



## EXHIBIT 'Z'

### VISTA ENVIRONMENTAL CONSULTING SOIL & WATER CONTACT PROCEDURES

March 24, 2014

Mr. Paul Costa  
Senior Project Manager  
Turner Construction Company  
1900 S. State College Blvd., Suite 200  
Anaheim, California 92806

**RE: Great Wolf Lodge – Preliminary Environmental Summary**

Dear Mr. Costa:

Vista Environmental Consulting has reviewed the environmental sight assessments for the Great Wolf Lodge project site in Garden Grove, California. We are still working on the precautions to take during major grading and dirt disturbance but wanted to get you some preliminary information for your initial site activities that are not likely to result in significant airborne dust and soil disturbance.

The results of the site assessments performed on this site and supplied to Vista for review indicate minor contamination from lead and arsenic. The lead was primarily found in the ground water and the arsenic was identified in surface soils to two feet below ground surface. The arsenic was identified at levels that are near normal background for soils in California.

Initial activities such as surveying and potholing are not likely to create significant airborne dust or exposure issues with contamination levels at the levels reported. Vista does recommend the following:

1. Wash face and hands prior to eating.
2. Use gloves if having to handle the dirt.
3. Brush off boots/shoes prior to leaving the site.
4. Water should be utilized to reduce airborne dust should winds create significant dust.

If you should have any questions please feel free to contact me on my mobile at 213.440.3128.

Michael Cardone  
Project manager  
Certified Asbestos Consultant #01-3025  
CDPH Lead Certification #LRCIA/LRCM-5485

March 25, 2014

Mr. Paul Costa  
Senior Project Manager  
Turner Construction Company  
1900 S. State College Blvd., Suite 200  
Anaheim, California 92806

**RE: Great Wolf Lodge – Work Practices for Soils & Waters with Low-Level Arsenic & Lead Contamination.**

Dear Mr. Costa:

VISTA Environmental Consulting (VISTA) has reviewed the environmental site assessments for the Great Wolf Lodge project site in Garden Grove, California. Based upon the information in the reports provided to VISTA we have developed procedures to use whenever soils are being graded, excavated or moved, and when working with ground water on the site.

**Report Review Summary**

Based upon the data provided in the final Phase II Report, June 2012, Revised December 2012 by Phase One, Inc. the highest concentration of arsenic in the soils was 10.4 mg/Kg (ppm) and the highest lead in ground water was 13.9 ug/L (ppb).

These levels of contaminants are not uncommon within California. Per the California Department of Toxic Substance Control (DTSC) the average or normal background level of arsenic in surface soils throughout California is 12 mg/Kg which is well above the EPA soil screening level of 1.6 mg/Kg for industrial soils. This background level is a result of both naturally occurring arsenic and from the extensive past use of arsenic for pest control. The concentration of lead detected in the ground water is also common within California, but is still below the EPA lead in drinking water standard of 15 ug/L.

The concentrations of arsenic and lead detected do not indicate the need for any special disposal requirements but there may be additional requirements for the discharge of the ground water to the sanitary sewer or storm drain.

The following is a summary of the highest detected concentrations of arsenic and lead and their various regulatory limits.

Contaminant	Detected in: Soil or Water	Highest Detected Concentration	EPA Screening Level	Normal Background Level	EPA Drinking Water Standard	Cal/OSHA PEL <sup>1</sup>
Arsenic	Soil	10.4 mg/Kg	1.6 mg/Kg	12 mg/Kg	N/A	0.01 mg/m <sup>3</sup>
Lead	Water	13.9 ug/L	15 ug/L	5 – 30 ug/L	15 ug/L	N/A

<sup>1</sup> PEL – Permissible Exposure Limit: The highest concentration that a worker can be exposed to, based on an 8-hour time weighted average (TWA), 40 hours per week over a normal working lifetime without suffering adverse health effects.

The primary routes of exposure to both arsenic and lead are ingestion and inhalation.

### **Work Practices**

These work practices have been developed to help minimize potential worker exposure to lead and arsenic.

#### ***Lead in Ground Water***


1. The untreated ground water at this site should not be consumed or ingested.
2. Direct skin contact should be limited and gloves and other protective equipment should be used as appropriate to prevent workers from getting large amounts of water on their clothing or skin, especially facial areas.
3. Prior to eating, using the restroom, applying makeup or leaving the job site, workers who come in contact with the ground water should wash their face and hands. Wash Stations should comply with 8 CCR 1527.

#### ***Arsenic in Soil***

1. Water should be used for dust control whenever soils are being graded, excavated or moved. Limiting the amount of airborne dust is the most important factor in limiting worker exposure to arsenic in the soil.
2. Where feasible, workers should avoid standing downwind of operations that result in significant airborne dust.
3. Direct skin contact should be limited and gloves should be worn during direct contact with the soil.
4. Wash face and hands prior to eating, using the restroom, applying makeup or leaving the job site.
5. Brush/wash off boots/shoes prior to leaving the site.
6. Worker exposure air monitoring should be performed in accordance with 8 CCR 5155 during the early grading and excavation operations to verify the effectiveness of the engineering controls such as wetting and to determine if respiratory protection is required.

These procedures are recommended, not only for this project, but for all similar projects where there is a potential for employee exposure to airborne dust.

If you should have any questions please feel free to contact me on my mobile at 213.440.3128.



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