



Response to Comments

Agreed Order & Public Participation Plan

Paine Field Fire Training Pit PFAS Cleanup Site

Snohomish County, WA

Toxics Cleanup Program

Washington State Department of Ecology
Northwest Region Office
Shoreline, Washington

September 2025

Publication Information

This document is available on the Department of Ecology's [Paine Field Fire Training Pit PFAS cleanup site webpage](#).¹

Cover photo credit

- Aerial view of the Paine Field Fire Training Pit PFAS site location, 2023, WA State Dept of Ecology

Related Information

- Cleanup Site ID: 16912
- Facility Site ID: 49626114

Contact Information

[Toxics Cleanup Program](#)²

Northwest Region Office

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To request an ADA accommodation, contact the Ecology ADA Coordinator by phone at 360-407-6831 or email at ecyadacoordinator@ecy.wa.gov. For Washington Relay Service or TTY call 711 or 877-833-6341. Visit [Ecology's website](#)³ for more information.

Language Access

The Department of Ecology offers free translation and interpretation services. If you need help in your preferred language, please call Kristen Forkeutis at 425-240-4353 and request an interpreter, or email Kristen.Forkeutis@ecy.wa.gov.

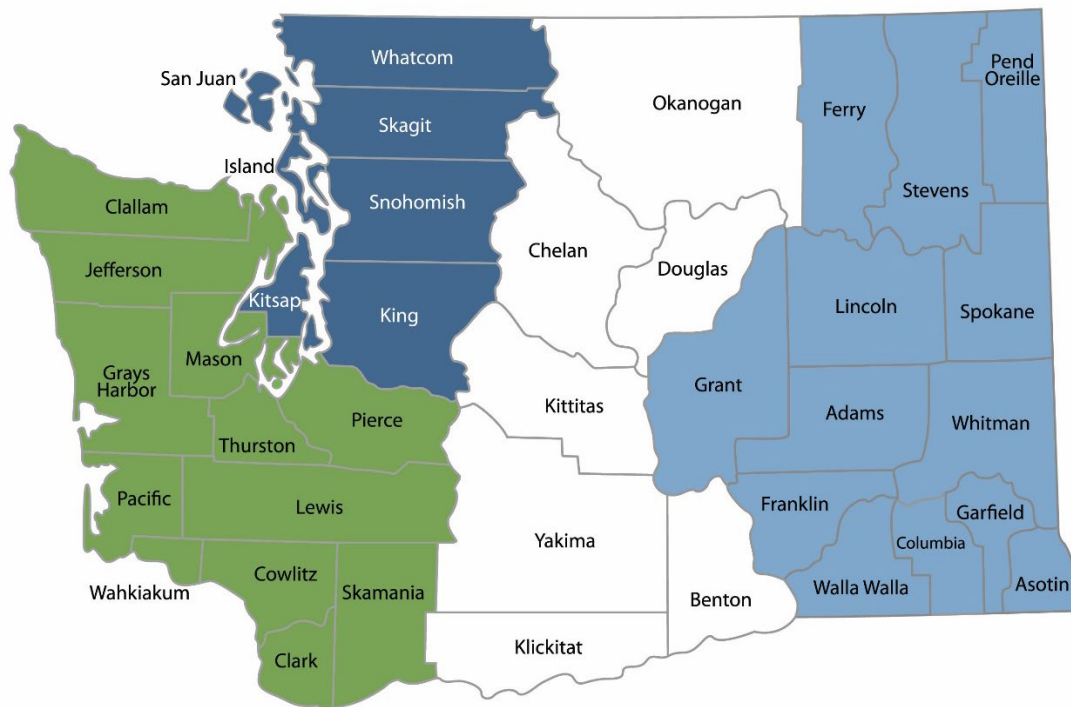
¹ <https://apps.ecology.wa.gov/cleanupsearch/site/16912>

² <https://ecology.wa.gov/About-us/Who-we-are/Our-Programs/Toxics-Cleanup>

³ <https://ecology.wa.gov/about-us/accessibility-equity/accessibility>

Department of Ecology's Region 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

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 47600 Olympia, WA 98504	360-407-6000

Response to Comments

Agreed Order and Public Participation Plan

Paine Field Fire Training Pit PFAS Cleanup Site Snohomish County, WA

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

September 2025



DEPARTMENT OF
ECOLOGY
State of Washington

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Outreach Summary

The Paine Field Fire Training Pit PFAS cleanup site, located on the western boundary of Paine Field near South Everett, is undergoing Washington State's [formal cleanup process](#)⁴ as directed under the Model Toxics Control Act ([MTCA](#)⁵). The WA State Department of Ecology is addressing contamination at the site.

Ecology's outreach activities related to this site's 30-day comment period (August 11, 12:00 a.m. – September 10, 11:59 p.m., 2025) included:

- **Fact Sheet:**
 - US mail distribution of a fact sheet providing information about the cleanup documents and the comment period to 3,863 addresses including neighboring residents, businesses, and other interested parties.
 - Email distribution about the comment period to over 150 contacts, including interested individuals, local/county/state/federal agencies, neighborhood associations, and interested community groups.
 - The fact sheet was available digitally through Ecology's [cleanup site webpage](#)⁶ in English. Language access information was provided in Spanish, Korean, Vietnamese, and Chinese.
- **Legal Notices:**
 - Publication of a print display advertisement in the *Everett Daily Herald*, dated Saturday, August 9, 2025. Corresponding digital ads and targeted programmatic advertisements also ran in the [HeraldNet.com](#)⁷ from Monday, August 11 to Wednesday, September 10, 2025.
 - Publication of one print display advertisement in both the *Mukilteo Beacon* and *Edmonds Beacon*, dated Thursday, August 14, 2025. Corresponding digital ads in the [MukilteoBeacon.com](#)⁸ and the [EdmondsBeacon.com](#)⁹ ran from Wednesday, August 13 to Wednesday, August 20.
 - Publication of one digital advertisement in [MyEverettNews.com](#)¹⁰ from Monday, August 11 to Monday, August 25, 2025.
- **Contaminated Site Register newsletter:**
 - Publication of three notices in Ecology's Toxics Cleanup Program Contaminated Site Register newsletter:
 - Comment Period Notice:
 - August 7, 2025
 - August 21, 2025

⁴ <https://ecology.wa.gov/MTCA-process>

⁵ <https://ecology.wa.gov/mtca>

⁶ <https://apps.ecology.wa.gov/cleanupsearch/site/16912>

⁷ <https://www.heraldnet.com>

⁸ <https://www.mukilteobeacon.com>

⁹ <https://www.edmondsbeacon.com>

¹⁰ <https://myeverettnews.com>

- September 4, 2025
- Visit [Ecology's Contaminated Site Register website](#)¹¹ to download PDFs.

Media Notification:

- Ecology sent a media notice on Thursday, August 7, 2025, to the *Everett Daily Herald*, the *Everett Post*, [MyEverettNews.com](#),¹² [Northwest Asian Weekly](#),¹³ and [La Raza del Noroeste](#).¹⁴
- **Media Coverage:**
 - *Everett Daily Herald* and *HeraldNet.com* ran a [story](#)¹⁵ on August 13, 2025
 - *Mukilteo Beacon* ran a [story](#)¹⁶ on August 18, 2025. This also ran in the *Mill Creek Beacon* and *Edmonds Beacon*, both part of the Beacon Publishing family of newspapers.
- **Blog Post:**
 - Ecology posted a [blog](#)¹⁷ on August 11, 2025.
- **Websites:**
 - Ecology announced the comment period, posted the fact sheet, and made the review documents available on Ecology's [cleanup site webpage](#)¹⁸ and [Ecology's Public Inputs & Events webpage](#).¹⁹
- **Document Repositories:**
 - Copies of the review documents and fact sheets were available for review at the Mukilteo Library.
 - Outreach materials also directed the reader to contact Kristen Forkeutis, Outreach Specialist, for document review assistance.

¹¹<https://apps.ecology.wa.gov/publications/UIPages/PublicationList.aspx?IndexTypeName=Program&NameValue=Toxics+Cleanup&DocumentTypeName=Newsletter>

¹² <https://myeverettnews.com>

¹³ <https://nwasianweekly.com>

¹⁴ <https://www.larazanw.com>

¹⁵ <https://www.heraldnet.com/news/public-comment-opens-for-cleanup-plan-at-paine-field-site/>

¹⁶ <https://www.mukilteobeacon.com/stories/ecology-seeks-public-input-on-paine-field-pfas-cleanup-agreement,137093>

¹⁷ <https://ecology.wa.gov/blog/august-2025/cleaning-up-addressing-pfas-contamination-at-paine-field-airport>

¹⁸ <https://apps.ecology.wa.gov/cleanupsearch/site/16912>

¹⁹ <https://ecology.wa.gov/Events/Search/Listing>

Comment Summary

From August 11, 12:00 a.m. to September 10, 11:59 p.m., 2025, Ecology solicited comments on an agreed order (legal agreement) and public participation plan. The agreed order between Ecology and Snohomish County (County) requires the County to investigate environmental conditions, and complete a remedial investigation, feasibility study, and cleanup action plan for the site. The public participation plan describes how Ecology will inform the community about the site activities and ways to become involved.

Ecology received four formal comments during the 30-day comment period.

Table 1: List of Commenters

	Date	Last Name	Last Name	Agency, Organization, or Business	Submitted By
1	8/11/25	Robert	Tucker		Individual
2	8/14/25	Anonymous	Anonymous		Individual
3	8/18/25	Kitty	Tucker		Individual
4	8/25/25	Andrea	Swisstack	Mukilteo Water and Wastewater District	Organization

Next Steps

Ecology has reviewed and considered the comments received on the agreed order and public participation plan. Based on Ecology's evaluation of the comments, no significant changes to the documents were necessary.

Ecology will finalize the documents and proceed with the cleanup for this site. See the graphic below and visit Ecology's [cleanup process webpage](https://ecology.wa.gov/MTCA-process)²⁰ to learn more about Washington's cleanup process.

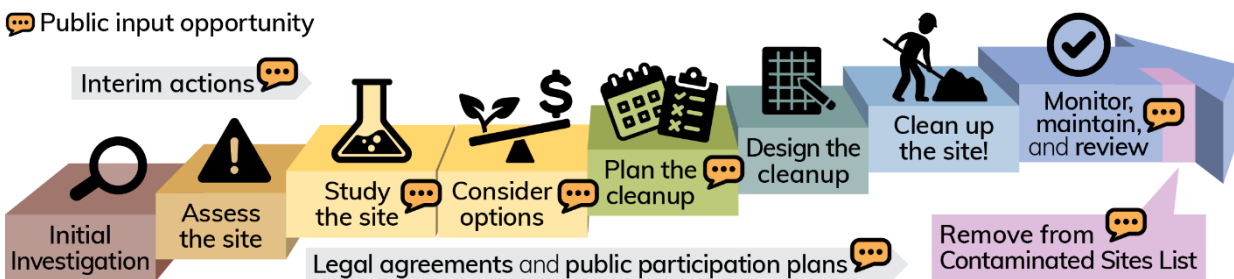


Figure 1: Washington's cleanup process

Public Comments and Responses

The public comments are presented below, along with Ecology's responses. The Appendix contains the comments in their original format.

Comment from: Robert Tucker, 8/11/25

I would like to provide the following comments to the subject clean-up effort:

1. The scope of this effort should be comprehensive in nature and not limited to a remediation. Please insure that this will be a complete clean-up and resolution of this egregious act by Paine Field and Snohomish County and not a problem passed forward to future generations. This entire effort should be funded by Paine Field and Snohomish County.

The proposed Agreed Order (AO) provides a way for Snohomish County and Ecology to work collaboratively to understand the contamination present at the site and decide on clean up actions to take at the site. The Remedial Investigation will delineate the extent of contamination, while the Feasibility Study will explain the different cleanup methods, called alternatives. Ecology will decide which of the cleanup alternatives is most appropriate for the site. We will base our decision on what option is the safest, most permanent, and most cost-

²⁰ <https://ecology.wa.gov/MTCA-process>

effective cleanup. We also take things like public concern, climate change, environmental justice, and cultural resources into consideration when making this determination. The cleanup process works to protect people's health and the environment, and to preserve natural resources for the future.

Snohomish County is currently listed as the potentially liable party (PLP) for this site and is responsible for funding investigation and cleanup work.

2. Detailed water quality testing which would include chemical and biological content should be performed multiple times per year (quarterly) to insure that the aforementioned clean-up was successful. This monitoring should last for several years and, again, be funded by Paine Field and Snohomish County.

Ecology will require sufficient characterization of all affected media at the site, including groundwater, surface water, soil, and sediments before selecting a cleanup alternative. Once a cleanup alternative has been selected, compliance monitoring will be necessary to show that the cleanup actions are successful in addressing contamination. A monitoring schedule will be determined at a later date. However, monitoring typically is done for at least 5 years. Results of long-term monitoring results will be evaluated every 5 years by Ecology for as long as needed.

3. The past and future impacts to salmon should be completely understood and resolved. The stream that runs through Big Gulch is a salmon stream which has been under attack over the decades. This PFAS clean-up effort should be used to improve the situation in Big Gulch and any other stream outflows from or near the pollution clean-up site.

As part of the Remedial Investigation required by this AO, sufficient characterization of PFAS impacts to potentially impacted surface water bodies will be required. Therefore, potential impacts to Big Gulch Creek will be evaluated.

4. The Tulalip Tribe should be engaged as an equal partner in this effort. They have restoration efforts planned at the outfall of Big Gulch into Puget Sound.

As part of our tribal engagement effort, the Northwest Region Office (NWRO) Toxics Cleanup Program (TCP) has been in contact with Tribes across our region to make plans for establishing the areas of the state they are interested in, identifying appropriate contacts in Tribal government, and understanding their preferred communication methods. Ecology contacted the Tulalip Tribes regarding this project in July of this year and will ensure their concerns about site characterization cleanup are adequately addressed.

5. No further development efforts at Paine Field, particularly on the west should be considered for permitting and approval until this clean-up issue is complete and multi-year water testing has confirmed as much. Paine Field has applied for permits through the Washington State Department of Ecology for the filling of two acres of wetlands to facilitate the Paine Field West Side Aerospace Complex. These wetlands drain directly into Big Gulch. How can the Department of Ecology ever approve this destruction and then expect to understand the baseline chemical and biological status of the drainage outfall below the Paine Field Fire Training Pit clean-up site? I do not believe they can and some disciplined science should be brought to this effort.

The intent of this AO is to characterize contamination related to the use of aqueous film forming foam (AFFF) at the Fire Training Pit area. Ecology will not approve any remedial actions that will worsen PFAS contamination in this area.

This AO is specific to PFAS contamination in the Fire Pit area. This is a small portion of the larger master plan for the airport, and limiting development in other portions of the airport may be out of the scope of what this cleanup project concerns. It's often the case that development presents a good chance for cleanups to occur.

6. The areas to the west of Paine Field have seen far too much development and environmental destruction over the last 50 years. It is time to stop this behavior and make it right.

Ecology's mission is to protect, preserve, and enhance Washington's environment for current and future generations. In our capacity of managing cleanup of this site, we will continue to coordinate with other programs at Ecology as well as Tribal, county, and local governments to ensure that the whole picture at Paine Field is understood and taken into account when planning further development.

Furthermore, in executing this AO to clean up PFAS contamination, we intend to ensure the public has a meaningful way to comment on the cleanup of this site. In addition to this comment period, more opportunities will be available to provide input as we continue to gather data at the site and write the reports required by the AO.

Response:

Thank you for your comment. Ecology's responses are added in blue within your questions and comments above.

Comment from: Anonymous, 8/14/25

I'd like to see more information on just how the chemicals are cleaned out of the soil - are we talking about just digging down some feet and removing the soil and trucking it somewhere else, or some other treatment that maybe bonds to the chemicals so the dirt can be "rinsed out"?

Response:

Thank you for your comment. Ecology will organize additional comment periods when we have more information about contamination at the site and how to clean it up. As part of this Agreed Order, Snohomish County is required to complete a Feasibility Study (FS). The FS evaluates the potential options for how to clean up the contamination at the site, including things like excavation, stabilization in-place (where the contaminants are immobilized in place), and other alternatives that could apply. Further information regarding potential cleanup alternatives will be included in the FS, which will also be available for public comment.

We encourage you to subscribe to this site to be notified if Ecology uploads a document, changes the site status, or opens a comment period. To subscribe, visit the Paine Field Fire Training Pit PFAS [webpage](#) and click the **Subscribe to this site button** in the upper right corner. You can unsubscribe at any time.

Comment from: Kitty Tucker, 8/18/25

I would like to provide the following comments to the subject clean-up effort:

1. The scope of this effort should be comprehensive in nature and not limited to a remediation. Please insure that this will be a complete clean-up and resolution of this egregious act by Paine Field and Snohomish County and not a problem passed forward to future generations. This entire effort should be funded by Paine Field and Snohomish County.

The proposed Agreed Order (AO) provides a way for Snohomish County and Ecology to work collaboratively to understand the contamination present at the site and decide on clean up actions to take at the site. The Remedial Investigation will delineate the extent of contamination, while the Feasibility Study will explain the different cleanup methods, called alternatives. Ecology will decide which of the cleanup alternatives is most appropriate for the site. We will base our decision on what option is the safest, most permanent, and most cost-effective cleanup. We also take things like public concern, climate change, environmental justice, and cultural resources into consideration when making this determination. The cleanup process works to protect people's health and the environment, and to preserve natural resources for the future.

Snohomish County is currently listed as the potentially liable party (PLP) for this site and is responsible for funding investigation and cleanup work.

2. Detailed water quality testing which would include chemical and biological content should be performed multiple times per year (quarterly) to insure that the aforementioned clean-up was successful. This monitoring should last for several years and, again, be funded by Paine Field and Snohomish County.

Ecology will require sufficient characterization of all affected media at the site, including groundwater, surface water, soil, and sediments before selecting a cleanup alternative. Once a cleanup alternative has been selected, compliance monitoring will be necessary to show that the cleanup actions are successful in addressing contamination. A monitoring schedule will be determined at a later date. However, monitoring typically is done for at least 5 years. Results of long-term monitoring results will be evaluated every 5 years by Ecology for as long as needed.

3. The past and future impacts to salmon should be completely understood and resolved. The stream that runs through Big Gulch is a salmon stream which has been under attack over the decades. This PFAS clean-up effort should be used to improve the situation in Big Gulch and any other stream outflows from or near the pollution clean-up site.

As part of the Remedial Investigation required by this AO, sufficient characterization of PFAS impacts to potentially impacted surface water bodies will be required. Therefore, potential impacts to Big Gulch Creek will be evaluated.

4. The Tulalip Tribe should be engaged as an equal partner in this effort. They have restoration efforts planned at the outfall of Big Gulch into Puget Sound.

As part of our tribal engagement effort, the Northwest Region Office (NWRO) Toxics Cleanup Program (TCP) has been in contact with Tribes across our region to make plans for establishing the areas of the state they are interested in, identifying appropriate contacts in Tribal government, and understanding their preferred communication methods. Ecology contacted the Tulalip Tribes regarding this project in July of this year and will ensure their concerns about site characterization cleanup are adequately addressed.

5. No further development efforts at Paine Field, particularly on the westside should be considered for permitting and approval until this clean-up issue is complete and multi-year water testing has confirmed as much. Paine Field has applied for permits through the Washington State Department of Ecology for the filling of two acres of wetlands to facilitate the Paine Field West Side Aerospace Complex. These wetlands drain directly into Big Gulch. How can the Department of Ecology ever approve this destruction and then expect to understand the baseline chemical and biological status of the drainage outfall below the Paine Field Fire Training Pit clean-up site? I do not believe they can and some disciplined science should be brought to this effort.

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This AO is specific to PFAS contamination in the Fire Pit area. This is a small portion of the larger master plan for the airport, and limiting development in other portions of the airport may be

out of the scope of what this cleanup project concerns. It's often the case that development presents a good chance for cleanups to occur.

6. Please insure that the clean-up plan includes a detailed understanding of water flow both above and below ground so that the potential geographical range of the PFAS impacts is completely understood.

As part of the Remedial Investigation required by the AO, all media which could potentially be impacted by the site, including both groundwater and surface water must be evaluated. As part of this effort, Ecology will require that Snohomish County has adequately defined the extent of contamination at the site so it is fully understood.

7. As this clean-up plan progresses, I believe there should be regular community meetings planned in Mukilteo to status interested parties in the progress.

Ecology is required to hold public comment periods prior to final approval of the Remedial Investigation report, Feasibility Study, Cleanup Action Plan, and Interim Action Report, if applicable. During public comment periods, Ecology may schedule a public event (meeting or open house, for instance) to share information and answer questions about the site. Ecology is also happy to participate in community group meetings organized by a third party, provided we have availability. Staffing and budget shortages may limit our ability to attend or host regular meetings with the community.

8. If possible, please engage community groups in the clean-up process. For example, water quality and biological testing.

Ecology appreciates the importance of citizen science and will evaluate the possibility of including community groups in characterization and cleanup activities at the site.

Response:

Thank you for your comment. Ecology's responses are added in blue within your questions and comments above. Responses #1 through #5 are the same as those shared with Robert Tucker.

Comment from: Andrea Swisstack, Mukilteo Water and Wastewater District, 8/25/25

August 25, 2025
David Unruh, Site Manager
WA Department of Ecology
P.O. Box 330316

Shoreline, WA 98133-9716

David.Unruh@ecy.wa.gov

RE: Paine Field Fire Training Pit PFAS Cleanup Site

Location: North of 10727 Bernie Webber Drive, Mukilteo & Taxiway K-6

Greetings:

The District is in receipt of the Paine Field Fire Training Pit PFAS Cleanup Site Factsheet. The above-mentioned property lies within the Mukilteo Water and Wastewater District's (District) water service area. Snohomish County Airport owns and maintains the sewer collection system on Paine Field.

District staff reviewed the Paine Field Training Pit PFAS site map enclosed with the Factsheet and has existing water infrastructure (mains, fittings, hydrants, etc.) located within the "Inferred location of groundwater contamination" boundary shown on the map.

Any cleanup within the vicinity of the District's infrastructure shall be coordinated with the Mukilteo Water and Wastewater District. A Developer Extension agreement may be required if work will occur near or around the existing infrastructure and/or if any infrastructure needs to be relocated to accommodate cleanup activities.

The District requires all projects to follow the current District Standards, Specifications and Regulations in place at the time of development. Details on the District's Developer Extension requirements and process can be found on the District's website at:

<https://mukilteowwd.org/DocumentCenter/View/97/Developer-StandardsPDF>.

Thank you for providing the District the opportunity to comment on the project.

Sincerely,

Andrea Swisstack

Engineering Manager

aswisstack@mukilteowwd.org

Response:

Thank you for your comment. The Model Toxics Control Act (MTCA) requires that cleanup alternatives considered in the Feasibility Study (FS) are evaluated for implementability, including administrative requirements. Prior to conducting any characterization or cleanup alternatives at the site, Ecology and Snohomish County will coordinate with the Mukilteo Water and Wastewater District to ensure actions at the site meet the District Standards, Specifications, and Regulations.

Appendix – Comments in Original Format

I-1: Robert Tucker

Submit Date: 08/11/2025 1:08 PM

Submit Method: Website

Comment I-1-1

I would like to provide the following comments to the subject clean-up effort:

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2. Detailed water quality testing which would include chemical and biological content should be performed multiple times per year (quarterly) to insure that the aforementioned clean-up was successful. This monitoring should last for several years and, again, be funded by Paine Field and Snohomish County.
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I-2:

Submit Date: 08/14/2025 4:01 PM

Submit Method: Website

Comment I-2-1

I'd like to see more information on just how the chemicals are cleaned out of the soil - are we talking about just digging down some feet and removing the soil and trucking it somewhere else, or some other treatment that maybe bonds to the chemicals so the dirt can be "rinsed out"?

I-3: Kittie Tucker

Submit Date: 08/18/2025 12:20 PM

Submit Method: Website

Comment I-3-1

I would like to provide the following comments to the subject clean-up effort:

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8. If possible, please engage community groups in the clean-up process. For example, water quality and biological testing.

Org-1: Mukilteo Water and Wastewater District (Andrea Swisstack)

Submit Date: 08/25/2025 1:11 PM

Submit Method: Email

Comment Org-1-1



7824 Mukilteo Speedway, Mukilteo, WA 98275 • 425.355.3355 • www.mukilteowwd.org

August 25, 2025

David Unruh, Site Manager
WA Department of Ecology
P.O. Box 330316
Shoreline, WA 98133-9716
David.Unruh@ecy.wa.gov

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