



DEPARTMENT OF  
**ECOLOGY**  
State of Washington

## **RESPONSIVENESS SUMMARY**

### **Sunnydell Dryke Shooting Range**

#### **Agreed Order for a Remedial Investigation**

The public comment period for the Sunnydell Dryke Shooting Range Agreed Order for a Remedial Investigation ran from July 6<sup>th</sup> to August 5<sup>th</sup>, 2009. Fact sheets were mailed to around 200 residents and local stakeholders. The Agreed Order was made available at repositories in Sequim (the Sequim Branch Library) and at the Department of Ecology in Lacey.

Comments were received from Janet Cattano, Darlene Marmol, Alfred Defalco, Sue King, Josey Paul, Jerry and Penney Manser, and Cheryl and Stacie Stough. The comments and responses are listed in this document. If you have questions about the site, please contact:

Guy Barrett, Site Manager  
Washington Department of Ecology  
SWRO Toxics Cleanup Program  
(Phone) 360-407-7115  
(E-mail) [gbar461@ecy.wa.gov](mailto:gbar461@ecy.wa.gov)

This document is available at Ecology's Web site:

[http://www.ecy.wa.gov/programs/tcp/sites/sunnydell/sunnydell\\_hp.html](http://www.ecy.wa.gov/programs/tcp/sites/sunnydell/sunnydell_hp.html)

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**Comment #1 Janet Cattano**

I appreciate your sending out the information on the Sunnydell Dryke Shooting Range investigation. I am very glad to hear that your Department is looking into the shooting range lead issues. I have been concerned since I moved here in 2002 that the lead that had certainly fallen into the small lake, as well as on other areas, on the Sunnydell property was leaching into the ground water.

My home backs up to the shooting range and is part of the Solmar Division which is served by Solmar Water System, Inc., a private water company. We get annual (I think) reports of water quality. This year (August 2008) the test results for lead was said to be <0.001 to .008, but I have no information who is performing the tests or that their results are verified.

I hope the Department of Ecology does a thorough investigation of the situation and lets the residents in the drainage area know the results. Thank you.

I realize the comments period doesn't begin until 7/6, but I'm going out of town, and I didn't want to fail to respond.

Janet Cattano  
640 Dryke Road  
Sequim, WA 98382

**Ecology Response**

Ms. Cattano,

Thank you very much for your concerns about this site. The purpose of the proposed remedial investigation is to determine the nature and extent of contamination at this site. One exposure pathway that will be investigated is drinking water. After the results of the remedial investigation are received, a feasibility study will be written to identify cleanup alternatives. We will be notifying nearby residents of the results of the investigation as well as our plans for any cleanup.

Guy Barrett, LHg  
Site Manager  
Southwest Regional Office  
Toxics Cleanup Program

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## **Comment #2 Darlene Marmol**

Greetings!

I am writing regarding the "lead contamination" problem at Sunnydell Shooting Grounds in Sequim, Washington.

I have been taking shooting lessons from Chuck Dryke for about two years and have found Sunnydell to be a work of art and the creative vision of a man dedicated to helping people achieve dreams and goals.

The dreams and goals are for individuals to improve not only their personal sporting abilities but also their personal creative visions.

It is a place where a family has overcome extreme obstacles to set records in the history books for sporting excellence.

It has been a place much akin to Disneyland where people can go for a short time and have a day of care-free recreation, much like the Magic Kingdom, but better because one can come away with a better sense of 'what the mind can believe, it will achieve.'

I know the lead is a problem.

I know the people running the investigation are trying to find the correct balance between the needs of the community and the livelihood of Chuck Dryke and affiliates.

I am offering that the community should be engaged in helping with the clean-up efforts either through financial donations or elbow grease or equipment.

I have offered my services. I think that when someone in the community is having a problem, there are others who can come to assist.

Sunnydell offers so many opportunities and has been (still is) the home of champions and ordinary people who just want to fine tune their skills.

Chuck Dryke has developed a teaching style with vision therapists and molded it for the sporting community but what some people don't know is that his activities have helped students with learning challenges overcome problems in school.

He is a humble man with a big, big heart. His Sunnydell is a living work of art that although has met a stumbling block, should be encouraged to survive and thrive. It has so much to offer and should not be forced into retirement either because it is a hazard or a financial drain on the owners.

With the help of the EPA's guidance, I would like to pursue ways to help with the clean-up and the sustainable access of Sunnydell Shooting Grounds.

I know there must be grants or other resources and I would be willing to look at writing grants or letters to help the cause.

Thank you for your time and the opportunity to help Sunnydell.

Darlene Jackson Marmol

## **Ecology Response**

Hello Darlene,

Thank you for taking the time to submit a comment. To answer your question about grants, Department of Ecology generally does not give cleanup grants to individuals or businesses. We do offer funding to non-profit organizations through Public Participation Grants, and to local governments through Remedial Action Grants. More information is available at <http://www.ecy.wa.gov/programs/swfa/grants/>.

I am not aware of any local or federal sources of funding for this type of cleanup, either. You may want to look into community resources or partnerships to assist Mr. Dryke.

Thank you again for your comment.

Hannah

Hannah Aoyagi, Ph.D.

Public Involvement Coordinator

Toxics Cleanup Program, Southwest Regional Office Washington State Department of Ecology  
(360) 407-6790

[haoy461@ecy.wa.gov](mailto:haoy461@ecy.wa.gov)

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## **Comment #3 Alfred Defalco**

I am writing this in support of Sunnydale Shooting Range. This facility, under the direction of Chuck Dryke, has produced some of the finest competitive shot gunners in the world, including Olympic and Pan-American gold medalists. I have also personally observed several young men and women come through this program to become skilled international competitors. Their experiences at Sunnydale were truly life defining moments for them. The Sunnydale experience has also been extended to countless amateur gunners who come away with a deep appreciation of gunning skills and, more importantly, awareness of safety issues surrounding firearms.

The cost of lead removal from this site, if borne by Sunnydale owners would result in the facility closing down. I would plead instead for a containment program which isolates lead to the ponds in a way which precludes contamination of the adjacent complainants property. Loss of this property is going to negatively impact hundreds of people. I hope it can be preserved.

Alfred Defalco MD

english sporting spaniels

## **Ecology Response**

Mr. Defalco,

I appreciate your concerns for the Sunnydell Dryke Shooting Range and you are not alone in these sentiments. Ecology will be working closely with the owners of this site to perform an appropriate investigation. The investigation is needed prior to making final decisions about

cleanup. It is certainly not my intent to close down any business that we work with, but at the same time we have a process to follow to protect human health and the environment. Again, thank you for your concern.

Guy Barrett, LHg  
Site Manager  
Southwest Regional Office  
Toxics Cleanup Program

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#### **Comment #4 Sue King**

I have recently learned, much to my dismay, that your agency is requiring Sunnydell Gun Club to engage in lead mitigation efforts which would impose extensive financial costs possibly threatening the future operation of Sunnydell. Sunnydell is one of the premier shooting clubs in the United States and has, during its decades of operation, taught many generations of young people and adults the responsible and safe use of firearms. Their membership and their many patrons from across this nation have benefited immeasurably from the Drykes teaching methods, the finest in the country, and produced many champions including Matt Dryke - an Olympic Champion. Sunnydell's involvement in community and charitable activities is a matter of record as is their outstanding efforts in welcoming and nurturing women's participation in the shooting sports.

I have traveled from Texas to Sequim on several occasions not only for the purpose of participating in their charity events but also to avail myself of coaching from the finest teacher of shooting sports in the country. I assure you that many people from across the nation have done the same and, while there, also spent their tourist dollars in local hotels, restaurants, golf clubs, etc.

I hope that you will understand and appreciate the value of Sunnydell to the many thousands of people who patronize the club but also understand Sunnydell's economic value to the community of Sequim.

I hope that your agency will work with the Drykes and not treat them as adversaries but valuable members of the community whose economic existence depends on your cooperation.

Thank you,  
(Mrs.) Sue King, Houston, TX

#### **Ecology Response**

Mrs. King,

Thank you for your concerns regarding the Sunnydell Dryke Shooting Range site. It is Ecology's policy to work cooperatively with owners, operators, or others known to be potentially liable for cleanup of hazardous substances at sites in Washington State. Ecology and the owners of this site agree to the terms of the agreed order, and as such we are certainly not treating them as adversaries. We will work with the owners to effectively collect, develop, and evaluate sufficient

information to be able to select a cleanup action. In this way the site can continue to be a value to the community and undertake actions that will protect human health and the environment.

Guy Barrett, LHg  
Site Manager  
Southwest Regional Office  
Toxics Cleanup Program

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**Comment #5 Josey Paul**

Guy Barrett, Site Manager

Mr. Barrett:

Thank you for taking action on the Sunnydell range. Clallam County has known for years that lead was spreading to neighboring property and that children were being exposed to contamination.

I know that the site was tested for lead, but it should also be tested for arsenic and PAHs. Sunnydell is largely a shotgun range, and shotgun pellets are typically comprised of about 1 percent arsenic, which is added as a hardening agent. PAHs are also commonly found at shotgun ranges, partly from the discharge gases and also from clay pigeons. Several of these PAHs are known to cause cancer, birth defects and genetic damage. And arsenic and PAHs are comutagenic. When coincident, they are known to increase the cancer odds by a factor of 10.

Previous tests found benzo-a-pyrene at 2,000 times cleanup standards. Other PAHs were also quite high: benzo-b-fluoranthene, benzo-k-fluoranthene and chrysene where all found in excess of 1,000 times cleanup standards.

Arsenic was not tested, but it is commonly found at shotgun ranges. The US Forest Service closed a private shotgun range at Index after hiring a consultant to test soil and groundwater. Lead levels were extremely high, as were arsenic and PAHs. Areas with the highest lead also had the highest levels of arsenic. This is an extremely important issue.

Sunnydell is in a family neighborhood, and there is a public park directly to the east. There are surface water and groundwater routes that need to be tested. And it is important that areas of contamination are not in areas where children play or explore. Soil, surface water, groundwater and plants in contaminated areas need to be tested. Many plants take up lead readily. Edible mushrooms concentrate lead, and young people forage for "magic" mushrooms in the cattle field that has been contaminated. Other types of plants pick up lead, too. If these plants are being eaten by wildlife and/or cattle, there is serious risk for lead to be spreading to all parts of the food chain.

Thank you for your concern.

Sincerely,  
Josey Paul

## **Ecology Response**

Mr. Paul,

Under the Model Toxics Control Act, Chapter 70.105D RCW, the owners of this site will be directed to investigate any hazardous substance that has been released to the environment that may pose a threat to human health or the environment. The agreed order for this investigation will describe the activities that are to occur and a subsequent work plan will provide details for those activities. We will also determine whether the release of hazardous substances to soil poses a threat to the terrestrial environment. Thank you for your continued interest in this site.

Guy Barrett, LHg  
Site Manager  
Southwest Regional Office  
Toxics Cleanup Program

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## **Comment #6 Jerry and Penney Manser**

*Comments made by phone call:*

Shotgun pellets fall on our property which is near this site. We may have lead contamination on our property. Surface water also drains from the site to their property.

Jerry and Penney Manser  
455 Panell Road  
Sequim, WA 98382

## **Ecology Response**

The upcoming remedial investigation will determine the nature and extent of lead contamination from this site. Various exposure pathways will be explored including the soil and surface water. Various cleanup alternatives will then be considered in a feasibility study. Thank you for your concerns.

Guy Barrett, LHg  
Site Manager  
Southwest Regional Office  
Toxics Cleanup Program

## **Comment #7 Cheryl and Stacie Stough**

*Comments made by phone call:*

How extensive is the contamination? What can be done?

Cheryl and Stacie Stough  
61 S. Solmar Drive  
Sequim, WA 98382-7523

### **Ecology Response**

Very limited data have been gathered at this time. We do not presently know the extent of the contamination but that will be determined in the remedial investigation. After the results of the investigation are determined, alternatives will be selected for any cleanup that may be needed.

Guy Barrett. LHg  
Site Manager  
Southwest Regional Office  
Toxics Cleanup Program