

1. Introduction

Pursuant to WAC 173-303-515(9) and WAC 173-303-610(2) and (12). Whatcom County submits a closure plan for the Plantation Rifle Range Facility as follows:

This Closure Plan is for closure of the two outdoor rifle ranges that have operated as unpermitted hazardous waste landfills at the Plantation Rifle Range Facility. The Plantation Rifle Range is located at 5102 Samish Way in Bellingham, Washington (Figures 1 and 2). This Closure plan accomplishes the following as required under WAC 173-303-120 and WAC 173-303-610(2).

- **Closure performance standard.** Establishes the closure performance standard in WAC 173-303-610(2)(b)(i) for closure of the waste management units and identifies criteria for satisfying the closure performance standard through removal and disposal of waste soil that exceeds the Model Toxics Control Act's (MTCA) Method B soil cleanup levels for lead and other contaminants. Since soil contamination has been found at the Plantation Rifle Range, a separate sampling and analysis plan (SAP) will be prepared to confirm whether remaining soils at the facility meet the closure performance standards required for soil in WAC 173-303-610(2)(a). Any contamination discovered in groundwater, surface water, or contamination beyond the property boundary will be deferred to corrective action.
- **Waste Removal.** Provides an estimate of the maximum inventory of waste on-site during the active operation of the units; provides a detailed description of the methods to be used during closure for removing, transporting, treating, storing, and/or disposing of all lead wastes and residues; and identifies the type(s) of on-site waste management units to be used during closure activities.
- **Decontamination Procedures.** Provides a detailed description of the steps needed to demonstrate that soils remaining after excavation meet MTCA Method B levels. Also identified is how soils with contamination over MTCA Method B levels will be removed and disposed.

1.1 Facility Contact Information

The facility operator is Whatcom County, Parks and Recreation and the facility is managed by Christ Thomsen. Telephone: 360-778-5850. Email: cthomsen@co.whatcom.wa.us Mailing address: 3373 Mount Baker Highway, Bellingham, WA 98226-7500. The Washington Department of Ecology (Ecology) project manager for the Plantation Rifle Range Facility is Val Cramer.

1.2 Facility Description

The Plantation Rifle Range (PRR) facility is currently closed. From 1971 to November 1, 2022,

PRR operated an outdoor high power rifle range, indoor and outdoor small-bore rifle and pistol ranges, and a trap field. The two outdoor rifle ranges contain spent lead shot and bullets. Bullets and debris were not collected and removed from the range surface. When in operation PRR's primary activity is to provide practice and training areas for rifle and handgun marksmanship. The facility is used by law enforcement and sports enthusiasts.

The EPA/STATE ID number for PRR is WAH000005306.

PRR is operated by Whatcom County Parks and Recreation on property leased from Bertch Timberlands, LLC.

Due to failure to adhere to the operation and maintenance requirements in accordance with best management practices for lead at outdoor shooting ranges, Ecology determined that PRR contains an unpermitted, unlined landfill. PRR has two Dangerous Waste Management Units (DWMUs), one encompassing the area of the high-power rifle range (DWMU-2), and the other, the area of the small-bore rifle and pistol range (DWMU-1).

1.3 Facility History, Function, Location, and Layout

From 1971 to present, PRR has been operated by Whatcom County Parks and Recreation on property leased from the current landowner is Bertch Timberlands. PRR did not apply for a Hazardous Waste treatment, storage, and disposal facility (TSDF) permit as required by RCRA after 1980 to land dispose hazardous waste.

Below is a summary of Ecology's and Whatcom County's interactions regarding the PRR:

- Pursuant to a June 1, 1998 notification, Whatcom County Parks and Trillium Corp (previous property owner) were issued identification number WAH000005306 by Ecology.
- On June 1, 1998, Whatcom County Parks notified Ecology of PRR's dangerous waste management activities. In the notification, Whatcom County Parks identified PRR as a medium quantity generator under Washington State's generator status. On January 15, 1999, Whatcom County Parks revised their notification to identify Plantation Rifle Range as a small quantity generator in Washington State. Within the 2000 and 2001 notifications to Ecology, Whatcom County Parks stated no dangerous waste was generated at PRR. The Facility withdrew the RCRA Site ID Number in 2001.
- On November 13, 2017, Ecology compliance inspectors conducted a dangerous waste compliance evaluation inspection at the PRR Facility. During that inspection, Ecology determined that the Whatcom County Parks and Recreation did not manage wastes from the indoor or outdoor ranges in a manner that was protective of human health and the environment. In a December 11, 2017 Notice to Comply, Ecology notified the County of violations of the Dangerous Waste regulations that Ecology observed during their November 13 inspection and the actions the Rifle Range needed to undertake to come into compliance. Ecology issued a delinquent letter on March 6, 2018, as the Rifle Range did not return to compliance within a specified timeframe.

- On January 7, 2020, Ecology received an anonymous complaint through Ecology's online Environmental Reports Tracking system (ERTS #695524). The complaint described and demonstrated with photos how water from extremely heavy rains was flowing across the outdoor high power rifle range.
- On January 9, 2020, Ecology inspectors conducted a second compliance evaluation inspection at the Facility. During that inspection, Ecology inspectors observed abandoned projectiles and other waste debris that had accumulated at the range and near Ruby Creek. Ecology confirmed the complaint and observed water had flooded the range, with threatened releases of lead and hazardous materials into Ruby Creek. Two surface water samples collected from Ruby Creek indicated lead concentrations exceeding MTCA standards and acute and chronic Water Quality regulatory standards, calculated relative to measured hardness values (WAC 173-201A-240). On April 29, 2020, Ecology mailed a Compliance Report, requiring Whatcom County Parks to meet specific items of non-compliance within the extended deadline. As Plantation Rifle Range did not return to compliance within the extended deadline, Ecology issued a delinquent letter on September 9, 2020.
- Ecology inspectors conducted a follow-up inspection of the Facility on October 14, 2020. The inspectors observed the impact berms were failing due to lack of maintenance.
- On April 29, 2021, Ecology inspectors attended a Whatcom County Parks sampling event at the Facility. Ecology's soil sample results determined the material was designated as dangerous waste per the Dangerous Waste regulations (WAC 173-303).
- Whatcom County Parks and Ecology entered into an Expedited Settlement Agreement on September 28, 2022. The settlement agreement outlines actions Whatcom County Parks must take to resolve the outstanding inspection findings at the Facility.

PRR has accumulated an unknown amount of lead hazardous waste on the surface and subsurface of both the outdoor high-power rifle and small-bore rifle/pistol ranges.

1.4 Products and Production Processes

The outdoor ranges feature shooting stations and target lines. Most spent bullets accumulate in and around target areas. However, the ranges were also used for trap shooting and law enforcement practice maneuvers that deposited lead in non-target areas. Extensive site sampling will be performed as the first step of this closure plan to delineate the extent of the waste units at the large and small outdoor ranges.

The small range has dimensions of approximately 2,500 ft x ft and, The large range has dimensions of approximately 200,000 ft x ft.

1.5 Waste Management and Units

Wastes were not properly managed at this facility in accordance with requirements for shooting ranges. The EPA guidance requires that bullets and shot be removed from range surfaces and impact berms at least once per year for recycling or disposal.

Marksmanship was practiced by range users and the spent bullets or shot were abandoned on the range surface. Over time, as annual rains softened soil, the heavier lead projectiles sank beneath the range surface. Site sampling will determine the lateral and vertical extent of lead contamination so that excavation and disposal can occur to achieve closure. After the landfill units are closed, they may be reopened by the county and operated according to EPA BMPs for rifle ranges to prevent future contamination.

1.6 Unit Description

DWMU-1 --- Small bore range (Figure 3)

Small range size = 2,500 ft x ft (approx.)

Dates of operation = mid-1970s to present

Target locations = Five target stations

Impact berms= One impact berm

DWMU-2 --- Large bore range (Figure 4)

Large range size = 200,000 ft x ft (approx.)

Dates of operation = 1971 to present

Target locations = 50, 100, 200, and 300 -yards target lines

Impact berms = 50 and 300-yard target lines

Current Maximum Waste Inventory

$202,500 \text{ ft}^2 \times 1 \text{ ft} = 202,500 \text{ ft}^3 * 30\% = \text{Approximately } 70,000 \text{ ft}^3 \text{ of maximum waste}$

2. Closure Performance Standard

Implementation of this closure plan will require excavating the surfaces of the DWMU-1 and DWMU-2 until floor and sidewall soils meet MTCA Method B cleanup levels for all contaminants. These units will be closed in a manner that complies with the performance standards in WAC 173-303-610(2)(c)(ii). The closure performance standard in -610(2) will be addressed after completion of the work being planned as an interim action. The closure of the soils at the facility includes characterizing the lateral and vertical extent of contamination, and removal and disposal of the affected soil and waste from the site. If the site wishes to reopen after closure of the dangerous waste management units, they must implement the BMPs for rifle ranges as outlined by EPA in "[Best management practices for lead outdoor shooting ranges](#)". The operator has stated it is their intent to reopen if they can afford to manage the facility according to the BMPs.

The objectives for this Closure Plan for PRR's DWMU-1 and DWMU-2 are as follows:

(1) Minimize the need for further maintenance; (2) Control, minimize, or eliminate, to the extent necessary to protect human health and the environment, the post-closure escape of lead into the ground, surface water, ground water, or to the atmosphere; and (3) Remove all waste and waste residues from the above DWMUs and properly recycle or dispose of it offsite.

The closure will use the MTCA Method B lead cleanup levels as the “Alternative Treatment Standard” to demonstrate that the remaining floor and sidewalls of the rifle range DWMUs meet MTCA risk based standards. Soils determined to be hazardous waste will be characterized, designated, and sent to a local federally regulated TSDf or permitted solid waste landfill, as appropriate, as prescribed in the SAP. Field tests will be used (for example, XRF) to determine the extent of the excavation area. Confirmational samples will be taken after excavation is complete.

Groundwater will be sampled when encountered during the closure process. The data obtained during closure activities will be evaluated by Ecology to determine whether corrective action is needed to address groundwater, surface water, or sediment contamination. In addition, the potential for soil contamination and contaminated groundwater migration outside of the DWMUs and/or outside the property boundary will be assessed.

3. Closure Activities

To remove soil in the DWMUs that exceeds MTCA Method B lead levels and to meet the closure standards of Section 2, the closure activities listed below will need to be performed.

- Grid DWMU-1 and DWMU-2 into 10-foot sections and sample each section with XRF.
- Collect direct push probe samples to confirm XRF surface results and to determine contaminant depth- send samples to laboratory for analysis.

After extent and depth of contamination are established, excavate the dangerous waste soils and place them in a lined roll-off container for transport to a Subtitle C landfill. Soils below dangerous waste levels for lead will be separately sent to a Subtitle D landfill. If there are areas where the lead shot can be separated from soil, lead will be sent for recycling.

3.1 Removal of Wastes and Waste Residues

All wastes and residues in DWMU-1 and DWMU-2 will be removed using the following procedure.

- (1) The outline of the area to be excavated will be indicated on the ground surface with utility locator spray paint.
- (2) Excavation equipment suited to the size of the area will be used to excavate to the depth indicated necessary by the sample analysis.
- (3) All waste material will be collected and disposed of as hazardous waste.
- (4) The remaining floor and sidewalls will be sampled to ensure that MTCA Method B cleanup levels have been reached.

The contractor performing the work for PRR will sample and analyze waste in compliance with all federal, state, and local regulations in effect at the time of closure. See Table 1 for further details.

3.2 Decontamination

Excavation Equipment

Exterior metal surfaces of the excavation equipment will be decontaminated using water washing and spraying until they meet the clean debris surface standard.

"Clean debris surface" means the surface, when viewed without magnification, shall be free of all visible contaminated soil and hazardous waste except that residual staining from soil and waste consisting of light shadows, slight streaks, or minor discolorations, and soil and waste in cracks, crevices, and pits may be present provided that such staining and waste and soil in cracks, crevices, and pits shall be limited to no more than 5% of each square inch of surface area.

When decontamination is complete, the wash water used will be appropriately contained and disposed of off-site. An independent qualified registered professional engineer will certify excavation equipment is decontaminated to meet the clean debris surface standard and Ecology will then verify the closure certification.

The contractor working for PRR will sample and analyze waste products in compliance with all federal, state, and local regulations in effect at the time of closure.

3.3 Identifying and Managing Contaminated Environmental Media

Currently, the rifle range DWMUs do not have a containment system at their border. Soil and surface water contamination has been found at PRR. The contamination requires a draft SAP for soils and groundwater at the facility to determine the extent of releases. Confirmation sampling is also required to determine whether closure performance standards are met for soil and groundwater (WAC 173-303-610(2)(b)(i)). The SAP will address how data will be used to characterize and segregate contaminated media for appropriate management and disposal.

3.4 Confirming Closure for Soils

Within 60 Days of completing the closure activities, PRR or their contractor will submit a closure certification to Ecology by registered mail. The closure certification must certify that the dangerous waste storage units were closed in accordance with this approved closure plan. The facility owner/operator must sign the certification, and the "independent qualified registered professional engineer" (PE) responsible for overseeing the closure must sign and stamp the certification. A closure report will be provided to Ecology for review and approval.

When closure activities are complete, PRR anticipates that all wastes and waste residues will be removed, and the soil within the units will meet closure standards. PRR plans to return the rifle ranges to service upon approval by Ecology that the closure is complete. PRR will be implementing EPA's operating BMPs to prevent recontamination.

The PE hired by PRR or their contractor will confirm that the DWMUs identified in section 1.6 are decontaminated and meet the closure standard by sampling the floor and sidewalls of each

and sending the samples to a certified laboratory for analysis. Photos and field notes will be used to confirm that the proper samples were taken to demonstrate closure.

The PE's report of closure confirmation shall include a detailed summary of all decontamination activities, all field notes and photographs relating to closure activities, and the results of DWMU excavation inspections. The report will also include data from sampling and analytical activities, including documentation of sampling procedures, sampling locations, quality assurance/quality control and chain of custody, and analytical results. Documentation of the final disposition of all dangerous wastes and dangerous waste residues, including contaminated media, debris, and all treatment residues will be included with the closure report.

3.5 Sampling and Analysis Plan

3.5.1 SAMPLING AND ANALYSIS PROCEDURES

This section covers sampling and analysis procedures for closure. The purpose and objectives of sampling procedures, sampling protocols, responsibilities, and project schedule are described in this section. Table 1 provides detail on each DWMU as to its size, historical usage and the appropriate analysis.

3.5.2 PURPOSE AND OBJECTIVE

Excavation equipment rinsate will be sampled and analyzed to confirm equipment decontamination. Quality Assurance and Quality Control activities ensure that the sampling and laboratory actions will result in data of sufficient quality. Ecology will provide the County a project Quality Assurance Project Plan (QAPP) that will be incorporated as an appendix to this Exhibit.

3.5.3 RESPONSIBILITIES

Coordination of sampling and analysis activities will be conducted by the Plantation Rifle Range's project manager. The closure procedures will be overseen by the Ecology project manager, ensuring work is done safely is the responsibility of the contractor hired by Ecology to perform the sampling and removal activities.

3.5.4 PROJECT SCHEDULE

Sampling activities will occur before the closure action to determine the lateral and vertical extent of excavation needed. It is estimated to take until April 2023 to complete all sampling activities for DWMUs 1 and 2. The excavations will be planned and equipment reserved from April-May, excavation and disposal occurs in June 2023. The closure phase of work must be complete by August 30, 2023.

3.5.5 SAMPLING PROTOCOLS

The Health and Safety Director reminds the sampler of the risks involved with sampling activities and ensures proper protective equipment is utilized. Both DWMUs will be divided into

grids measuring 10 feet x 10 feet to allow for surface characterization. The XRF analyzer will be operated in ‘point and shoot’ mode to determine lead levels for that grid’s surface. One grab sample per each 10-foot grid will be obtained and placed in a four ounce glass sampling jar with a Teflon lid. Each grid’s sample will be uniquely identified by the DWMU and grid number

Ten percent of the grab samples will be randomly selected for lab analysis to confirm the XRF data. Samples will be collected and analyzed to ensure representative and reliable results. To demonstrate this, rinsate blanks will be obtained to determine if decontamination procedures have been sufficient. Also, field blanks will be obtained from the laboratory and opened on-site to assess sampling methods and lab procedures. Each sample will be analyzed via standard methods and Quality Assurance and Quality Control (QA/QC) activities will include a field notebook maintained by the PE.

The following Soil Sampling Equipment will be present on-site.

- Sampling Plan
- Safety equipment, as specified in the Health and Safety Plan
- Tape Measure
- Camera
- Stainless steel buckets or bowls
- Sample equipment (stainless steel sampling equipment or disposable one-time sampling equipment)
- Sample containers
- Zip lock bags
- Logbook
- Labels
- Chain of Custody forms
- Coolers
- Ice
- Portable multi-gas detector

Upon notification by the excavator that the soil excavation is complete, the excavators bucket or excavation tools will be decontaminated with water and the water collected. A sample of the final rinsate will be obtained as follows:

- Certified clean laboratory jars will be obtained and used throughout the sampling activities.
- Wear clean latex exam gloves for each sample.
- Collect final rinsate sample with deionized water.
- Record all information on the sample data sheet and logbook.
- Label the container with the appropriate sample tag.
- Place sample in iced cooler.

The samples will be transported to an accredited laboratory under chain of custody protocol for analysis. Table 1 indicates what analysis will be performed.

3.6 Role of the Independent Qualified Registered Professional Engineer

An independent qualified registered professional engineer will become familiar with PRR's closure activities by reviewing this closure plan, observing field activities and reviewing records. At a minimum, this will include field observation and a review of records of the following activities:

- (1) Removal of waste and disposition of waste to ensure the removal was complete and materials were properly disposed.
- (2) Decontamination procedures and results to ensure that the closure plan for decontamination was followed and the closure standard for decontamination was achieved - this will include inspecting the excavator after decontamination to confirm that a "clean debris surface" and other decontamination performance standards are achieved.
- (3) Management of decontamination residuals and removed soil and debris to ensure proper waste management was carried out.

When closure is complete, the independent qualified registered professional engineer will sign and stamp PRR's certification that all closure activities were conducted in accordance with the approved closure plan. If methods or materials deviated from the plan but were minor and equivalent the exceptions will be described in the closure report. Deviations from the closure plan that are not equivalent will be proposed in writing and will have prior approval by Ecology.

3.7 Certification of Closure

Within 60 days of closure of the rifle range DWMUs, PRR will submit to Ecology, by registered mail, certification that the units have been closed in accordance with this closure plan. The certification will be signed by PRR's owner. PRR's owner will make the following certification:

I certify under penalty of the law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing of violations.

The closure certification also will be signed and stamped by an independent qualified registered professional engineer who is familiar with PRR's closure activities.

PRR will submit the following information to support its closure certification:

- (1) All field notes and photographs related to closure activities, including the results of the

RFA to define the units' capacity and results of confirmational (floor and sidewall) sampling, and minor deviations deemed equivalent by the PE to the approved closure plan.

(2) A description of any non-minor deviations from the approved closure plan and justification for these deviations and the documentation of approvals by Ecology.

(3) Documentation of the final disposition of all wastes and waste residues, including contaminated media, debris, and all treatment residuals.

(4) A description of what the unit area looks like at completion of closure, including a description of what parts of the former unit, if any, will remain after closure.

3.8 Conditions That Will Be Achieved When Closure Is Complete

The conditions that will be achieved at closure include removing soils from DWMU's 1 and 2 so that remaining sidewall and floor soil meet MTCA method B standards. These units will be closed in a manner that complies with the performance standards in WAC 173-303-610(2)(b)(ii). The closure performance standard in -610(2) will be addressed after completion of the work being planned in the SAP. The closure of the facility anticipates the characterization and removal of a majority of each range's soil surface. It is anticipated that the facility will reopen in a similar configuration but follow EPA's operation BMPs for rifle ranges to avoid recontamination.

4. Closure Schedule and Timeframe

4.1 Closure Schedule

The facility is closed for operations and intends to complete closure in accordance with this plan as soon as it is approved by Ecology. PRR will complete closure activities in accordance with the approved closure plan within 180 days. PRR will submit closure certification to Ecology within 60 days following completion of closure activities at each closing unit and/or completion of final facility closure.

5. Cost of Closure

5.1 Closure Cost Estimate

The information presented in this section for implementing the Closure Plan has been prepared in accordance with WAC 173-303-620(3). The following assumptions were used in developing the cost estimate:

- (1) A third party will be used to conduct closure activities.
- (2) The maximum waste volume will be present on site and managed during closure.
- (3) Salvage value salable product is not included in the closure cost estimate. The salvage value for recyclable lead was not used because the lead is thoroughly mixed with soil.
- (4) Costs will be incurred for management of wastes handled during closure. Closure certification activities will be conducted by an independent qualified registered professional engineer registered in Washington State and a certification that closure has been done in accordance with the approved closure plan will be submitted to Ecology as required in WAC 173-303-610(6).

The closure cost estimate will be adjusted annually for inflation as specified in WAC 173-303-620(3)(c)(i) and (ii). Costs for closure labor, equipment, and analytical services are based on currently available rates. At the time of implementation of this Closure Plan, PRR reserves the option to use any appropriately-permitted facility for disposal or recycling of wastes.

The cost estimate for closure of the recycling unit at PRR is presented in Appendix B, along with a more detailed breakdown of the cost estimates.

5.2 Financial Assurance for Closure

Whatcom County will meet the financial assurance requirements specified under WAC 173-303-620(4) through continual maintenance of a financial assurance mechanism for closure with Ecology. The amount of the mechanism will be no less than the closure cost estimate provided in Appendix B of this Closure Plan. PRR will provide documentation of financial assurance in at least the amount of the current cost estimate, as required by WAC 173-303-620(4) and (10). PRR has chosen to use a trust account as its financial assurance mechanism for closure. Ecology shall be named as a secondary beneficiary on the trust account. Details of the financial assurance insurance policy for closure are provided in Appendix C.

5.3 Financial Assurance for Liability

PRR will meet the financial assurance requirements for specified under WAC 173-303-620(8) through an insurance policy. Details of the insurance policy are provided in Appendix C.

6. Figures and Tables

Figure 1: Plan view of facility showing all locations where waste is managed.

Table 1 Individual DWMU Detail and applicable analysis.

7. Appendices

Appendix A: Closure Cost Estimate

Appendix B: Financial Assurance for Closure through a Trust Account

Appendix C: Financial Assurance for Liability through Property Casualty Insurance policy

Appendix A

Project Management

- Assume 80 hours at \$200 per hour \$20,000

In late January, 2023:

Have contractor grid site and collect soil samples from each 10'x10' square (100 ft²):

Assumptions:

- Site is approximately 211,000 ft². Therefore, $211,000/100 = 2,110$ primary samples.
- Assume 10% duplicate rate. $2,110 \times 0.1 = 211$ duplicate samples.
- Assume 20 trip blanks, 20 field blanks, and 20 rinsate samples = 60 QA/QC samples.
- Total samples = $2,110 + 211 + 60 = 2,381$ samples

Team of 4 people, about two weeks, plus equipment = \$200,000

- Assumes one discrete surface soil sample per grid. If composite sampling or multi-incremental sampling is required, more funds needed.

Send initial samples for analysis at end January, expect results by March 2023, to determine hotspots

Sample analysis = \$40,000

Data validation = \$20,000

Summarize Sampling Results = \$15,000

Hot-spot sampling occurs in late March 2023

Planning second round of sampling activities = \$30,000

Further sampling at depths in the 6 "hot spots" (there may be more than 6 hotspots, decide after seeing initial results how many hotspots to prioritize)

- Collect samples in 4, evenly spaced locations within the hotspot at: 1) the surface, 2) 6"-sub surface, 3) 12"-subsurface, 4) 24"-subsurface, and 5) 36"-subsurface;
- Assume 20 samples per "hot spot." Total of 120 primary samples. With duplicates and QA/QC samples, total of 140 samples.
- Once contamination removed, collect confirmation samples from sidewall and floor.

Team of 4 people, about two weeks, plus equipment = \$235,000

Sample analysis = \$60,000

Data validation = \$20,000

Hotspot sample results back by May 1, 2023, target soil removal for dry week in May, early June

Plan and schedule excavation for Summer/Fall 2023 = \$10,000

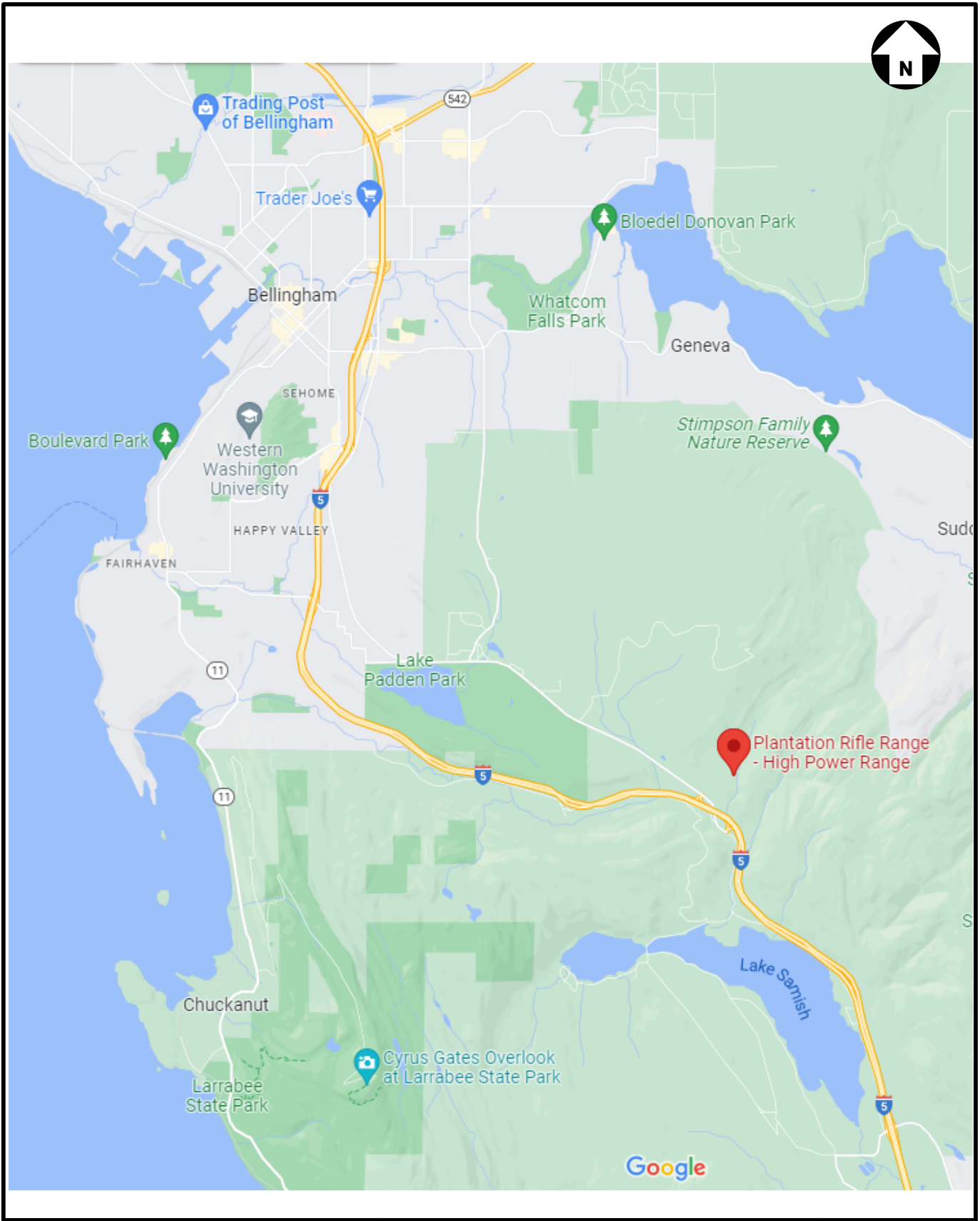
Final report of contamination, diagrams, and summary = \$50,000

Total Project

\$700,000

Soil from hotspots disposed of by mid-June 2023, earlier if there is a dry week to excavate in May 2023.

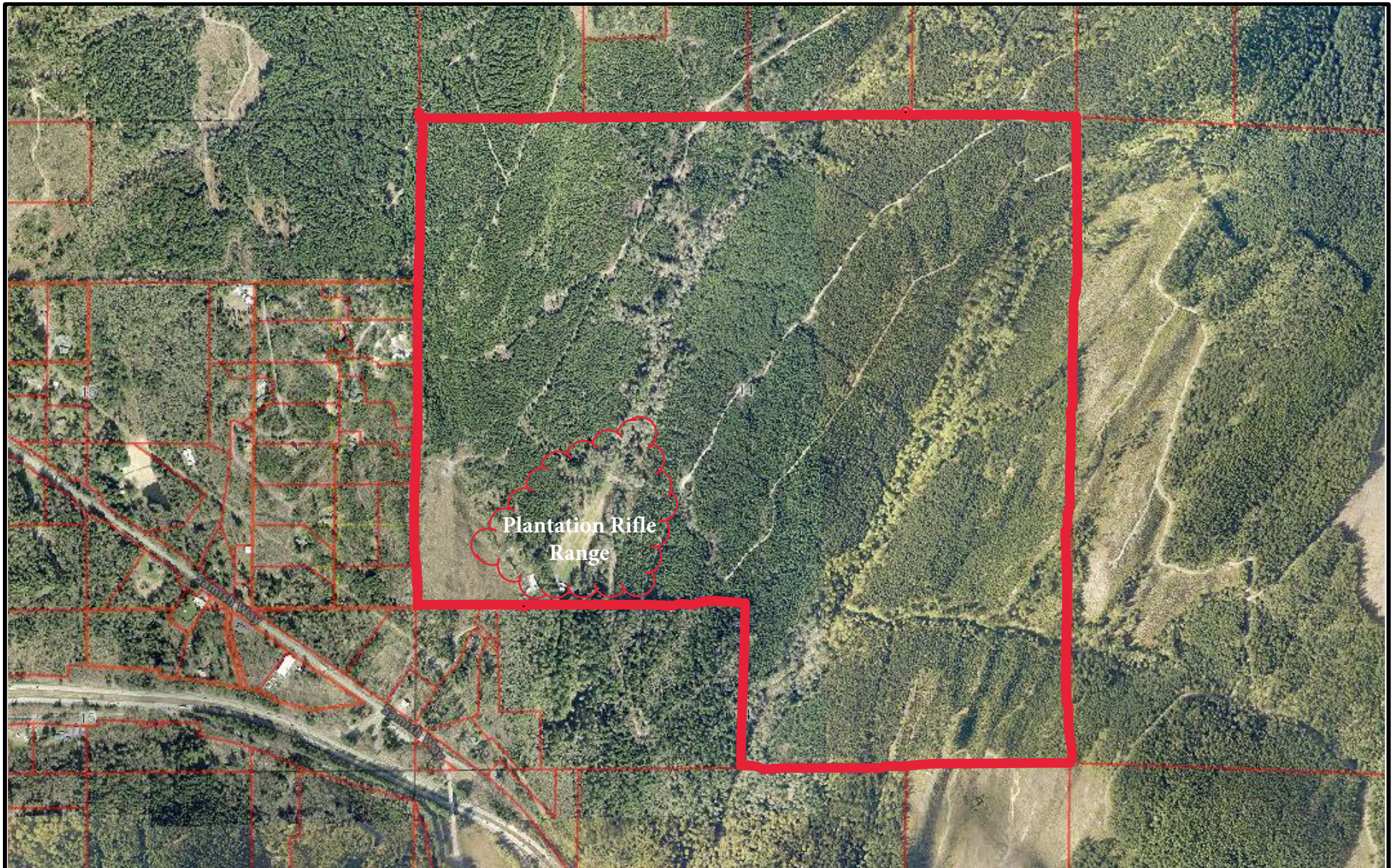
DWMU. (Capacity)	Previous Use(s)	Previous Contents	Current Use	Type of Bottle required	Appropriate analysis
Large range 300 yards	<ul style="list-style-type: none"> • none 	Contains shot, bullets, fragments,			<ul style="list-style-type: none"> •
Small range	<ul style="list-style-type: none"> • 				<ul style="list-style-type: none"> •
	<ul style="list-style-type: none"> • 				<ul style="list-style-type: none"> •
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Site Location

Plantation Rifle Range
 5120 Samish Way
 Bellingham, WA 98229

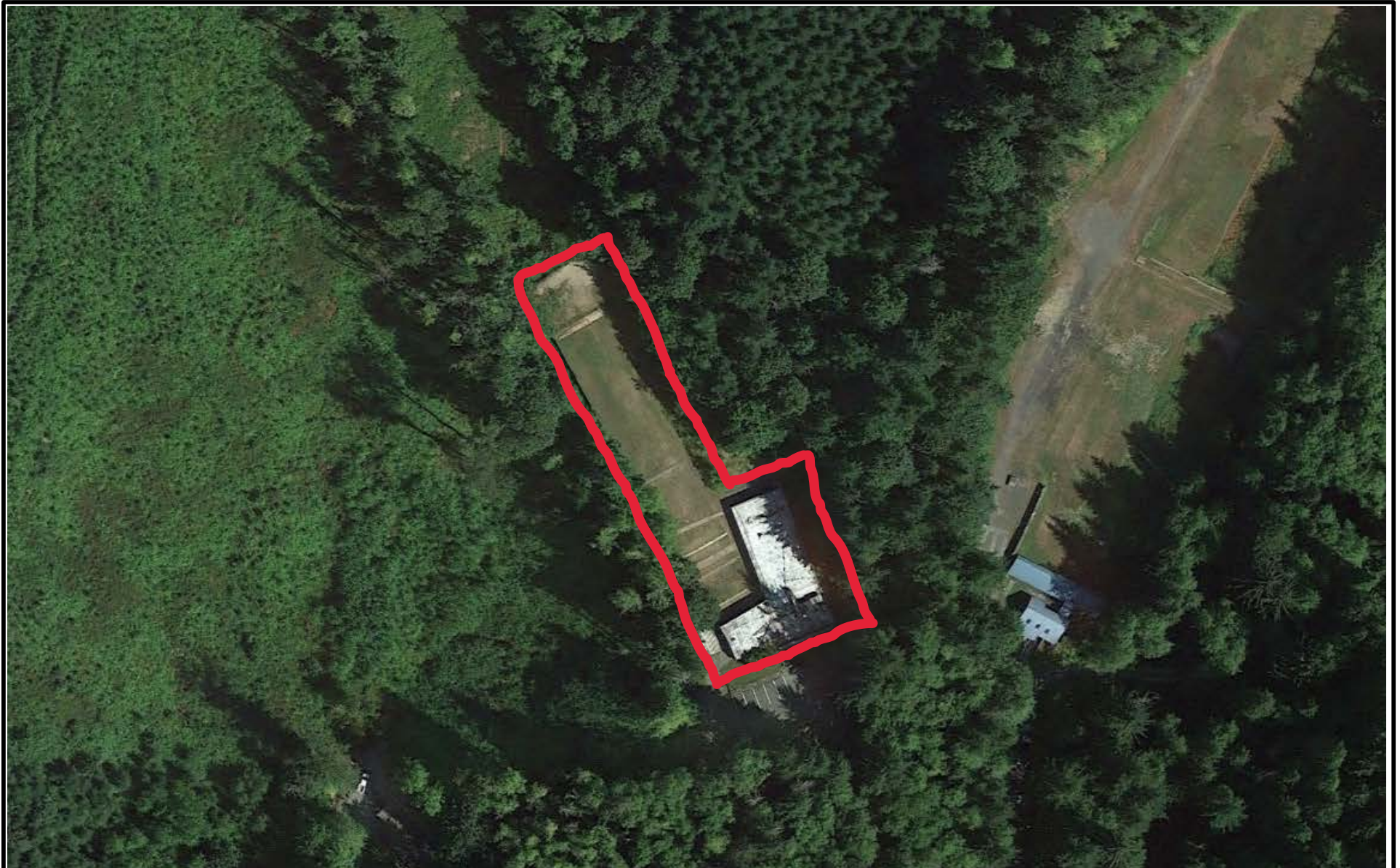
Figure
 1



Berth Timberland Property
Boundary
&
Plantation Rifle Range

Plantation Rifle Range
5120 Samish Way
Bellingham, WA 98229

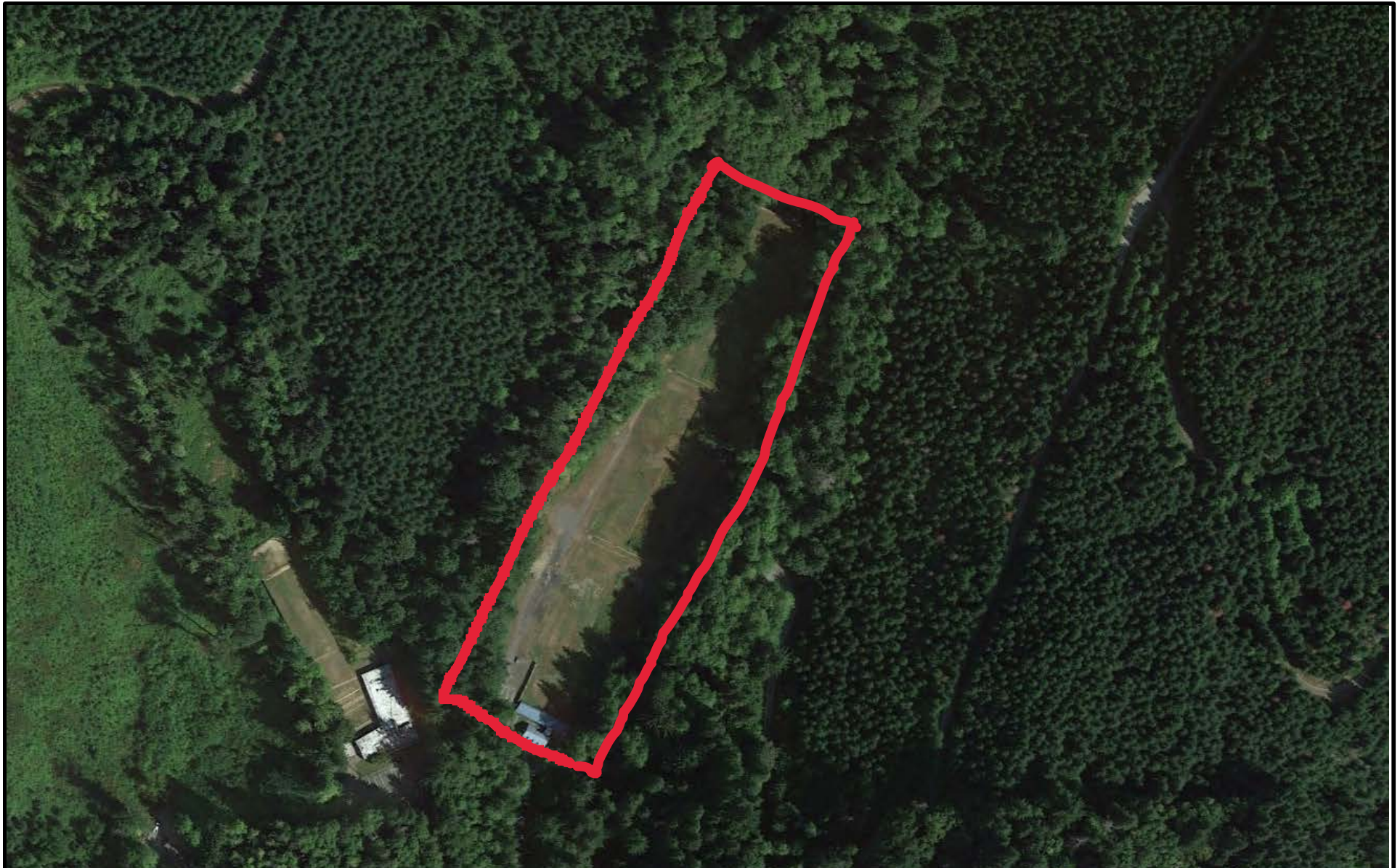
Figure
2



Approximate Area of
Small Bore Range

Plantation Rifle Range
5120 Samish Way
Bellingham, WA 98229

Figure
3



Approximate Area of
Large Bore Range

Plantation Rifle Range
5120 Samish Way
Bellingham, WA 98229

Figure
4