

GLOBAL LIFESCI DEVELOPMENT CORPORATION

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November 16, 2017

VIA Email (James.Carroll@Maryland.gov & Edmon.Larrimore@Maryland.gov) & FedEx

Mr. James Carroll, Program Administrator, Land Restoration Program
Mr. Edmon Larrimore, Program Administrator, Mining Program
Maryland Department of the Environment
1800 Washington Boulevard
Baltimore, MD 21230-1719

Re: Percontee Cherry Hill Road Sand and Gravel Quarry Site – White Oak, Maryland

Dear Mr. Carroll and Mr. Larrimore:

Thank you and your colleagues for all your time, consideration, and efforts relating to our planned repurposing of this former industrial site to a newly master planned and entitled mixed-use development creating a strategic biomedical and biotechnological global innovation hub, in association with and adjacent to the US FDA Headquarters in White Oak, Maryland.

Global LifeSci Development Corporation (GLDC) has engaged Arc Environmental (Arc) to analyze the repurposing of the Percontee Cherry Hill Road Sand and Gravel Quarry (Site) to comply with all environmental laws and regulations, as required by the Maryland Department of the Environment (MDE). In connection with Percontee's reclamation and closure of its existing permitted mining operations at the Site, this letter specifically requests MDE to confirm the protocols and procedures outlined in this letter regarding the proposed use of the remaining processed and to-be-processed concrete as subgrade structural fill; but only within the boundaries of the Site, and only in accordance with the proposed Comprehensive Remedial Action Plan (RAP), a draft of which GLDC submitted to MDE in August 2017. GLDC's use of the recycled concrete is needed to close out the current mining operations, reclaim the land to developable grade, and repurpose and redevelop the Site.

Without the use of the remaining processed and to-be-processed concrete on-site, the redevelopment of the Site for the intended mixed-use biomedical global innovation hub is not financially feasible or viable.

The following facts are relevant to this request for MDE's confirmation of our proposed protocols and procedures:

1. Percontee discontinued accepting any and all building demolition and concrete debris effective as of December 31, 2015. Accordingly, only the existing processed and to-be-processed concrete material that is currently on-site would be used for the proposed subgrade structural fill on the Site.
2. Percontee employs a full time operator, who is solely responsibility for sorting out asphalt deposits and unsuitable fill from the raw concrete material. All of the sorted asphalt and unsuitable fill material is stockpiled separately, and then hauled off-site to appropriately licensed solid waste disposal facilities. Accordingly, the asphalt deposits and unsuitable fill materials would not be used on-site as part of the structural fill.
3. The remaining sorted concrete material is separated and crushed to create RC-6 engineered fill similar to CR-6.
4. Approximately 90,000 tons of material has been processed and currently stockpiled, and approximately 400,000 tons of unprocessed material will be processed (to remove the asphalt deposits and unsuitable fill material) over the next 18-24 months. Any of this processed or to-be-processed concrete material would be used on-site only up to planned subgrade elevations.
5. Percontee currently has a mining and reclamation permit, which expires in 2022. In preparation for the Site's redevelopment, Percontee will close out their decades old mining permit and reclaim the Site to a developable grade. This reclamation process will require considerable fill and regrading operations. Percontee intends to utilize the combined approximately 490,000 tons of processed and to-be-processed concrete, and move approximately 1,000,000 cubic yards of soil, to reclaim and regrade the Site.
6. No fee simple residences are planned for the redeveloped mixed-use biomedical global innovation hub, and all of the Site would be governed by and subject to the procedures set forth in the to-be-finalized RAP.

To facilitate the repurposing of this formerly zoned industrial site to the currently master plan zoned and entitled mixed-use development for a strategic biomedical and biotechnological global innovation hub adjacent to the US FDA Headquarters, GLDC requests MDE permit GLDC to undertake the following actions with regard to the approximately 490,000 tons of remaining processed and to-be-processed concrete:

1. We request MDE permit GLDC to continue the sorting and processing of its current concrete on-site (removing the asphalt deposits and unsuitable fill materials, which would continue to be hauled off-site to appropriately licensed solid waste disposal facilities), and reclaim the Site (on a strategically phased basis, according to market demands for the phased redevelopment of Site) as expeditiously as possible to close out the mining permit and prepare the Site according to those strategic phases for redevelopment. GLDC affirms that Percontee discontinued accepting any and all building demolition and concrete debris effective as of December 31, 2015 and that only the existing processed

and to-be-processed concrete material that is currently on-site shall be used for the proposed subgrade structural fill material.

Percontee is employing a full time operator, who is solely responsible for sorting asphalt deposits and unsuitable fill from the raw concrete material into a separate stockpile. The material in this stockpile is destined for offsite disposal at an appropriately permitted disposal facility. In the event the Percontee operator identifies fill material displaying unusual visual or olfactory characteristics that are different from the surrounding materials, the operator or other qualified personnel shall use a photo ionization detector (PID) to field screen the material prior to placement in the separate stockpile above.

The unsuitable material collected in the separate stockpile shall be transported to a permitted disposal facility and Percontee shall provide the Department with weigh tickets, manifests or other appropriate documentation demonstrating the proper disposal of the material.

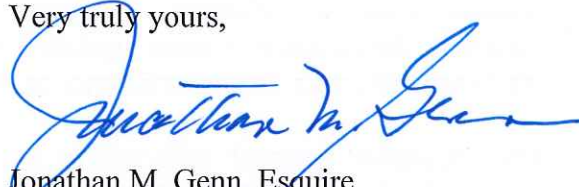
2. We request MDE permit GLDC to use the processed and to-be-processed concrete (which would have the asphalt deposits and unsuitable fill material removed) as subgrade structural fill (but use only on-site), without the need for any further soil sampling, testing, characterization, or pre-use approvals from MDE, so long as: (1) all areas of the Site where the recycled concrete material is used as subgrade structural fill are fully and properly documented for future reference in the event those areas are sampled at a later date; and (2) prior to any portion of the Site being sampled, tested, and characterized pursuant to the procedures of the RAP, no further use of the recycled concrete material shall be permitted at that portion of the Site, unless MDE expressly authorizes its use under the explicit provisions of the RAP.
3. GLDC acknowledges and agrees that a Capping Remedy, as set forth in the to-be-finalized RAP, may become necessary to address any impacts as a result of the past and current reclamation activities.
4. GLDC also acknowledges and agrees to provide the Mining Program with a revised reclamation plan for the Site showing grading and proposed contours. The revised reclamation plan should include a description of the projected use of the recycled concrete and include the depth(s) of the concrete to be utilized as being sub-grade and/or below any Capping Remedy. The submission of the revised mining reclamation grading plan will occur within 45 days and prior to any reclamation activities utilizing the concrete at the facility.

GLDC further proposes to create an online internet website (proposed to have the domain name "PerconteeReclamationPlan.com"), which would be an online public repository of all relevant documentation, reporting, and other information relating to the reclamation activities (including the use of on-site recycled concrete material as structural fill) and the closure of the existing permitted mining activities on the Site.

We request confirmation (including specific confirmation from the Land Restoration Program, the Mining Program, and the Solid Waste Program) that these proposed protocols and procedure are acceptable to and permitted by MDE.

Please feel free to contact me, if you or any of those copied on this letter have any questions or comments.

Very truly yours,



Jonathan M. Genn, Esquire
Executive Vice President & General Counsel

cc: Ed Dexter, Program Administrator, Solid Waste Program (Ed.Dexter@Maryland.gov)
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