LANDAU ASSOCIATES

December 12, 2025

Transmitted via email to: dunr461@ecy.wa.gov

Washington State Department of Ecology
Toxics Cleanup Program
PO Box 330316
Shoreline, WA 98133-9716

Attn: David Unruh

Re: Agreed Order Remedial Investigation Preliminary Cleanup Levels and Screening Levels
Former TECT Aerospace Leasehold Area
Cleanup Site ID: 12071; Facility/Site ID: 17392
Snohomish County Airport/Paine Field
Everett, Washington
Landau Project No. 0222057.050

Dear Mr. Unruh:

On behalf of Snohomish County Airport (Airport), Landau Associates, Inc. (Landau) prepared this letter report, which summarizes recommended preliminary cleanup levels (pCULs) to be included in the pending draft Agreed Order (AO) remedial investigation (RI) report associated with the former TECT Aerospace cleanup site at Paine Field (site). The purpose of this letter report is to provide the Washington State Department of Ecology (Ecology) with an opportunity to review the approach used to develop the pCULs and the resulting pCULs being recommended for soil and groundwater at the site. This letter report also presents proposed screening levels (SLs) for soil gas and perfluoroalkyl and polyfluoroalkyl substances (PFAS) at the site. Ecology's review of the pCULs and SLs is being sought prior to preparation of detailed RI report figures and tables that will compare actual site data to the pCULs and SLs. The term SLs rather than pCULs is being used for PFAS because these compounds are being addressed under a separate AO for the site. The term SLs is used for soil gas, because cleanup levels have not been promulgated for soil gas.

As you may recall, two phases of the AO RI have been completed at the site and the results of those two phases were provided in two interim data reports dated November 20, 2024 and May 15, 2025 (Landau 2024b, 2025). Both of these RI phases were conducted in accordance with the AO RI work plan (Landau 2024a), which included a section on the development of site SLs for soil, groundwater, and soil gas (see Section 5 of the AO RI work plan). These SLs were based on the most conservative regulatory criteria (typically, Model Toxics Control Act [MTCA] Method B unrestricted land-use values) available in Ecology's Cleanup Levels and Risk Calculations (CLARC) database (Ecology; accessed October 8, 2025) to provide a conservative evaluation of constituents for initial screening of data.

PRELIMINARY CLEANUP LEVELS

The first step in developing the pCULs presented in this letter report was to eliminate from further consideration those constituents listed in the AO RI work plan that were either undetected or detected at concentrations below the SLs developed in the AO RI work plan. This step reduced the number of constituents needing soil pCUL development from 56 to 15 and the number of constituents needing groundwater pCUL development from 63 to 22. The remaining steps for pCUL development are discussed separately below for soil and groundwater.

Preliminary Cleanup Levels for Soil

The development of pCULs for soil is outlined in Table 1 which, similar to the development of site SLs in the AO RI work plan, considered the following MTCA-based criteria:

- Concentrations established under applicable state and federal laws
- Concentrations protective of human health:
  - Concentrations that, due to direct contact with contaminated soil, are estimated to result in no acute or chronic non-carcinogenic or carcinogenic toxic effects on human health
  - Concentrations that will not cause contamination of groundwater at levels that exceed groundwater cleanup levels (CULs).

In addition to accounting for human health impacts, MTCA-based CULs must account for any potential terrestrial or aquatic ecological impacts. As described in the AO RI work plan (Section 7.0), the site qualifies for a simplified Terrestrial Ecological Evaluation (TEE), the results of which will be provided in the RI report. The TEE was conducted in conjunction with pCUL development to determine if the site poses a substantial threat of significant adverse effects to terrestrial ecological receptors and, if so, whether a need exists to consider ecological receptors in the development of the pCULs. As will be documented in the RI report, no such threat was identified for the site and no further evaluation of pCULs based on protection of ecological receptors is necessary.

Because the site meets the definition of an industrial property as promulgated in Washington Administrative Code (WAC) 173-340-200 and WAC 173-340-745(1)(a)(i), MTCA Method C CULs are provided along with CULs based on MTCA Method B for unrestricted land use for comparison purposes. Except for total petroleum hydrocarbons (TPH), standard MTCA Method B and Method C soil CULs protective of groundwater or direct human contact were determined in accordance with WAC 173-340-740(3) and WAC 173-340-745 using Ecology's CLARC database (Ecology; accessed October 8, 2025). MTCA Method A soil CULs for unrestricted land uses were used for TPH because there are no Method B or C values for these constituents published in CLARC.

The recommended pCUL for each constituent is shown in the last column of Table 1. As footnoted in the table, the pCUL is based on the lowest of the values shown in the table for each constituent except that the value shown for "Protection of Groundwater Saturated" was not considered for the following reasons. First, the perched groundwater at the site is not a current source of drinking water and the groundwater does not meet the definition of potable groundwater, as defined in

WAC 173-340-720(2), due to limited yield (less than 0.5 gallons per minute on a sustainable basis to a compliant well). Local ordinances also prohibit the installation of new wells to source potable groundwater at the site and surrounding areas. Soil CULs developed for the site that are based on protection of groundwater as drinking water should therefore be focused on protecting groundwater in the deep aquifer. As such, impacted soil at the site is not considered to be located at or below the groundwater table (the saturated zone), as described in WAC 173-340-747(4)(e), and therefore the "Protection of Groundwater Saturated" CUL values are not applicable.

Second, the primary difference between the CULs for protection of groundwater saturated and protection of groundwater vadose in CLARC is due to the large dilution factor used in MTCA Equation 747-1 for calculating the vadose CUL protective of groundwater value (20) versus the dilution factor used for calculating the saturated CUL protective of groundwater value (1). Given that up to 80 feet of low-permeability till separates the impacted soil at the site from the deep aquifer groundwater, infiltration from the perched groundwater to the deep aquifer would be limited thus justifying the use of the higher default dilution factor associated with the vadose CUL.

Preliminary Cleanup Levels for Groundwater

The development of pCULs for groundwater is outlined in Table 2, which, similar to the development of site screening levels in the AO RI work plan, considers the following MTCA-based criteria:[1]

- Concentrations established under applicable state and federal laws
- Concentrations protective of human health determined using MTCA Equations 720-1 or 720-2, if sufficiently protective health-based criteria have not been established under applicable state and federal laws.

CUL criteria provided in Table 2 are derived from values in the CLARC database (Ecology; accessed October 8, 2025) and consist of maximum contaminant levels (MCLs) established under applicable state or federal laws and MTCA Method B and C CULs established using MTCA Equations 720-1 or 720-2. For those constituents that have an assigned MCL, the initial pCUL values shown in Table 2 (see column labeled "Preliminary Cleanup Levels (Before Adjustment for PQL [Practical Quantitation Limit] and Background)") are equal to the MCL provided the MCL is protective to a maximum carcinogenic risk of $1x10^{-5}$ and a hazard index of less than or equal to 1, as allowed under MTCA [WAC 173-340-720(4)(b)]. For those constituents with an assigned MCL that is not protective to a maximum carcinogenic risk of $1x10^{-5}$, the pCUL was adjusted downward from the MCL until the pCUL resulted in a carcinogenic risk of $1x10^{-5}$.

These initial pCUL values were then adjusted, if applicable, based on laboratory PQL and background concentrations. This adjustment resulted in changing only the pCUL of arsenic, which was set at the Snohomish County background concentration of 13.6 micrograms per liter (µg/L; San Juan 2022).

[1] Contaminant concentrations must also be protective of surface water beneficial uses if impacted groundwater will reach surface water; however, no surface water features are located near the site.

Finally, MTCA requires that the combined risk of chemical mixtures be considered when developing cleanup standards [WAC 173-340-720(7)(a)]. This total site risk evaluation was completed on five constituents—trichloroethene (TCE), vinyl chloride (VC), cis-1,2-dichloroethylene (cis-1,2-DCE), 1,2-dichloroethane, and 1,4-dioxane—referred to as indicator hazardous substances (IHSs). The IHSs represent those constituents that were detected in groundwater at concentrations above the SLs established in the AO RI work plan in at least 20 percent of the samples analyzed and thus contribute the most significant portion of the risk at the site. For IHSs exhibiting carcinogenic risks, the cancer risk was apportioned between IHSs such that the total cancer risk between all IHSs did not exceed $1x10^{-5}$. This step resulted in the downward adjustment of the pCULs for 1,4-dioxane, TCE, and VC. The pCUL for cis-1,2-DCE was also adjusted downward to result in a combined hazard index of less than 1. The final recommended groundwater pCULs for the site are shown in the last column of Table 2.

It is noted that the recommended groundwater pCULS for benzene and TCE (5 µg/L and 3.5 µg/L, respectively) are slightly higher than the groundwater SLs shown in Table 2 for protection of the vapor intrusion pathway. The recommended pCUL was not adjusted downward to the vapor intrusion SL values for several reasons. First, the groundwater protective of the vapor intrusion pathway criterion is an SL and not a promulgated cleanup standard. Second, rigorous indoor air assessment activities conducted at the site in 2017 in the Building C-23 Annex and in 2021 in Building C-19 did not detect volatile organic compound concentrations above applicable chronic or acute screening criteria for commercial workers.[2] Both of these buildings are/were located over groundwater plumes with TCE concentrations much higher than the SLs shown in Table 2 indicating that the SLs are overly conservative for conditions at the site. Third, concerns regarding the soil gas to indoor air pathway for future site development will be managed during the development and evaluation of cleanup alternatives during the feasibility study (FS) phase of the project, which will consider the need for establishing environmental covenants requiring the installation of vapor mitigation systems beneath future site buildings.

SCREENING LEVELS

Analytical results for soil gas and PFAS in groundwater will be compared to SLs instead of pCULs. Screening levels for soil gas and PFAS are provided in Tables 3 and 4, respectively.

Screening Levels for Soil Gas

For soil gas, the CLARC database provides SLs for MTCA Method B, Method C, and Commercial Workers. Because the current site use is light industrial, the commercial worker values for cancer risk provided in CLARC will be used for comparison to soil gas sampling results in the pending AO RI report.

[2] The results of the 2017 Building C-23 Annex investigation are described in Section 3.2.4 of the September 19, 2018 RI/FS work plan (Landau 2018). The results of the 2021 Building C-19 investigation are described in a December 15, 2021 letter report from Landau Associates to Snohomish County Airport (Landau 2021).

Screening Levels for PFAS in Groundwater

SLs for the eight PFAS compounds listed in the CLARC database are based on protection of groundwater and categorized as MTCA Method B cancer CULs, or Washington State Action Levels, which are protective of groundwater for use as drinking water. Because PFAS will be investigated as part of a future Airport-wide AO, no significant evaluation of the PFAS groundwater sampling results is planned for the AO RI report. Therefore, the SLs shown in Table 4 are only for reference, if needed.

* * * * *

As stated above, Landau would be pleased to discuss the contents of this letter report with you and your team and to obtain Ecology's input on the pCULs described above prior to preparation of the RI report. We look forward to hearing from you.

USE OF THIS LETTER REPORT

This report has been prepared for the exclusive use of Snohomish County and Ecology for specific application to the site. No other party is entitled to rely on the information, conclusions, and recommendations included in this document without the express written consent of Landau. Further, the reuse of information, conclusions, and recommendations provided herein for extensions of the project or for any other project, without review and authorization by Landau, shall be at the user's sole risk. Landau warrants that within the limitations of scope, schedule, and budget, our services have been provided in a manner consistent with that level of care and skill ordinarily exercised by members of the profession currently practicing in the same locality under similar conditions as this project. Landau makes no other warranty, either express or implied.

This document has been prepared under the supervision and direction of the following key staff.

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cc: Andrew Rardin, Airport Environmental and Wildlife Manager

References

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Landau. 2021. Site Investigation Report, Building C-19 Indoor Air Evaluation and Monitoring Well Installation, Former TECT Aerospace Leasehold Area, Snohomish County Airport, Everett, Washington. Landau Associates, Inc. December 15.

Landau. 2024a. Agreed Order Remedial Investigation and Feasibility Study Work Plan, Paine Field TECT Aerospace Leasehold, Everett, Washington. Landau Associates, Inc. May 7.

Landau. 2024b. Letter Report: Agreed Order Remedial Investigation Interim Data Report and Proposed Next Steps, Former TECT Aerospace Leasehold Area, Cleanup Site ID: 12071, Facility/Site ID: 17392, Snohomish County Airport/Paine Field, Everett, Washington. Landau Associates, Inc. November 20.

Landau. 2025. Letter Report: Agreed Order Remedial Investigation 2nd Phase Interim Data Report and Proposed Next Steps, Former TECT Aerospace Leasehold Area, Cleanup Site ID: 12071, Facility/Site ID: 17392, Snohomish County Airport/Paine Field, Everett, Washington. Landau Associates, Inc. May 15.

San Juan, Charles. 2022. Study Results: Natural Background Groundwater Arsenic Concentrations in Washington State. Publication No. 14-09-044. Toxics Cleanup Program, Washington State Department of Ecology. January.

Attachments

Table 1: Preliminary Cleanup Levels for Soil
Table 2: Preliminary Cleanup Levels for Groundwater
Table 3: Screening Levels for Soil Gas
Table 4: Screening Levels for PFAS in Groundwater

Table 1
Preliminary Cleanup Levels for Soil
Agreed Order Remedial Investigation Report
TECT Aerospace Cleanup Site
Paine Field – Everett, Washington

Analyte Group	CAS No.	Analyte	Unit of Measurement	Protection of Groundwater Vadose @ 13 degrees Celsius	Protection of Groundwater Saturated @ 13 degrees Celsius	MTCA Method A Unrestricted Land Use (TPH Only)	Direct Contact Pathway (Ingestion Only) MTCA Method B Unrestricted Land Use Method B Formula Values		Direct Contact Pathway (Ingestion Only) MTCA Method C Industrial Land Use Method C Formula Values		Preliminary Cleanup Level[1]
							Non-Carcinogen	Carcinogen	Non-Carcinogen	Carcinogen	
Metals	7440-47-3	Chromium (total)	mg/kg	2,000	100						2,000
TPH	DRO	TPH, diesel-range organics	mg/kg			2,000					2,000
TPH	GRO	TPH: gasoline-range organics, benzene present	mg/kg			30					30
TPH	GRO	TPH: gasoline-range organics, no detectable benzene	mg/kg			100					100
VOCs	107-06-2	1,2-Dichloroethane (EDC)	µg/kg	23	1.6		480,000	11,000	21,000,000	1,400,000	23
VOCs	71-43-2	Benzene	µg/kg	27	1.7		320,000	18,000	14,000,000	2,400,000	27
VOCs	75-34-3	Dichloroethane; 1,1-	µg/kg	41	3		16,000,000	180,000	700,000,000	23,000,000	41
VOCs	75-35-4	Dichloroethene; 1,1-	µg/kg	46	2.5		4,000,000		180,000,000		46
VOCs	156-59-2	Dichloroethene; 1,2-,cis	µg/kg	79	5.2		160,000		7,000,000		79
VOCs	156-60-5	Dichloroethene; 1,2-, trans	µg/kg	520	32		1,600,000		70,000,000		520
VOCs	100-41-4	Ethylbenzene	µg/kg	5,900	340		8,000,000		350,000,000		5,900
VOCs	127-18-4	Tetrachloroethene (PCE)	µg/kg	50	2.80		480,000	480,000	21,000,000	63,000,000	50
VOCs	1330-20-7	Total xylenes	µg/kg	14,000	830		16,000,000		700,000,000		14,000
VOCs	79-01-6	Trichloroethene (TCE)	µg/kg	25	1.5		40,000	12,000	1,800,000	2,900,000	25
VOCs	75-01-4	Vinyl chloride	µg/kg	1.7	0.090		240,000	670	11,000,000	88,000	1.7

Note:
1. Based on the lowest of the values shown except for the value shown for "Protection of Groundwater Saturated," which was not considered for the reasons discussed in the text accompanying this table.

Abbreviations and Acronyms:

CAS = Chemical Abstracts Service
DRO = diesel-range organics
GRO = gasoline-range organics
µg/kg = micrograms per kilogram
mg/kg = milligrams per kilogram
MTCA = Model Toxics Control Act
TPH = total petroleum hydrocarbons
VOC = volatile organic compound

Table 2
Preliminary Cleanup Levels for Groundwater
Agreed Order Remedial Investigation Report
TECT Aerospace Cleanup Site
Paine Field – Everett, Washington

Analyte Group	CAS No.	Analyte	Unit of Measurement	Federal MCL	Washington State MCL	MTCA Method A (Lead, Mercury, and TPH Only)	MTCA Method B Standard Formula Values		MTCA Method C Industrial Land Use		Groundwater Protective of Vapor Intrusion Screening Level	Preliminary Cleanup Levels (Before Adjustment for PQL and Background)	Laboratory PQL	Groundwater Background Concentration	Adjusted Preliminary Cleanup Level Before Total Site Risk Adjustment	Adjusted Preliminary Cleanup Level After Total Site Risk Adjustment
							Non-Carcinogen	Carcinogen @ 1x10-6 risk	Non-Carcinogen	Carcinogen @ 1x10-5 risk						
Conventionals	14797-55-8	Nitrate	µg/L	10,000	10,000		26,000		56,000			10,000	153		10,000	10,000
Metals	7440-38-2	Arsenic	µg/L	10	10		0.96	0.0027	2.1	0.027		0.027	1	13.6[c]	1.0	13.6
Metals	7440-43-9	Cadmium	µg/L	5	5		8		18			5	1		5	5
Metals	7440-47-3	Chromium (total)	µg/L	100	100							100	2		100	100
Metals	7439-92-1	Lead	µg/L	15	15	15						15	1		15	15
Metals	7439-97-6	Mercury	µg/L	2	2	2						2	0.2		2	2
TPH	DRO	TPH, diesel-range organics	µg/L			500						500	130		500	500
TPH	GRO	TPH: gasoline-range organics, benzene present*	µg/L			800						800	50		800	800
TPH	GRO	TPH: gasoline-range organics, no detectable benzene	µg/L			1,000						1,000	50		1,000	1,000
VOCs	79-00-5	1,1,2-Trichloroethane	µg/L	5	5		32	0.77	70	7.7		5	0.5		5[a]	5
VOCs	123-91-1	1,4-Dioxane	µg/L				240	0.44	530	4.4		0.44	0.40		0.44	4.4
VOCs	71-43-2	Benzene	µg/L	5	5		32	0.8	70	8	2.4	5	0.5		5[a]	5
VOCs	75-34-3	Dichloroethane; 1,1-	µg/L				1,600	7.7	3,500	77	11	7.7	2		7.7	7.7
VOCs	107-06-2	Dichloroethane; 1,2- (EDC)	µg/L	5	5		48	0.48	110	4.8		4.8	0.02		4.8	4.8
VOCs	75-35-4	Dichloroethene; 1,1-	µg/L	7	7		400		880			7	2		7[a]	7
VOCs	156-59-2	Dichloroethene; 1,2-, cis	µg/L	70	70		16		35			16	2		16	14[b]
VOCs	156-60-5	Dichloroethene; 1,2-, trans	µg/L	100	100		160		350			100	2		100	100
VOCs	78-87-5	Dichloropropane; 1,2-	µg/L	5	5		320	1.2	700	12		5	0.5		5[a]	5
VOCs	127-18-4	Tetrachloroethene (PCE)	µg/L	5	5		48	21	110	210	25	5	2		5[a]	5
VOCs	71-55-6	Trichloroethane; 1,1,1-	µg/L	200	200		16,000		35,000		5,400	200	2		200	200
VOCs	79-01-6	Trichloroethene (TCE)	µg/L	5	5		4	0.54	8.8	9.5	1.4	4	0.5		4	3.5[b]
VOCs	75-01-4	Vinyl chloride	µg/L	2	2		24	0.029	53	0.29	0.33	0.29	0.029		0.290	0.20[b]

Notes:

(a) pCUL value is based on the MCL, which is protective of $1x10^{-5}$ total cancer risk.
(b) pCUL values based on total site risk calculation of site IHS.
(c) See text for reference

Abbreviations and Acronyms:

CAS = Chemical Abstracts Service
DRO = diesel-range organics
GRO = gasoline-range organics
µg/L = micrograms per liter
MCL = maximum contaminant level
MTCA = Model Toxics Control Act
PQL = practical quantitation limit
TPH = total petroleum hydrocarbons
VOC = volatile organic compound

Table 3
Screening Levels for Soil Gas
Agreed Order Remedial Investigation Report
TECT Aerospace Cleanup Site
Paine Field – Everett, Washington

CAS No.	Analyte	Unit of Measurement	MTCA Method B Soil Gas Screening Level		MTCA Method C Soil Gas Screening Level		Soil Gas Screening Level Commercial Worker		Screening Level (Before Adjustment for PQL)	Laboratory PQL	Adjusted Preliminary Screening Level
			Non-Carcinogenic	Carcinogenic	Non-Carcinogenic	Carcinogenic	Non-Carcinogenic	Carcinogenic			
71-43-2	Benzene	µg/m^3	460	11	1,000	110	3,900	50	50	1.3	50
75-34-3	Dichloroethane; 1,1-	µg/m^3		52		520		240	240	1.3	240
127-18-4	Tetrachloroethene	µg/m^3	610	320	1,300	3,200	5,200	1,500	1,500	1.3	1,500
79-01-6	Trichloroethene	µg/m^3	30	11	67	200	250	95	67	1.3	95
75-01-4	Vinyl chloride	µg/m^3	1,500	9.5	3,300	95	13,000	44	44	1.3	44

Note:

Analyte list is based on VOCs that were detected in any soil gas sample collected by Landau Associates during the AO RI and during investigations conducted prior to the AO RI and that were present in concentrations exceeding the site-specific screening levels included in the Agreed Order Remedial Investigation/Feasibility Study Work Plan (Landau 2024a).

Abbreviations and Acronyms:

AO = Agreed Order
CAS = Chemical Abstracts Service
µg/m^3 = microgram per cubic meter
MTCA = Model Toxics Control Act
PQL = practical quantitation limit
RI = remedial investigation
VOCs = volatile organic compounds

Table 4
Screening Levels for PFAS in Groundwater
Agreed Order Remedial Investigation Report
TECT Aerospace Cleanup Site
Paine Field – Everett, Washington

Analyte Group	CAS No.	Analyte	Unit of Measurement	Federal MCL	Washington State MCL	MTCA Method B Standard Formula Values		MTCA Method B	MTCA Method C Industrial Land Use		Screening Level (Before Adjustment for PQL and Background)	Laboratory PQL	Adjusted Screening Level
						Non-Carcinogen	Carcinogen	Potable Groundwater	Non-Carcinogen	Carcinogen			
PFAS	27619-97-2	Fluorotelomer sulfonic acid; 6:2 (6:2 FTS)	µg/L			3.2		3.2	7		3.200	0.00607	3.2
PFAS	13252-13-6	Hexafluoropropylene oxide dimer acid (HFPO-Da; Genx)	µg/L	0.01	0.01	0.024		0.01	0.053		0.010	0.00668	0.024
PFAS	375-73-5	Perfluorobutanesulfonic acid (PFBS)	µg/L			4.8		4.8	11		4.8	0.00142	4.8
PFAS	375-22-4	Perfluorobutanoic acid (PFBA)	µg/L			8		8	18		8	0.0064	8
PFAS	335-76-2	Perfluorodecanoic acid (PFDA)	µg/L			0.000032		0.000032	0.00007		0.000032	0.0016	0.0016
PFAS	355-46-4	Perfluorohexanesulfonic acid (PFHxS)	µg/L	0.01	0.01	0.0000064		0.0000064	0.000014		0.01	0.00146	0.01
PFAS	307-24-4	Perfluorohexanoic acid (PFHxA)	µg/L			8		8	18		8	0.0016	8
PFAS	375-95-1	Perfluorononanoic acid (PFNA)	µg/L	0.01	0.01	0.04		0.01	0.088		0.01	0.0016	0.01
PFAS	1763-23-1	Perfluorooctanesulfonic acid (PFOS)	µg/L	0.004		0.0016	0.0022	0.0004	0.0035	0.022	0.0004	0.00149	0.004
PFAS	335-67-1	Perfluorooctanoic acid (PFOA)	µg/L	0.004		0.00048	0.00003	0.0004	0.0011	0.00003	0.0004	0.0016	0.048

Note:

Screening levels for PFAS are provided for evaluation purposes only; preliminary cleanup levels have not been developed because PFAS will be evaluated under a separate agreed order.

Abbreviations and Acronyms:

CAS = Chemical Abstracts Service
µg/L = micrograms per liter
MCL = maximum contaminant level
MTCA = Model Toxics Control Act
PFAS = per- and polyfluorinated substances
PQL = practical quantitation limit