



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Northwest Region

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TTY 711

September 12, 2025

via email delivery

Randy Nattis
Federal On-Scene Coordinator
U.S. EPA Region 10
Superfund and Emergency Management Division
Oregon Operations Office, Portland

RE: Request for EPA Removal Support for Banks Sunset Park, Trap Shooting Range
Banks Gun Club, DEQ ECSI #6501
12765 NW Main St, Banks, Washington County, OR 97106

Randy,

The Oregon Department of Environmental Quality (DEQ) requests U.S. EPA Removal Program support for cleanup of lead-contaminated soil at Banks Sunset Park (Site), identified in our files as Banks Gun Club (ECSI #6501). Banks Sunset Park is located at the above-referenced address and identified as Washington County Map ID 2N4360000900. The Banks Sunset Park is owned and operated by Banks Sunset Park & Civic Center, a 501(c)3 non-profit organization.

Background

Banks Sunset Park trap shooting range and gun club operated on the Site for approximately 70 years before shooting was permanently discontinued in 2022. From 1945 to 2008 the gun range was used for weekly league trap shooting events. From 2008 to 2022 ground clays were shot in front of trap houses once or twice a year, there has also been six-gun draw contests with wax loads and not lead. Most of the year the range area is used for parking during community or speedway events. Due to historic trap shooting activities, lead-shot fragments have contaminated soil north of the trap houses on the Site and the north-adjointing farm property (former Vanderzanden Farm, ECSI# 5918).

Summary of Environmental Assessments (on- and off-site)

Environmental investigations on the farm property from 2011 to present identified lead contamination in soil exceeding 100,000 milligrams per kilogram (mg/kg), presumably related to operation of a gun range on the northwest portion of Banks Sunset Park property. Lead concentrations in soil on the farm property vary considerably based on sampling methodology used during the assessments, and appear to decrease with sample depth below ground surface. However, lead detections were reported above applicable DEQ risk-based screening levels and the regional background concentration for lead in soil.

In June 2022, DEQ prepared a Pre-CERCLA Screening Checklist for Banks Gun Club under DEQ's federal Preliminary Assessment/Site Inspection grant. Subsequently, DEQ sent an option letter to the park with follow-up actions. In response to the letter, the park entered into a voluntary cleanup agreement with DEQ for cleanup oversight.

In June 2024, under DEQ cleanup program oversight, WSP USA Inc. on behalf of the Banks Sunset Park Association (former owner) conducted a limited site investigation under a DEQ-approved work plan. The area of concern on Site was assessed using multi-increment sampling methodology. Seven decision units, covering about one-half acre each, were assessed at two sample depths: surface (0-0.5 feet below ground surface [bgs]) and near-surface (0.5-2.0 feet bgs). Sample results document lead in soil ranging from 64.0 to 3,790 mg/kg.

Closing

Banks Sunset Park is operated by community residents and volunteers. The park is funded by community events and fundraising activities hosted at the park. The funds raised at these events are primarily reserved for park maintenance. The cost of cleanup required to address exposure risk to park users and community members is prohibitive to the park's ability to move forward with remediation. Without immediate action, lead contamination in surface and near surface soils remain a threat to human health and the environment. Therefore, DEQ requests U.S. EPA's assistance to remove this hazardous substance from the Banks Sunset Park property.

DEQ appreciates your consideration of our request. If you have any questions regarding this letter or need additional information, please contact Kara Master, DEQ Project Manager, at (503) 686-3903 or kara.e.master@deq.oregon.gov.

Respectfully,



Amanda Wozab
DEQ Northwest Region Cleanup Section Manager

Cc: Kara Master, DEQ
Wesley Thomas, DEQ
Kevin Dana, DEQ

Attachments: Lead Sampling Memo figures

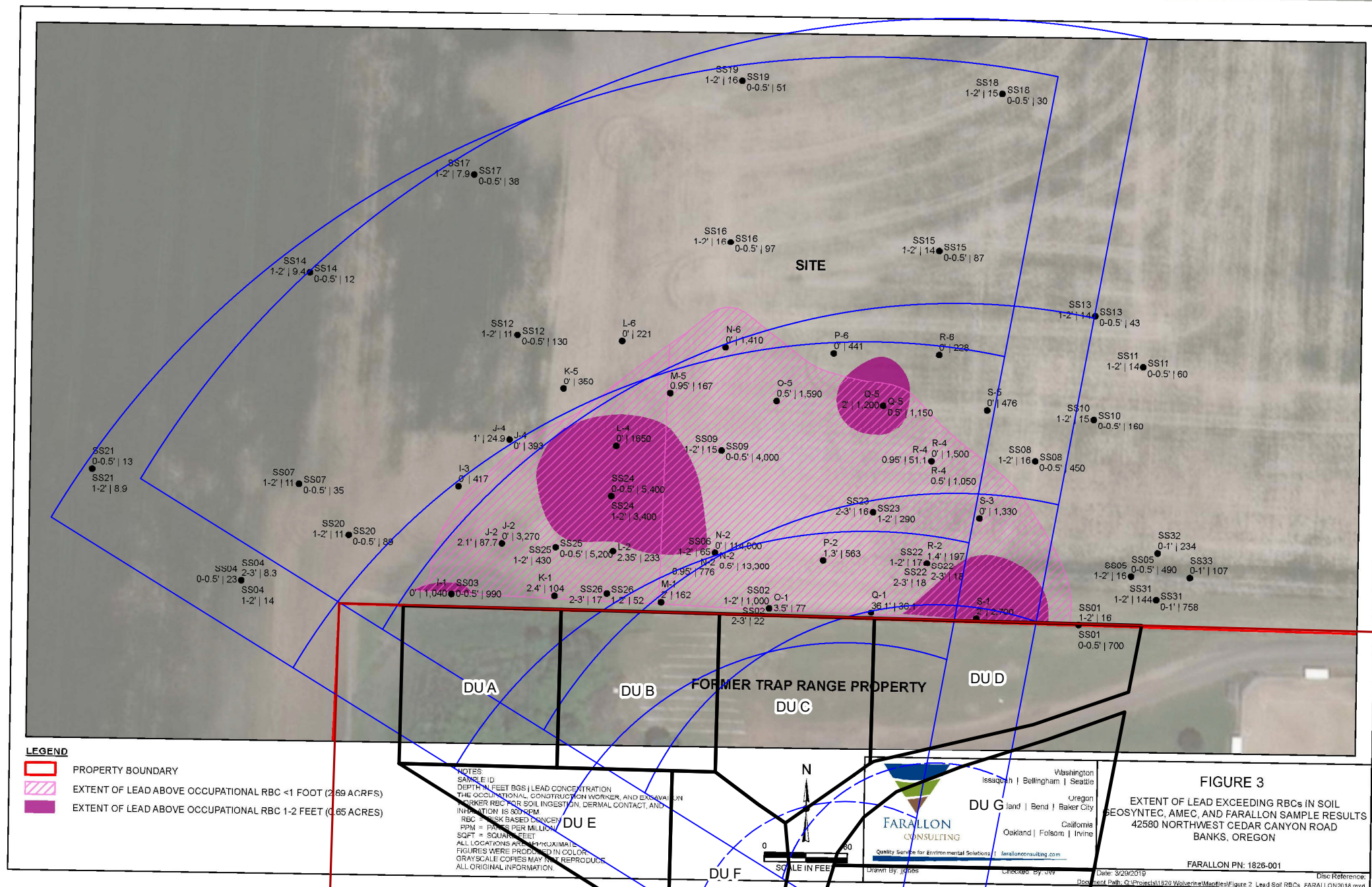


	BANKS SUNSET PARK ASSOCIATION		BANKS SUNSET PARK BANKS, OREGON	DATE MARCH 2024
				SCALE 1" = 120'
	WSP USA 15862 SW 72nd Ave., Suite 150 Portland, OR 97224		SITE PLAN	PROJECT NO. 2-61M-12489-1
				FIGURE 2

DRAFT

LEGEND:

- Site Boundary
- Decision Unit Boundary



DU_ID	AREA (sqft)
A	22,449
B	22,526
C	24,928
D	25,371
E	19,830
F	17,784
G	24,350
H	24,510

BANKS SUNSET PARK ASSOCIATION

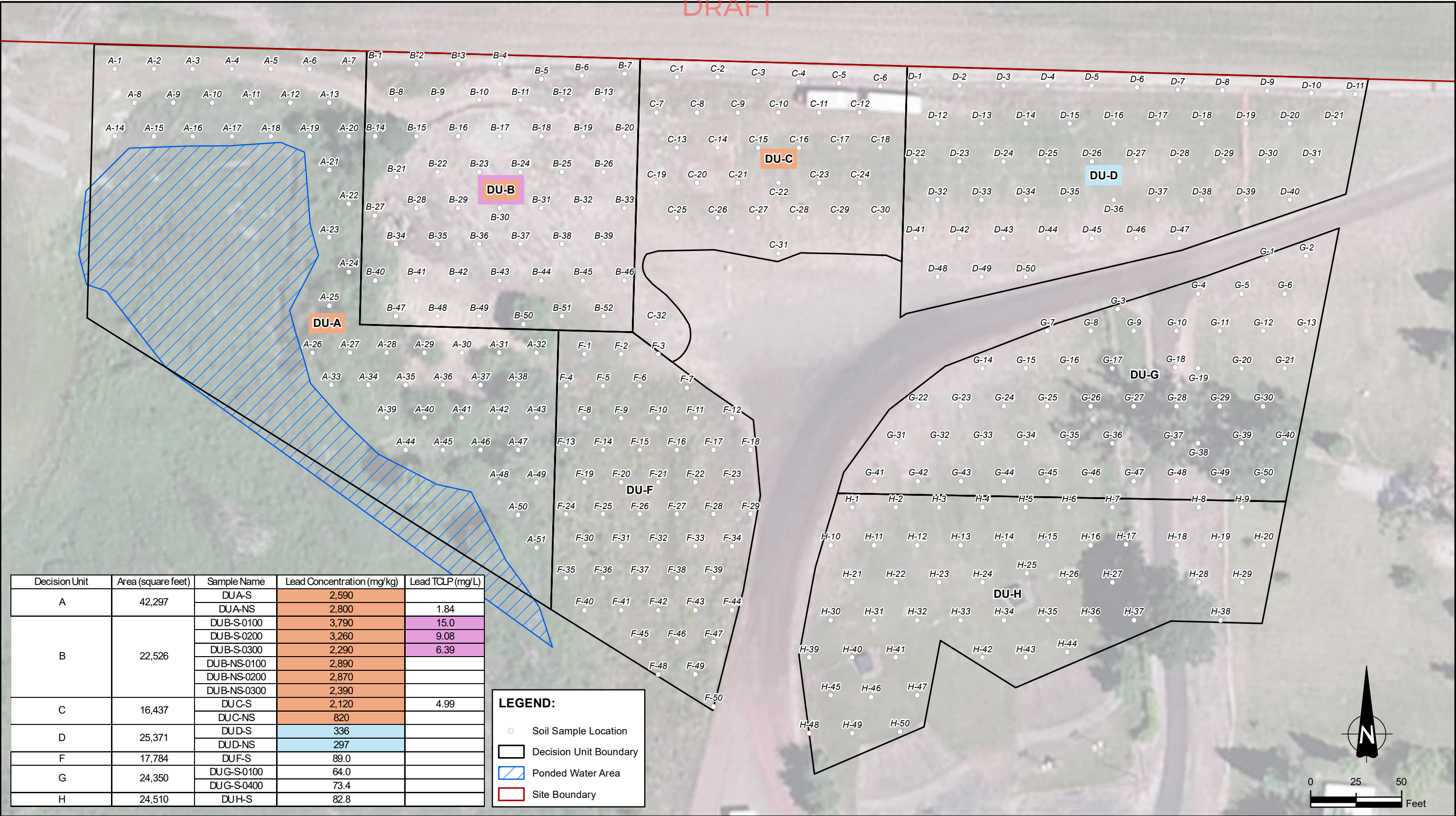
WSP USA
15862 SW 72nd Ave., Suite 150
Portland, OR 97224



BANKS SUNSET PARK
BANKS, OREGON

PROPOSED SAMPLING GRID
(ADJACENT PROPERTY
LEAD RESULTS INCLUDED)

DATE	APRIL 2024
SCALE	1" = 120'
PROJECT NO.	2-61M-12489-1
FIGURE	3



Decision Unit	Area (square feet)	Sample Name	Lead Concentration (mg/kg)	Lead TCLP (mg/L)
A	42,297	DUA-S	2,590	
		DUA-NS	2,800	1.84
B	22,526	DUB-S-0100	3,790	15.0
		DUB-S-0200	3,260	9.08
		DUB-S-0300	2,290	6.39
		DUB-NS-0100	2,890	
		DUB-NS-0200	2,870	
		DUB-NS-0300	2,390	
C	16,437	DUC-S	2,120	4.99
		DUC-NS	820	
D	25,371	DUD-S	336	
		DUD-NS	297	
F	17,784	DUF-S	89.0	
G	24,350	DUG-S-0100	64.0	
		DUG-S-0400	73.4	
H	24,510	DUH-S	82.8	

NOTE:
mg/kg = milligrams per kilogram
mg/L = milligrams per liter
DEQ = Oregon Department of Environmental Quality
TCLP = Toxicity Characteristic Leaching Procedure
= Analyte exceeds the Residential Screening Level only
= Analyte exceeds hazardous waste classification criteria
= Analyte exceeds DEQ Risk-Based Concentration for Occupational, Construction, or Excavation Worker

BANKS SUNSET PARK ASSOCIATION

WSP USA
15862 SW 72nd Ave., Suite 150
Portland, OR 97224



BANKS SUNSET PARK
BANKS, OREGON

SAMPLING RESULTS

DATE
FEBRUARY 2025

SCALE
1" = 50'

PROJECT NO.
2-61M-12489-1

FIGURE
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