1 of 1

Project: Cottonwood	Terramins Project No.: 200611
Location: El Cajon, Ca.	
Client: Howard Weinberg	

Location: Cottonwood Golf Course	Lat/Long: N32 44.680 W116 54.835	Collar Elevation and Datum: 373' 1927 NA
Coordinates: Depth to Groundwater (ft) 12-15'	First:	Total Depth (ft): 30'
Drilling Equipment/Method: Sonic Rig 1513	Static:	Date Started: 6/21/2006
Drilling Contractor: Travis Osterberg/Boart-LongYear		Date Completed: 6/21/2006
Borehole Diameter: Casing: 6"	Logged by: Katie Kohl	Checked by: Dinah Shumway

4" Core Barrel

Elevation (feet MSL)	Depth (feet)	Sample No.	Recovery (%)	USCS	Moisture	Material Description / Comments
373	0	CSDH3 0'-10'			Damp	Light to dark brown, very fine sand to silty sand
370	3					Dark brown medium sand subangular to subrounded, 5% rounded gravel, <10% silt, quartz, feldspar, and some mica.
363	10					Groundwater @ 10'
358	15	CSDH3 17.5'-30'			Very wet	Dark brown clayey silt from 10' to 17.5' with abundant mica. >5 % medium sand.
356	17.5					Medium to dark brown coarse grained sand and gravel, subangular to subrounded grains, quartz, feldspar, granitic minerals, >1% silt.
343	30					

TerraMins Inc.

Consulting Mining/Economic Geologists

14360 St. Andrews Drive, Suite 4

Victorville, CA 92395

Drill Hole Log

CSDH - 4

Sheet 1 of 1

Project: Cottonwood	Terramins Project No.: 200611
Location: El Cajon, Ca.	
Client: Howard Weinberg	

Location: Cottonwood Golf Course	Lat/Long: N32 44.477 W116 55.602	Collar Elevation and Datum: 340' 1927 NA
Coordinates: Depth to Groundwater (ft) approx 15'	First:	Total Depth (ft): 30'
Drilling Equipment/Method: Sonic Rig 1513	Static:	Date Started: 6/21/2006
Drilling Contractor: Travis Osterberg/Boart-LongYear		Date Completed: 6/21/2006
Borehole Diameter: Casing: 6"	Logged by: Katie Kohl	Checked by: Dinah Shumway

4" Core Barrel

Elevation (feet MSL)	Depth (feet)	Sample No.	Recovery (%)	USCS	Moisture	Material Description / Comments
340	0					
335	5.5	CSDH4 0-5.5			damp	Light tan medium sand, 10% silt, 1% gravel, rounded to subrounded. Primarily quartz, feldspar.
329	11.5	CSDH4 5.5-11.5			▼	Coarse to very coarse sand, <5% silt, 1% gravel, rounded to subrounded. Primarily quartz, feldspar. Groundwater @ 10'
322	18					Black silty clay, clayey silt, clay <2%, coarse sand lenses up to 6" thick, abundant mica.
		CSDH4 18-30			Very wet	Medium to dark brown coarse grained sand and gravel, subangular to subrounded grains, quartz, feldspar, granitic minerals, >1% silt.
310	30					

**ATTACHMENT 3
TESTING AND ANALYTICAL RESULTS**

Physical Testing for Aggregate Suitability (Geotechnics, Inc.)

Summary of Testing Results for Samples collected at the Cottonwood Golf Course									
	CSDH-1 0'-9'	CSDH- 1 9'-15'	CSDH- 2 0'-10'	CSDH - 2 10'-22'	CSDH - 3 0'-10'	CSDH - 3 17 1/2'-30'	CSDH - 4 0'-5 1/2'	CSDH - 4 5 1/2'-11.5	CSDH - 4 18'-30
Sieve Analysis (ASTM C88)									
<i>wt % passing ... (Greenbook standard)</i>									
<i>wt % passing 1/2"</i>			100		100				
<i>wt % passing 3/8" (100)</i>	100	100	99.2	100	98.3	100	100	100	100
<i>wt % passing #4 (95-100)</i>	99.8	96.6	98.2	99.4	97.1	98.3	98.3	98.5	98.6
<i>wt % passing #8 (75-90)</i>	94.7	84.3	92.3	93.4	90.3	67.2	90.6	85.2	93.0
<i>wt % passing #16 (55-75)</i>	77.9	61.3	75.6	72.5	73.4	43.2	71.9	54.9	77.7
<i>wt % passing #30 (30-50)</i>	53.5	39.8	50.8	37.5	54.5	21.9	49.3	26.2	55.0
<i>wt % passing #50 (10-25)</i>	29.5	26.9	24.3	12.6	36.3	7.9	27.3	10.7	30.5
<i>wt % passing #100 (2-10)</i>	12.9	20.0	9.1	4.1	22.7	3.0	10.2	4.6	12.8
<i>wt % passing #200 (0-5)</i>	4.3	15.2	4.3	1.9	9.7	3.0	4.3	1.9	6.6
Specific Gravity (ASTM C127) (apparent)	2.751	2.709	2.733	2.719	2.730	2.721	2.727	2.708	2.734
Absorption (ASTM C127)	1.0	4.38	1.29	1.25	1.46	1.51	1.075	1.175	1.295
Sand Equivalency (70)	74	30	75	85	57	75	75	90	69



PERMIT #LMWP-000937
 A.P.N. # 518-030-05, -10, -12;
 519-010-15, -17, -21, -33
 EST # NONE

**COUNTY OF SAN DIEGO
 DEPARTMENT OF ENVIRONMENTAL HEALTH
 LAND AND WATER QUALITY DIVISION
 MONITORING WELL PROGRAM
 GEOTECHNICAL BORING CONSTRUCTION PERMIT**

SITE NAME: PREMIER GOLF PROPERTIES

**SITE ADDRESS: 2560 STEELE CANYON RD, 3121, 3629 AND OTHER UNDEVELOPED
 PROPERTIES ON WILLOW GLEN DR, EL CAJON, CA 92019**

PERMIT FOR: TWELVE GEOTECHNICAL BORINGS

PERMIT APPROVAL DATE: FEBRUARY 28, 2014

PERMIT EXPIRES ON: JUNE 28, 2014

RESPONSIBLE PARTY: PREMIER GOLF PROPERTIES, LP

PERMIT CONDITIONS:

1. All borings must be sealed from the bottom of the boring to the ground surface with an approved sealing material as specified in California Well Standards Bulletin 74-90, Part III, Section 19.D. **Drill cuttings are not an acceptable fill material.**
2. All borings must be properly destroyed within 24 hours of drilling.
3. Placement of any sealing material at a depth greater than 30 feet must be done using the tremie method.
4. This work is not connected to any known unauthorized release of hazardous substances. Any contamination found in the course of drilling and sampling must be reported to DEH. All water and soil resulting from the activities covered by this permit must be managed, stored and disposed of as specified in the SAM Manual in Section 5, II, E-4. (http://www.sdcountry.ca.gov/deh/lwq/sam/manual_guidelines.html) In addition, drill cuttings must be properly handled and disposed in compliance with the Stormwater Best Management Practices of the local jurisdiction.
5. Within 60 days of completing work, submit a well/boring construction report, including all well and/or boring logs and laboratory data to the Well Permit Desk. This report must include all items required by the SAM Manual, Section 5, Pages 6 & 7.
6. **This office must be given 48-hour notice of any drilling activity on this site and advanced notification of drilling cancellation. Please contact the Well Permit Desk at (858) 505-6688.**

APPROVED BY: _____

M Crystal

MARISUE CRYSTAL

Digitally signed by Marisue Crystal
 - DN: cn=Marisue Crystal,
 o=Department of Environmental
 Health, ou=Monitoring Well Program,
 email=marisue.crystal@sdcounty.ca.gov,
 c=US
 Date: 2014.02.28 16:59:25 -0800

DATE: 02/28/2014

*new pg 1 + m...
found*



**PERMIT APPLICATION
GROUNDWATER
AND VADOSE MONITORING WELLS
AND EXPLORATORY OR TEST BORINGS**

OFFICE USE ONLY	
PERMIT LIMON #	<u>060 737</u>
SAM CASE Y/N #	<u>None</u>
DATE RECEIVED:	<u>2-19-14</u>
FEE PAID:	<u>\$ 737.00</u>
CHECK #	<u>721</u>

A. RESPONSIBLE PARTY: Triad/Holmes Assoc. E-mail: tplatz@thainc.com *USE RPOm 643 PJ.1 ->*
 (The person, persons, or company responsible for the construction, maintenance, and destruction of the proposed borings and/or wells.)
 Mailing Address: P.O. Box 1570 City: Mammoth Lakes State: CA Zip: 93546
 Contact Person: Verne Freeman Phone 650 787 4197 Ext. _____

B. SITE ASSESSMENT PROJECT NUMBER – IF APPLICABLE # _____

C. CONSULTING FIRM: Triad/Holmes Assoc.
 Mailing Address P.O. Box 1570 City: Mammoth Lakes State CA Zip 93546
 Registered Professional Thomas A. Platz Phone 760-934-7588 Registration # PE C 41039 RCE CEG PG *EXP. 3-31-15*
 E-mail tplatz@thainc.com Circle if applicable
 Contact Person Tom Platz Phone 760-934-7588 Ext. _____ Email tplatz@thainc.com

D. DRILLING COMPANY Tri-County Drilling, Inc. C57# 547737
 Contact Name David Maske E-mail dmaske@tcdrilling.com
 Mailing Address 9631 Candida St. City San Diego State CA Zip 92126
 Phone 858-271-0099 Ext. _____

E. CONSTRUCTION INFORMATION

TYPE OF WELLS/ BORINGS TO BE CONSTRUCTED #	MATERIALS TO BE USED		PROPOSED CONSTRUCTION
	CASING	SEAL/BORING BACKFILL	
<input type="checkbox"/> Groundwater _____	Not Applicable _____	<input type="checkbox"/> Neat Cement	Estimated groundwater depth: <u>20</u> ft.
<input type="checkbox"/> Vadose _____	Type _____	<input checked="" type="checkbox"/> X Cement & Bentonite	Estimated depth of boring <u>20</u> ft.
<input type="checkbox"/> Boring <u>12</u>	Gauge _____	<input type="checkbox"/> Sand-Cement	Concrete surface seal <u>0 to 3</u>
<input type="checkbox"/> Other _____	Diameter _____	<input type="checkbox"/> Bentonite	Annular seal _____ to _____
	Well Screen Size _____	<input type="checkbox"/> Other	Bentonite transition seal _____ to _____
	Filter Pack _____	Borehole diameter _____	Filter Pack _____ to _____
NUMBER OF WELLS TO BE DESTROYED	Drilling Method		Perforation _____ to _____
<input type="checkbox"/> _____	<input type="checkbox"/> Auger	<input type="checkbox"/> Air Rotary	
	<input type="checkbox"/> Mud Rotary	<input type="checkbox"/> Other	
	<input type="checkbox"/> Percussion		

NOTE:
Attach a well construction diagram for wells with multiple completions

I agree to comply with the requirements of the current Site Assessment and Mitigation Manual, and with all ordinances and laws of the County of San Diego and the State of California pertaining to well/boring construction and destruction.

DRILLER'S SIGNATURE

[Handwritten Signature]

DATE

11/24/2014

Within 60 days of completion, I will furnish the Monitoring Well Permit Desk with a complete and accurate well/boring log. I will certify the design and construction or destruction of the well/borings in accordance with the permit application.

REG/ROE/CEG SIGNATURE

[Handwritten Signature]

DATE

2/18/14

F. SITE INFORMATION

ASSESSOR'S PARCEL NUMBERS:

- 1. ~~519-010-15-00~~
- 2. ~~519-010-200-00~~
- 3. ~~519-010-21-00~~
- 4. ~~519-010-17-00~~
- 5. ~~518-030-15-00~~
- 6. ~~518-030-22-00~~
- 7. ~~518-030-12-00~~
- 8. ~~518-030-13-00~~
- 9. ~~518-030-10-00~~
- 10. ~~518-030-08-00~~
- 11. ~~518-030-21-00~~
- 12. ~~518-012-13-00~~
- 13. ~~518-012-14-00~~
- 14. ~~506-020-52-00~~
- 15. ~~506-021-19-00~~
- 16. ~~519-011-03-00~~
- 17. ~~518-030-05-00~~
- 18. ~~518-012-08-00~~
- 19. ~~518-030-06-00~~
- 20. ~~518-030-07-00~~
- 21. ~~519-010-34-00~~
- 22. ~~519-010-33-00~~
- 23. ~~519-010-37-00~~



Site Name: Cottonwood Golf Course

Site Address 3121 Willow Glen Drive City: El Cajon Ca. Zip: 92019

PROPERTY OWNER: Premier Golf Properties, L.P.

Phone 619-442-9891 Ext. _____ Fax 619-442-2301

Mailing Address: see above City _____ State _____ Zip _____

NUMBER OF WELLS _____

TYPE OF WELLS _____



RECEIVED
RECEIVED
 PERMIT APPLICATION
 GROUNDWATER
 AND VADOSE MONITORING WELLS
 AND EXPLORATORY OR TEST BORINGS
 ENVIRONMENTAL HEALTH

FEB 10 2014
 JAN 27 2014

OFFICE USE ONLY

PERMIT LIMON # _____
 SAM CASE Y/N # _____
 DATE RECEIVED: _____
 FEE PAID: _____
 CHECK # _____

A. RESPONSIBLE PARTY Freeman Associates E-mail verne.freeman@gmail.com
 (The person, persons, or company responsible for the construction, maintenance, and destruction of the proposed borings and/or wells.)
 Mailing Address: 994 San Antonio road City Palo Alto State CA Zip 94303
2121 Willow Glen Drive El Cajon
 Contact Person: Verne Freeman Phone 650 787 4197 Ext. _____
Daryl Idler 619 442 442 - 9891

B. SITE ASSESSMENT PROJECT NUMBER - IF APPLICABLE # _____

C. CONSULTING FIRM Freeman Associates
 Mailing Address see above City Palo Alto State CA Zip 94303
 Registered Professional Verne Freeman Phone 650 787 9197 Registration # _____ (RCE, CEG, PG)
 E-mail verne.freeman@gmail.com Circle if applicable
 Contact Person VERNE Freeman Phone 650 787 4197 Ext. _____ Email verne.freeman@gmail.com

D. DRILLING COMPANY Tri-County Drilling, Inc C57# 547737
 Contact Name David Maske E-mail dmaske@tcdriilling.com
 Mailing Address 9631 Candida St. City San Diego State CA Zip 92126
 Phone 858-271-0099 Ext. _____

E. CONSTRUCTION INFORMATION

TYPE OF WELLS/ BORINGS TO BE CONSTRUCTED	MATERIALS TO BE USED	PROPOSED CONSTRUCTION
#	CASING	
<input type="checkbox"/> Groundwater _____	Not Applicable _____	Estimated groundwater depth: <u>20</u> ft.
<input type="checkbox"/> Vadose _____	Type _____	Estimated depth of boring <u>20</u> ft.
<input type="checkbox"/> Boring <u>12</u>	Gauge _____	Concrete surface seal <u>0 to 3</u>
<input type="checkbox"/> Other _____	Diameter _____	Annular seal _____ to _____
	Well Screen Size _____	Bentonite transition seal _____ to _____
	Filter Pack _____	Filter Pack _____ to _____
		Perforation _____ to _____
NUMBER OF WELLS TO BE DESTROYED	Drilling Method	
<input type="checkbox"/> _____	<input checked="" type="checkbox"/> Auger	
	<input type="checkbox"/> Mud Rotary	
	<input type="checkbox"/> Percussion	
	<input type="checkbox"/> Air Rotary	
	<input type="checkbox"/> Other	

NOTE:
 Attach a well construction diagram for wells with multiple completions

PREMIER GOLF PROPERTIES L.P. ASSESSOR PARCEL NUMBERS

COTTONWOOD GOLF COURSE

3121 WILLOW GLEN DRIVE, EL CAJON, CALIFORNIA 92019

APNS for Soil Borings only

1. 519-010-15-00 ✓
2. ~~519-010-20-00~~ ✓
3. 519-010-21-00 ✓
4. 519-010-17-00 ✓
5. 518-030-12-00 ✓
6. 518-030-10-00 ✓
7. 518-030-05-00 ✓
8. 518-012-08-00 ✓
9. 519-010-33-00 ✓

Handwritten note: 2/10/14

RECEIVED

FEB 10 2014

ENVIRONMENTAL
HEALTH

All APN's listed are owned by Premier Golf Properties L.P.

619 442 9891

ASSESSOR'S PARCEL NUMBER 519-010-17

Site Name _____

Site Address _____ City _____ Zip _____

PROPERTY OWNER _____

Phone _____ Ext. _____ Fax _____

Mailing Address _____ City _____ State _____ Zip _____

NUMBER OF WELLS 1 ✓ TYPE OF WELLS Soil boring

3. ASSESSOR'S PARCEL NUMBER 518-030-12

Site Name _____

Site Address _____ City _____ Zip _____

PROPERTY OWNER _____

Phone _____ Ext. _____ Fax _____

Mailing Address _____ City _____ State _____ Zip _____

NUMBER OF WELLS 1 ✓ TYPE OF WELLS soil boring

4. ASSESSOR'S PARCEL NUMBER 518-030-10

Site Name _____

Site Address _____ City _____ Zip _____

PROPERTY OWNER _____

Phone _____ Ext. _____ Fax _____

Mailing Address _____ City _____ State _____ Zip _____

NUMBER OF WELLS 1 ✓ TYPE OF WELLS soil boring

FEES (in effect beginning July 1, 2012, through June 30, 2013)

ACTIVITY	FEE SCHEDULE	AMOUNT
Permit for Well Installations Only (Groundwater Monitoring Wells, Vadose, Vapor Extraction Wells)	\$200.00 for the first monitoring well	\$200.00
New Well Inspection	\$99.00 for first new well inspection	\$99.00
Each Additional New Well	\$161.00 for each additional well installation	___ x \$161.00
	\$30.00 for each additional new well inspection	___ x \$ 30.00

ASSESSOR'S PARCEL NUMBER 518-030-5

Site Name _____

Site Address _____ City _____ Zip _____

PROPERTY OWNER _____

Phone _____ Ext. _____ Fax _____

Mailing Address _____ City _____ State _____ Zip _____

NUMBER OF WELLS 1 TYPE OF WELLS soil boring

3. ASSESSOR'S PARCEL NUMBER 518-012-8 ?

Site Name _____

Site Address _____ City _____ Zip _____

PROPERTY OWNER _____

Phone _____ Ext. _____ Fax _____

Mailing Address _____ City _____ State _____ Zip _____

NUMBER OF WELLS 1 TYPE OF WELLS soil boring

4. ASSESSOR'S PARCEL NUMBER 519-10-33

Site Name _____

Site Address _____ City _____ Zip _____

PROPERTY OWNER _____

Phone _____ Ext. _____ Fax _____

Mailing Address _____ City _____ State _____ Zip _____

NUMBER OF WELLS 1 TYPE OF WELLS soil boring

FEES (in effect beginning July 1, 2012, through June 30, 2013)

ACTIVITY	FEE SCHEDULE	AMOUNT
Permit for Well Installations Only (Groundwater Monitoring Wells, Vadose, Vapor Extraction Wells)	\$200.00 for the first monitoring well	\$200.00
New Well Inspection	\$99.00 for first new well inspection	\$99.00
Each Additional New Well	\$161.00 for each additional well installation	___ x \$161.00
	\$30.00 for each additional new well inspection	___ x \$ 30.00

ASSESSOR'S PARCEL NUMBER 519-010-15
 Site Name _____
 Site Address _____ City _____ Zip _____
 PROPERTY OWNER _____
 Phone _____ Ext. _____ Fax _____
 Mailing Address _____ City _____ State _____ Zip _____
 NUMBER OF WELLS 2 ✓ TYPE OF WELLS Soil borings

3. ASSESSOR'S PARCEL NUMBER 519-010-20 ?
 Site Name _____
 Site Address _____ City _____ Zip _____
 PROPERTY OWNER _____
 Phone _____ Ext. _____ Fax _____
 Mailing Address _____ City _____ State _____ Zip _____
 NUMBER OF WELLS 1 TYPE OF WELLS soil boring

4. ASSESSOR'S PARCEL NUMBER 518-010-21
 Site Name _____
 Site Address _____ City _____ Zip _____
 PROPERTY OWNER _____
 Phone _____ Ext. _____ Fax _____
 Mailing Address _____ City _____ State _____ Zip _____
 NUMBER OF WELLS 4 ✓ TYPE OF WELLS soil boring

FEES (in effect beginning July 1, 2012, through June 30, 2013)

ACTIVITY	FEE SCHEDULE	AMOUNT
Permit for Well Installations Only (groundwater Monitoring Wells, Vadose, Vapor Extraction Wells)	\$200.00 for the first monitoring well	\$200.00
New Well Inspection	\$99.00 for first new well inspection	\$99.00
Each Additional New Well	\$161.00 for each additional well installation	___ x \$161.00
	\$30.00 for each additional new well inspection	___ x \$ 30.00

no

Permit for Borings Only (CPT's, Hydrofracture, Geopoles, Temporary Well Points, etc.)	\$2000.00 for the first boring..... \$490.00 for each additional boring.....	11 x \$2000.00 111 x \$ 490.00 \$2000 <u>\$539</u>
Permit for Well Destrutions Only	\$2000.00 for the first destruction..... \$123.00 for each additional destruction...	___ x \$2000.00 ___ x \$123.00
Permit for any Combination of Well Installations, Borings, & Destrutions (except UST Backfill permit)	The first activity will be \$2000.00 Additional activities will be as follows: \$1651.00 for each additional well..... \$99.00 for first well maintenance inspection \$ 30.00 for each additional well maintenance inspection \$123.00 for each well destruction \$ 49.00 for each additional boring	___ x \$2000.00 ___ x \$1651.00 ___ x \$ 99.00 ___ x \$ 30.00 ___ x \$123.00 ___ x \$ 49.00
Permit for Underground Storage Tank Monitoring System in Backfill (i.e. Enhanced Leak Detection)	\$320.00 (Flat Fee)	\$ _____
	TOTAL COST OF PERMIT	\$ 739

\$ 739

H1.

QUESTIONNAIRE: Please answer all applicable questions completely. For well destructions, complete only #11 below and submit any required supportive documentation.

1. If wells are to be destroyed, provide a description of method of destruction N/A

2. What is the purpose of the well/boring investigation?

a. Part of an ongoing site assessment case in which a government regulator is the lead agency. If yes, indicate which government regulator is the lead agency and the case number.

DEH

RWQCB

DTSC

b. Part of a Phase I investigation for property ownership transfer or: _____

X c. Geotechnical investigation for proposed construction, land stabilization or:

d. Other: _____

3. What procedures will be used to prevent the well/boring from providing an avenue to contamination during construction?

All soil borings will be backfilled with bentonite and compacted.

4. What field procedures will be utilized to determine if contamination exists?

We will use olfactory sensing to determine if the soil from borings is contaminated.

5. What procedures will be used to determine whether samples will be sent for laboratory testing or archiving?

Samples from all holes will be taken and tested.

6. What constituents will be monitored and tested (Include EPA Laboratory Test Methods to be used)?

Soil Samples.

7. How will samples be transported and preserved? Samples will be bagged and transported by car to a testing lab.

8. What sampling methods will be used? Samples will be taken by hand from hollow flight auger rig.

9. Are you proposing a variation from the methods and/or procedures presented in the requirements for the construction or destruction of Vadose and Groundwater Monitoring Wells (Current SAM Manual Requirements)? If yes, specify these variations and include a well construction diagram and all required supporting documentation. Refer to the SAM Manual Appendix B for monitoring well guidelines (www.sdcdelh.org). Yes No X

10. Are you proposing a variation in drilling and destruction of soil borings from the methods and/or procedures specified in the current SAM manual? If yes, specify these variations and include a destruction diagram. Yes No X

11. What procedures will be used to ensure that the drilling equipment will introduce no contamination?

Augers and downhole equipment is pressure wash prior to arrival at site.

12. What methods will be used to clean sampling equipment? _____

113. What cleaning method will be used to clean casing and screen prior to installation? _____

144. A Property Owner Consent (POC) agreement is required for all applications, except for onsite, open LOP/SAN site assessment cases, Caltrans properties and military properties.



County of San Diego

JACK MILLER
DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
LAND AND WATER QUALITY DIVISION
P.O. BOX 129261, SAN DIEGO, CA 92112-9261
(858)505-6688
www.sdcdelh.org

ELIZABETH POZZEDON
ASSISTANT DIRECTOR

PROPERTY OWNER CONSENT

Proposed locations for subsurface work:

Property Address:

Assessor's Parcel Number (APN):

Cottonwood Golf Club
3121 Willow Glen Drive
El Cajon, CA 92019

1519-010-15-00, 519-010-200-00, 519-010-21-00, 519-010-17-00, 518-030-15-00, 518-030-22-00, 518-030-12-00, 518-030-13-00, 518-030-10-00, 518-030-08-00, 518-030-21-00, 518-012-13-00, 518-012-14-00, 506-020-52-00, 506-021-19-00, 519-011-03-00, 518-030-05-00, 518-012-08-00, 518-030-06-00, 518-030-07-00, 519-010-34-00, 519-010-33-00, 519-010-37-00

I, DARYL IDLER am the President, Managing General Partner of Premier Golf Properties, L.P., owner of the property/properties listed above, give my permission to Freeman Associates (consulting company, contractor) to conduct the following work at the locations stated above.

Install _____ monitoring wells Destroy _____ monitoring wells Drill 12 soil borings

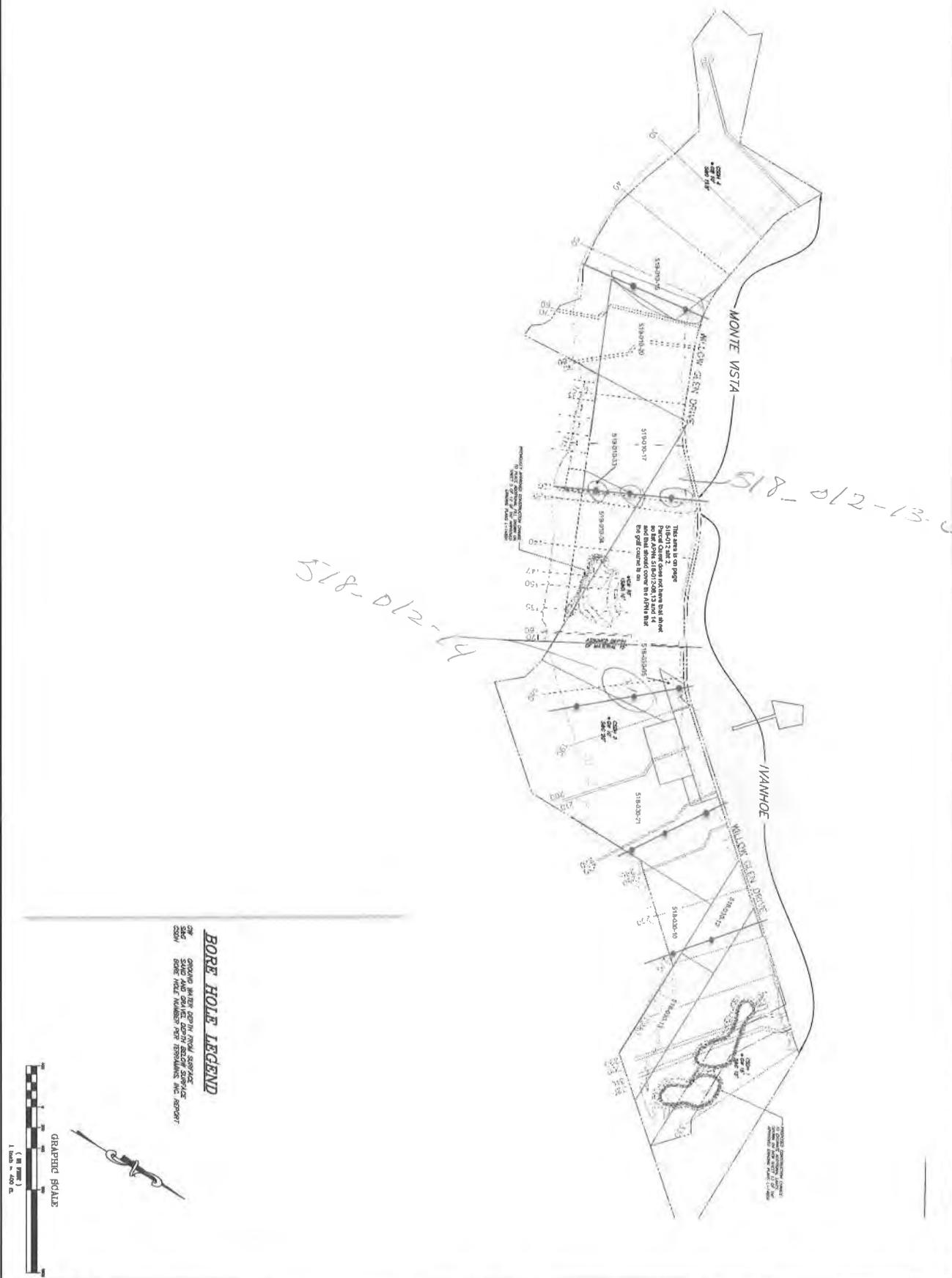
I understand that Dave Masse (registered professional) of Tricounty Drilling (consulting company) and an authorized signer for Tricounty Drilling (drilling company) have submitted a signed application to the Department of Environmental Health in which they have agreed to complete the above-stated work according to the requirements of the current SAM Manual, all ordinances and laws of the County of San Diego and the State of California pertaining to well/boring construction and destruction. I have arranged with the Responsible Party, the person who causes to have monitoring wells/borings installed or existing wells destroyed on this property, to ensure proper closure of the monitoring wells/borings.

Property Owner Signature: Daryl Idler Date: JANUARY 24, 2014

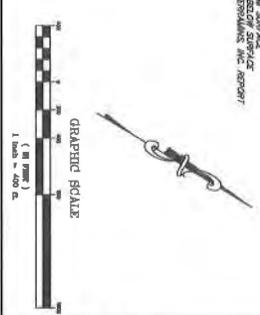
Print Name: DARYL IDLER Title: PRESIDENT, MANAGING GENERAL PARTNER

Company: PREMIER GOLF PROPERTIES, L.P.

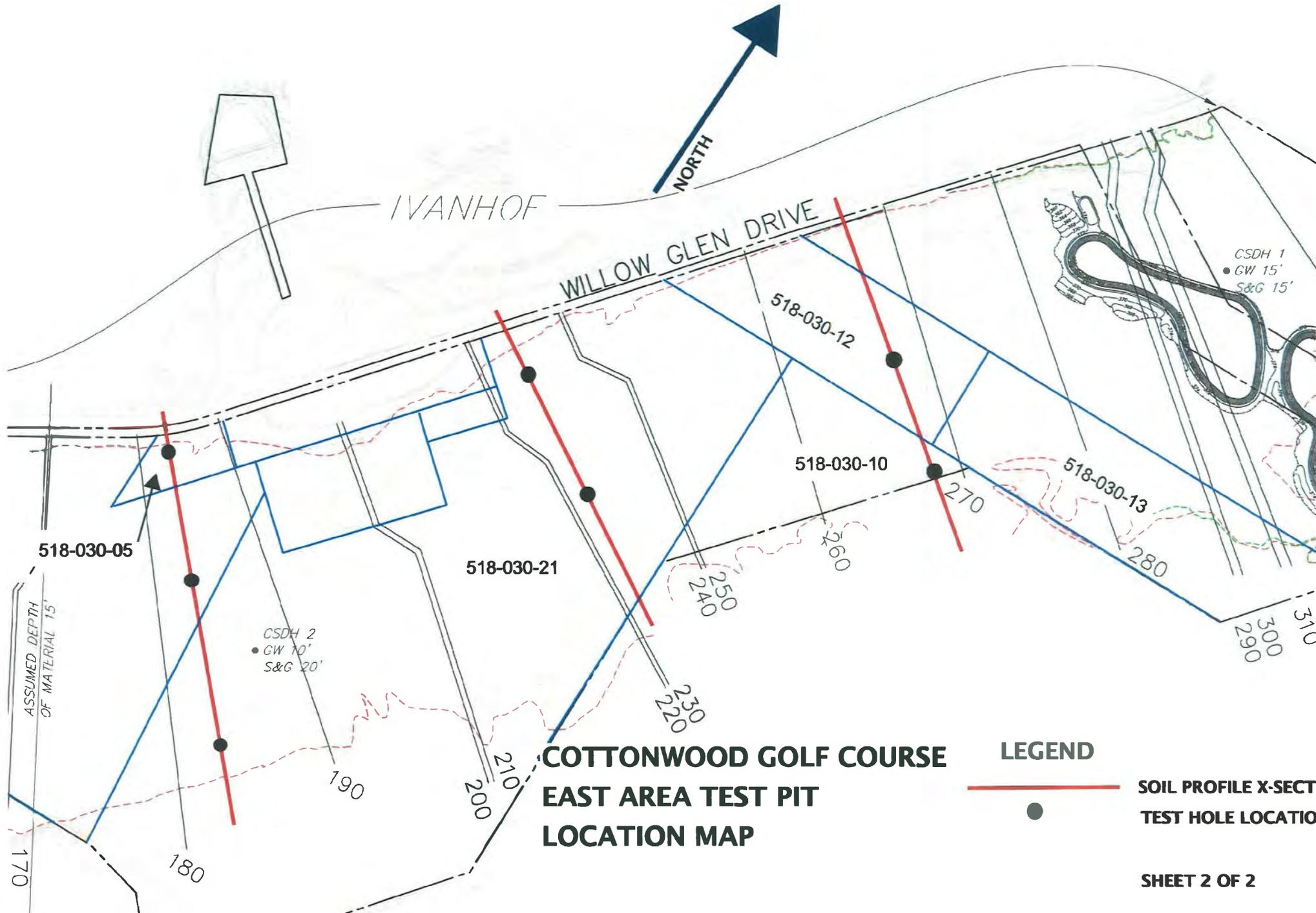
Mailing Address: 3121 WILLOW GLEN DRIVE, EL CAJON, CA 92019



BORE HOLE LEGEND
 518-012-13-08
 518-012-14



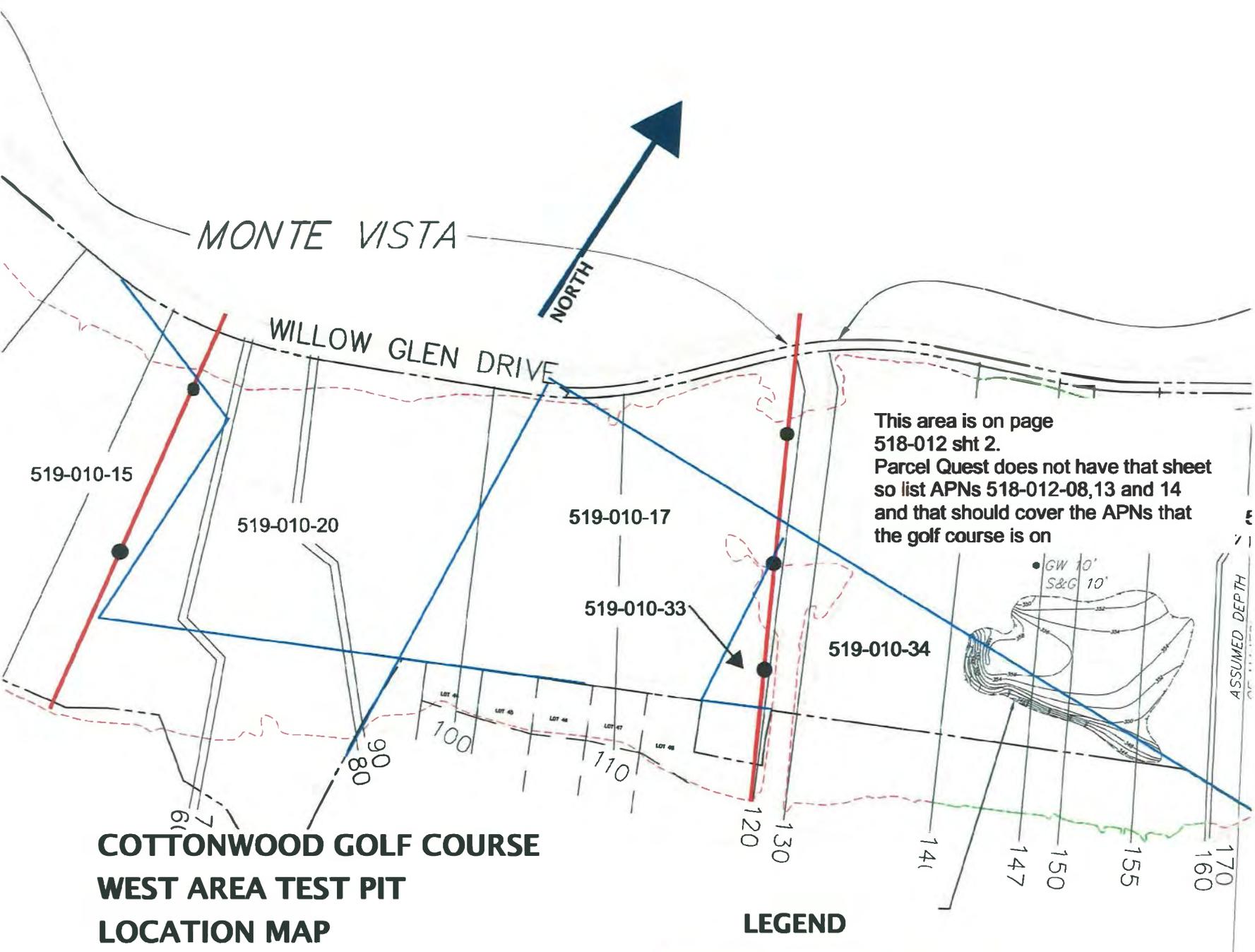
<p>DLG/DAVIS GROUP CIVIL ENGINEERS 14400 N. JAMES REDWOOD CITY, CA 94061 TEL: 650.593.8800 FAX: 650.593.8801 WWW.DLGDAVIS.COM</p>	<p>COTTONWOOD GOLF COURSE VERIFICATION OF QUANTITIES</p>	<p>DATE: 05/18/2011 TIME: 5:00 PM</p>	<p>PROJECT NO: 518-012-13-08</p>	<p>SCALE: 1" = 400'</p>
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**COTTONWOOD GOLF COURSE
EAST AREA TEST PIT
LOCATION MAP**

LEGEND

- SOIL PROFILE X-SECT
- TEST HOLE LOCATIO

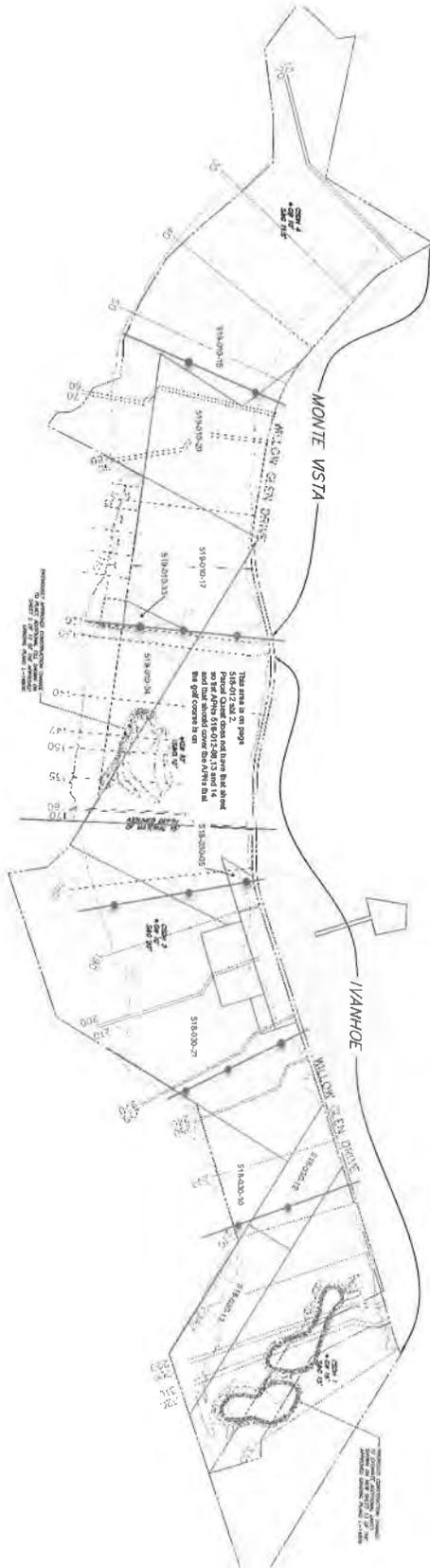


**COTTONWOOD GOLF COURSE
WEST AREA TEST PIT
LOCATION MAP**

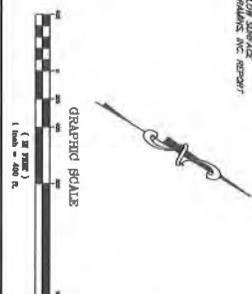
This area is on page
518-012 sht 2.
Parcel Quest does not have that sheet
so list APNs 518-012-08, 13 and 14
and that should cover the APNs that
the golf course is on

LEGEND

- SOIL PROFILE X-SECTION LINE
- TEST HOLE LOCATION



BORE HOLE LEGEND
 2"Ø GROUND WATER DEPTH FROM SURFACE
 3"Ø POND AND DAMS, DEPTH FROM SURFACE
 3"Ø POND AND DAMS, DEPTH FROM SURFACE
 3"Ø POND AND DAMS, DEPTH FROM SURFACE



<p>COTTONWOOD GOLF COURSE 1440 SOUTH JAMES BIRMINGHAM, AL 35202 SAN LUIS OBISPO</p>	<p>DATE: _____ DRAWN BY: _____ CHECKED BY: _____ APPROVED BY: _____</p>	<p>COTTONWOOD GOLF COURSE VERIFICATION OF QUANTITIES</p>	<p>DATE: 04/18/2013 TIME: 1:40P USER: enr/</p>
---	--	--	--



PERMIT #: LMWP-004405

A.P.N. #: 519-010-15

EST #: None

**COUNTY OF SAN DIEGO
DEPARTMENT OF ENVIRONMENTAL HEALTH
LAND AND WATER QUALITY DIVISION
MONITORING WELL PROGRAM**

BORING CONSTRUCTION PERMIT

SITE NAME: COTTONWOOD GOLF CLUB

SITE ADDRESS: 3121 WILLOW GLEN DRIVE, EL CAJON 92019

PERMIT FOR: CONSTRUCTION OF SOIL BORINGS (3)

PERMIT APPROVAL DATE: 3/5/2020

PERMIT EXPIRES ON: 7/3/2020

RESPONSIBLE PARTY: HELIX ENVIRONMENTAL

PERMIT CONDITIONS:

1. All borings must be sealed from the bottom of the boring to the ground surface with an approved sealing material as specified in California Well Standards Bulletin 74-90, Part III, Section 19.D. **Drill cuttings are not an acceptable fill material. Bentonite slurries are not an acceptable fill material in the unsaturated zone.**
2. All borings must be properly destroyed within 24 hours of drilling.
3. Placement of any sealing material at a depth greater than 30 feet must be done using the tremie method.
4. This work is not connected to any known unauthorized release of hazardous substances. Any contamination found in the course of drilling and sampling must be reported to DEH. All water and soil resulting from the activities covered by this permit must be managed, stored and disposed of as specified in the SAM Manual in Section 5, II, D-4. In addition, drill cuttings must be properly handled and disposed in compliance with the Stormwater Best Management Practices of the local jurisdiction.
5. Within 60 days of completing work, submit a well construction report, including all well and/or boring logs and laboratory data to the Well Permit Desk. This report must include all items required by the SAM Manual, Section 5, Pages 6 & 7.
6. This office must be given 24-hour notice of any drilling activity on this site and advanced notification of drilling cancellation. Please contact the Well Permit Desk at (858) 505-6688.

NOTE: This permit does not constitute approval of a work plan as defined in Section 2722 of Article 11 of C.C.R., Title 23. Work plans are required for all unauthorized release investigations in San Diego County.

APPROVED BY: _____

Jon Senaha
Jon Senaha

DATE: 3/5/2020



**PERMIT APPLICATION
GROUNDWATER
AND VADOSE MONITORING WELLS
AND EXPLORATORY OR TEST BORINGS**

OFFICE USE ONLY
 PERMIT LMWP# 004405
 SAM CASE Y/N # None
 DATE RECEIVED: 2/26/2020
 FEE PAID: \$380.00
 CHECK # Online

A. RESPONSIBLE PARTY Helix Environmental

E-mail

AndreaB@helixepi.com

(The person, persons, or company responsible for the construction, maintenance, and destruction of the proposed borings and/or wells.)

Mailing Address 7811 University Avenue

City La Mesa

State CA Zip 91941

Contact Person Andrea Bitterling

Phone 619.462.1515

Ext. _____

B. SITE ASSESSMENT PROJECT NUMBER – IF APPLICABLE # 51901015; 518101214; & 51803022

C. CONSULTING FIRM Geo-Logic Associates

Mailing Address 11415 West Bernardo Court, Suite 200

City San Diego

State CA Zip 92127

Registered Professional Kyle Welchans

Phone 619.540.5509

Registration # 9255(PG)

E-mail Kwelchans@geo-logic.com

Contact Person Kyle Welchans

Phone 619.540.5509

Ext. _____

Email

kwelchans@geo-logic.com

D. DRILLING COMPANY ABC Liovin

C57# 422904

Contact Name Rick Hastings

E-mail Rick@abcdrilling.com

Mailing Address 13830 Danielson Street

City Poway

State CA Zip 92064

Phone 562.981.8575

Ext. _____

E. CONSTRUCTION INFORMATION

TYPE OF WELLS/ BORINGS TO BE CONSTRUCTED	MATERIALS TO BE USED		PROPOSED CONSTRUCTION
#	CASING	SEAL/BORING BACKFILL	Estimated Groundwater Depth:
<input type="checkbox"/> Groundwater _____	Not Applicable X	<input type="checkbox"/> Neat Cement	_____ ft.
<input type="checkbox"/> Vadose _____	Type _____	<input checked="" type="checkbox"/> Cement & Bentonite	Estimated Depth of Boring:
<input checked="" type="checkbox"/> Boring <u>3</u>	Gauge _____	<input type="checkbox"/> Sand-Cement	_____ ft.
<input type="checkbox"/> Soil Vapor _____	Diameter _____	<input type="checkbox"/> Bentonite	Concrete Seal: <u>0</u> to <u>3</u>
<input type="checkbox"/> Other _____	Screen Size _____	<input type="checkbox"/> Other	Annular Seal: _____ to _____
	Filter Pack _____	Borehole diameter <u>6-5/8"</u>	Filter Pack: _____ to _____
			Perforation: _____ to _____
NUMBER OF WELLS TO BE DESTROYED	Drilling Method		
<input type="checkbox"/> Destruction _____	<input checked="" type="checkbox"/> Auger	<input type="checkbox"/> Air Rotary	NOTE: Attach a well construction diagram
	<input type="checkbox"/> Direct Push	<input type="checkbox"/> Sonic	
	<input type="checkbox"/> Other _____	<input type="checkbox"/> Percussion	

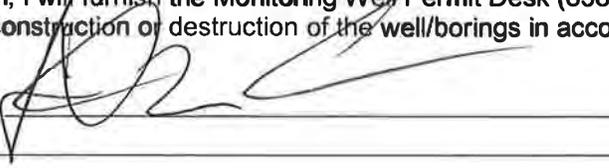
I agree to comply with the requirements of the current Site Assessment and Mitigation Manual, and with all ordinances and laws of the County of San Diego and the State of California pertaining to well/boring construction and destruction.

DRILLER'S SIGNATURE 

DATE 2/24/2020

Within 60 days of completion, I will furnish the Monitoring Well Permit Desk (858) 505-6688 with a complete well/boring log. I will certify the design and construction or destruction of the well/borings in accordance with the permit application.

PG/RCE/CEG SIGNATURE



DATE

2/24/20

F. SITE INFORMATION - A Property Owner Consent agreement is required for all applications, except for onsite, open LOP/SAM site assessment cases, Caltrans properties and military properties. Submit a separate sheet for additional parcels.

1. ASSESSOR'S PARCEL NUMBER 51901015

Site Name Cottonwood Golf Club

Site Address 3121 Willow Glen Drive

City El Cajon

Zip 92019

PROPERTY OWNER Cottonwood Golf Club

Phone 619.442.9891

Ext. _____

Fax _____

Mailing Address 3121 Willow Glen Drive

City El Cajon

State CA Zip 92019

NUMBER OF BORINGS 1

TYPE OF WELLS No wells; boring only.

2. ASSESSOR'S PARCEL NUMBER 51801214

Site Name Cottonwood Golf Club

Site Address 3121 Willow Glen Drive

City El Cajon

Zip 92019

PROPERTY OWNER Cottonwood Golf Club

Phone 619.442.9891

Ext. _____

Fax _____

Mailing Address 3121 Willow Glen Drive

City El Cajon

State CA Zip 92019

NUMBER OF BORINGS 1

TYPE OF WELLS No wells; boring only.

3. ASSESSOR'S PARCEL NUMBER 51803022

Site Name Cottonwood Golf Club

Site Address 3121 Willow Glen Drive

City El Cajon

Zip 92019

PROPERTY OWNER Cottonwood Golf Club

Phone 619.442.9891

Ext. _____

Fax _____

Mailing Address 3121 Willow Glen Drive

City El Cajon

State CA Zip 92019

NUMBER OF BORINGS 1

TYPE OF WELLS No wells; boring only.

G. QUESTIONNAIRE: Please answer all applicable questions completely and submit any required supportive documentation.

1. What is the purpose of the well/boring investigation?

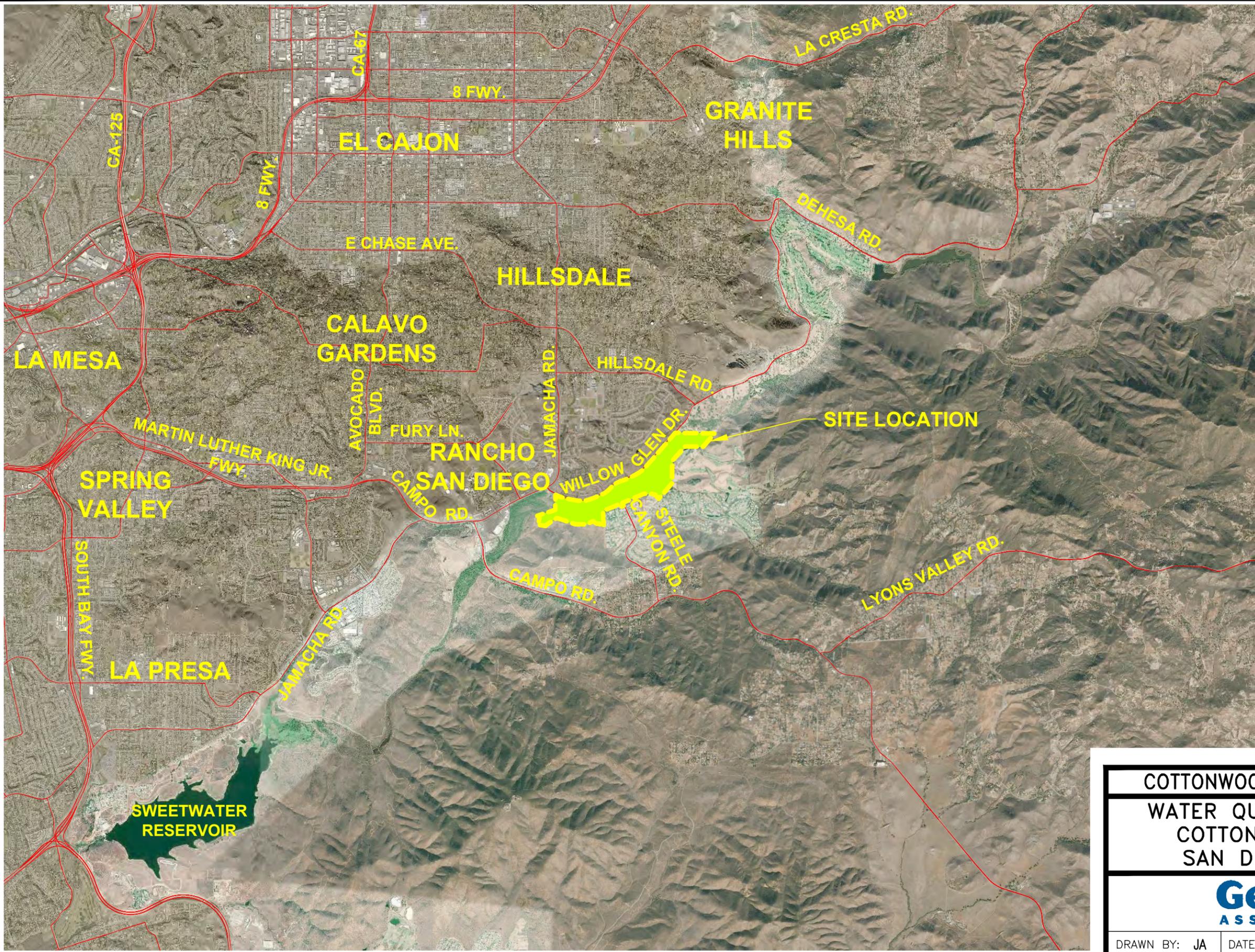
- a. Part of an ongoing site assessment case in which a government regulator is the lead agency. If yes, indicate which government regulator is the lead agency and the case number.

Department of Environmental Health _____

- Regional Water Quality Control Board _____
- Department of Toxic Substances Control _____

- b. Part of a Phase I investigation for property ownership transfer.
- c. Geotechnical investigation for proposed construction or land stabilization.
- d. Other: Support for Environmental Impact Report for review by County of San Diego Dept of Planning and Development Services. Permit No. MUP 18-023

2. If wells are to be destroyed, provide a description of method of destruction _____
3. Are you proposing a variation from current SAM Manual Requirements for the construction or destruction of borings, Vadose and/or Groundwater Monitoring Wells? If yes, specify these variations and include a well construction diagram and all required supporting documentation. Refer to the SAM Manual Appendix B for monitoring well guidelines. Yes No



LEGEND:

-  COTTONWOOD PROJECT BOUNDARY
-  ROADS

PREVIOUSLY MINED LANDS CREATES A NATURAL SET BACK



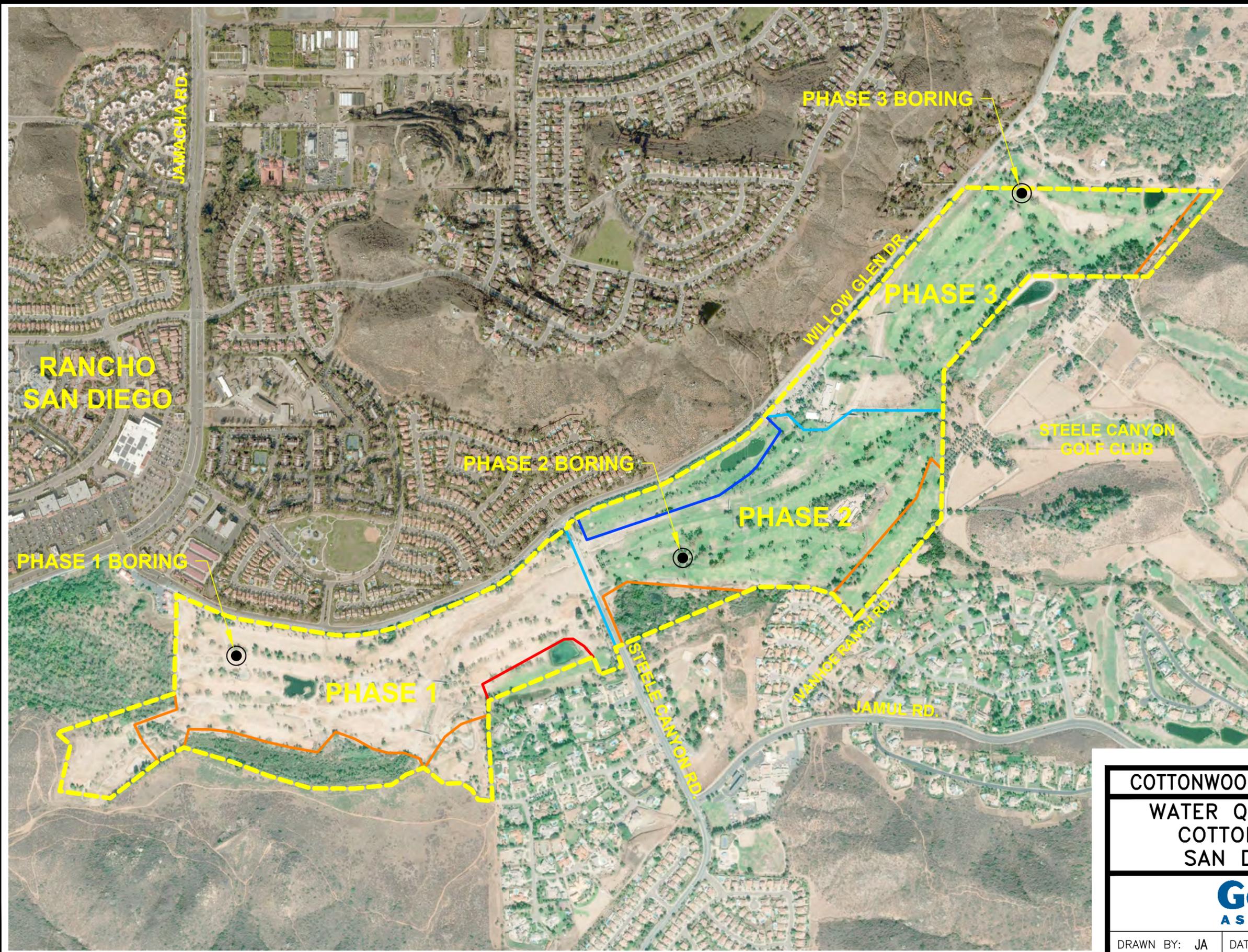
SCALE: 1" = 1 MILE

FIGURE 1

COTTONWOOD MINE REGIONAL MAP
WATER QUALITY INVESTIGATION
COTTONWOOD SAND MINE
SAN DIEGO COUNTY, CA



DRAWN BY: JA	DATE: FEBRUARY 2020	JOB NO.: S020.1016
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LEGEND:

- COTTONWOOD PROJECT BOUNDARY
- MINED PRIOR TO 1966
- NO MINING AREAS
- COTTONWOOD PHASING LINES
- PROPOSED PLANT LOCATION

PREVIOUSLY MINED LANDS CREATES A NATURAL SET BACK

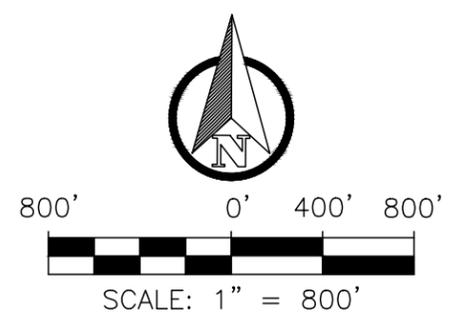


FIGURE 2A

COTTONWOOD MINE BORING LOCATION		
WATER QUALITY INVESTIGATION		
COTTONWOOD SAND MINE		
SAN DIEGO COUNTY, CA		
		
DRAWN BY: JA	DATE: FEBRUARY 2020	JOB NO.: S020.1016



LEGEND:

- - - COTTONWOOD PROJECT BOUNDARY
- MINED PRIOR TO 1966
- NO MINING AREAS
- COTTONWOOD PHASING LINES
- PROPOSED PLANT LOCATION

PREVIOUSLY MINED LANDS CREATES A NATURAL SET BACK

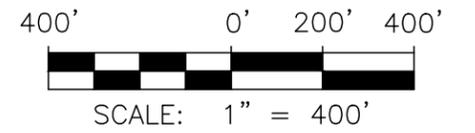


FIGURE 2B

PHASE 1 BORING LOCATION		
WATER QUALITY INVESTIGATION		
COTTONWOOD SAND MINE		
SAN DIEGO COUNTY, CA		
DRAWN BY: JA	DATE: FEBRUARY 2020	JOB NO.: S020.1016