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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Region Office
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September 15, 2022

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RE: Direction to Investigate Sources, Nature, and Extent of Per- and Polyfluoroalkyl Substances (PFAS) at the North Boeing Field Georgetown Steam Plant Site

- **Site Name:** North Boeing Field Georgetown Steam Plant
- **Address:** 7370 East Marginal Way South, Seattle, WA 98108
- **Facility/Site No.:** 2050
- **Cleanup Site ID No.:** 4765

Dear Joseph Flaherty, Allison Crowley, and Peter Dumaliang:

The Washington State Department of Ecology (Ecology) has determined that PFAS are hazardous substances and are regulated under the Model Toxics Control Act (MTCA). See Ecology's website at <https://ecology.wa.gov/Waste-Toxics/Reducing-toxic-chemicals/Addressing-priority-toxic-chemicals/PFAS/Cleanup-sites> for additional information.

PFAS compounds are known to have been used at the North Boeing Field Georgetown Steam Plant site, including the bulk storage and use of aqueous film forming foams (AFFF). In particular, releases of AFFF have been documented at the site in the following locations.

- AFFF release of 100 gallons of 3-6% solution of FC-783 at the 3-380 paint hangar to the storm drain in November 1991.
- AFFF release of 50 gallons of 3% solution at the Power Plant Test Center "Fuel Slab" in December 1991.

- AFFF leak of 100 to 500 gallons of 3% solution at the “F&G Fuel Slabs” in July 1994.
- 3-333/3-335 Fuel Test Facility fire suppression system leak in July 2004.
- Releases from the Boeing Fire Training Center (FTC) located at King County International Airport (KCIA), which drained to low lying areas at the Georgetown Steam Plant property.

Based on this information, the potential for current and historical storage and use of PFAS-containing materials at other areas of the Site, and the potential for undocumented releases at the Site, Ecology hereby requires the PLPs to conduct an investigation of PFAS compounds in potentially PFAS-impacted site media. At a minimum, you should consider potential PFAS impacts to soil, groundwater, and catch basin solids. This should include a summary of areas where PFAS-containing materials have previously been or are currently stored and/or used at the Site and a summary of all known and potential release areas at the Site. Once this summary is complete, Ecology requires that the PLPs develop and implement an Ecology-approved work plan to characterize nature and extent of PFAS in potential PFAS-impacted site media. Due to the size of the Site and the potential extent of areas where PFAS-containing materials were stored, used, and/or released, Ecology recommends utilizing a phased investigation approach beginning with collection and analysis of groundwater samples from existing site wells.

Ecology understands that with these contaminants, it can be confusing to determine how to approach the remedial investigation work. In July 2022, Ecology issued recommended soil and groundwater cleanup levels for six of the most common PFAS compounds, based on Washington State Department of Health State Action Levels. At this stage in your cleanup process, these cleanup levels are just being used to give you an idea of where there is likely a risk to human health and the environment. As we move forward in the cleanup timeline, site-specific cleanup levels will be established and finalized in the Cleanup Action Plan.

Ecology recognizes that the PLPs are currently working on an updated draft of the Remedial Investigation (RI) Report. It is not Ecology’s intention to delay the RI schedule; instead, Ecology prefers that the investigation of PFAS at the Site be conducted concurrently with the development of the RI Report. The information gained in this investigation may be provided to Ecology as an addendum to the next submittal of the RI Report, but if another revision to the RI Report is deemed necessary, all available PFAS-investigation data will be incorporated with each subsequent submission of the RI Report. The results of the PFAS investigation must be completed prior to the Feasibility Study, and the results of this PFAS investigation shall be considered as part of the Feasibility Study.

Please feel free to contact me via phone (425) 515-5992 or by email at julia.schwarz@ecy.wa.gov with any questions.

Sincerely,



Julia Schwarz
Site Manager
Toxics Cleanup Program, NWRO

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