



Response to Comments

Agreed Order and Public Participation Plan

TECT Aerospace Everett Site Everett, WA

Public comment period: April 24– May 23, 2023

Facility Site ID: 17392

Cleanup Site ID: 12071

Toxics Cleanup Program

Washington State Department of Ecology
Northwest Regional Office
Shoreline, Washington

June 2023

Publication Information

This document is available on the Department of Ecology's website at:

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

Related Information

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

Contact Information

Toxics Cleanup Program

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ADA Accessibility

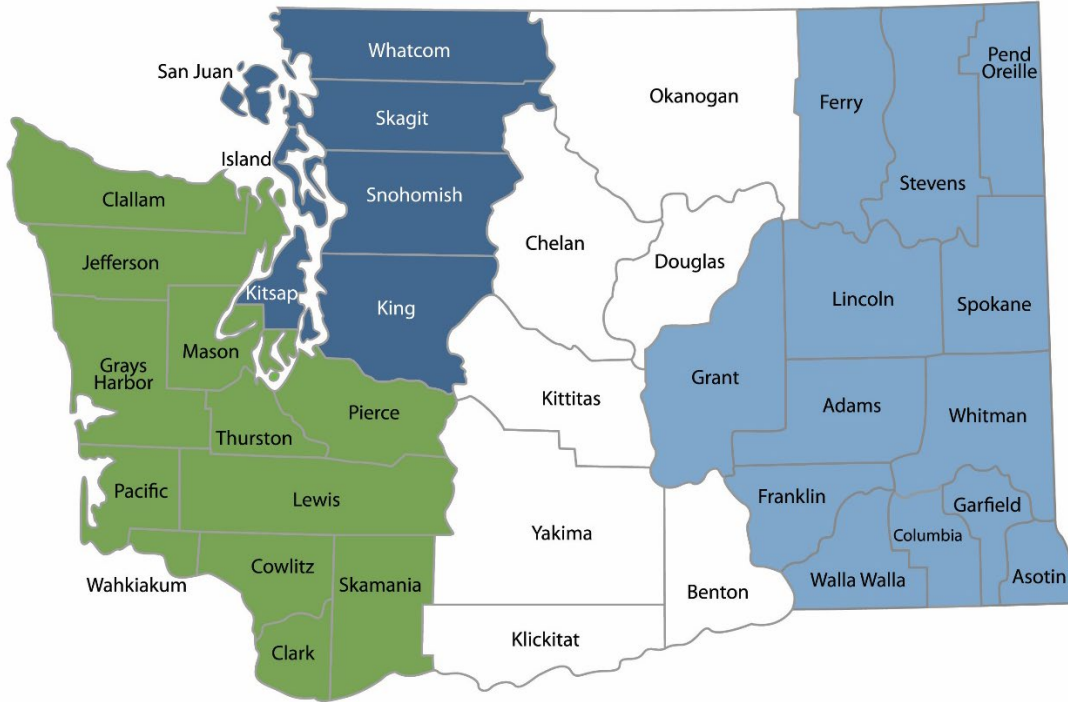
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¹ <https://ecology.wa.gov/contact>

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 Outreach Summary

The TECT Aerospace Everett cleanup site (Site) located on the southeastern portion of Paine Field in South Everett is beginning Washington State's [formal cleanup process](#)² as directed under the Model Toxics Control Act ([MTCA](#)³). An Agreed Order (legal agreement) requires Snohomish County, a potentially liable person (PLP), to prevent existing contamination from impacting human health and the environment by investigating and addressing contamination under the Model Toxics Control Act (MTCA).

The Department of Ecology's public involvement activities related to this Site's 30-day comment period (April 24 – May 23, 2023) included:

- **Fact Sheet:**
 - U.S. mail distribution of a fact sheet providing information about the cleanup documents and the public comment period to approximately 4,000 people including neighboring businesses and other interested parties.
 - Email distribution of the fact sheet to approximately 43 people, including interested individuals, local/county/state/federal agencies, neighborhood associations, and interested community groups.
- **Legal Notices:**
 - Publication of one paid printed display ad in *The Everett Herald*, dated Saturday, April 22, 2023.
 - Publication of one paid digital display ad in the *Herald Net* for 30-days during the comment period.
 - Publication of one paid digital display ad in *La Raza* for 30-days during the comment period.
 - Publication of one paid digital display ad in *MyEverettNews.com* for 30-days during the comment period.
 - Publication of one paid digital display ad in the *Everett Post* for 30-days during the comment period.
- **Site Register:**
 - Publication of 3 notices in Ecology's Toxics Cleanup Site Register:
 - Comment Period Notice:
 - April 20, 2023
 - May 4, 2023
 - May 18, 2023
 - Visit [Ecology's Site Register website](#)⁴ to download PDFs.

² <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Cleanup-process>

³ <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Rules-directing-our-cleanup-work/Model-Toxics-Control-Act>

⁴ <https://fortress.wa.gov/ecy/publications/UIPages/PublicationList.aspx?IndexTypeName=Program&NameValue=Toxics+Cleanup&DocumentTypeName=Newsletter>

- **Media Coverage:**
 - [Blog post](#)⁵ by Ecology on April 28, 2023.
 - *MyEverettNews* ran a [story online](#)⁶ on May 1, 2023 along with a Tweet and Facebook post.
- **Social Media:**
 - **Twitter:** Ecology – Northwest Region @ecyseattle posted a [tweet on April 28, 2023](#)⁷ connecting readers to the comment period including the cleanup site webpage, a virtual tour, and how to submit comments.
- **Websites:**
 - Announcement of the public comment period and posting of the fact sheet and associated documents for review on [Ecology’s TECT Aerospace webpage](#)⁸ and Ecology’s [Public Inputs & Events webpage](#)⁹.
- **Community Outreach**
 - Ecology contacted the Westmont Holly Neighborhood Association about the cleanup site to encourage their participation and welcome their thoughts and concerns. We integrated their suggestions into our outreach and answered their initial questions via email.
- **Fact Sheet Community Distribution**
 - Ecology distributed multiple fact sheets to the following locations at the suggestion of the Westmont Holly Neighborhood Association.
 - Mukilteo Library
 - Grocery Outlet
 - Los Gavilanes Market
 - Fairmont Elementary School
 - Horizon Elementary School
 - Ecology attempted to hang fact sheets at the local Home Depot and Explorer Middle School (at the suggestion of the Westmont Holly Neighborhood Association), but that was not possible.
- **Community Outreach Targeting Populations Speaking Other Languages**
 - Ecology reached out to the following organizations to research alternative methods to reach specific populations speaking languages highly represented in the community.
 - WA State Commission on Asian Pacific American Affairs – Emailed on 3.30.23 and it was undeliverable
 - Refugee and Immigrant Services Northwest – Left a voicemail with the Executive Director at 425 388 9312 and received no response
 - Ukrainian Community Center of Washington – Emailed on 3.31.23 and received

⁵ <https://ecology.wa.gov/Blog/Posts/April-2023/Cleaning-up-TECT-Aerospace-cleanup-in-Everett-is-g>

⁶ <https://myeverettnews.com/2023/05/01/input-sought-as-washington-department-of-ecology-plans-tect-aerospace-cleanup-in-south-everett/>

⁷ <https://twitter.com/ecyseattle/status/1652002438772330497>

⁸ <https://apps.ecology.wa.gov/cleanupsearch/site/12071>

⁹ <https://ecology.wa.gov/Events/Search/Listing>

no response

- Mulkiteo Schools - Emailed on 3.31.23 and they suggested reaching out to *Connect Casino Road* and *Child Strive*.

- Everett Community College (Equity and Social Justice Division) - Emailed on 3.31.23 and received no response

- **Document Repositories:**

- Ecology offered three locations for document review: 1) Dept of Ecology Northwest Regional Office by appointment, 2) Everett Public Library Main Branch, and 3) Everett Public Library Evergreen Branch.

Comment Summary

From April 24, 2023, to May 23, 2023, Ecology solicited public comments on a draft Agreed Order and Public Participation Plan for the TECT Aerospace Everett cleanup site.

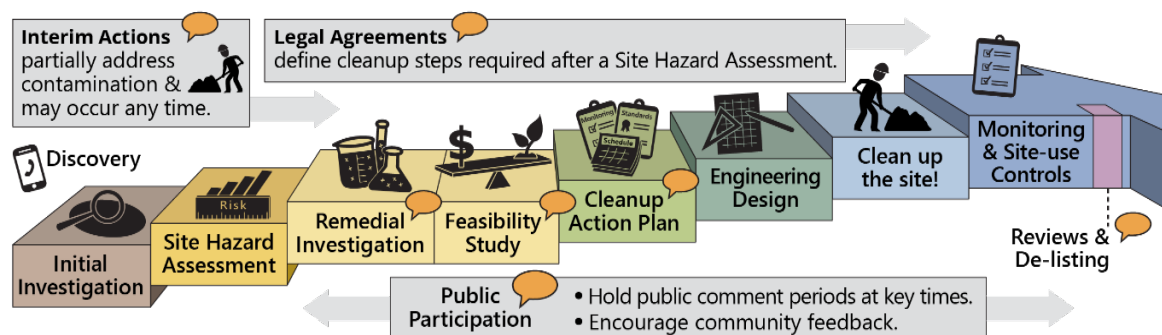
Ecology received one comment during the 30-day comment period.

Next Steps

Ecology has reviewed and considered the public comment received on the draft Agreed Order and Public Participation Plan. Based on Ecology's evaluation, no changes were necessary in the documents, and they are being finalized.

Work will begin on the Remedial Investigation and Feasibility Study. See graphic below and visit Ecology's [cleanup process webpage](#)¹⁰ to learn more about Washington's formal cleanup process.

Another opportunity for public input will occur when the public review drafts of the Remedial Investigation, Feasibility Study, and Cleanup Action Plan have been completed.



Washington's formal cleanup process ([download a text explanation](#)¹¹).

¹⁰ <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Cleanup-process>

¹¹ <https://apps.ecology.wa.gov/publications/SummaryPages/1909166.html>

Comments and Responses

The public comment received is printed verbatim below and followed by Ecology's response.

Comment from: John Carroll (email, May 3, 2023)

Subject: TECT Aerospace Everett

Greetings Kristen and David,

I propose using plants capable of absorbing toxic materials and converting them through mineralization into less toxic substances. This process is called phytoremediation. This process is well understood and well documented. As a consulting agronomist, I've used this process many times in both Asia and the Americas. Phytoremediation has very competitive advantages over other methods of removing toxins in the soil. Currently, I'm working with an elite cultivar of grass that sequesters large quantities of toxins contained in the soil profile, during a single cropping cycle. The superior advantage of using a phytoremediation crop is that the toxics are rendered less dangerous through mineralization, there are little or no toxic particulates dispersed in the atmosphere and the costs of detoxification are greatly reduced. This process would be performed in conjunction with the establishment of a native planting barrier.

I have proprietary genetics capable of excelling in this process. A comprehensive program of fighter remediation then following up with a diversified native planting should mitigate soil contaminants and provide a cost effective solution. Feel free to contact me if this process is of interest. I live locally and am not trying to monetize this procedure. I have included links of studies with show efficacy regarding this method.

Kind regards from a concerned scientist,

John Carroll

Research Agronomist

<https://www.sciencedirect.com/science/article/pii/S0013935120303200>

<https://arundobioenergy.com/arundo-donax-for-phytoremediation-of-metal-contaminated-soils/>

<https://www.frontiersin.org/articles/10.3389/fenvs.2021.652367/full>

<https://www.hindawi.com/journals/bmri/2013/324830/>

Ecology's response

Thank you for your creative ideas and interest in the cleanup. Ecology will consider all applicable remedial technologies once sufficient data has been gathered during the Remedial Investigation. Remedial technologies, including phytoremediation if appropriate, will be evaluated in the Feasibility Study Report. Another opportunity for public input will occur when the public review drafts of the Remedial Investigation, Feasibility Study, and Cleanup Action Plan have been completed.