



Paragon Tactical Inc. (PTI)  
1580 Commerce Street  
Corona, CA 92878

Attn: Board of Supervisors – Orange County

April 27th, 2021

This letter is a follow up confirmation of the events that occurred at the Orange County Board of Supervisors Meeting held on Tues April 13<sup>th</sup> at the 333 W. Santa Ana Blvd., 10 Civic Center Plaza Board Hearing Room Item #19. As a result of the 1 minute of allotted time to raise our concerns and present the required information, it was apparent that the Orange County Sheriff's Dept representatives could not provide a comprehensive response to the questions on whether or not an alternate bullet trap submittal was received or approved. In addition, it was confirmed that the website link and submittal approach taken was not compliant and was not allowed for review. Furthermore, there was no additional information provided by the OCSO representative on the Paragon Tactical Inc bullet trap system being the only approved, environmentally safe bullet trap for the shooting ranges in which Archico, the lowest bidder and proposed awardee did not utilize within their respective equipment submittal and also acknowledged in an email correspondence with myself post bid that they were mindful of this. (See Exhibit A – Email)

With regards to the installation and assembly of the system, PTI remains the only certified and qualified installer for PTI range equipment and materials required to meet the design specifications of the Katella Indoor Shooting range project.

If you have any questions, please give us a call at 951-736-9440 or email us at [info@paragontactical.com](mailto:info@paragontactical.com).

Sincerely,

Kenny Muhaw  
*Project Manager – Paragon Tactical Inc.*

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The below represent some of the numerous characteristics and performance criteria within the Katella range equipment specification for the shooting range rubber bullet trap that are not met by the proposed range equipment. Subsequently, no approval for the range equipment alternative was publicly announced prior to bid time.

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1. The bullet trap does not meet the OCSD spec - Protective Plate.

There is no evidence of a fail-safe 3/8"AR500 Fail Safe plate that the PTI Super Trap® contains and per the spec. Spec reference below with supporting info. This makes the risk of a "shoot thru" at the "throat" at the back of the trap where the slope meets the back vertical portion. This is where a rubber trap is at its weakest point where the rubber can become thin much less than the allowable amount where rounds can penetrate. Without a "fail-safe" plate, this trap is inferior. The drawings and proposal depicted or described nothing to meet this spec.

**11-48-90> 2.02 Materials > A. > 7.**

The infrastructure of the backstop system shall be constructed in a manner that it will have a "fail safe" rear plate constructed of **3/8" AR500 steel** approximately 30" tall and 42" wide mounted in each section of the backstop system. This feature shall be included to prevent shoot through situations, in the event the system were to be improperly maintained by maintenance personnel.

2. The bullet trap does not meet the OCSD spec - Class A Fire Rated Complete System.

The Class A fire rated material is not Gel-Cor® that is required within the spec. The Flame Seal product that they are proposing is not a gel polymer where hydration is required to fully mix the Gel-Cor® deep within the trap making the entire trap media mass and overall system a Class A fire rated structure. The Flame Seal is a spray applicant that is only sprayed onto the surface of the trap's rubber media. Coverage is only achieved on one layer of rubber media where it makes contact and dries. The rest of the media is not covered. Their spec states that this application is applied on every 6" of media. That means that about 5" x 4 times is NOT covered by the Flame Seal. 20" inches of media is does not have any FlameSeal on it only about 4" in total.

The PTI Gel-Cor® process is proven and tested by the Army Corps of Engineers. The integral design of the Gel-Cor® system infrastructure means the whole bullet trap system passed a Class A fire test, not just one component that is added to many other flammable materials.

**11-48-90> 1.04 QUALITY ASSURANCE > F.**

The rubber media shall be capable of passing a Class A fire test of a seventy (70) minute time frame.

## **11-48-90> 2.02 Materials > B. > 1.**

The rubber media used shall be GEL-COR® fireproof bullet-trapping media that accepts bullets fired from any angle, producing little or no lead dust and reducing both fire risk and range noise.

3. The proposed alternate bullet trap does not meet the OCSD spec - Lead Immobilization.

The PTI Super Trap® is also treated with ELIxIR®, which is a lead immobilizer. This is part of the make-up of the Gel-Cor®. There is reference within the spec of “anti-lead additive and dry lubricant additive” Spec ref below. There is no evidence of a lead immobilizer or inhibitor in the their proposal what-so-ever. See cut sht / spec of PTI’s BRM (Ballistic Rubber Media).

## **11-48-90> 2.02 Materials > B. > 3-4**

The rubber material shall be treated with a fire retardant, hydrated gel polymers, anti-lead additive and dry lubricant material; each component being non-toxic and integral to the overall ballistic and environmental performance of the bullet trap system.

The Ballistic Rubber Media shall be treated with non-hazardous chemical materials, including gel polymers, capable of preventing the loss of lead into the surrounding environment and / or contacting liquids

4. The bullet trap does not meet the OCSD spec - Height of Bullet Trap System.

The proposed bullet trap is 9' high versus the clear stated minimum requirement of being 10' high. This represents effectively 10% less materials that the owner would be getting.

## **11-48-90> 2.02 Materials > A. > 1.**

The primary impact area of the bullet trap shall extend to minimum height of 10'-10" above the finish floor surface, and shall have a maximum footprint depth of 15'-0".