



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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August 9, 2013

Julie S. Nicoll
Associate Attorney
Forsberg & Umlauf, P.S.
901 Fifth Avenue, Suite 1400
Seattle, WA 98164

RE: Kitsap Rifle and Revolver Club

Dear Ms. Nicoll:

The Department of Ecology (Ecology or Department) has received your letter requesting the Department withdraw its planned ranking of the property owned by your client, the Kitsap Rifle and Revolver Club. The Department is moving forward with the ranking and publishing of the results of the Site Hazard Assessment recently done on the subject property. There are a number of points raised in your letter and I will attempt to answer them individually.

First, you state that Ecology "has no reasonable basis to believe that a release or threatened release of a hazardous substance has occurred." Analyses of soil samples taken from the backstop berms and elsewhere on the site demonstrate a release. Please refer to the EPA's "Integrated Assessment, Kitsap Rifle and Revolver Club," where it is concluded that "Based on the results of the IA field sampling events, it appears that the KRRC site contains sources of CERCLA hazardous substances which are migrating to adjacent wetlands. Sediment samples collected from wetlands at the site indicate the presence of TAL (Target Analyte List) metals at elevated concentrations with respect to background concentrations and at levels exceeding screening levels. Impact berms are the likely source of TAL metals contamination."

Your letter further states that the terms "soil" and "release" are misapplied when applied to the KRRC constructed containment and recovery system. The Department also does not agree with this statement. No information has been presented to Ecology to demonstrate that these berms were constructed of anything but local soils. Analyses of samples taken of the berm found lead, copper, arsenic, and antimony at elevated concentrations, most likely due to the discharge of pistols, rifles, and shotguns.

The accompanying letter from Pacific Crest Environmental raises several other points, as mentioned in your letter. These points are addressed individually, in the order presented, as follows:

1. The SHA has been amended to read that "The 70 acre parcel owned by KRRC is situated next to and is a part of the Watershed of Chico Creek, a salmon stream."

2. The depth to groundwater has been amended, but not to the depth requested in the Pacific Crest Environmental letter. The depth has been amended to "0 to 25 feet," with a corresponding value of 8. Please refer to the attached map showing minimum annual depth to watertable. Also, please be aware of the fact that standing water is located on the KRRRC parcel year-round, and that such "perched" water is considered to be in hydraulic connectivity with other groundwater unless shown otherwise. The well log cited in your request shows the depth to completion for water supply purposes, not to the first encounter of saturated soils. Indication of the probability of groundwater being found at depths less than 300 feet are seen in the use of the terms "blue till" and "blue-silty-clay" in the well log. These geologic layers serve as aquatards, which result in pockets of perched groundwater.
3. The reference to an on-site septic system has been removed.
4. The SHA has been changed to read "The investigation showed that the site was likely contaminated with lead from the years of shooting with a limited lead recover program. Ecology does recognize that lead recovery by club members has occurred, but complete removal of lead has not been attempted (i.e., soil washing, vacuuming, cyclonic separation).
5. Vanadium has been removed from Table 1 of the SHA and the referenced sentence has been removed.
6. The SHA has been changed to read "US Navy Camp Wesley Harris (FS ID 2603), which is on the Confirmed and Suspected Contaminated Sites list and is ranked a 2, is immediately adjacent to the east."
7. The value of 2.3 people per household will be used in calculations of population.
8. "Sandy loam," with the corresponding erodibility of 86 tons per year will be used in the Air Route calculation.
9. "Sandy sit, silty sand, permeable till, clayey sand, cemented sandstone, fractured rock, shale, porous volcanic rock," with the corresponding hydraulic conductivity of 10^{-5} to 10^{-3} cm/s, and the Value of 3, will be used for calculations.

When these changes are incorporated into the calculations for WARM Bin Ranking, the final result remains a WARM Bin Ranking of 2. It would need to be demonstrated that groundwater was not found at a depth less than 300 feet for the site to rank at a lesser priority (i.e., 3). This site will not rank at less than a 3 unless it can be demonstrated that no hazardous materials were present at concentrations above MTCA Method A, in which event a "No Further Action" letter will be issued by the Department of Ecology.

Should you wish to further discuss these points, please do not hesitate to contact either Louise Bardy or me at the addresses in your letter.

Sincerely,

Ted H. Benson
SHA Coordinator
Toxics Cleanup Program
(360) 407-6683

Enclosure: Site Hazard Assessment, Kitsap Rifle & Revolver Club