



Electronic Copy

**STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY**

Northwest Region Office
PO Box 330316, Shoreline, WA 98133-9716 • 206-594-0000

May 27, 2025

Andrew Rardin
Paine Field Snohomish County Airport
9901 24th Pl W, Suite A
Everett, WA 98204
(andrew.rardin@snoco.org)

Re: Final Determination of Liability for Release of Hazardous Substances at the following Contaminated Site:

- **Site Name:** Paine Field Fire Training Pit PFAS
- **Site Address:** 3220 100th St SW, Everett, WA 98204
- **Cleanup Site ID:** 16912
- **Facility/Site ID:** 49626114

Dear Andrew Rardin:

On February 21, 2025, the Department of Ecology (Ecology) sent you a written notice of our preliminary determination that Snohomish County (the County) is a potentially liable person (PLP) for a release of hazardous substances at the Paine Field Fire Training Pit PFAS site (Site).

Based on available information, Ecology finds that credible evidence exists that the County is an owner or operator of property within the Site and thus is liable for the release of hazardous substances at the Site. Based on this finding, Ecology has determined that the County is a PLP with regard to the Site.

The purpose of the Model Toxics Control Act (MTCA) is to identify, investigate, and clean up facilities where hazardous substances have been released. Liability for environmental contamination under MTCA is strict, joint and several (RCW 70A.305.040(2)). Ecology ensures that contaminated sites are investigated and cleaned up to the standards set forth in the MTCA statute and regulations. Ecology has determined that it is in the public interest for remedial actions to take place at this Site. Ecology will contact you regarding the actions necessary for the County to bring about the prompt and thorough cleanup of hazardous substances at this Site.

Andrew Rardin

May 27, 2025

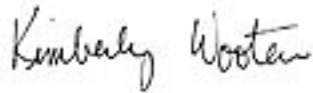
Page 2

Failure to cooperate with Ecology or comply with MTCA in this matter will result in Ecology employing enforcement tools as it deems necessary and appropriate. This includes, but is not limited to, the issuance of an administrative order. Failure to comply with such an order may result in a fine of up to \$25,000 per day and liability for up to three times the costs incurred by the state (RCW 70A.305.050(1)).

Your rights and responsibilities as a PLP are outlined in Chapter 70A.305 RCW, and Chapters 173-340 and 173-204 WAC. Ecology's cleanup project manager for the Site, David Unruh, will contact you with information about how Ecology intends to proceed with the cleanup.

If you have any questions regarding this notice, please contact David Unruh by phone at 206-459-6287 or by email at david.unruh@ecy.wa.gov.

Sincerely,



Kimberly Wooten

Section Manager

Toxics Cleanup Program, NWRO

By certified mail: 9171 9690 0935 0214 2548 14

cc: Allyson Bazan, Hillis, Clark, Martin, & Peterson P.S. (allyson.bazan@hcmp.com)
Dan Lawler, Office of the Attorney General (Dan.Lawler@atg.wa.gov)
Dhroov Shivjiani, Ecology (Dhroov.Shivjiani@ecy.wa.gov)
David Unruh, Ecology (david.unruh@ecy.wa.gov)
Ecology Site File