



February 26, 2026

**Port of Everett MTCA Site Status, 2026 Work Prioritization,
and Site Pause Request**

Dear Ryan,

The Port of Everett, a small public municipal entity, is currently laboring under immense financial and administrative burdens to meet the obligations of the Mill-A cleanup. Because of the scale of that project, the Port has had no choice but to go “all-in” to accomplish this multi-media cleanup, which includes the implementation of Ecology’s Final Marine Area Cleanup Action Plan—involving a \$200M+ sediment cleanup in the Marine Area— and the development of an RI/FS and eventual cleanup of the Upland Area. The Marine Area has a current estimated construction completion in the early 2030’s, based on current assumptions. In addition to the Agreed Order work, as you and the Department of Ecology know, the Port is also the named plaintiff in active litigation in the Snohomish County Superior Court against Weyerhaeuser for past and future cleanup costs for the historical Mill-A Site pollution that originated from Weyerhaeuser’s Mill operations. As a result, the Port is requesting a continued pause of major technical work at each of the Agreed Order sites listed below; however, there are several coordination and planning tasks that we anticipate accomplishing in 2026.

The Port appreciates Ecology’s willingness to consider a pause at these cleanup sites while we, and others, focus efforts on the Mill A Site. We value Ecology’s partnership and flexibility as we work to align limited technical, consultant, and funding resources. A brief summary for each site is provided below.

Bay Wood

The Bay Wood cleanup site has undergone substantial interim actions that enabled upland redevelopment, public access, and shoreline restoration that was completed in 2021. In 2025, the Port, in coordination with Ecology, removed a historic wooden work barge from the Bay Wood tide flats as an environmental improvement and mitigation for a separate Port project. This barge was identified early on by Ecology and the Port as a habitat improvement to be performed as part of the Puget Sound Initiative.



The Port and Ecology have worked collaboratively on interim actions at the site over several years. These actions addressed the most significant contamination, habitat restoration needs, and supported redevelopment. The remaining work under the Agreed Order is primarily documentation and final cleanup planning.

Current Site Status

The site is functionally stabilized following the interim actions, but the formal RI/FS and Cleanup Action Plan remain to be completed. The Port requests that major technical work be paused in 2026 while Mill A is prioritized.

Key Project Facts

- **Agreed Order:** DE 5490
- **Grant Status:** Approximately \$600,000 Oversight Remedial Action grant funds were retracted due to project pause and age of funding in 2024. Funding has not been restored.
- **Stage of Work:** Interim actions complete. Continued habitat monitoring of the shoreline restoration. Remaining: RI/FS and Cleanup Action Plan (CAP)
- **Consultant Status:** Due to external circumstances out of the Port's control, no active consultant is currently under contract for the RI/FS.
- **2026 Activities:** Limited coordination with Ecology; Continued Habitat Monitoring and Maintenance; Development of the Year 5 Monitoring Report consistent with the Bay Wood Shoreline Interim Cleanup and Restoration Plan.

Anticipated Timeframe to Restart

The Port expects to reinstate the RI/FS work at the Bay Wood site when financial and administrative resources become available. We will meet annually with Ecology at the beginning of the third quarter to review the status of the Port of Everett AOs to consider work prioritization for the following year.

TC Systems

The TC Systems site is a former metal finishing and marine-related industrial property where soil and groundwater contamination has been identified. Cleanup work has progressed through investigation and interim actions, with remaining work focused on completion of the RI/FS. The site has a long industrial history, including a shingle mill,



fiberglass boat construction, and later metal finishing operations supporting the aviation and marine industries from 1984 to 2010. The facility was closed in accordance with the Dangerous Waste Regulations, and cleanup investigations began in 2011. The Port acquired the property in 2019 and was named a PLP in 2020. The Port signed the Second Amendment to the Agreed Order in December of 2020.

Current Site Status

Multiple investigation phases and an interim trunkline replacement have been completed. The draft RI/FS remains in development. The Port requests that major technical work be paused in 2026 while Mill A is prioritized.

Key Project Facts

- **Agreed Order:** DE 7818 (as amended)
- **Grant Status:** No active grant currently funding major technical work
- **Stage of Work:** Need to re-draft the RI/FS to account for Ecology's expansion of the site.
- **Consultant Status:** Landau Associates was competitively contracted in 2025.
- **Major Work Completed:**
 - RI/FS work plan (2011)
 - Multiple soil and groundwater investigations (2011–2014)
 - 2019 trunkline interim action and soil removal
 - Monitoring well replacements (2022)
 - Site boundary expansion (2023)
 - Groundwater Monitoring Data Report (2024)
- **2026 Activities:** Limited coordination and data management

Anticipated Timeframe to Restart

The Port expects to reinstate the RI/FS work at the TC Systems site when financial and administrative resources become available. We will meet annually with Ecology at the



beginning of the third quarter to review the status of the Port of Everett AOs to consider work prioritization for the following year.

Kimberly-Clark Worldwide Upland Cleanup Site (Everett)

The Kimberly-Clark upland site is a large former pulp and paper mill property where significant interim actions have already been completed. The remaining work focuses on developing a Draft Cleanup Action Plan. The site has undergone extensive cleanup work since execution of the Agreed Order, including large-scale soil removal, petroleum remediation, infrastructure decommissioning, and installation of a cap. These actions have significantly reduced exposure risks and helped put this site back into productive use.

Current Site Status

The site is stabilized under a cap, covering about 80% of the maximum capping area on the site, with final cleanup planning documents remaining. The Port is requesting that major technical work be paused in 2026 while Mill A is prioritized.

Key Project Facts

- **Agreed Order:** DE 9476 (as amended)
- **Grant Status:** Active grant TCPRA-2325-EverPo-00075 issued in 2025; \$327,115.88 remaining
- **Stage of Work:** Draft Cleanup Action Plan
- **Consultant Status:** Due to external factors outside of our control, the Port must contract a new consultant for this project.
- **Major Work Completed:**
 - 2013 interim soil removal (~39,000 tons)
 - Comprehensive RI with extensive sampling
 - 2019–2021 interim actions and site wide cap
 - Final RI/FS Issued in 2025
- **2026 Activities:** Select a new consultant



Anticipated Restart

The Port expects to initiate the preparation of the draft Cleanup Action Plan work at the Kimberly-Clark site in 2027, assuming financial and administrative resources are available. We will meet with Ecology annually at the beginning of the third quarter to review the status of the Port of Everett AOs to consider work prioritization, including this site.

East Waterway (Everett)

The East Waterway is a multi-party sediment cleanup site that currently involves the Port and the U.S. Navy. The site encompasses contaminated marine sediments and upland source control areas. The site is governed by an Agreed Order requiring completion of an RI/FS and development of a Draft Cleanup Action Plan. Investigations have identified a range of contaminants in sediments associated with historic industrial activities. The site is being separated into several Sediment Management Areas and two Sediment Cleanup Units.

Current Site Status

Multiple sediment investigations have been completed, and the site is currently in the RI phase of work. The Port is requesting that major technical work be paused in 2026 while Mill A is prioritized.

Key Project Facts

- **Agreed Order:** DE 11350
- **Grant Status:** Active grant TCPRA-2325-EverPo-00071 issued in 2024; \$497,574.53 remaining
- **Stage of Work:**
 - RI/FS in progress
 - Anticipating interim actions
- **Consultant Status:** Due to external factors outside of our control, the Port must contract a new consultant for this project.
- **2026 Activities:** Limited coordination with Ecology and partners; select a new consultant



Anticipated Restart

The Port expects to reinitiate the RI/FS work at the East Waterway site when financial and administrative resources become available. We will meet with Ecology annually at the beginning of the third quarter to review the status of the Port of Everett AOs to consider work prioritization, including this site.

Conclusion

Thank you for considering the request to pause major technical work at the sites listed above. The Port will continue to diligently search for opportunities and partnerships that would facilitate progress in the cleanup of these sites, while we remain focused on Mill A. An example of our work to find opportunities to clean up and restore these sites is the Bay Wood Barge Removal project we performed in 2025. We will continue to seek these types of opportunities and more. The Port will stay in communication with Ecology in the future as we work through Mill-A.

Sincerely,

A handwritten signature in black ink, appearing to read "Erik Gerking".

Erik Gerking

Port of Everett

cc.

Amy Hargrove

Jacob Kirschner

Steve Thiele