FULCRUM environmental consulting

September 20, 2021

Washington State Department of Ecology
Attn: Ted Uecker
1026 West Broadway Avenue
Spokane, WA, 99260

Re: Sundance Golf Course – VCP Update

Dear Mr. Uecker,

Fulcrum Environmental Consulting, Inc. (Fulcrum) has been retained by the owner of the former Sundance Golf Course to assist in environmental characterization and remediation of the site as it transitions to a residential development. The site is located at 9725 North Nine Mile Road in Nine Mile Falls, Washington, and is approximately 89 acres in size. Fulcrum has provided the following environmental services in support of site development.

- May 2019 Phase I Environmental Site Assessment (ESA)
- Sept. 2019 Phase II Characterization Sampling for Agricultural Chemicals and PCS
- Sept. 2020 Hazardous Building Materials (HBM) inspection of site buildings
- Oct 2020 Additional Phase II Cleanup Oversight of Maintenance Building PCS
- Dec 2020 Initial Sampling of 19-locations for Arsenic, Lead, and Mercury
  Follow up sampling for Mercury focusing on the greens (54 samples)
- Jan 2021 Public Hearing Presentation
  Additional Analysis of samples for cadmium
- Feb 2021 VCP Application
- April 2021 Mercury Impacted Soil Removal Oversight
  Sampling of six suspect locations for herbicide/pesticide presence
- May 2021 Mercury Impacted Soil Removal Oversight
  Sampling of 24 additional locations for herbicide/pesticide presence
- June 2021 Mercury Impacted Soil Removal Oversight

All environmental services were provided by, or under the direction of Travis Trent, a Principal of Fulcrum with 26-years of experience in environmental site assessment and hazardous materials investigations. Mr. Trent is a Washington State Licensed Geologist (LG) and Licensed Hydrogeologist (LHG); a Certified Industrial Hygienist (CIH); and Certified Hazardous Materials Manager (CHMM).

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Fulcrum has worked in coordination with the Washington State Department of Ecology (Ecology) through the Voluntary Cleanup Program (VCP) to assist the developer in completing a site cleanup in accordance with applicable regulatory standards. The only environmental hazards identified at the site are a localized area of petroleum contaminated soil associated with vehicle maintenance activities (cleaned up), asbestos containing materials in site buildings (abated prior to demolition), and residual agricultural chemicals.

Fulcrum's investigation has found no information indicating that agricultural chemicals were not used in accordance with applicable labeling and governing standards at the time of application and as such, do not constitute a release to the environment. In consideration of change in site use from a golf course to residential, the owner has investigated site soils for residual agricultural chemical impact and has remediated locations identified with concentrations in excess of regulatory thresholds. As the project moves towards completion of environmental remediation, Fulcrum has identified the following issues as points of discussion.

- Mercury TCLP Analysis
- Chromium Speciation
- Confirmation of Sample Locations (GPS and Maps)
- Wood Chips
- Terrestrial Ecological Evaluation
- Pesticides and Herbicides
- Mercury Impacted Soil Characterization Sufficiency
- Final Reporting with EIM Database submittal

Mercury TCLP Analysis

In December of 2020, Fulcrum collected 54 soil samples from putting greens (3 per green) for Arsenic, Lead, Mercury, and Cadmium analysis. Results identified mercury concentrations above Method A cleanup levels in four (4) samples. Fulcrum requested that the laboratory (Test America) prepare a composite of all 54 samples (SGC-Comp-01) and a second composite of the six (6) samples identified with mercury above cleanup levels (SGC-Comp-02). Both samples were run for mercury TCLP analysis by Method 7470A. Results of the mercury TCLP analysis are presented below.

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Table 1: Sundance Golf Course – Mercury TCLP Results in ppm (mg/kg)

Sample #	Mercury TCLP in mg/kg	Dangerous Waste Designation in mg/kg
SGC-COMP-01	Non-Detect	0.20
SGC-COMP-02	0.0003	0.20

Results document that the soil does not characterize as a hazardous waste based on mercury presence. Analytical data was submitted with the Graham Road Landfill and the soil was approved for disposal as mercury impacted soil.

Chromium Speciation

In April of 2021, Fulcrum collected six (6) samples for characterization for agricultural chemicals including mercury. The highest concentration of chromium detected during the sampling event was 19 ppm identified in sample SGC-04221-PH-05. The sample was submitted for further analysis for hexavalent chromium. Results were non-detect.

Confirmation of Sample Locations

In response to concerns raised by neighbors regarding specific sample locations, Ecology requested soil sample location maps for putting greens and all soil sample coordinates for the site. The requested soil sample location maps from putting greens with detectable levels of mercury are presented in Attachment 1 and the soil sample coordinates are presented in Attachment 2.

Wood Chips

In consideration of the presence of mercury impacted soil, Ecology has identified a concern about reuse of wood chips derived from site trees. The owner is investigating alternate options for removing the materials from the site.

Terrestrial Ecological Evaluation

Fulcrum anticipates that all soil contaminated with hazardous substances above applicable cleanup levels will be removed from the site. If any soils are retained, they will be protected by institutional controls as established under WAC 173-340.

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Pesticides & Herbicides

Ecology expressed concern that routine application of pesticides on the former golf course may have resulted in residual elevated presence in site soils. To evaluate this concern, Fulcrum collected six (6) representative samples and had them analyzed for organochlorine pesticides; organophosphorus compounds and herbicides. No organophosphorus pesticides or herbicides were detected in any of the samples. De minimis concentrations of chlordane (an organochlorine pesticide) were identified in three samples at concentrations substantially below Ecology cleanup standards. Ecology expressed additional concern about potential presence of organochlorine pesticides. In response, Fulcrum collected 24 additional samples (30 total samples) and submitted them for organochlorine pesticide analysis. It is Fulcrum's professional opinion that results demonstrate that historic use of pesticides/herbicides consistent with site labeling has not resulted in adverse impact to site soils.

Mercury Impacted Soil Characterization Sufficiency

To date, Fulcrum has collected 109 mercury characterization soil samples from the site (not inclusive of post remediation confirmation samples). The average concentration of the 109 samples is 0.96 ppm as compared to a Method A Cleanup Level of 2.0 ppm. A total of 11 samples (10%) were found to have concentrations above Method A cleanup levels. All 11 samples were collected from putting greens.

Fulcrum has collected a total of 78 soil characterization samples (not inclusive of confirmation soil samples) from the putting greens for an average of 4.33 samples per putting green. Results identified mercury above cleanup thresholds in 14% of the samples. A summary table documenting all mercury characterization soil samples is presented in Attachment 3.

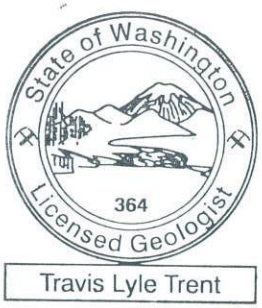
Project Reporting and EIM Database Entry

Upon project completion Fulcrum will prepare and submit a summary report detailing site activities, characterization testing, remedial actions, and confirmation testing. The report will include applicable analytical data and sample location maps. Sample information will be entered into the EIM database.

Sincerely,

Travis Trent, LG, CIH
Principal

Attachments



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LEGEND

00 Negative mercury characterization soil sample

00 Positive mercury characterization soil sample

N

0 25

Approximate Scale in Feet

Figure 1: Putting Green #2 - Soil Characterization Sample Locations for Mercury Contaminated Soil

9725 North Nine Mile Road
Nine Mile Falls, Washington 99206

FULCRUM ENVIRONMENTAL CONSULTING, INC.
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(509) 459-9220 www.efulcrum.net

MAP BY: Ethan Ducken	PROJECT NUMBER: 192860.03
DATE: September 14, 2021	REVIEWED BY: T. Trent

LEGEND

00 Negative mercury characterization soil sample

00 Positive mercury characterization soil sample

N

0 25

Approximate Scale in Feet

Figure 2: Putting Green #3 - Soil Characterization Sample Locations for Mercury Contaminated Soil

9725 North Nine Mile Road
Nine Mile Falls, Washington 99206

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(509) 459-9220 www.efulcrum.net

MAP BY: Ethan Ducken	PROJECT NUMBER: 192860.03
DATE: September 14, 2021	REVIEWED BY: T. Trent

LEGEND

00 Negative mercury characterization soil sample

00 Positive mercury characterization soil sample

N

0 25

Approximate Scale in Feet

Figure 3: Putting Green #4 - Soil Characterization Sample Locations for Mercury Contaminated Soil

9725 North Nine Mile Road
Nine Mile Falls, Washington 99206

FULCRUM ENVIRONMENTAL CONSULTING, INC.
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MAP BY: Ethan Ducken	PROJECT NUMBER: 192860.03
DATE: September 14, 2021	REVIEWED BY: T. Trent

LEGEND

00 Negative mercury characterization soil sample

00 Positive mercury characterization soil sample

N

0 25

Approximate Scale in Feet

Figure 4: Putting Green #5 - Soil Characterization Sample Locations for Mercury Contaminated Soil

9725 North Nine Mile Road
Nine Mile Falls, Washington 99206

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MAP BY: Ethan Ducken	PROJECT NUMBER: 192860.03
DATE: September 14, 2021	REVIEWED BY: T. Trent

LEGEND

00 Negative mercury characterization soil sample

00 Positive mercury characterization soil sample

N

0 25

Approximate Scale in Feet

Figure 5: Putting Green #7 - Soil Characterization Sample Locations for Mercury Contaminated Soil

9725 North Nine Mile Road
Nine Mile Falls, Washington 99206

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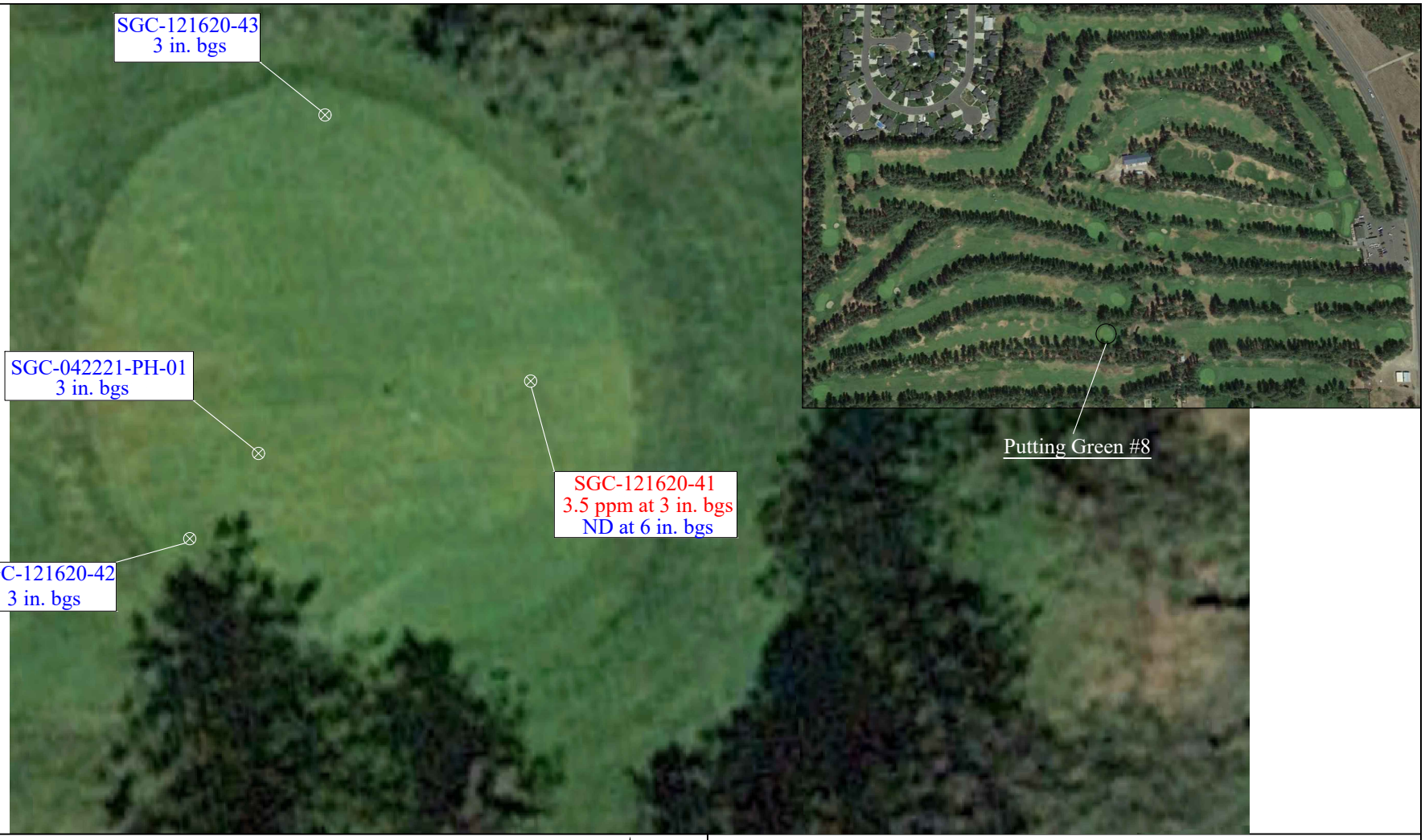
MAP BY: Ethan Ducken	PROJECT NUMBER: 192860.03
DATE: September 14, 2021	REVIEWED BY: T. Trent



LEGEND

00 Negative mercury characterization soil sample

00 Positive mercury characterization soil sample

N

0 25

Approximate Scale in Feet

Figure 6: Putting Green #8 - Soil Characterization Sample Locations for Mercury Contaminated Soil

9725 North Nine Mile Road
Nine Mile Falls, Washington 99206

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MAP BY: Ethan Ducken	PROJECT NUMBER: 192860.03
DATE: September 14, 2021	REVIEWED BY: T. Trent

LEGEND

00 Negative mercury characterization soil sample

00 Positive mercury characterization soil sample

N

0 25

Approximate Scale in Feet

Figure 7: Putting Green #9 - Soil Characterization Sample Locations for Mercury Contaminated Soil

9725 North Nine Mile Road
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MAP BY: Ethan Ducken	PROJECT NUMBER: 192860.03
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LEGEND

00 Negative mercury characterization soil sample

00 Positive mercury characterization soil sample

N

0 25

Approximate Scale in Feet

Figure 8: Putting Green #10 - Soil Remediation Extents and Soil Sample Locations for Mercury Contaminated Soil

9725 North Nine Mile Road
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MAP BY: Ethan Ducken	PROJECT NUMBER: 192860.03
DATE: September 14, 2021	REVIEWED BY: T. Trent

LEGEND

00 Negative mercury characterization soil sample

00 Positive mercury characterization soil sample

N

0 25

Approximate Scale in Feet

Figure 9: Putting Green #11 - Soil Characterization Sample Locations for Mercury Contaminated Soil

9725 North Nine Mile Road
Nine Mile Falls, Washington 99206

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MAP BY: Ethan Ducken	PROJECT NUMBER: 192860.03
DATE: September 14, 2021	REVIEWED BY: T. Trent

LEGEND

00 Negative mercury characterization soil sample

00 Postive mercury characterization soil sample

N

0 25

Approximate Scale in Feet

Figure 10: Putting Green #17 - Soil Characterization Sample Locations for Mercury Contaminated Soil

9725 North Nine Mile Road
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MAP BY: Ethan Ducken	PROJECT NUMBER: 192860.03
DATE: September 20, 2021	REVIEWED BY: T. Trent

Sample ID	Latitude	Longitude
SD-120320-01	47°44'47.89"N	117°30'31.82"W
SD-120320-02	47°44'46.54"N	117°31'0.86"W
SD-120320-03	47°44'47.93"N	117°31'2.55"W
SD-120320-04	47°44'46.15"N	117°30'46.41"W
SD-120320-05	47°44'44.52"N	117°30'28.67"W
SD-120320-06	47°44'42.95"N	117°30'32.29"W
SD-120320-07	47°44'42.26"N	117°31'4.49"W
SD-120320-08	47°44'44.91"N	117°30'54.11"W
SD-120320-09	47°44'46.52"N	117°30'41.76"W
SD-120320-10	47°44'50.20"N	117°30'28.96"W
SD-120320-11	47°44'58.20"N	117°30'52.53"W
SD-120320-12	47°44'47.71"N	117°31'2.86"W
SD-120320-13	47°44'48.75"N	117°31'4.51"W
SD-120320-14	47°44'49.94"N	117°30'50.54"W
SD-120320-15	47°44'57.04"N	117°30'35.91"W
SD-120320-16	47°44'55.46"N	117°30'35.46"W
SD-120320-17	47°44'52.39"N	117°30'47.73"W
SD-120320-18	47°44'49.30"N	117°30'33.34"W
SD-120320-19	47°44'52.03"N	117°30'38.59"W
SD-120320-20	47°44'42.26"N	117°31'4.49"W
SGC-121620-21	47°44'48.62"N	117°30'43.40"W
SGC-121620-22	47°44'48.43"N	117°30'43.40"W
SGC-121620-23	47°44'48.75"N	117°30'43.40"W
SGC-121620-24	47°44'46.19"N	117°30'43.40"W
SGC-121620-25	47°44'46.54"N	117°30'43.40"W
SGC-121620-25B	47°44'46.78"N	117°31'0.74"W
SGC-121620-26	47°44'45.55"N	117°31'5.14"W
SGC-121620-27	47°44'46.00"N	117°31'5.23"W
SGC-121620-28	47°44'46.13"N	117°31'4.67"W
SGC-121620-29	47°44'46.03"N	117°30'46.57"W
SGC-121620-30	47°44'45.79"N	117°30'46.18"W
SGC-121620-31	47°44'46.01"N	117°30'45.88"W
SGC-121620-32	47°44'44.50"N	117°30'28.23"W
SGC-121620-33	47°44'44.56"N	117°30'29.13"W
SGC-121620-34	47°44'44.55"N	117°30'28.64"W
SGC-121620-35	47°44'42.74"N	117°30'40.20"W
SGC-121620-36	47°44'43.06"N	117°30'40.61"W
SGC-121620-37	47°44'42.76"N	117°30'40.99"W
SGC-121620-38	47°44'42.27"N	117°31'5.03"W
SGC-121620-39	47°44'42.31"N	117°31'4.71"W
SGC-121620-40	47°44'41.87"N	117°31'4.74"W
SGC-121620-41	47°44'44.54"N	117°30'46.61"W
SGC-121620-42	47°44'44.40"N	117°30'47.14"W
SGC-121620-43	47°44'44.81"N	117°30'46.98"W
SGC-121620-44	47°44'46.28"N	117°30'28.18"W
SGC-121620-45	47°44'46.56"N	117°30'28.68"W

SGC-121620-46	47°44'46.14"N	117°30'29.01"W
SGC-121620-47	47°44'58.70"N	117°30'34.86"W
SGC-121620-48	47°44'58.44"N	117°30'34.60"W
SGC-121620-49	47°44'58.09"N	117°30'34.41"W
SGC-121620-50	47°44'58.36"N	117°30'52.60"W
SGC-121620-51	47°44'58.23"N	117°30'52.22"W
SGC-121620-52	47°44'58.11"N	117°30'51.73"W
SGC-121620-53	47°44'52.22"N	117°31'3.50"W
SGC-121620-54	47°44'51.91"N	117°31'3.42"W
SGC-121620-55	47°44'51.56"N	117°31'3.25"W
SGC-121620-56	47°44'48.39"N	117°31'4.70"W
SGC-121620-57	47°44'48.76"N	117°31'5.04"W
SGC-121620-58	47°44'48.83"N	117°31'4.30"W
SGC-121620-59	47°44'48.80"N	117°30'47.21"W
SGC-121620-60	47°44'49.00"N	117°30'47.59"W
SGC-121620-61	47°44'49.15"N	117°30'48.09"W
SGC-121620-62	47°44'56.94"N	117°30'35.34"W
SGC-121620-63	47°44'57.11"N	117°30'36.09"W
SGC-121620-64	47°44'56.69"N	117°30'35.97"W
SGC-121620-65	47°44'51.47"N	117°30'32.11"W
SGC-121620-66	47°44'51.16"N	117°30'32.45"W
SGC-121620-67	47°44'50.92"N	117°30'31.93"W
SGC-121620-68	47°44'51.75"N	117°30'47.55"W
SGC-121620-69	47°44'52.18"N	117°30'48.07"W
SGC-121620-70	47°44'51.83"N	117°30'48.30"W
SGC-121620-71	47°44'49.05"N	117°30'32.39"W
SGC-121620-72	47°44'49.68"N	117°30'32.93"W
SGC-121620-73	47°44'49.17"N	117°30'33.29"W
SGC-040721-01	47°44'46.03"N	117°30'46.29"W
SGC-040721-02	47°44'46.02"N	117°30'46.09"W
SGC-040721-03	47°44'46.01"N	117°30'45.91"W
SGC-040721-04	47°44'45.90"N	117°30'46.25"W
SGC-040721-05	47°44'46.04"N	117°30'46.51"W
SGC-040721-06	47°44'46.14"N	117°30'46.18"W
SGC-040721-07	47°44'44.53"N	117°30'47.01"W
SGC-040721-08	47°44'44.54"N	117°30'46.80"W
SGC-040721-09	47°44'44.55"N	117°30'46.62"W
SGC-040721-10	47°44'44.36"N	117°30'46.90"W
SGC-040721-11	47°44'44.53"N	117°30'47.14"W
SGC-040721-12	47°44'44.69"N	117°30'46.87"W
SGC-040721-13	47°44'42.10"N	117°31'4.78"W
SGC-040721-14	47°44'42.11"N	117°31'4.63"W
SGC-040721-15	47°44'42.12"N	117°31'4.39"W
SGC-040721-16	47°44'41.92"N	117°31'4.78"W
SGC-040721-17	47°44'42.09"N	117°31'4.99"W
SGC-040721-18	47°44'42.28"N	117°31'4.69"W
SGC-040721-19	47°44'51.83"N	117°30'44.85"W

SGC-040721-20	47°44'54.50"N	117°30'36.65"W
SGC-040721-21	47°44'58.10"N	117°30'52.03"W
SGC-040721-22	47°44'58.10"N	117°30'51.89"W
SGC-040721-23	47°44'58.11"N	117°30'51.74"W
SGC-040721-24	47°44'57.93"N	117°30'52.01"W
SGC-040721-25	47°44'58.16"N	117°30'52.32"W
SGC-040721-26	47°44'58.29"N	117°30'51.95"W
SGC-040721-27	47°44'58.24"N	117°30'52.25"W
SGC-040721-28	47°44'46.32"N	117°30'28.58"W
SGC-040721-29	47°44'46.34"N	117°30'28.47"W
SGC-040721-30	47°44'46.36"N	117°30'28.37"W
SGC-040721-31	47°44'46.25"N	117°30'28.56"W
SGC-040721-32	47°44'46.32"N	117°30'28.75"W
SGC-040721-33	47°44'46.57"N	117°30'28.62"W
SGC-040721-34	47°44'44.54"N	117°30'28.51"W
SGC-040721-35	47°44'44.54"N	117°30'28.36"W
SGC-040721-36	47°44'44.55"N	117°30'28.16"W
SGC-040721-37	47°44'44.30"N	117°30'28.57"W
SGC-040721-38	47°44'44.55"N	117°30'28.74"W
SGC-040721-39	47°44'44.79"N	117°30'28.48"W
SGC-042221-40	47°44'46.51"N	117°30'28.61"W
SGC-042221-41	47°44'46.61"N	117°30'28.59"W
SGC-042221-42	47°44'46.32"N	117°30'28.95"W
SGC-042221-43	47°44'46.31"N	117°30'29.05"W
SGC-042221-44	47°44'44.46"N	117°30'28.59"W
SGC-042221-45	47°44'44.54"N	117°30'28.57"W
SGC-042221-46	47°44'44.54"N	117°30'28.68"W
SGC-042221-47	47°44'44.59"N	117°30'28.73"W
SGC-042221-48	47°44'46.04"N	117°30'45.98"W
SGC-042221-49	47°44'46.04"N	117°30'45.89"W
SGC-042221-50	47°44'46.23"N	117°30'46.22"W
SGC-042221-51	47°44'46.28"N	117°30'46.22"W
SGC-042221-52	47°44'44.54"N	117°30'46.97"W
SGC-042221-53	47°44'44.53"N	117°30'47.05"W
SGC-042221-54	47°44'44.55"N	117°30'46.67"W
SGC-042221-55	47°44'44.56"N	117°30'46.55"W
SGC-042221-56	47°44'44.78"N	117°30'46.94"W
SGC-042221-57	47°44'44.85"N	117°30'46.94"W
SGC-042221-58	47°44'42.12"N	117°31'4.71"W
SGC-042221-59	47°44'42.16"N	117°31'4.81"W
SGC-042221-60	47°44'42.10"N	117°31'4.61"W
SGC-042221-61	47°44'42.10"N	117°31'4.46"W
SGC-042221-62	47°44'42.31"N	117°31'4.73"W
SGC-042221-63	47°44'42.40"N	117°31'4.73"W
SGC-042221-64	47°44'58.11"N	117°30'51.89"W
SGC-042221-65	47°44'58.11"N	117°30'51.99"W
SGC-042221-66	47°44'58.32"N	117°30'51.95"W

SGC-042221-67	47°44'58.38"N	117°30'51.94"W
SGC-042221-68	47°44'58.31"N	117°30'52.12"W
SGC-042221-69	47°44'58.31"N	117°30'52.00"W
SGC-042221-70	47°44'46.35"N	117°30'28.44"
SGC-042221-71	47°44'46.35"N	117°30'28.29"W
SGC-042221-72	47°44'46.38"N	117°30'28.66"W
SGC-042221-73	47°44'46.30"N	117°30'28.66"W
SGC-042921-74	47°44'41.94"N	117°31'4.71"W
SGC-042921-75	47°44'41.81"N	117°31'4.68"W
SGC-042921-76	47°44'42.07"N	117°31'4.72"W
SGC-061621-77	47°44'46.44"N	117°31'0.91"W
SGC-061621-78	47°44'46.46"N	117°31'0.75"W
SGC-061621-79	47°44'46.47"N	117°31'0.57"W
SGC-061621-80	47°44'46.28"N	117°31'0.83"W
SGC-061621-81	47°44'46.42"N	117°31'1.07"W
SGC-061621-82	47°44'46.56"N	117°31'0.81"W
SGC-061621-83	47°44'58.19"N	117°30'34.55"W
SGC-061621-84	47°44'58.21"N	117°30'34.36"W
SGC-061621-85	47°44'58.23"N	117°30'34.19"W
SGC-061621-86	47°44'58.06"N	117°30'34.44"W
SGC-061621-87	47°44'58.19"N	117°30'34.70"W
SGC-061621-88	47°44'58.38"N	117°30'34.45"W
SGC-080421-89	47°44'51.89"N	117°30'47.77"W
SGC-080421-90	47°44'51.90"N	117°30'47.60"W
SGC-080421-91	47°44'51.91"N	117°30'47.43"W
SGC-080421-92	47°44'51.75"N	117°30'47.69"W
SGC-080421-93	47°44'51.88"N	117°30'47.92"W
SGC-080421-94	47°44'52.00"N	117°30'47.68"W
SGC-080421-95	47°44'45.83"N	117°31'5.13"W
SGC-080421-96	47°44'45.84"N	117°31'4.99"W
SGC-080421-97	47°44'45.84"N	117°31'4.85"W
SGC-080421-98	47°44'45.72"N	117°31'5.05"W
SGC-080421-99	47°44'45.84"N	117°31'5.22"W
SGC-080421-100	47°44'45.95"N	117°31'5.02"W
SGC-042221-PH-01	47°44'44.46"N	117°30'47.06"W
SGC-042221-PH-02	47°44'46.09"N	117°30'55.51"W
SGC-042221-PH-03	47°44'46.56"N	117°30'0.98"W
SGC-042221-PH-04	47°44'56.11"N	117°30'46.86"W
SGC-042221-PH-05	47°44'58.25"N	117°30'34.35"W
SGC-042221-PH-06	47°44'46.11"N	117°30'33.67"W
SGC-070721-PH-07	47°44'42.67"N	117°31'2.42"W
SGC-070721-PH-08	47°44'45.93"N	117°31'5.01"W
SGC-070721-PH-09	47°44'50.28"N	117°31'2.89"W
SGC-070721-PH-10	47°44'51.84"N	117°31'3.34"W
SGC-070721-PH-11	47°44'52.55"N	117°30'54.67"W
SGC-070721-PH-12	47°44'52.41"N	117°30'50.17"W
SGC-070721-PH-13	47°44'58.61"N	117°30'53.09"W

SGC-070721-PH-14	47°44'58.24"N	117°30'51.21"W
SGC-070721-PH-15	47°44'58.45"N	117°30'39.92"W
SGC-070721-PH-16	47°44'52.20"N	117°30'34.52"W
SGC-070721-PH-17	47°44'51.86"N	117°30'47.72"W
SGC-070721-PH-18	47°44'48.80"N	117°30'47.67"W
SGC-070721-PH-19	47°44'47.89"N	117°30'42.87"W
SGC-070721-PH-20	47°44'42.60"N	117°30'40.37"W
SGC-070721-PH-21	47°44'44.39"N	117°30'36.68"W
SGC-070721-PH-22	47°44'47.98"N	117°30'37.66"W
SGC-070721-PH-23	47°44'54.01"N	117°30'42.77"W
SGC-070721-PH-24	47°44'52.94"N	117°30'36.96"W
SGC-070721-PH-25	47°44'58.28"N	117°30'49.56"W
SGC-070721-PH-26	47°44'58.43"N	117°30'45.48"W
SGC-070721-PH-27	47°44'53.51"N	117°30'52.46"W
SGC-070721-PH-28	47°44'52.45"N	117°30'58.57"W
SGC-070721-PH-29	47°44'51.44"N	117°30'57.98"W
SGC-070721-PH-30	47°44'47.31"N	117°30'57.67"W

Table 1: Sundance Golf Course - Mercury Characterization Soil Samples

Location	Sample Number & Area	Sample Depth (in)	12/03/20 Mercury Characterization Sampling	12/16/20 Mercury Characterization Sampling	04/22/21 Mercury Characterization Sampling	7/7/21 Mercury Characterization Sampling
Hole 1	SD-120320-01 (tee box)	3	0.04			
	SGC-121620-21, (northeast green)	3		0.04		
	SGC-121620-22, (south central green)	3		0.04		
	SGC-121620-23, (northwest green)	3		0.04		
	SGC-070721-PH-19 (south of green)	3				0.04
	SGC-070721-PH-22 (fairway low area)	3				0.04
Hole 2	SD-120320-02, (central green)	4	0.04			
	SGC-121620-24, (southeast green)	3		0.12		
	SGC-121620-25, (northwest green)	3		0.12		
	SGC-121620-25B, (north central green)	3		0.14		
	SGC-042221-PH-03, (central green)	3			**2.6**	
	SGC-070721-PH-30 (fairway low area)	3				0.04
Hole 3	SD-120320-03 (fairway)	3	0.04			
	SGC-121620-26, (south central green)	3		0.04		
	SGC-121620-27, (northwest green)	3		0.04		
	SGC-121620-28, (northeast green)	3		0.04		
	SGC-070721-PH-08, (central green)	3				**16**
Hole 4	SD-120320-04, (northwest area green)	6	**5.2**			
	SGC-121620-29, (west central green)	3		0.037		
	SGC-121620-30, (south central green)	3		0.04		
	SGC-121620-31, (east central green)	3		0.28		
	SGC-042221-PH-02 (central fairway)	3			0.04	
Hole 5	SD-120320-05, (north central green)	1.5	0.04			
	SGC-121620-32, (east central green)	3		**2.6**		
		6		**4.5**		
		12		1.7		
	SGC-121620-33, (west central green)	3		0.54		
	SGC-121620-34, (central green)	3		0.084		
	SGC-070721-PH-21, (fairway low area)	3				0.04
Hole 6	SD-120320-06 (tee box)	3	0.04			
	SGC-121620-35, (east central green)	3		0.23		
	SGC-121620-36, (north central green)	3		1.8		
	SGC-121620-37, (west central green)	3		0.38		
	SGC-070721-PH-20, (east central green)	3				0.77
Hole 7	SD-120320-07 (central green)	3	**6.9**			
	SGC-121620-38, (northwest green)	3		0.11		
	SGC-121620-39, (north central green)	3		0.14		
	SGC-121620-40, (south central green)	3		0.098		
	SGC-070721-PH-07, (faiway low area)	3				0.04
Hole 8	SD-120320-08 (fariway)	3	0.04			
	SGC-121620-41, (east central green)	3		**3.5**		
		6		0.29		
	SGC-121620-42, (southwest green)	3		0.75		
	SGC-121620-43, (north central green)	3		0.23		
	SGC-042221-PH-01, (southwest green)	3			0.31	
Hole 9	SD-120320-09 (tee box)	3	0.04			
	SGC-121620-44, (east central green)	3		1.9		
	SGC-121620-45, (north central green)	3		**21**		
		6		0.12		
	SGC-121620-46, (southwest green)	3		0.26		
	SGC-042221-PH-06 (low spot fairway)	3			0.04	
Hole 10	SD-120320-10 (tee box)	3	0.04			
	SGC-121620-47, (north central green)	3		0.11		
	SGC-121620-48, (central green)	3		0.091		
	SGC-121620-49, (south central green)	3		0.16		
	SGC-042221-PH-05, (southeast green)	3			**4.1**	
Hole 11	SD-120320-11, (central green)	6	0.1			
	SGC-121620-50, (northwest green)	3		0.04		
	SGC-121620-51, (central green)	3		0.078		
	SGC-121620-52, (southeast green)	3		**13**		
		6		0.04		
	SGC-070721-PH-13, (lowspot NW of green)	3				0.04
	SGC-070721-PH-14, (lowspot east of green)	3				0.04
	SGC-070721-PH-15, (lowspot west of tee box)	3				0.04
	SGC-070721-PH-25, (fairway lowspot)	3				0.04
	SGC-070721-PH-26, (fairway lowspot)	3				0.04

Location	Sample Number & Area	Sample Depth (in)	12/03/20 Mercury Characterization Sampling	12/16/20 Mercury Characterization Sampling	04/22/21 Mercury Characterization Sampling	7/7/21 Mercury Characterization Sampling
Hole 12	SD-120320-12 (tee box)	3	0.04			
	SGC-121620-53, (north central green)	3		0.2		
	SGC-121620-54, (central green)	3		0.04		
	SGC-121620-55, (south central green)	3		0.042		
	SGC-070721-PH-10, (putting green)	3				0.14
	SGC-070721-PH-11, (fairway lowspot)	3				0.04
	SGC-070721-PH-12, (fairway lowspot)	3				0.04
	SGC-070721-PH-27, (fairway lowspot)	3				0.04
	SGC-070721-PH-28, (fairway low spot)	3				0.04
Hole 13	SD-120320-13, (central green)	3	0.04			
	SGC-121620-56, (south central green)	3		0.04		
	SGC-121620-57, (northwest green)	3		0.054		
	SGC-121620-58, (northeast green)	3		0.066		
	SGC-070721-PH-09, (fairway low spot)	3				0.04
Hole 14	SD-120320-14 (fairway)	3	0.04			
	SGC-121620-59, (southeast green)	3		0.058		
	SGC-121620-60, (central green)	3		0.24		
	SGC-121620-61, (northwest green)	3		0.066		
	SGC-070721-PH-18, (south central green)	3				0.45
	SGC-070721-PH-29 (central fairway)	3				0.04
Hole 15	SD-120320-15, (central green)	3	0.04			
	SGC-121620-62, (east central green)	3		0.32		
	SGC-121620-63, (northwest green)	3		0.04		
	SGC-121620-64, (southwest green)	3		0.082		
	SGC-042221-PH-04, (east fairway)	3			0.04	
Hole 16	SD-120320-16 (tee box)	3	0.04			
	SGC-121620-65, (north central green)	3		0.2		
	SGC-121620-66, (west central green)	3		0.04		
	SGC-121620-67, (south central green)	3		0.13		
Hole 17	SD-120320-17, (central green)	3	0.04			
	SGC-121620-68, (southeast green)	3		0.04		
	SGC-121620-69, (north central green)	3		0.04		
	SGC-121620-70, (southwest green)	3		0.097		
	SGC-070721-PH-16, (fairway low spot)	3				0.04
	SGC-070721-PH-17, (putting green)	3				**6.2**
	SGC-070721-PH-23, (fairway low spot)	3				0.04
	SGC-070721-PH-24, (fairway low spot)	3				0.04
Hole 18	SD-120320-18, (central green)	3	0.04			
	SGC-121620-71, (southeast green)	3		0.04		
	SGC-121620-72, (north central green)	3		0.19		
	SGC-121620-73, (southwest green)	3		0.79		
	SGC-121620-73, (southwest green)	3		0.79		
Driving Range	SD-120320-19	3	0.04			
	Total Samples Analyzed		**19**	**60**	**6**	**24**
	Average Concentration		**0.68**	**0.97**	**1.19**	**1.01**
	MTCA Method A Cleanup Level for Mercury (mg/kg)		**2**			

Bold Laboratory analytical above MTCA Method A Cleanup levels of 2 mg/kg for mercury

Total Samples	109
Average of All Samples	0.9624
Total Samples Above Method A Cleanup	11
Percent of samples above Method A	10%

Note: Soil samples were characterized for mercury disposal via TCLP analysis for comparision to the applicable waste criteria of 0.2 ppm
TCLP analysis was conducted for a composite of the 54 soil samples collected on 12/16/21 with non-detect results
TCLP analysis was also conducted for a composite of the six samples with mercury above cleanup with results at 0.0003 ppm
Speciation analysis was non-detect for hexavalent Chromium