



Electronic Copy

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

January 05, 2026

Andrew Rardin
Airport Environmental & Wildlife Manager
Paine Field Snohomish County Airport
3220 100th St SW, Suite A
Everett, WA 98204
(andrew.rardin@co.snohomish.wa.us)

Re: Ecology Comments on Preliminary Cleanup Levels (PCULS) for the following cleanup site:

Site Name: TECT Aerospace Everett

FSID: 17392

CSID: 12071

Agreed Order No.: DE21781

Dear Andrew Rardin:

Thank you for submitting the memo *Agreed Order Remedial Investigation Preliminary Cleanup Levels and Screening Levels, Former TECT Aerospace Leasehold Area*, dated December 12, 2025 (*December 2025 PCUL Memo*). Ecology has comments regarding your proposed PCULs and Screening levels, which are provided in Table 1 below.

Ecology appreciates your continued efforts cleaning up this site in accordance with the requirements of the Agreed Order. Please let me know if you have additional questions as you continue drafting the Remedial Investigation report. We look forward to continuing to work with you to clean up this site. Please contact me at 206-459-6287 or by email at david.unruh@ecy.wa.gov if you have further questions.

Sincerely,

David Unruh, LG, LHG

Site Manager

Toxics Cleanup Program, NWRO

cc: Jerry Ninteman, Landau Associates Inc. (JNinteman@landauinc.com)
Stephanie Renando, Landau Associates Inc. (SRenando@landauinc.com)
Priscilla Tomlinson, Ecology (priscilla.tomlinson@ecy.wa.gov)



Table 1

Comment Number	Section	ECY Comment
1	Preliminary Cleanup Levels for Soil	Page 3, Paragraph 1: Local ordinances are not considered when deciding whether groundwater is potable because they can change. However, the limited yield of the shallow groundwater zone may be used to demonstrate that the groundwater is not potable. The RI report should discuss all three criteria in WAC 173-240-720(2)(b) when evaluating groundwater for non-potability.
2	Table 1	If there is no reason to believe hexavalent chromium was used at the Site, you may use the direct contact CUL of 4,300,000 mg/kg for trivalent chromium.
3	Table 2	Delete the columns for Method C CULs unless it can be shown that one of the criteria in WAC 173-340-706(1)(a) are met at the Site. Qualifying as industrial land is not one of the criteria for groundwater.
4	Table 2	Vapor intrusion screening levels are missing for the following VOCs: 1,1,2-TCA; 1,4-dioxane; 1,2-DCA; 1,1-DCE; cis-1,2-DCE; trans-1,2-DCE; and 1,2-DCP.
5	Table 2	Please list the federal MCLGs, which are listed as ARARs under WAC 173-340-720(b)(b)(ii)(B). The MCLG for 1,1,2-TCA is 3 ug/L, which is the correct Method B CUL.
6	Table 4	The correct SL for GenX is 0.01 ug/L based on the MCLs.
7	Table 4	The SL for PFHxS prior to adjustment should be 6.4×10^{-5} . The MCLs are not sufficiently protective and must be adjusted downward to 6.4×10^{-5} to achieve a HQ of 1. It may then be adjusted up to the PQL of 0.00146 ug/L.
8	Table 4	The CULs listed in CLARC for PFOS and PFOA are each 0.004 ug/L. Ecology deviated from the normal Method B approach and listed these CULs based on the PQLs determined by EPA. Please add a footnote explaining this deviation.

