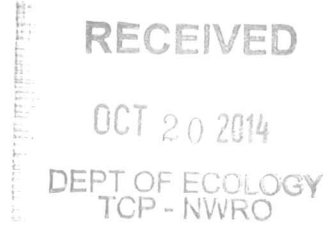


# DANIELSON LAW OFFICES, P.S.

1001 Fourth Avenue, Suite 3200  
Seattle, WA 98154  
Tel: 206-652-4550 Fax: 206-652-4551  
[bruce@brucedanielsonlaw.com](mailto:bruce@brucedanielsonlaw.com)

October 17, 2014



Heather Vick, LHg  
Washington Department of Ecology  
3190 160<sup>th</sup> Ave SE  
Bellevue, WA 98008-5452

Re: *VCP - NW2781; Kitsap Rifle and Revolver Club, Kitsap County, WA.*

Dear Ms. Vick,

This office has been retained to assist the Kitsap Rifle and Revolver Club (KRRC) and to act as a conduit for the following action. By unanimous vote of the Executive Committee, please consider this formal notice of KRRC's immediate withdrawal from and revocation of the reserved agreement between KRRC and the Washington State Department of Ecology (DOE) with regard to the above listed VCP agreement.

Kitsap Rifle & Revolver Club has had since its inception a very active and regular voluntary clean-up program. Our Environmental Stewardship Program (ESP) is currently tasked with keeping KRRC operating in exceedance of the United States Environmental Protection Agency's (EPA) Best Management Practices for Outdoor Shooting Ranges (BMP), a copy of which is attached. When your agent, Grant Holdcroft first visited our facility, he twice recommended "no further action" (NFA) due to his investigation into the matter.

As I am sure you are aware, KRRC is an active and operational shooting facility, and has been so continuously since 1926. Our recycling program has been VERY effective as any testing done by the DOE has shown. (Please consult with Mr. Holdcroft as to the testing he personally performed with regards to his tests and the quality of our ESP program).

KRRC first reluctantly agreed to enter into a reserved agreement with DOE based on the assurance of Russ Olsen of DOE that KRRC would not receive the threatened Site Hazard Assessment (SHA) or be ranked and listed as a hazardous site. The ranking happened in spite of our agreement with your agent to the contrary. Our voluntary participation has been an unacceptable drain on valuable resources that KRRC can no



longer afford to expend for no purpose. The attempted fraudulent billing of a phone call involving a State Assistant Attorney General is only one example. This one issue alone involved at least 6 personnel to deal with and bring to the conclusion that KRRC should have never been charged.

It has also come to our attention that MTCA is being misapplied. There is as no waste of any material of concern to your department or any other agency. The consumer products in use at our facility are continually recycled and re-used with nothing leaving our 70 acre range complex

Our decision was made after consulting with several environmental and legal experts and given the totality of the circumstances. We are proud of our facility and will continue to be good stewards of the wonderful blessing KRRC is to the community and the state. We will continue to recycle the consumer products used at our facility with efficiency that exceeds that of any active shooting range in the state, and beyond. Thank you for your interest in KRRC.

DANIELSON LAW OFFICE, P.S.

Very Truly yours,



Bruce O. Danielson

cc: client  
enc.

