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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Southwest Region Office

PO Box 47775 • Olympia, Washington 98504-7775 • 360-407-6300

July 2, 2025

Tom Kirkman
Sunnydell Dryke Shooting Range
292 Dryke Road
Sequim, WA 98382
trkirkman@hotmail.com

RE: Draft Plan for Management of Lead Shot

- **Site Name:** Sunnydell Dryke Shooting Range
- **Site Address:** 292 Dryke Road, Sequim, Clallam County, WA 98382
- **Facility/ Site ID:** 1283666
- **Cleanup Site ID:** 3572

Dear Tom Kirkman,

The Washington State Department of Ecology (Ecology) received the draft "Plan for Management of Lead Shot," dated April 2025, via your email on April 3, 2025. This plan was requested by Ecology as part of our periodic review of the above referenced Site which determined that lead reclamation is not being conducted frequently enough at the Site to meet the intentions of the best management practices (BMPs) established in the Cleanup Action Plan (CAP). Ecology has reviewed the submitted "Plan for Management of Lead Shot," and provides the following comments.

Comment #	PDF Page #	Ecology Comment
1	2	Under item #3 (<i>Maintain soil pH between 6.5 and 8.5 in the shot fall zone</i>), it is stated that soil pH will be checked annually. The plan should also note what action(s) will be taken if pH is measured to be outside of the 6.5 to 8.5 range.

Comment #	PDF Page #	Ecology Comment
2	3	<p>It is stated that the Upper Pond is not amenable to raking. The lead management plan should be updated to include how lead accumulation will be addressed in the Upper Pond and at what frequency.</p> <p>To reduce the amount of pollution in the Upper Pond, Ecology recommends establishing additional BMPs. One BMP could be to use only non-toxic shot (i.e. shot that does not contain lead) in this shooting range area. In addition, as noted in comment #5, lead reclamation should be conducted at the Site, including in the Upper Pond area, by a professional contractor when financially feasible.</p>
3	3	<p>In addition to maintaining records for where hand raking occurs, and the amount of lead recovered; records should also be maintained for soil pH results and how many rounds each range user is firing. This will be beneficial in documenting the amount of lead deposited versus the amount of lead recovered and may be more accurate than assuming one shot per target.</p>
4	General	<p>The plan appears to follow the less conservative suggestion found in EPA's "Best Management Practices for Lead at Outdoor Shooting Ranges" (EPA-902-B-01-001) regarding when lead reclamation should be conducted (i.e. after accumulation of 2 pounds per square foot instead of after 250,000 targets have been thrown). However, per the plan, hand ranking will be conducted annually. Ecology agrees that this is an acceptable frequency.</p>
5	General	<p>Per an email received from Tom Kirkman on May 15, 2025, a lead reclamation contractor that visited the Site indicated that 60 tons of lead would be needed to make lead reclamation at the Site financially feasible. Please update the lead management plan to indicate that following accumulation of an estimated 60 tons of lead, lead reclamation will be conducted at the Site by a professional contractor. Lead accumulation should include both the amount that remains in the active shooting range areas and what has been collected via hand ranking and stored on Site.</p>

If you have any questions, please contact me at danielle.gibson@ecy.wa.gov or 360-409-6164.

Sincerely,

A handwritten signature in blue ink, appearing to read "Danielle Gibson".

Danielle Gibson
Site Manager/UECA Coordinator
Southwest Region Office
Toxics Cleanup Program

cc: Ellen Dryke, Sunnyside Dryke Shooting Range, ellendryke@hotmail.com
Tom Colligan, Consultant for Sunnyside Dryke Shooting Range, t_colligan@hotmail.com
Connie Groven, PE, Ecology, connie.groven@ecy.wa.gov
Ecology Site File