



RESPONSIVENESS SUMMARY

Sunnydell Dryke Shooting Range

March 30 - May 1, 2017 Public Comment Period

Delisting from the Hazardous Sites List

Prepared by

Washington State Department of Ecology
Southwest Regional Office
Toxics Cleanup Program
300 Desmond Drive
Olympia, Washington 98504-7775

May 2017

List of Commenters

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Site Manager: Andrew Smith
Public Involvement contact: Megan MacClellan

Summary

We received seven comments on the delisting after the cleanup of the Sunnyside Dryke Shooting Range site. The comments did not suggest substantive changes. The comment period ran from March 30 to May 1, 2017. The cleanup documents are available in the site file and online at <https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=3572>.

Comment A – Janet Cattano

-----Original Message-----

From: Janet Cattano [mailto:jancatt@gmail.com]

Sent: Saturday, April 01, 2017 5:39 PM

To: Smith, Andrew (ECY) <ansm461@ECY.WA.GOV>

Subject: Sunnydell Dryke Shooting Range, Facility Site IDE #1283666

Thank you for sending me the proposed removal of the above-cited site from the Hazardous Sites List. (A lot of c/sites.)

By now you are probably aware that the map on the reverse of the Notice is for a completely different site in a completely different area. Just sayin'.

Janet Cattano
640 Dryke Rd.
Sequim, WA 98382-9452

Ecology Response

Thank you for your comment. We apologize for the map error in the fact sheet you received.

Comment B – Bard Gallant

-----Original Message-----

From: Bart Gallant [mailto:hfihq@televar.com]

Sent: Thursday, March 30, 2017 3:23 PM

To: Smith, Andrew (ECY) <ansm461@ECY.WA.GOV>

Subject: Sunnydell Dryke Delisting

I fully support the proposed delisting of the Sunnydell Shooting Grounds.

Bart Gallant

Ecology Response

Thank you for your comment.

Comment C – Dale Luther

-----Original Message-----

From: Dale Luther Sr. [<mailto:dluther@olympen.com>]

Sent: Tuesday, April 25, 2017 7:48 AM

To: Smith, Andrew (ECY) <ansm461@ECY.WA.GOV>

Subject: Sunnydell Cleanup

Mr. Smith,

It is refreshing that the Sunnydell Shooting Grounds is being delisted. They continue to work toward a safer environment and also operate a much need facility.

Dale Luther

Ecology Response

Thank you for your comment.

Comment D – Josey Paul

Note: Since this letter referred to several issues, we have labeled each comment in the original message and responded with corresponding labels.

-----Original Message-----

From: Josey Paul [<mailto:thegreatstream@gmail.com>]

Sent: Sunday, April 30, 2017 5:17 PM

To: Smith, Andrew (ECY) <ansm461@ECY.WA.GOV>

Subject: Sunnydell Dryke Shooting Range

Re: Facility Site ID No. 1283666

Cleanup Site ID NO. 3572

Dear Mr. Smith:

Several issues should be addressed before Ecology closes this cleanup action.

Comment 1 First, the site was never tested for arsenic. Arsenic is added to the lead in shotgun pellets as a hardening agent, and considerable evidence with shooting ranges typically finds high levels of arsenic wherever shotgun shooting is located.

For example, the National Forest Service's cleanup of a shooting range at Index (Index Sportsmen's Club, Mt. Baker-Snoqualmie National Forest) found arsenic in all samples collected. Those arsenic levels exceeded Ecology's Washington state natural background level (7 mg/kg) and the EPA Industrial PRG (1.6 mg/kg). On-site surface soil samples

contained arsenic at concentrations up to 319 mg/kg, with the highest arsenic concentrations detected in soil samples that also had the highest lead levels.

Comment 2 Second, Ecology is permitting continued shooting into water that is in direct hydraulic continuity with Sequim groundwater. This permitted activity includes targets with high levels of PAHs. There should be no contamination of surface water, and that prohibition is especially important when the surface water is direct contact with groundwater. There is considerable case law to support this prohibition.

Comment 3 Third, Ecology has largely ignored the off-site migration of lead into adjacent pastures because the lead concentration is only slightly below action levels. Cattle grazing in this pasture have tested with elevated levels of lead. No lead should be allowed to migrate offsite.

I would hope that Ecology corrects these deficiencies before signing off on the cleanup.

Sincerely,

Josey Paul

Ecology Response

Thank you for the letter you submitted about the delisting of the Sunnydell Dryke Shooting Range. Since it referred to several issues, we have labeled each comment in your letter and responded with corresponding labels.

Comment 1

You are correct that we did not test for arsenic. There are two primary reasons for that decision. First, the amount of arsenic reported to be in lead shot is very small relative to lead (approximately 0.5%, with lead making up 97% of the shot composition). Secondly, since lead and arsenic were distributed through the same mechanism (lead shot) and behave the same way once in soil or water, we were confident that we would resolve arsenic concerns by addressing contamination from lead and cPAHs during cleanup.

To avoid recontamination in the future, the active shooting areas will be managed through the Best Management Practices established in the Remedial Action Work Plan. These management practices will be required as long as the facility is in operation.

Comment 2

I appreciate your comments regarding the protection of groundwater and surface water from contaminants on the site. In the following response, I presume that your comment refers to the upper pond.

We tested for PAHs in the upper pond during our original analysis [Remedial Investigation/Feasibility Study by LaManna Geosciences, Inc., dated May 15, 2012] and did not find detectable concentrations in the surface water samples. Given those results, lead became the primary concern.

Analysis of the upper pond water after cleanup indicated lead concentrations near or below the surface water cleanup level. Groundwater tests from 4 wells on site indicated lead was only detected in one well near the upper pond and it was below the groundwater cleanup level.

With the removal of lead shot from the upper pond and the considerable reduction of lead concentrations in the upper pond water resulting from cleanup, we anticipate the concentration in groundwater near the upper pond will continue to decrease.

Two additional mechanisms are in place to monitor and control any future contamination since the upper pond is an active shooting area. Lead shot must be removed from the upper pond regularly, per the required management activities listed in the Remedial Action Work Plan. Also, in accordance with the environmental covenant filed for the property, the property owners must monitor groundwater and Ecology will perform a periodic review every five years to demonstrate that the cleanup activities continue to protect human health and the environment.

Comment 3

Ecology agrees that lead contamination should not be allowed offsite. Based on the results of extensive testing (15 samples) of the soils on the off-site property, we concluded that there is no need for cleanup actions under state cleanup law. That sampling is documented in the Remedial Investigation/Feasibility Study by LaManna Geosciences, Inc., dated May 15, 2012, and shows no action is needed off-site.

Comment E – Ann Soule

-----Original Message-----

From: Ann Soule [<mailto:asoule@sequimwa.gov>]

Sent: Thursday, March 30, 2017 12:23 PM

To: Smith, Andrew (ECY) <ansm461@ECY.WA.GOV>

Subject: Regarding Sunnydell Fact Sheet about the comment period

Map and photo on the fact sheet are not for Sunnydell.

I couldn't find the Cleanup Action Plan on the webpage.

One question: where and what is the Quail Run berm indicated for deposit of contaminated material in the Cleanup Action Report? Is that material not required to be treated or disposed of as waste?

Thanks for getting back to me.

*Ann Soule, LHG
Resource Manager, Public Works
City of Sequim, WA
360-582-2436*

Ecology Response

Thank you for your comment. The Cleanup Action Plan is listed under the "Current Status" section of the Sunnydell Dryke Shooting Range website: <https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=3572>. You can access it by clicking the hyperlink in the text, or by clicking the "View Electronic Documents" link in the right hand navigation bar on the same webpage. We apologize for the error in the fact sheet you received.

Quail Run is one of the active shooting areas and the contaminated soil excavated from the lower pond (now an inactive area) was used to create a larger berm in the Quail Run area to help contain the shot in that area. Periodically, the shot will be mined from the berms and recycled. This is detailed in the Remedial Action Work Plan, which documents the site management activities for the shooting range.

Comment F – Vicki Tallman

-----Original Message-----

From: Vicki Tallman [<mailto:vickitallman50@hotmail.com>]

Sent: Saturday, April 29, 2017 10:13 AM

To: Smith, Andrew (ECY) <ansm461@ECY.WA.GOV>

Subject: Sunnydell shooting grounds

I am happy sunnydell will remain open for business!!

Public shooting ranges are sorely needed. One only needs to go to forest lands and look at the mess left behind by inconsiderate people to realize the need for public shooting facilities Thank you Vicki Tallman

Ecology Response

Thank you for your comment.

Comment G – Laurie Tanguay

-----Original Message-----

From: LoBo Designs [<mailto:info@lo-bo.com>]

Sent: Wednesday, April 05, 2017 8:15 AM

To: Smith, Andrew (ECY) <ansm461@ECY.WA.GOV>

Subject: Sunnydell Shooting range site

As a residential neighbor of the Dryke site, we appreciate the update.

Thank you.

Laurie Tanguay

Ecology Response

Thank you for your comment.