



PUBLIC PARTICIPATION PLAN

**Sunnydell Dryke Shooting Range
292 Dryke Road
Sequim, Washington**

Prepared by
Washington State Department of Ecology
Southwest Regional Office
Toxics Cleanup Program
300 Desmond Drive
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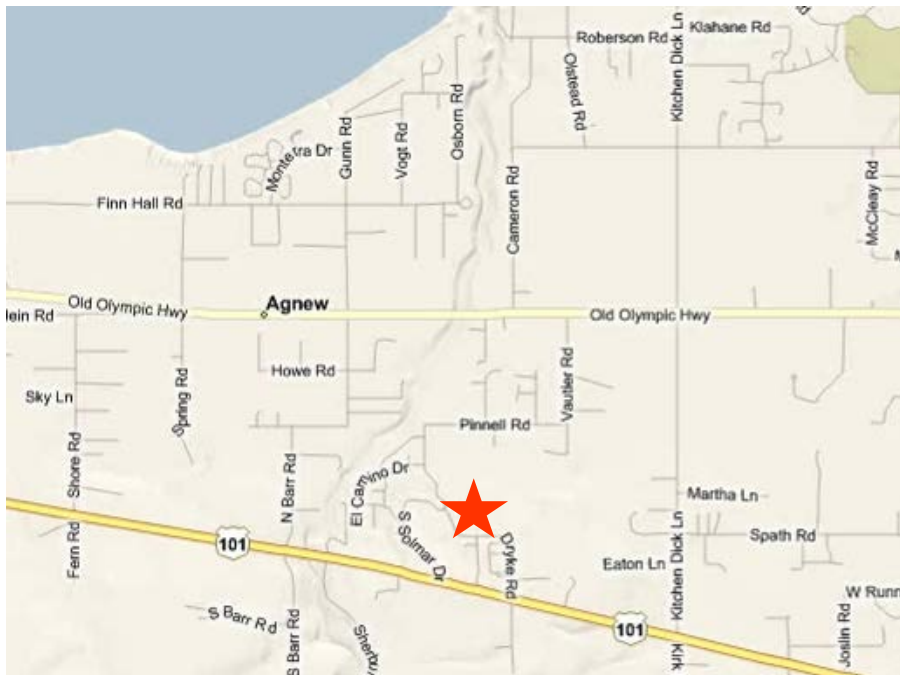
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INTRODUCTION

Public participation plans promote meaningful involvement during cleanups. This plan describes the tools the Washington State Department of Ecology (Ecology) will use to inform the public about and gather input on the Sunnydell Dryke Shooting Range cleanup.

SITE LOCATION

Sunnydell Dryke Shooting Range is located at 292 Dryke Road in Sequim. It is an active shooting range.



SITE BACKGROUND

The site has been a gun range since the 1960s. In 2004, Ecology received a complaint from a neighboring property owner about pond water being dumped onto their property and their trees dying as a result. Clallam County Department of Health and Human Services collected water and sediment samples from the site and found lead levels above state standards. Lead is a common contaminant at shooting ranges, coming from shells and bullets.

In 2009, Ecology and the property owners entered into an agreed order (legal agreement). The order required the owners to investigate contamination and evaluate cleanup options.

Investigations showed that soil and pond sediments are contaminated with lead from lead shot, and polycyclic aromatic hydrocarbons (PAHs) from clay targets. Some water samples from

Upper Pond, which is located in the middle of the property, had high levels of lead, which was likely due to sediment floating in the water during the sampling.

Description of Contamination

Lead – Lead is a metal that can be found in all parts of our environment. Much of it comes from human activities. In the past, lead was used as an additive in gasoline. It is especially harmful for children under age six. It can cause permanent damage to the developing nervous system and lead to behavioral problems.

Polycyclic Aromatic Hydrocarbons (cPAHs) – PAHs are a group of over 100 different chemicals formed during the incomplete burning of coal, oil, gas, garbage, or other organic (carbon-containing) substances. Humans can be exposed to PAHs by breathing them in air, by eating foods that have been grilled, and coming into contact with air, water, or soil at sites contaminated with them.

More information about these pollutants and their health effects is available at <http://www.atsdr.cdc.gov> and <http://www.epa.gov>.

CURRENT ACTIVITY

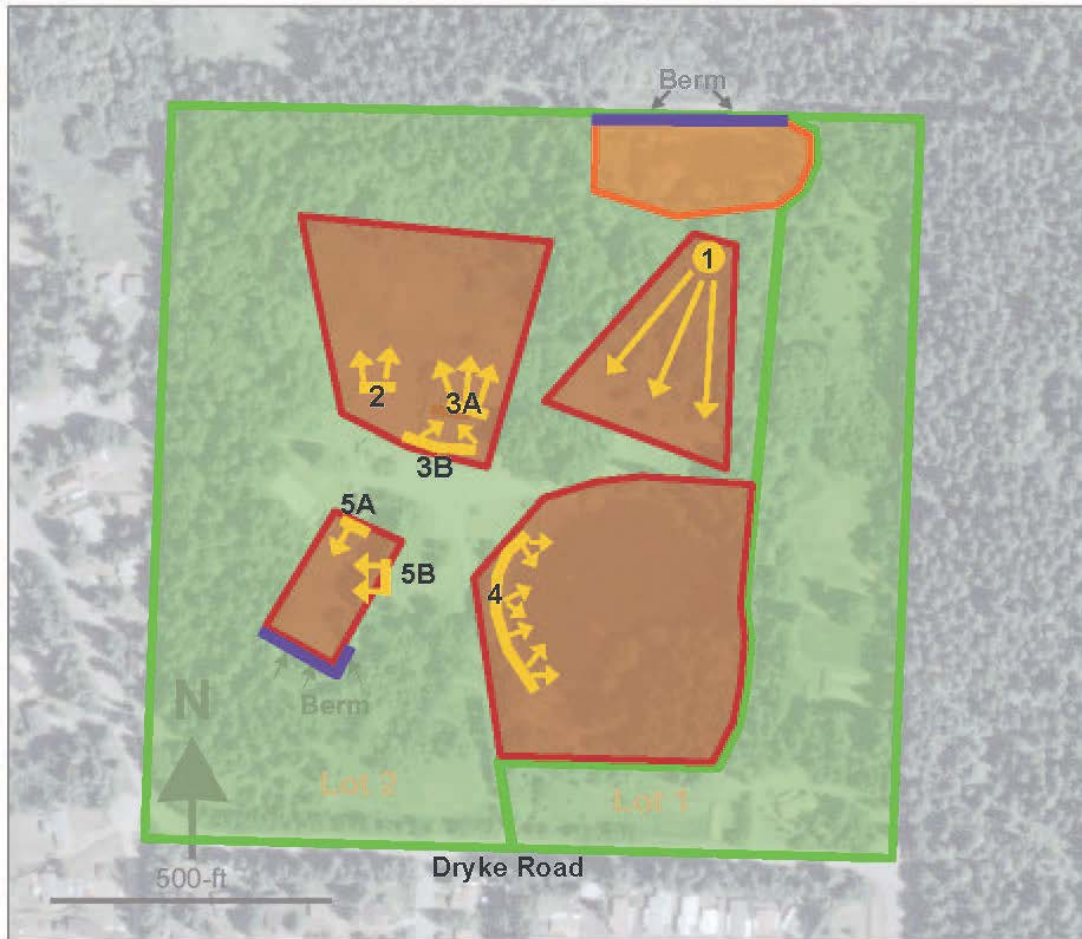
In early 2013, Ecology is holding a public comment period on:

- The **Remedial Investigation/Feasibility Study (RI/FS) report**—Describes the nature and extent of contamination and evaluates possible final cleanup options.
- The **Draft Cleanup Action Plan (draft CAP)**—Describes how the owners of the site will clean up contamination.
- **State Environmental Policy Act (SEPA) Determination and Checklist**—Describes the potential negative impacts of the cleanup work and how they will be lessened.
- An **Agreed Order** – Updates the original legal agreement between Ecology and the owner. It requires the owner to carry out the CAP.

Under the cleanup plan, the site will be broken up into three cleanup and management areas – the active shooting ranges, which includes the “upper pond area” in the property’s center; the “lower pond area” that is adjacent to neighboring properties, and non-shooting areas. The map and box on page 5 show how each area will be managed.

Ecology will review the site status every five years to ensure that management practices used there are protecting human health and the environment. This is called a “periodic review.” To receive notice of these reviews, contact Diana Smith at Diana.Smith@ecy.wa.gov or visit Ecology’s website at <https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=3572>. The owners will need to do more cleanup if the site is no longer used as a shooting range in the future.

Cleanup and Management Areas



Legend			
Active Shooting Ranges		Non-Shooting Areas	
Shooting direction		Lower Pond Area	
Shooting locations		Berms (barriers)	

Cleanup and Management Area Activities		
In the three cleanup and management areas, the owners will:		
<p>Active Shooting Ranges</p> <ul style="list-style-type: none"> Keep shooting within the active shooting ranges and towards the middle of the property. Reclaim and recycle lead shot to reduce lead buildup. Use plants to cover bare soil after lead is removed. Use biodegradable targets when possible. Keep soil from active shooting ranges separate from cleaner soil in non-shooting areas. Keep children from contact with soil in these areas. Children are more sensitive to the toxic effects of lead. 	<p>Lower Pond Area</p> <ul style="list-style-type: none"> Remove soil contaminated with lead and PAHs. Prohibit target practice and hunting. Use a soil barrier (berm) along the northern property line to keep water from running off onto neighboring properties. 	<p>Non-Shooting Areas</p> <ul style="list-style-type: none"> Cannot bring soil from the other areas into the non-shooting areas. Keep shooting and lead reclamation activities out of the non-shooting areas.

After the comment period, Ecology will:

- Review and consider all comments we received during the comment period.
- Respond to comments in a responsiveness summary. We will send this document to those who commented and post it online.
- Finalize the cleanup plan and agreed order. If needed, we will make changes to the plans based on comments.

The owners will clean up and manage the site. They will also record an environmental (restrictive) covenant for the property. It will alert future owners of the site's use as a shooting range and of possible contamination

Ecology will review the site status every five years (see page 3).

SITE CLEANUP PROCESS

Cleanup activities at the Downtown Safeway site fall under Washington's Model Toxics Control Act (MTCA) and accompanying regulations (Revised Code of Washington (RCW) 70.105D and Washington Administrative Code (WAC) 173-340). MTCA has procedures for cleaning up contaminated sites to standards that are safe for both human health and the environment.

Toxic sites are cleaned up in stages, described below. Each stage has a related report or plan that the public is welcome to review and comment on.

Remedial Investigation & Feasibility Study (RI/FS)

The RI looks at the extent and type of pollution on the site. It also looks at possible human health and environmental impacts. The FS identifies and evaluates different cleanup options.

Interim Actions

Ecology may allow Interim Actions to partly clean up a site before the final cleanup plan is complete.

Cleanup Action Plan (CAP)

The CAP describes the cleanup methods and how they will meet Ecology's cleanup standards.

Cleanup

Cleanup removes contaminants from the site, contains them on the site, or treats them to make them less toxic. Based on the information in the RI/FS, Ecology selects a cleanup action and develops a new legal agreement for cleanup. CAPs require a public comment period.

Delisting

Ecology keeps track of toxic cleanup sites on the Hazardous Sites List. Once cleanup is complete, the public will have a chance to comment before Ecology takes a site off the list.

You can find more information about toxic cleanups on Ecology's website:
http://www.ecy.wa.gov/programs/tcp/cu_support/cu_process_steps_defns.htm.

PUBLIC PARTICIPATION ACTIVITIES AND RESPONSIBILITIES

The purpose of this Public Participation Plan is to promote public understanding and participation in the cleanup. This section of the plan describes how Ecology will share information and receive public comments on cleanup activities. Ecology will use the following public involvement activities during the Sunnydell Dryke site cleanup:

Formal Public Comment Periods

Comment periods are the primary method Ecology uses to get feedback from the public on proposed cleanup decisions. Comment periods usually last 30 days. WAC 173-340-600 requires them at key points during the investigation and cleanup process, before final decisions are made. During a comment period, the public can comment in writing. Ecology can only take verbal comments during a public hearing.

After comment periods, Ecology reviews all comments and may respond in a document called a responsiveness summary. Ecology considers whether a document or decision needs to be changed or revised based on public input. If there are major changes, Ecology may hold a second comment period. If there are no major changes, Ecology finalizes the draft document(s).

Public Meetings and Hearings

Ecology may hold public meetings at key points during the investigation and cleanup. Ecology also may offer public meetings for actions expected to be of particular interest to the community. Ecology will also hold a public meeting if ten or more people request one. These meetings will be at places and times convenient to the public.

Information Repositories

These are places where the public can read and review site information, including public comment period documents. Ecology has three repositories for this site:

- Sequim Branch Library – 630 North Sequim Ave., Sequim, WA 98382, (360) 683-1161.
- Washington State Department of Ecology, 300 Desmond Drive, Lacey 98516. Please call (360) 407-6045 for an appointment.

See also Ecology's website: <https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=3572>.

Site Register

Ecology's Toxics Cleanup Program uses its bimonthly Site Register to announce public meetings and comment periods, and many other activities. To receive the Site Register by e-mail, contact Seth Preston at (360) 407-6848 or Seth.Preston@ecy.wa.gov. You can also read it on Ecology's website at http://www.ecy.wa.gov/programs/tcp/pub_inv/pub_inv2.html.

Mailing List

Ecology's mailing list for this site includes neighboring landowners and businesses, public agencies, and other known interested parties. Ecology's Southwest Regional Office maintains the list and will update it as needed. Please contact Diana Smith at (360) 407-6255 or Diana.Smith@ecy.wa.gov if you would like to have your address added to or deleted from this mailing list.

Fact Sheets

Ecology will mail fact sheets to people and groups interested in this cleanup. Fact sheets will announce comment periods and public meetings. Ecology also may mail fact sheets with updates on cleanup progress.

Newspaper Display Ads

Ecology will place ads in *The Peninsula Daily News* and *The Sequim Gazette* to announce public comment periods and public meetings for the site.

Plan Update

Ecology may update this Public Participation Plan as the project moves forward. The public will have a chance to comment on any major changes to the plan.

Contacts

If you have questions or need more information about this plan or the Sunnydell Dryke cleanup site, please contact:

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GLOSSARY

Agreed Order: A legal agreement between Ecology and a Potentially Liable Person (see below) to conduct work toward a cleanup.

Cleanup: Actions that deal with a release or threatened release of hazardous substances that could affect public health or the environment. Ecology often uses the term "cleanup" broadly to describe response actions or phases of cleanup, such as the Remedial Investigation/Feasibility Study.

Cleanup Action Plan (CAP): A plan that explains which cleanup option(s) will be used at a site. The Remedial Investigation and Feasibility Study provide the data and analysis to write a CAP. It also takes into account public comments and public concerns.

Comment Period: A time period during which the public can review and comment on various documents and proposed actions. For example, a comment period may be provided to allow community members to review and comment on proposed cleanup action alternatives and proposed plans.

Contaminant: Any hazardous substance that does not occur naturally or occurs at greater than natural background levels

Feasibility Study: This study develops and evaluates cleanup options for a given site.

Groundwater: Water found beneath the earth's surface that fills spaces between materials such as sand, soil, or gravel. In some aquifers, ground water occurs in large enough amounts to be used for drinking water, irrigation and other purposes.

Information Repository: A file containing site information and reports for public review. It is usually located in a public building convenient for local residents, such as a public school, city hall, or library.

Model Toxics Control Act (MTCA): A law passed by Washington voter initiative in 1988. Its purpose is to find, investigate, and clean up places where hazardous substances have been released. It defines Ecology's role and encourages public involvement in cleanup decisions.

Potentially Liable Person: Any individual(s) or company(s) potentially responsible for, or contributing to, the contamination problems at a site. Whenever possible, Ecology requires PLPs to clean up sites.

Public Notice: At a minimum, adequate notice mailed to all persons who have made a timely request of Ecology and to persons residing in the potentially affected vicinity of the proposed action; mailed to appropriate news media; published in the local (city and county) newspaper of largest circulation; and the opportunity for the interested persons to comment.

Public Participation Plan: A plan prepared to encourage coordinated and effective public involvement designed to the public's needs at a particular site.

Remedial Investigation: This study characterizes the site and defines the extent of contamination.

Remedial Investigation/Feasibility Study: Two distinct but related studies. They are usually performed at the same time, and together referred to as the "RI/FS." They are intended to:

- Gather the data necessary to determine the type and extent of contamination;
- Establish criteria for cleaning up the site;
- Identify and screen cleanup alternatives for remedial action; and
- Analyze in detail the technology and costs of the alternatives.

Responsiveness Summary: A summary of oral and/or written public comments received by Ecology during a comment period on key documents, and Ecology's responses to those comments. The responsiveness summary is especially valuable during the Cleanup Action Plan phase at a site when it highlights community concerns.

Risk: The probability that a hazardous substance, when released into the environment, will cause an adverse effect in the exposed humans or living organisms.

Sediments: Settled particles located at the bottom of a lake, river or in wetlands. Sediment(s) also includes settled particulate matter exposed by human activity (e.g., dredging) to the biologically active aquatic zone or to the water column.

Site: Any area where a hazardous substance, other than a consumer product in consumer use, has come to be located.

Toxicity: How much harm a substance causes to living organisms, including people, plants and animals, at a certain concentration.