



Public Participation Plan

TECT Aerospace Everett Cleanup Site Everett, WA

Toxics Cleanup Program

Washington State Department of Ecology

Northwest Regional Office

Shoreline, Washington

April 2023

Publication Information

This document is available online at Ecology's [TECT Aerospace Everett](#) cleanup site page.¹

Cover photo credit

- Snohomish County, 2001

Related Information

- Cleanup site ID: 12071
- Facility site ID: 17392

Contact Information

Toxics Cleanup Program

Northwest Regional Office

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¹ <https://apps.ecology.wa.gov/cleanupsearch/site/12071>

² <https://ecology.wa.gov/About-us/Contact-us>

Department of Ecology's Regional Offices

Map of Counties Served



Southwest Region 360-407-6300	Northwest Region 206-594-0000	Central Region 509-575-2490	Eastern Region 509-329-3400
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Region	Counties served	Mailing Address	Phone
Southwest	Clallam, Clark, Cowlitz, Grays Harbor, Jefferson, Mason, Lewis, Pacific, Pierce, Skamania, Thurston, Wahkiakum	PO Box 47775 Olympia, WA 98504	360-407-6300
Northwest	Island, King, Kitsap, San Juan, Skagit, Snohomish, Whatcom	PO Box 330316 Shoreline, WA 98133	206-594-0000
Central	Benton, Chelan, Douglas, Kittitas, Klickitat, Okanogan, Yakima	1250 W Alder St Union Gap, WA 98903	509-575-2490
Eastern	Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Spokane, Stevens, Walla Walla, Whitman	4601 N Monroe Spokane, WA 99205	509-329-3400
Headquarters	Across Washington	PO Box 46700 Olympia, WA 98504	360-407-6000

Public Participation Plan

**TECT Aerospace Everett
Everett, WA**

Toxics Cleanup Program
Washington State Department of Ecology
Northwest Regional Office
Shoreline, WA

April 2023



DEPARTMENT OF
ECOLOGY
State of Washington

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Public Involvement in Contamination Cleanup

The Washington State Department of Ecology (Ecology) developed this public participation plan (plan) in cooperation with Snohomish County, a party potentially responsible for cleanup costs. The purpose of the plan is to promote meaningful community involvement during cleanup.

The plan describes ways Ecology will inform the public about contamination investigations and cleanup options throughout the cleanup process. Ecology encourages the public to learn about and get involved in decision-making opportunities. This plan identifies how and when the public can get involved during different stages of the investigation and cleanup of contamination.

This plan is for the Agreed Order for the TECT Aerospace Everett cleanup site.

Site contacts

To be included in the site record, comments about the cleanup process must be submitted during comment periods. Questions and informal comments or information about the site's history are welcome anytime.

Ecology

Northwest Regional Office
PO Box 330316
Shoreline, WA 98133-9716

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Public Participation Grants

Grants may be available to neighborhood committees, non-profits, and other groups interested in the site. For contaminated sites, these funds can be used to:

- Hire an expert to help interpret technical information³
- Conduct activities that enhance the public's understanding of, and participation in, the cleanup process

³ Ecology currently does not have a citizen technical advisor for providing technical assistance to citizens on issues related to the investigation and cleanup of the site.

For more information about public participation grants, please contact Faith Wimberley at 425-275-7285 or faith.wimberley@ecy.wa.gov. You may also visit the [Public Participation Grant website](#).⁴

Washington's Cleanup Laws

Ecology uses the Model Toxics Control Act (MTCA) and accompanying regulations for cleanup activities.

This plan is required under MTCA, a law that passed in 1989. MTCA provides guidelines for contaminated site cleanup in Washington State and sets standards to ensure the cleanup protects human health and the environment.

Model Toxics Control Act

MTCA began as a grassroots citizen's initiative in 1988 and started the process of systematically cleaning up contaminated sites in Washington. Under MTCA, current and/or past property owners or operators may be held responsible for cleaning up contamination on, or coming from, their property to standards that are safe for human health and the environment.

Ecology enacts MTCA and oversees cleanups in the state and issues regulations and guidance governing those cleanups. The regulations are found in [Chapter 173-340 Washington Administrative Code \(WAC\)](#).⁵ Ecology investigates reports of property contamination, and if the contamination is seen as a significant threat to human health or the environment, the contaminated property is placed on the Hazardous Sites List, and the cleanup process begins.

Public participation is an important part of cleanup under the MTCA process. Participation needs are assessed at each cleanup site according to the level of public interest and the degree of risk posed by the contamination. Individuals who live near the site, community groups, businesses, government, other organizations, and interested parties have the opportunity to get involved by commenting on the cleanup process.

Under MTCA, the cleanup process generally includes five phases. Each phase includes an opportunity for the public to review and comment on cleanup documents.

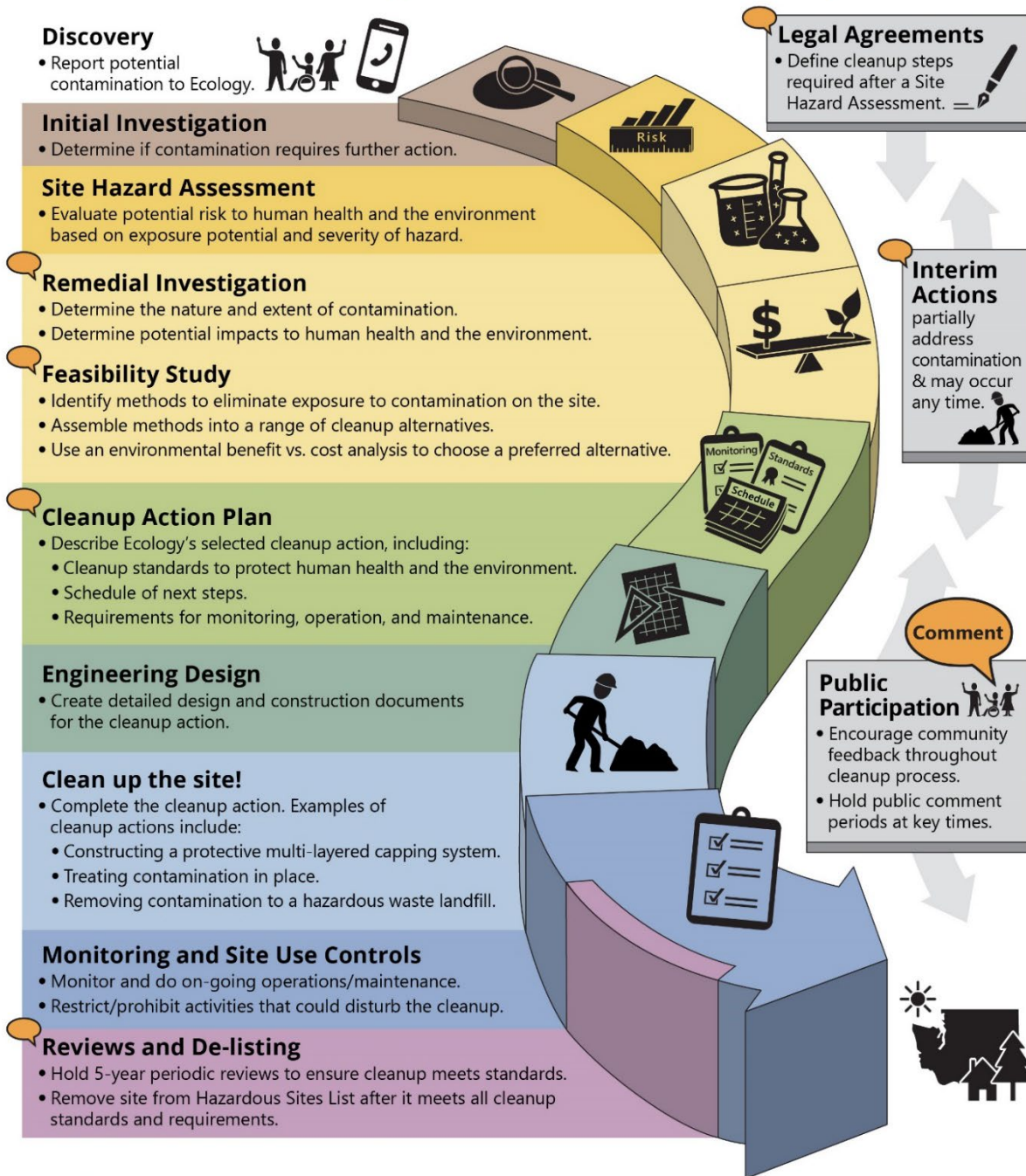
State Environmental Policy Act

The State Environmental Policy Act (SEPA) is followed during review and development of cleanup plans.

⁴ <https://ecology.wa.gov/About-us/Payments-contracts-grants/Grants-loans/Find-a-grant-or-loan/Public-participation-grants>

⁵ <https://apps.ecology.wa.gov/publications/publications/9406.pdf>

Washington's Formal Cleanup Process



 **Washington's Cleanup Law**
Model Toxics Control Act (MTCA)

MTCA defines the cleanup process. This public-initiated environmental law directs upland cleanups (on land or in groundwater) and sediment cleanups (in freshwater or marine environments). Ecology enacts MTCA and regulates the cleanup process.

September 2019
Ecology Publication 19-09-166

Figure 1: Steps in Washington's Cleanup Process⁶

⁶ <https://apps.ecology.wa.gov/publications/SummaryPages/1909166.html>

Site Information

Land Use

TECT Aerospace Everett is located at, and in the immediate vicinity of, 2933 109th St SW in Everett, WA, 98204 (the Site). This 39-acre Site is located on the southeastern portion of Paine Field in South Everett and is zoned for light industrial use. The Site is owned by the County and currently leased for use by several aerospace manufacturing operations. The Site history is as follows:

- **1936:** Developed into a county airfield by a federal program.
- **1940-1948:** Acquired by the U.S. military. Used by the U.S. Army Air Corps as an air base named Paine Field.
- **1948-1968:** Jointly occupied and used by the County and U.S. Air Force. Redeveloped for aerospace manufacturing operations by the County.
- **1968-Present:** Managed and operated by the County.

The Site consists of a series of existing and former buildings located at Snohomish County Airport (Paine Field):

- **Building C-19** was constructed in 1979 and primarily utilized for aerospace manufacturing. It is currently used for aerospace manufacturing, warehouse storage, and metal fabrication.
- **Building C-20, C-21, C-22, and C-23** were constructed between the 1940s and the late 1980s and used for barracks, warehousing, and aerospace manufacturing. Today, these buildings are unoccupied and scheduled for demolition in 2023.
- **Building C-29/Former Fuel Farm** was constructed before 1947 for chemical storage of aviation fluid. Building C-29 was used for metal fabrication from 1965-1966 and demolished in 1996.

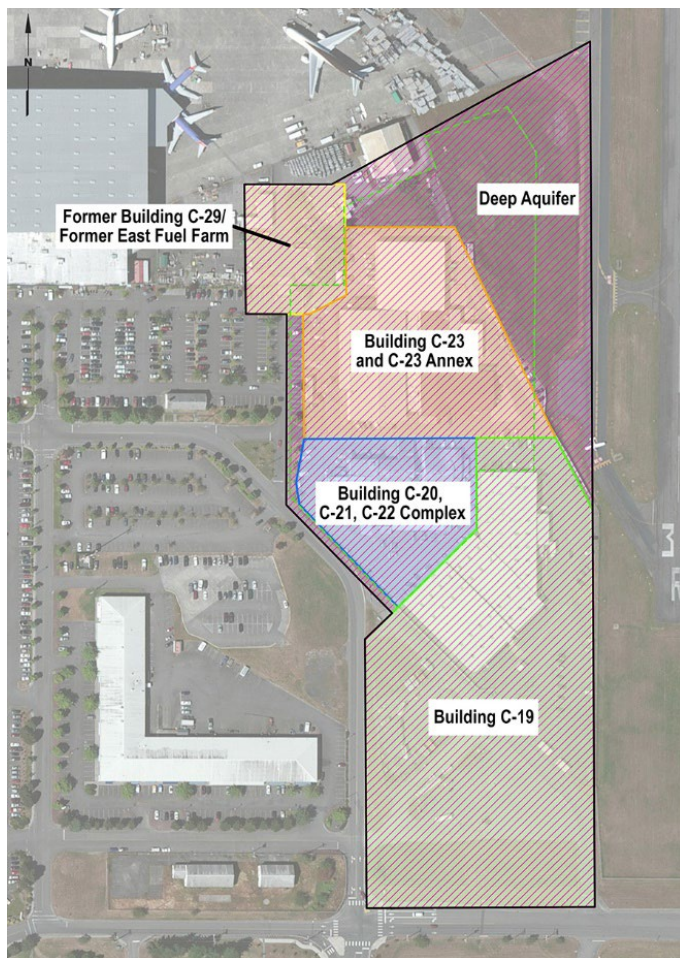


Figure 2: Aerial view of TECT Aerospace cleanup site

How the site became contaminated

With a long history of aerospace manufacturing operations, this Site has experienced contamination from many different sources.

- **Building C-19** – A former degreaser collection vault was housed in this building. Releases from this vault resulted in contamination of soil, groundwater, and soil vapor. Releases of cutting oils from manufacturing operations also caused soil contamination.
- **Building C-20, C-21, C-22, and C-23** – General aerospace manufacturing operations including metal fabrication and degreasing within these buildings resulted in contamination of soil, groundwater, and soil vapor.
- **Building C-29/Former Fuel Farm** – This now demolished building was initially used for storage of chemicals and aviation fuels in underground storage tanks (USTs) and bunkers. This area was also referred to as the East Fuel Farm. Subsequent usage of building C-29 involved metal fabrication. These activities caused soil, groundwater, and soil vapor contamination.

Site Investigation and Contamination

The Site has undergone numerous environmental investigations by multiple parties beginning in the early 1990s through 2022. These evaluations focused on contamination of the subsurface soil, groundwater, and soil gas. Multiple contaminants were found in the soil, shallow and deep groundwater, and soil gas that exceeded minimum allowed levels under MTCA:

- **Chlorinated volatile organic compounds (CVOCs):** tetrachloroethene (PCE); trichloroethene (TCE); cis-1,2-dichloroethene (cis-1,2 DCE); and vinyl chloride (VC)
- **Petroleum hydrocarbons:** Gasoline- (TPH-G), diesel- (TPH-D), and oil-range- (TPH-O) total petroleum hydrocarbons, and benzene
- **Metals:** arsenic and chromium

Ecology determined that this Site poses low-to-moderate risk during an evaluation of data in 1997. Rankings are based on the type of contamination identified at the Site and the potential risks to human health and the environment. A review of the Site Hazard Assessment is scheduled for 2024 following completed site characterization.

Cleanup plans

The following remedial actions have been conducted at the TECT Aerospace Everett cleanup site.

Underground Storage Tanks: In 1992 at Building C-29, one 12,000-gallon Underground Storage Tank (UST)—used for storage of aviation fuel—was removed along with 100 cubic yards of contaminated soil. An additional 12,000-gallon UST was planned for removal but could not be located.

Contaminated Soil Excavation: In 2011 at Building C-19, shallow soil contaminated with TPH-D and TPH-O was excavated from below the building in several limited areas. Ecology issued this portion of the Site a no further action necessary letter in 2013 for soil contaminated with TPH.

Snohomish County is now entering into Ecology's [Formal Cleanup Program](#).⁷ Ecology conducts or supervises formal cleanups when property owners are under court order or decree, or when cleanups are funded by legislative initiatives. The public can provide input during public meetings and comment periods.

⁷ <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Cleanup-process>

Community Profile

Environmental Justice

Ecology utilizes multiple resources to better understand the environmental and demographic information of the community surrounding this cleanup site. The following tools provide information that help our team properly plan for public outreach.

EJScreen

The [Environmental Justice Screening and Mapping Tool \(EJScreen\)](#)⁸ has been developed by the Environmental Protection Agency (EPA). It is based on nationally consistent data and an approach that combines environmental and demographic indicators in maps and reports. Ecology uses this information to tailor its communications to the needs of communities through various means. These include developing language translations and identifying the need for interpreters. Ecology translates materials like fact sheets into languages that are spoken by 5% or more of the local community.

For this Site, Ecology is using the EJScreen to capture community information within a one-mile radius of the cleanup site. This area is larger than the required quarter-mile radius per the MTCA law, due to the distance of residential areas in relation to the Site.

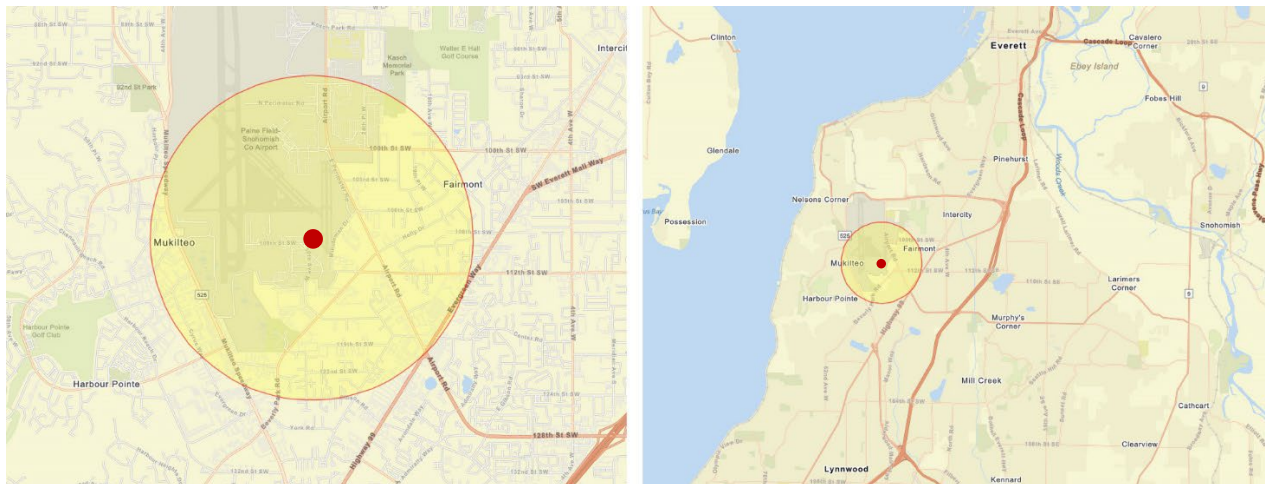


Figure 3: US EPA EJScreen - Maps of TECT Aerospace Everett displaying a one-mile radius around the Site

Washington Environmental Health Disparities Map

The [Washington Environmental Health Disparities Map](#)⁹ is managed by the WA State Dept of Health. This interactive mapping tool evaluates environmental health risk factors and identifies disparities in communities across the state. It estimates an environmental health impact score on a scale of 1-10 (low to high) for each census tract. The score reflects pollutant exposure and factors that affect people’s vulnerability to environmental pollution.

⁸ <https://ejscreen.epa.gov/mapper/index.html>

⁹ <https://fortress.wa.gov/doh/wtnibl/WTNIBL/>

The TECT Aerospace Everett cleanup site lies within census tract 041901 with a high score of 9. Neighboring census tracts have scores ranging from 7 to 8. These rankings reflect communities facing greater environmental risk factors. This information further highlights the importance for Ecology to improve access to information about the Site’s public comment period. Ecology will offer translations of the Site’s outreach materials, post information in public locations frequented by community members, and reach out to community organizations for feedback and input.

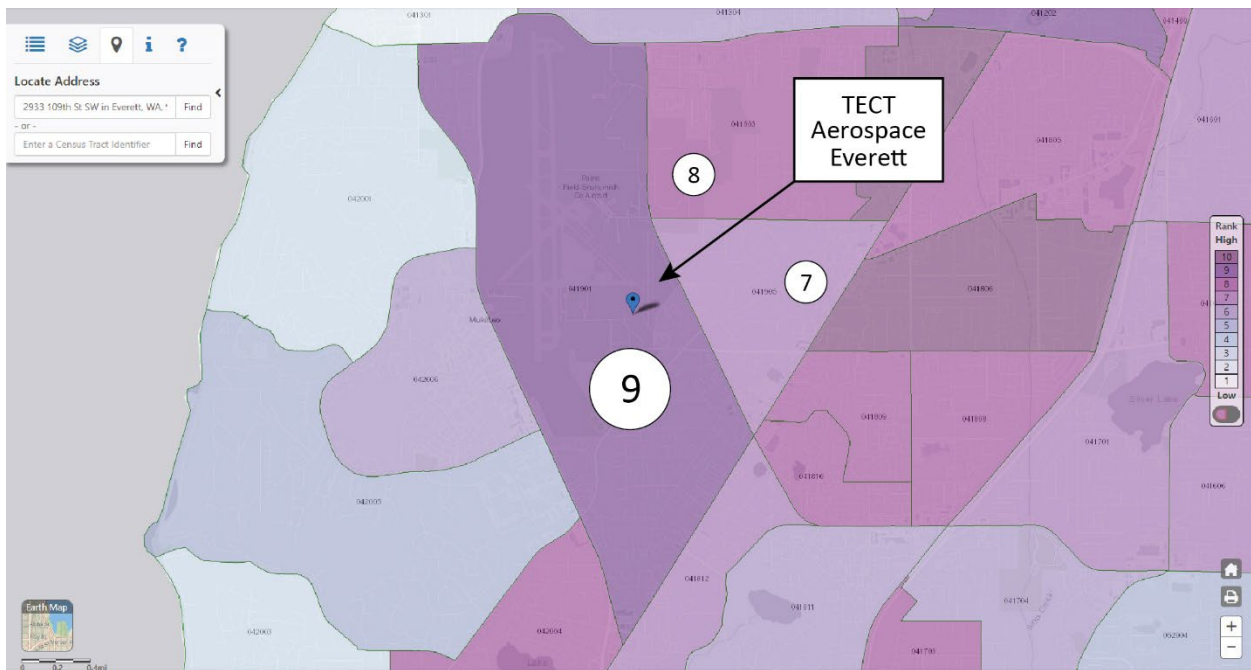


Figure 4: Washington Environmental Health Disparities Map – The census tract at TECT Aerospace Everett cleanup site and neighboring census tracts show high rankings for communities facing greater environmental risk factors.

Demographics and Language Needs

The TECT Aerospace Cleanup Site is located on the southeastern portion of Paine Field, unincorporated Snohomish County in South Everett, WA. The Site and Paine Field are part of the SW Everett Industrial Center. The residential community of the Holly neighborhood is ~.5 miles from the Site. Here there are clusters of homes, businesses, parks, and the Fairmount Elementary school. Ecology has reached out to the Westmont Holly Neighborhood Association about the TECT Aerospace Everett cleanup site. Ecology will incorporate feedback from the neighborhood association into outreach plans and communicate all cleanup activities at the Site.

The Holly neighborhood is extremely diverse and includes areas zoned for industrial, commercial, and residential use. According to the EJScreen socioeconomic indicators, this area ranks at the 92nd percentile in the state for limited English-speaking households (see Figure 5) and at the 81st percentile in the state for those with less than a high school education (see Figure 5). In addition, the EJ data shows that 24% of the population age 5+ speaks English “less than very well” (see Figure 6). Of the languages spoken at home, Spanish ranks the highest at

14%, followed by Vietnamese at 7%, and a Russian, Polish, or other Slavic language at 5% (see Figure 7). Based on this data and previous experience working in the Everett community, Ecology is translating fact sheets into Spanish, Vietnamese, and Russian. In addition, when public meetings are needed, or requested by 10 or more persons during a public comment period, Ecology may provide interpreter services in those languages. We strive to make our public participation efforts as inclusive as possible and welcome your input about how to best reach the surrounding community.



EJScreen Report (Version 2.1)



1 mile Ring Centered at 47.899571,-122.273642, WASHINGTON, EPA Region 10

Approximate Population: 7,125

Input Area (sq. miles): 3.14

TECT Aerospace Everett

Selected Variables	Value	State Avg.	%ile in State	USA Avg.	%ile in USA
Pollution and Sources					
Particulate Matter 2.5 ($\mu\text{g}/\text{m}^3$)	7.47	7.85	34	8.67	21
Ozone (ppb)	31.5	35.3	20	42.5	4
Diesel Particulate Matter* ($\mu\text{g}/\text{m}^3$)	0.475	0.334	74	0.294	80-90th
Air Toxics Cancer Risk* (lifetime risk per million)	40	35	92	28	95-100th
Air Toxics Respiratory HI*	0.5	0.51	72	0.36	95-100th
Traffic Proximity (daily traffic count/distance to road)	760	740	74	760	76
Lead Paint (% Pre-1960 Housing)	0.043	0.22	27	0.27	24
Superfund Proximity (site count/km distance)	0.029	0.18	18	0.13	27
RMP Facility Proximity (facility count/km distance)	0.19	0.64	43	0.77	36
Hazardous Waste Proximity (facility count/km distance)	9.2	2.2	94	2.2	94
Underground Storage Tanks (count/km ²)	11	6.3	81	3.9	89
Wastewater Discharge (toxicity-weighted concentration/m distance)	2.4E-05	0.021	51	12	22
Socioeconomic Indicators					
Demographic Index	34%	28%	71	35%	58
People of Color	48%	33%	79	40%	65
Low Income	21%	24%	49	30%	38
Unemployment Rate	5%	5%	64	5%	61
Limited English Speaking Households	14%	4%	92	5%	89
Less Than High School Education	14%	8%	81	12%	69
Under Age 5	4%	6%	42	6%	43
Over Age 64	9%	15%	23	16%	21

Figure 5: US EPA EJScreen - Socioeconomic Indicators within one-mile area around Site



EJSCREEN ACS Summary Report



Location: User-specified point center at 47.899571, -122.273642
 Ring (buffer): 1-miles radius
 Description: TECT Aerospace Everett

	2016 - 2020 ACS Estimates	Percent	MOE (±)
Population Age 5+ Years by Ability to Speak English			
Total	6,818	100%	824
Speak only English	3,749	55%	426
Non-English at Home ¹⁺²⁺³⁺⁴	3,069	45%	624
¹ Speak English "very well"	1,448	21%	219
² Speak English "well"	643	9%	164
³ Speak English "not well"	768	11%	190
⁴ Speak English "not at all"	210	3%	210
³⁺⁴ Speak English "less than well"	978	14%	270
²⁺³⁺⁴ Speak English "less than very well"	1,620	24%	312

Figure 6: US EPA EJScreen - Population Age 5+ Years by Ability to Speak English within one-mile area around Site

	2016 - 2020 ACS Estimates	Percent	MOE (±)
Population by Language Spoken at Home*			
Total (persons age 5 and above)	6,278	100%	894
English	3,400	54%	681
Spanish	895	14%	519
French, Haitian, or Cajun	40	1%	95
German or other West Germanic	11	0%	34
Russian, Polish, or Other Slavic	308	5%	225
Other Indo-European	95	2%	135
Korean	137	2%	191
Chinese (including Mandarin, Cantonese)	8	0%	24
Vietnamese	456	7%	670
Tagalog (including Filipino)	178	3%	261
Other Asian and Pacific Island	302	5%	235
Arabic	263	4%	307
Other and Unspecified	184	3%	212
Total Non-English	2,878	46%	1,066

Figure 7: US EPA EJScreen – Population by Language Spoken at Home within one-mile area around Site

Tribal Lands

The following federally recognized tribes have been contacted regarding cultural resources associated with this Site: Muckleshoot Indian Tribe, Samish Indian Nation, Sauk-Suiattle Indian Tribe, Snoqualmie Indian Tribe, Stillaguamish Tribe of Indians, Suquamish Tribe, Swinomish Indian Tribal Community, and Tulalip Tribes. Ecology will ensure that these Tribes are engaged with any decision-making processes for this Site and have ample opportunity to be involved throughout the process on a government-to-government basis.

Public Participation Activities

Members of the public may ask questions, submit informal comments, or share site information at any time. Interested parties do not need to wait for a formal public comment period to contact Ecology.

However, to be included in the formal site record, comments about the site investigation, cleanup alternatives, or cleanups must be submitted during formal comment periods. In addition, the public is invited to review site documents before they become final. This is the most direct and influential way to learn more about the site and be involved in the cleanup's decision-making.

How we share information with the community

During specific stages of the cleanup, Ecology will mail notices about public comment periods to addresses surrounding the site. The mailing list area will vary depending on the type of contamination and where it's located, but the list will at least include addresses within a 1/4-mile radius of the site and other interested organizations and individuals. These notices will provide general information about the site, contact information for submitting comments, and times and locations of public meetings or hearings or how to request one if not yet scheduled.

Ecology may also develop documents outside of comment periods to keep the community updated on the site's status. These informational documents will be available online and at document repositories. Print copies may be mailed to the nearby community if we feel the message warrants the associated cost and resources.

Comment period notices and other site announcements may also be posted in various locations throughout the community (for example, local businesses, schools, libraries).

Postal mailing list

Ecology maintains a mailing list that includes addresses within a .25-mile radius of the site and relevant local, state, and federal government contacts.

All contacts receive public comment notices when draft documents are available.

We will add additional individuals, organizations, and other interested parties to the mailing list as requested. If you would like to be added to the mailing list for this site, please contact Kristen Forkeutis, Outreach Specialist, by phone at 425-240-4353 or email at Kristen.Forkeutis@ecy.wa.gov.

Site Register

Public comment periods, events, and other cleanup notices are published in Ecology's [Site Register](#).¹⁰ To receive the *Site Register* by email, please [subscribe online](#),¹¹ or contact Sarah Kellington at sarah.kellington@ecy.wa.gov or 360-280-3167.

Newspaper display ads or legal notices

We announce public comment periods and events in ads or notices published in the Everett Daily Herald and MyEverettNews.com. We will also publish notice on our [Public Input & Events Listing](#).¹²

Email lists

Ecology maintains an email list to update interested persons about this site. If you would like to be added to the email list for this site, please contact Kristen Forkeutis, Outreach Specialist, by phone at 425-240-4353 or email at Kristen.Forkeutis@ecy.wa.gov.

Ecology's website and social media platforms

We maintain a website for the [TECT Aerospace Everett Cleanup site](#).¹³ The website provides site information, and you may download cleanup documents.

We may also share information about cleanup sites through [news releases, our ECOconnect blog, and social media](#).¹⁴

Places to see print documents

During public comment periods, you can find print documents at the following locations:

Everett Public Library, Evergreen Branch
9512 Evergreen Way
Everett, WA 98204
425-257-8250

Everett Public Library, Main Library
2702 Hoyt Ave
Everett, WA 98201
425-257-8000

Washington Department of Ecology
Northwest Regional Office
15700 Dayton Ave N
Shoreline, WA 98133
206-594-0000

¹⁰ <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Site-Register-lists-and-data>

¹¹ https://public.govdelivery.com/accounts/WAECY/subscriber/new?topic_id=WAECY_118

¹² <https://ecology.wa.gov/Events/Search/Listing>

¹³ <https://apps.ecology.wa.gov/cleanupsearch/site/12071>

¹⁴ <https://ecology.wa.gov/About-us/Who-we-are/News>

To schedule an appointment, please contact Central Records by calling the Ecology Northwest Regional Office main number at 206-594-0000 or emailing mnwro_public_request@ecy.wa.gov.

Signs around the cleanup site

We may also install signs displaying information about project status, traffic impacts, and health risks around the cleanup site.

How to share information with us

At minimum, MTCA requires 30-day public comment periods for draft cleanup documents and 14-day comment periods SEPA documents. SEPA documents are often made available for public review with other cleanup documents. In that case, we combine the comment periods, and they last at least 30 days. We may hold comment periods longer than 30 days.

We may also identify public concerns and cleanup goals by meeting with and soliciting information from interested community members and organizations. To collaborate with us about this site, please contact Kristen Forkeutis, Outreach Specialist, at 425-240-4353 or Kristen.Forkeutis@ecy.wa.gov.

Public comment periods

Formal 30-day comment periods allow interested members of the public to comment on draft documents, legal agreements, and proposed cleanup actions. If there is significant interest, Ecology may extend the public comment period. When Ecology oversees SEPA determinations, we hold comment periods for at least two weeks and may extend to 30 days or more when other cleanup documents are concurrently available for review.

Following a comment period, we publish all the input we received and respond to significant comments and questions. If the comments result in significant changes to the cleanup documents, then the documents will be revised and re-issued for public review. If the comments do not result in significant changes, then they become final.

Public events

We hold public meetings, workshops, open houses, and public hearings based on community interest. If we have not scheduled a meeting, we will hold one if 10 people request it, and this may cause us to extend a public comment period, so the meeting occurs during it.

Events are held at locations close to the site that meet Americans with Disabilities Act standards. Public meetings, workshops, open houses, and hearings are always announced in advance using a variety of methods.

Americans with Disabilities Act

To request ADA accommodation for disabilities, or printed materials in a format for the visually impaired, contact the Ecology ADA Coordinator at 360-407-6831 or ecyadacoordinator@ecy.wa.gov, or visit our [ADA website](#).¹⁵ People with impaired hearing may call Washington Relay Service at 711. People with speech disability may call TTY at 877-833-6341.

Plan Amendments

Ecology developed this plan following MTCA regulations (WAC 173-340-600). We review it as the cleanup progresses and amend it as necessary. You may suggest amendments to Kristen Forkeutis, Outreach Specialist, at 425-240-4353 or Kristen.Forkeutis@ecy.wa.gov.

This plan includes information for the public regarding opportunities for public involvement and comment. The outreach activities discussed in this section reflect Ecology's current plans for keeping the public informed and providing ways for those interested in the site to communicate their concerns and questions to us.

If you feel the planned outreach activities and mechanisms described in this plan are insufficient, or should otherwise be modified, we will work to find solutions. New outreach activities or outreach tools established as a result can be implemented right away, with or without amending this plan.

¹⁵ <https://ecology.wa.gov/About-us/Accessibility-equity/Accessibility>