



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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February 21, 2014

Mr. Kevin T. Gross  
5619 NW Iskra Boulevard  
Bremerton, WA 98312-6103

**Re: Kitsap Rifle and Revolver Club Site, VCP No. NW2781**

Dear Mr. Gross:

Thank you for your recent correspondence regarding the **Kitsap Rifle and Revolver Club** (Site) and bringing your environmental concerns to our attention. The Site is currently enrolled in the Washington State Department of Ecology (Ecology) Voluntary Cleanup Program (VCP) as Site No. NW2781. Your letter indicated that you had concerns about allowing this Site into the VCP. I would like to provide a brief background on the VCP and expectations for any cleanup conducted under this program.

The purpose of the VCP is to encourage cleanup as well as to facilitate redevelopment of contaminated properties. Under the VCP, a site or property can be cleaned up independently, without Ecology supervision. However, an independent clean up must be conducted by licensed environmental professionals and certified analytical laboratories. The work must meet appropriate and applicable requirements and industry standard. Further, the sufficiency of the cleanup is evaluated by Ecology based on the authority of the Model Toxics Control Act (MTCA) Chapter 70.105D RCW and the ensuing regulation Chapter 173-340 WAC.

Once a Site is enrolled in the VCP, annual evidence and documentation of cleanup activities must be provided to Ecology to remain in the program. If insufficient or no progress is made, Ecology will terminate the VCP project and possibly pursue other options to accomplish cleanup goals. When circumstances are appropriate, Ecology prefers allowing cleanup activities to occur independently as this is typically more expeditious and less costly for all parties.

The Site is currently developing a work plan to address hot spot areas on the property to remove soils containing high levels of lead. The work plan will need to address how these areas will be removed or capped appropriately to prevent exposure. Once received, Ecology will be reviewing the work plan and providing an opinion on its adequacy to address the lead hot spots. The Site owners must work collaboratively with Ecology to carry out further Site characterization and cleanup actions. If there is no progress toward that end through the VCP, Ecology will re-evaluate this approach.



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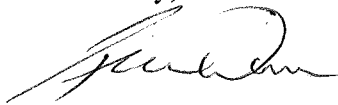
With regard to other concerns raised in your letter about the wetland buffer area, RCRA wastes and water quality, Ecology's Toxic Cleanup Program is coordinating with the designated programs within the agency to address and follow-up on each specific issue. Follow-up and resolution of these issues could take some months to resolve. I recommend contacting Donna Musa, the Initial Investigations Coordinator at (425) 649-7136 or at [dmus461@ecy.wa.gov](mailto:dmus461@ecy.wa.gov) for updates on those issues.

Ecology's website provides information on the Site and any documents that are submitted will be uploaded for public review. The link to the Cleanup Site Search page is:  
<https://fortress.wa.gov/ecy/gsp/SiteSearchPage.aspx>

At the Cleanup Site Search page, type in the Cleanup Site ID (11446) in the sixth row which will take you to the Kitsap Rifle and Revolver Club link shown below the Search Criteria panel. Click on the Site Name and it will take you to another screen. Click on 'View Electronic Documents' on the right hand column and that should provide a list of available documents in electronic format that can be downloaded.

Again, thank you for bringing these issues to our attention. Please feel free to contact me if you have any further questions or concerns at (425) 649-7054 or the VCP Site Manager, Heather Vick at (425) 649-7064 or [hvic461@ecy.wa.gov](mailto:hvic461@ecy.wa.gov) who will be responsible for reviewing and providing Ecology opinions on Site submittals.

Sincerely,



Robert W. Warren, P.Hg. MBA  
Section Manager  
Toxics Cleanup Program

cc: Louise Bardy, VCP Unit Supervisor, Ecology  
Donna Musa, Initial Investigation and Site Hazard Assessment Coordinator, Ecology  
Heather Vick, VCP Site Manager, Ecology