

Response to Comments

Remedial investigation and feasibility study

Jorgensen Forge Corp cleanup site Tukwila, WA

Toxics Cleanup Program

Washington State Department of Ecology

Northwest Regional Office

Shoreline, Washington

November 2026

DEPARTMENT OF ECOLOGY
State of Washington

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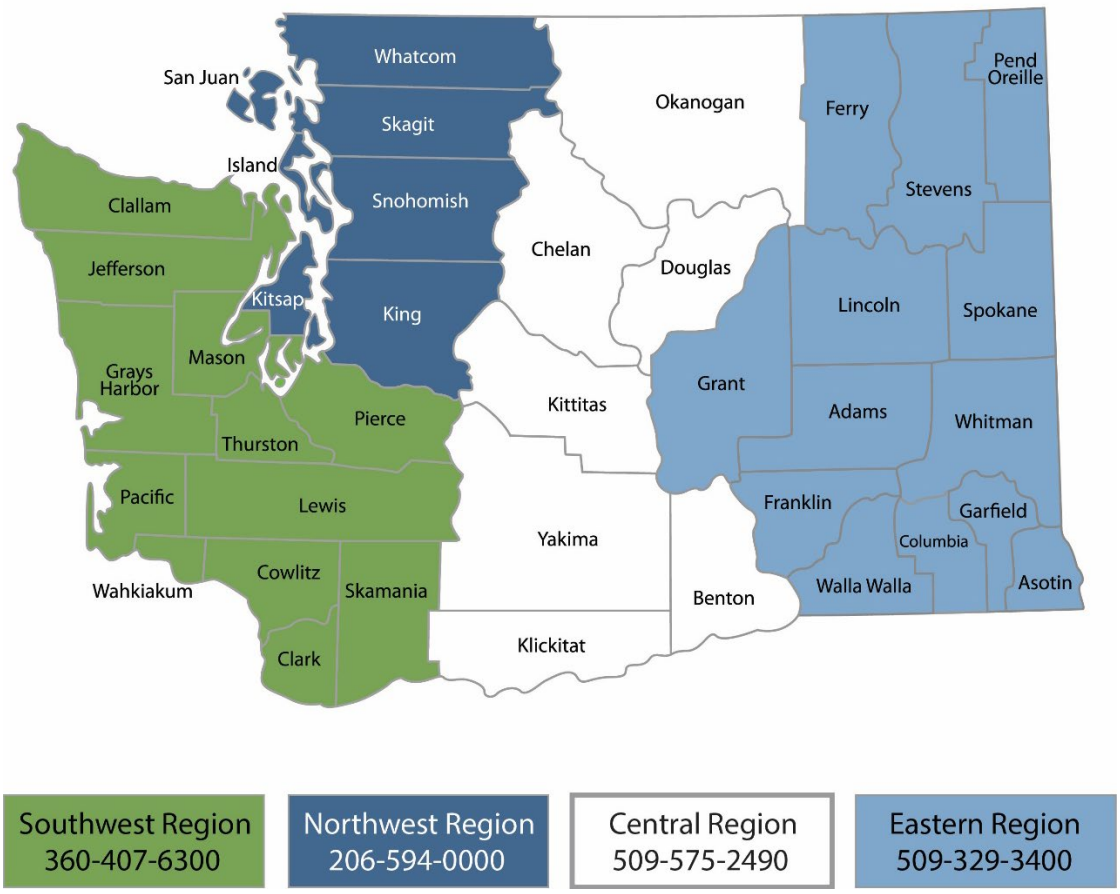
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[1] www.ecology.wa.gov/contact

Department of Ecology's region offices

Map of counties served



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Northwest	Island, King, Kitsap, San Juan, Skagit, Snohomish, Whatcom	PO Box 330316 Shoreline, WA 98133	206-594-0000
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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
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Public outreach summary

The Jorgensen Forge Corp site located in Tukwila is continuing Washington State's formal cleanup process[2] as directed under the Model Toxics Control Act (MTCA[3]). The Early M. Jorgensen Company is addressing contamination at the site under a legal agreement with Ecology.

The Department of Ecology's public involvement activities related to this Site's 45-day comment period (March 9 – April 22, 2026) included:

- **Fact sheet:**
  - US mail distribution of a fact sheet providing information about the cleanup documents, the public comment period to approximately 3261 addresses including neighboring businesses and other interested parties.
  - Email distribution of the postcard and a fact sheet to 156 people, 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[4].
- **Legal notices:**
  - Publication of one paid display ad in *Seattle Times,* dated Friday, March 6, 2026
- **Site register:**
  - Publication of 4 notices in our Toxics Cleanup Site Register:
    - Comment period notice:
      - March 5, 2026
      - March 19, 2026
      - April 2, 2026
      - April 16, 2026
    - Response summary notice:
      - November 12, 2026
    - Visit our Site Register website[5] to download PDFs.
- **Websites**:
  - We announced the public comment period, posted the fact sheet and postcard, and made the review documents available on our Jorgensen Forge Corp webpage[6] and our Public Inputs & Events webpage[7].
- **Document repositories:**
  - Documents were available at the Seattle Public Library – South Park Branch and at our Northwest Region Office.

[2] https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Cleanup-process
[3] https://ecology.wa.gov/mtca
[4] https://apps.ecology.wa.gov/cleanupsearch/site/3689
[5]https://apps.ecology.wa.gov/publications/UIPages/PublicationList.aspx?IndexTypeName=Program&NameValue=Toxics+Cleanup&DocumentTypeName=Newsletter
[6] https://apps.ecology.wa.gov/cleanupsearch/site/3689
[7] https://10ecology.wa.gov/Events/Search/Listing

- **Digital Newsletter:**
    - We announced the comment period using a video update attached to the Lower Duwamish Waterway monthly newsletter[8] in March 2026.

Comment summary

From March 9 – April 22, 2026, we solicited public comments on a remedial investigation and feasibility study for the Jorgensen Forge Corp cleanup site.

We received three comments during the 45-day comment period.

Table 1: List of commenters

	First name	Last name	Agency/Organization/Business	Submitted by
1	Alexandra	Johnson	Duwamish River Community Coalition	Organization
2	Molly	Taptich	The Boeing Company	Business
3	Shawn	Blocker	Suquamish Tribe	Tribe

Next steps

Minor changes made

We have reviewed and considered the public comments received on the documents. Based on our evaluation of the comments, changes were made acknowledging Tribes and local residents who harvest and fish from the Duwamish River in Section 2.1 of the feasibility study. These changes are noted in our responses below. The remedial investigation and feasibility study are now being finalized. The final version will overwrite the draft version on the Jorgensen Forge Corp webpage.

Next steps

The next step for the Jorgensen Forge Corp site is to develop a draft cleanup action plan. This document is expected to be available for public comment at the end of 2026 to early 2027.

See graphic below and visit our cleanup process webpage[9] to learn more about Washington's formal cleanup process.

[8] https://public.govdelivery.com/accounts/WAECY/subscriber/new?topic_id=WAECY_37
[9] https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Cleanup-process
[15] https://apps.ecology.wa.gov/publications/SummaryPages/1909166.html

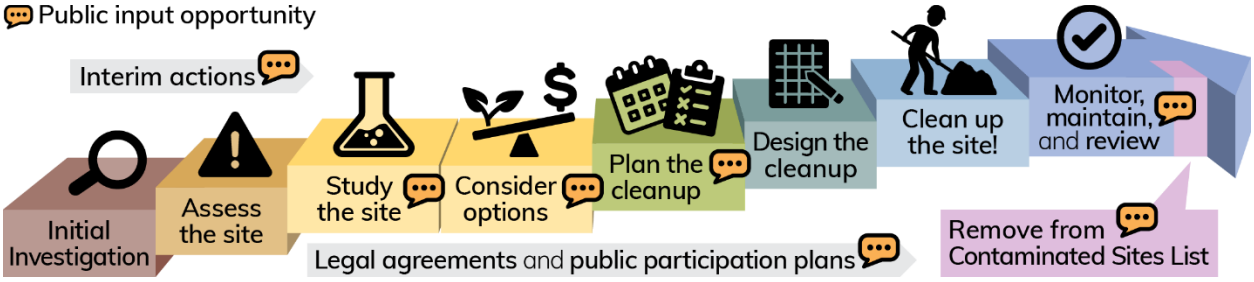


Figure 1 Washington's formal cleanup process.

Comments and responses

The public comments are presented below, along with our responses. Appendix A, page 21, contains the comments in their original format.

Comment from: Duwamish River Community Coalition

Letter to: the Department of Ecology

Re: Jorgensen Forge Corp Site Public Comment

On behalf of: the Duwamish River Community Coalition (DRCC)

Dear Department of Ecology,

Thank you for creating this draft remedial investigation report. When reading through this report, our priorities lie with our neighbors. As a community-based organization rooted in the Duwamish Valley, we bring forward the lived experiences, technical knowledge, and long-standing advocacy of residents most impacted by contamination in the Lower Duwamish Waterway. People who live in Georgetown and South Park have some of the most severe health inequities in our region. Childhood asthma hospitalization rates are among the highest in the City of Seattle, and life expectancy is approximately 10 years shorter when compared to wealthier neighborhoods and seven years shorter when compared to the King County average (*Public Health - Seattle & King County Assessment, Policy Development & Evaluation, 2023*). Our community also lives in close proximity to several contaminated waste sites and suffers from air pollution caused by both King County International and Seattle-Tacoma International airports, over 1400 industrial facilities operating in the Valley, drayage truck and traffic congestion, and three highways blanketing our neighborhoods. The straightening, widening, and deepening of the River to accommodate industry in the early 1900s, the continued settler occupation of the land, and zoning decisions thereafter changed the landscape so severely and legalized dumping of waste into the River for so many decades that this cleanup effort is just the beginning of the myriad reparations required to heal our lands and waters.

When viewing the Jorgensen Forge Corp site through this lens, we offer the following recommendations to the draft plan:

Tribal Considerations

We request that you explicitly acknowledge that the Duwamish Waterway is a Usual and Accustomed harvest area for the Suquamish, Muckleshoot, and Yakama federally recognized tribal nations, and is a site used for subsistence fishing for Duwamish Tribal members and additional Duwamish Valley neighbors, many of whom are immigrants, people of color, or low-income, and the source control cleanup sites are vital to the health and safety of the residents.

Response 1: We have added the following text to section 2.1 of the Feasibility Study:

The LDW lies within the Usual and Accustomed harvest areas for the Suquamish, Muckleshoot, and Yakama Tribes. It is also used by the Duwamish Tribe and local residents for subsistence fishing. Many of the local residents belong to vulnerable or overburdened populations.

Alternatives

The preferred alternative in the Feasibility Study is Alternative 3, which

consists of targeted excavation for LNAPL recovery and ISS in Areas 1 and 2, capping and monitored natural attenuation in other areas and institutional controls, as needed. This alternative will leave LNAPL and will not include a permeable reactive barrier (PRB) wall.

We are advocating for Alternative 4. Alternative 4 would provide the highest level of protectiveness by removing the greatest amount of LNAPL at the site. Because of the proximity to the LDW this consideration should receive higher weighting. As noted in the FS, Alternative 4 scores the highest for permanence because it would remove the greatest amount of LNAPL. Both Alternative 4b and 3b also provided a higher score for effectiveness because of the role of the PRB in controlling offsite migration of PFOS.

Response 2: The LNAPL plumes were identified in approximately 1993 and have been monitored over the last 34 years. The LNAPL plumes extents are stable and remain within the property boundaries. The proposed excavations will remove the most impacted portions of the LNAPL plume and will recover LNAPL on top of the water. The remaining portions of the plumes will be solidified or stabilized using ISS. This will further prevent LNAPL from migrating off-property or closer to the river. The PFOS plume is within the southern LNAPL plume and will be solidified or stabilized along with the LNAPL. A PRB will be installed if the PFOS plume migrates towards the southern property boundary.

Final Contaminant Boundary Delineation

The FS states that the approximate footprint of the targeted excavation will be determined based on the estimated thirty-percent excess soils generated during ISS treatment. What is the plan of action if the LNAPL has shifted laterally, especially given the proximity to Boeing Isaacson?

Response 3: Due to the stability of the LNAPL plume over the last 34 years, removal of source material from the center of the plume is not anticipated to affect the plume boundaries. Pumping from the center of the plume will likely draw LNAPL towards the center, not push LNAPL farther.

Stormwater Drainage System

The FS notes that a stormwater treatment system and outfall will remain onsite following the cleanup. The treatment system is not mapped in the FS, limiting our ability to understand potential contaminant migration pathways to the Lower Duwamish River. Please provide an updated map showing the above and belowground (if applicable) stormwater infrastructure and any assessment that has been made of leakage.

Response 4: The stormwater treatment footprint and outfall location are shown on FS Figure 2-1. Subsurface stormwater infrastructure within the planned cleanup action areas will be located and mapped prior to construction. We anticipate that a figure showing more detailed locations will be included in the Engineering Design Report.

Permeable Reactive Barrier

The preferred alternative, Alternative 3, does not include the PRB. The PFAS Release Area is located within the footprint of Area 2, occupying an area of roughly 18,000 square feet, and is in close proximity to Boeing Isaacson. Currently only two groundwater monitoring wells are located south of the "inferred" LNAPL plume. If a PRB is not utilized, the number and depths of wells will likely need to be increased to detect potential migration.

Without the permeable reactive barrier wall how would PFAS movement be controlled or other contaminants that could migrate offsite? How would this affect potential migration into Boeing Isaacson?

Additionally, for treatment/cleanup of PFAS, an adaptive management approach should be taken. Treatment and cleanup levels for PFAS are continuing to rapidly develop and the cleanup should reflect that through an adaptive management approach. Most research related to PFAS-remediation is based on laboratory-scale studies under ideal conditions that do not represent the complexity of PFAS-contaminated media.1 Excessive precipitation and tidal fluctuations may reduce effectiveness and should be evaluated as well.2 ***A pilot scale PRB should be explored for any alternatives that propose the use of a PRB. Will there be a treatability study? What other sites have shown its effectiveness or not?***

Response 5: The PFAS plume was identified in approximately 2021 and has remained stable since it was detected. The ISS treatment is anticipated to stabilize the PFOS or at least reduce the amount of groundwater flow within the PFOS plume. As part of the proposed remedy, the PFAS plume will be monitored. If the PFAS plume begins to migrate, a PRB will be installed to remediate the PFAS before it reaches the southern property boundary. Additional wells may be installed to monitor the PFAS and southern LNAPL plumes.

Tidal influence does not extend east to the LNAPL and PFAS plumes. Based on information collected during the Remedial Investigation, tidal fluctuations reduce to less than a foot of influence at well MW-46.

If a PRB is needed to address the PFAS plume, all potential available technologies will be utilized to determine which is most effective at this site. One technology that is currently used for PRBs to remediate PFAS and would be considered in that evaluation is colloidal activated carbon. This is the same technology that will be implemented in an interim action at the Eastside Fire & Rescue and City of Issaquah site (EFR HQ IVES, CSID 16581[10]).

[10] https://apps.ecology.wa.gov/cleanupsearch/site/16581

Excavation of LNAPL

The FS proposes to excavate contaminated soil down to 12-15 feet below ground surface, and leave the hole open for an undetermined period of time while collecting additional LNAPL with sumps, skimmers and pumping systems. We are concerned about the potential impacts of this approach on contaminant migration, especially in the Alternatives where LNAPL will remain onsite. Given the dynamics at the site, such as tidal fluctuations, and groundwater connectivity to adjacent parcels, we are concerned that this approach has the potential to encourage additional vertical and lateral migration and distribution of contaminants.

LNAPL does not float on the water table in a uniform, high-saturation, flat layer. LNAPL is distributed above, at, and below the water table at saturations that vary vertically depending on past conditions such as LNAPL driving head and water table fluctuations.

During and after the excavation and the pumping, the remaining LNAPL could be redistributed in unanticipated ways that could affect the site, adjacent sites, and the Lower Duwamish River. The changes in pressure from the excavation and pumping (e.g., changes in head) may encourage LNAPL to move along a vertical gradient or lateral gradient depending on the porosity of the soils and rock. Once it encounters less permeable areas, it may move laterally. Depending on the depths and media, LNAPL then may be partitioned into various forms such as gas, groundwater and soil. ***How will partitioning of LNAPL that could occur after implementation be addressed?***

How will potential for migration be addressed during implementation? Removal of soils and of floating LNAPL will likely change pressure head and may lead to enhanced migration. How will this be monitored and offsite movement be prevented? Has this potential impact been modelled? If this effort is being tested at the Boeing IT site, how are you going to factor those results into this plan?

LNAPL also often "smears" into sediment/soils as groundwater tables rise and fall and thus it may be left at greater depths as water tables fluctuate with tides. Since this site is proximal to the Lower Duwamish River it is tidally influenced and will experience rising and falling water tables, which could trap remaining LNAPL in pore spaces and fractures, where present. While the LNAPL contamination is not adjacent to the Lower Duwamish River, this area is still tidally influenced. ***We would like to better understand how the impacts of rising and falling tides, flooding, and salinity levels have been incorporated into the FS and what controls are necessary to reduce impacts?***

Response 6: Removal of the highest concentrations of soil with LNAPL and removal of LNAPL from the center of the plumes (pumping, etc.) will not cause contaminant migration for reasons mentioned in Responses 2, 3, and 5 above.

Those reasons include:

- The LNAPL plumes have been stable for 34 years.

- When the center of the plumes are excavated, fluids (water and LNAPL) will be pumped out for disposal and the pumping will create a lower pressure area that will pull fluids towards the center of the plume.

- Soil that is not excavated will be solidified with a concrete-like mixture where high concentrations of TPH and/or LNAPL are present.

- Groundwater studies at the site have demonstrated that tidal influence does not reach the LNAPL plumes.

The plumes will be monitored during and after the remedial actions. If migration of the LNAPL plumes occurs, contingency actions will be implemented.

Comment from: The Boeing Company

Subject: Comments on Jorgensen Forge Corporation (Jorgensen Forge) Property (Jorgensen

Forge Site) Remedial Investigation and Feasibility Study Reports

Dear Mr. Johnson:

The Boeing Company (Boeing) appreciates the opportunity to submit these comments on the Jorgensen Forge Corporation Site (Jorgensen Forge Site) public comment draft Remedial Investigation (RI) and Feasibility Study (FS) Reports (RI/FS Reports).

Boeing identified the following incorrect and/or incomplete and misleading information in the RI/FS Reports:

1. The RI/FS Reports Incorrectly Identify the Source of Contamination Found in the South of OA-11 Area of Concern (AOC) as Boeing's Plant 2 Site and Not the Jorgensen Forge Site.

(a) <u>There is no evidence that PCBs in the South of OA-11 AOC at the Jorgensen Forge Site are from Boeing's Plant 2 Site</u>

One of the AOCs identified in the RI/FS Reports is the South of Boeing's Other Area 11 AOC (South of OA-11 AOC). In regard to that AOC, the RI Report incorrectly states:

- "[I]t is apparent that PCB-impacted soil radiates out from the Boeing OA-11 Area of Discovery excavation." (RI Report, Section 4.24).
- "PCB-impacted soil is present on the Site within an area radiating out from the Boeing Plant 2 OA-11 Area of Discovery." (RI Report, Section 7.1.11).

- "Remedial activities were completed in 2016; however, additional investigations have identified contamination extending from OA-11 onto the Site." (RI Report, Section 1.6.1).

In addition, the FS Report incorrectly states:

- "PCB contamination in soil in this area has been attributed to historic releases of PCB containing oil from transformers within a former Seattle City Light substation in OA-11 which was located approximately 12 feet north of the property boundary." (FS Report, Section 3.1).

Boeing's OA-11 was remediated in 2016 as an Interim Measure (IM) under an Administrative Order on Consent and in direct coordination with and oversight from the United States Environmental Protection Agency (EPA). A portion of the OA-11 excavation extended a few feet onto the Jorgensen property, but when PCB concentrations in sidewall samples were found to be increasing rather than decreasing as the excavation moved onto the Jorgensen property, the excavation was stopped in coordination with EPA.

During the Jorgensen Forge Site RI, a maximum concentration of 998 milligrams per kilogram (mg/kg) PCBs was detected in shallow soil on the Jorgensen property in the South of OA-11 AOC at boring SB-2021-052 (Table 211). This concentration is greater than the maximum PCB concentration of 660 mg/kg detected in the Area of Discovery (AOD)2 in OA-11, and PCB concentrations increase moving southward from the OA-11 IM excavation area onto Jorgensen property, which indicates a source of PCBs on the Jorgensen property. The RI Report also notes that PCBs on the Jorgensen property extend laterally to the west towards the LDW with concentrations greater than 10 mg/kg, which is beyond the westward extent of PCB impacts on Boeing property and in OA-11, which further supports a source of PCBs on the Jorgensen property.

EPA evaluated the source of PCB contamination in the South of OA-11 AOC in connection with the Corrective Measures Study, Statement of Basis (2019), and Response to Comments and Final Corrective Action Decision (2022) prepared for Boeing Plant 2 under the Resource Conservation and Recovery Act. Specifically, in its response to a comment from Earl M. Jorgensen (EMJ) on the draft Statement of Basis, EPA stated the following:

- "EPA relies on key information omitted from EMJ's technical comments, and notes where EMJs comments are not supported by data or other available information."
- "The EPA has also considered the former Seattle City Light substation transformer as a potential source of the PCB concentrations associated with the OA 11 area. These data, however, indicate that PCB concentrations in the former transformer were sufficiently low (<10 ppm total PCBs) such that the transformer is unlikely to have been the primary source explaining the observed PCB concentrations remaining on the Jorgensen Forge Property."

- "[T]here is insufficient justification for EMJ's comment that the concrete stormwater draining trench that ran along the southern edge of the AOD was a conduit for transmitting PCBs. … Therefore, EMJ's comment that the stormwater drainage trench could have been a source of PCBs is not supported by the facts and reasonable assumptions based on those facts."

These EPA responses to EMJ and the supporting technical rationale refute EMJ's assertion that Plant 2 is the source of contamination in the South of OA-11 AOC.

(b) EPA Indicated There May Be PCB Sources on the Jorgensen Forge Site near the South of OA-11 AOC.

The RI Report incorrectly states: "there is no evidence that PCBs were used on the Site area south of and in the proximity to the Boeing OA-11 Area of Discovery while there is documented evidence that transformers with documented releases were present on the Boeing property." (RI Report, Section 4.24).

The potential presence of PCB sources at the Jorgensen Forge Site near the South of OA-11 AOC was evaluated by EPA in connection with the Corrective Measures Study, Statement of Basis, and Response to Comments and Final Corrective Action Decision prepared for Boeing's cleanup of Plant 2. Specifically, in its response to a comment from EMJ on the draft Statement of Basis, EPA stated:

> EMJ's comment that no source of PCBs is located on the Jorgensen Forge Property south of and in proximity to the AOD is a premature conclusion based on insufficient or incomplete facts. For example, information obtained by the EPA through a request issued pursuant to Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 U.S.C. § 9604(e), indicates that there are a number of potential sources on the Jorgensen Forge Property that may relate to the remaining PCB contamination on the Jorgensen Forge Property near the OA 11 area. Most of these potential sources will require additional characterization to determine to what extent, if any, they may explain the remaining PCB contamination in question. The EPA expects that this characterization work will, at least in part, occur as part of the Washington State Department of Ecology Remedial Investigation/Feasibility Study at the Jorgensen Forge Property conducted under the Model Toxics Cleanup Program. … Until such time as each of these potential sources have been adequately characterized such that the extent of their contribution to PCB contamination associated with the OA 11 area is known, it is not possible to eliminate the Jorgensen Forge Property as a source of that contamination.

Therefore, EPA concluded: **"[T]here is a lack of factual support for EMJ's conclusions that the Jorgensen Forge Property south of and in proximity to the AOD could not have been a source of PCBs, and that alleged sources of contamination on Boeing property explain the remaining PCB contamination associated with the OA 11 area."**

The RI Report does not include any information that would change the conclusions reached by EPA, nor does it address documented PCB contamination and releases at the Jorgensen Forge Site. Specifically:

- The RI Report does not include evidence to support its proposition that PCBs on the Jorgensen Forge Site in the South of OA-11 AOC came from the Plant 2 site rather than the Jorgensen Forge Site.
- The RI Report does not include a thorough evaluation of historical operations at the Jorgensen Forge Site near the South of OA-11 AOC, such that PCB sources on the Jorgensen Forge Site can be ruled out.
- The RI Report fails to address documented evidence of PCB contamination and releases at the Jorgensen Forge Site, such as (1) the detection of PCBs in asphalt samples, (2) the detection of PCBs in soil adjacent to the acid tank/former tote storage area, and (3) the discharge of PCBs to the LDW in treated stormwater during building demolition, as documented in an Ecology warning letter dated February 21, 2020. Additionally, little detail is provided about the dangerous waste accumulation area "black shack" adjacent to OA-11, specifically whether those dangerous wastes may have contained PCBs.

In sum, the evidence shows (or at minimum there is insufficient data to rule out) that the Jorgensen Forge Site is the source of PCB contamination in the South of OA-11 AOC.

The RI/FS Reports must be revised to accurately reflect that the evidence does not support the incorrect assertion that contamination in the South of OA-11 AOC came from Plant 2. Specifically, the inaccuracies identified above in RI Report Sections 1.6.1, 4.24, and 7.1.11 and FS Report Section 3.1 (and any similar incorrect statements regarding contamination in the South of OA-11 AOC) should be revised. In addition, the following paragraph in the RI Report should be revised: "Similarly, EMJ investigated PCB contamination along the northern end of the Site that emanates from the Property Line Outfalls and/or the adjacent Boeing property. Pending further discussion with Ecology, EMJ reserves its right to exclude this contamination from further investigation, and does not commit to investigating, containing, or cleaning it up." (RI Report, Section 7.4).

Response: Comment acknowledged. While there may be different technical interpretations regarding the source of contamination within OA-11, contamination within OA-11 will be addressed via the cleanup action planned for the Jorgensen Forge Site, regardless of its source.

2. **The RI Report Incorrectly Asserts that All cVOC Contamination in Groundwater at the Jorgensen Forge Site Emanated from Adjacent Boeing Sites.**

The RI Report incorrectly states:

> During the RI, EMJ installed wells that monitor contaminated groundwater that emanates from the adjacent properties owned and operated by Boeing. EMJ collected

> and analyzed water samples from these wells. EMJ does not appear to have an obligation to perform such activities under MTCA Revised Code of Washington 70.105D.020(22)(b)(iv), which excludes from the definition of a liable owner or operator any person who owns or operates property on which hazardous substances have come to be located solely as a result of passive migration through groundwater from another property. Pending further discussion with Ecology, EMJ reserves its right to exclude this Boeing-sourced groundwater contamination from further investigations, and does not commit to investigating, containing, or cleaning it up.

Response: Comment acknowledged. While there may be different technical interpretations regarding the source of cVOC contamination in groundwater, the contamination will be addressed via the cleanup action planned for the Jorgensen Forge Site, regardless of its source.

(RI Report, Section 7.4). **This paragraph wrongly states, or at minimum implies, that all cVOC groundwater contamination on the Jorgensen Forge Site emanated from Boeing sites.**

Boeing acknowledges that some evidence supports the possibility that cVOC contamination in groundwater may have migrated from Boeing's Plant 2 site onto a small area on the northern edge of the Jorgensen Forge Site. However, the evidence does not support the assertion or implication that Plant 2 is the sole source of all cVOC contaminated groundwater at the Jorgensen Forge Site. The RI Report does not provide any evidence that would indicate groundwater contamination at the Jorgensen Forge Site emanated from Boeing's Isaacson site.

(a) <u>Groundwater Data Shows that Most Flow is Towards Plant 2, Not Away from It.</u>

The updated RI Report groundwater elevation contours (shown in Figures 11A, 12A, 13A, and 14A) show that most groundwater flow in Level A of the aquifer *is toward Plant 2* (a fact not depicted in the COC iso-concentration figures cited), not toward the Jorgensen Forge Site. It is therefore highly implausible that contaminated groundwater from Plant 2 would be the sole source of all of the groundwater contamination at the Jorgensen Forge Site; rather, at most, contamination from Plant 2 may have impacted a small area at the northern edge of the Jorgensen Forge Site.

(b) <u>The Shipping Area is a Likely Source of cVOCs; It is Just a Question of How Much.</u>

The RI Report incorrectly finds that there isn't an onsite source of vinyl chloride, stating:

> The distribution and measured concentrations of vinyl chloride within groundwater samples taken from across the Site do not appear to be related to an on-site source. The only identified potential on-site source is the Shipping Area, where solvents were historically used to clean products prior to shipment. As discussed in Section 4.10, soil samples were taken from the boring for MW-58 within the Shipping Area. None of the soil samples taken from the boring contained detectable concentrations of vinyl chloride; in addition, none of the analyzed HVOCs were detected within soil samples

taken from this location. Groundwater samples taken from the well did not contain detectable HVOCs.

(RI Report, Section 4.23). This statement ignores (i) that sampling has previously found vinyl chloride concentrations above the cleanup level (CUL) in MW-23 and (ii) that the water level data presented in RI Level A groundwater contour Figures 11A, 12A, 13A, and 14A show that MW-23 is positioned hydraulically downgradient from the Shipping Area. Clearly, the Shipping Area is a likely source of VOCs. Properly interpreted, the evidence shows that the Shipping Area is a likely source of VOC contamination on the Jorgensen Forge Site.

(c) The RI Report Fails to Discuss Likely Sources of cVOCs on the Jorgensen Forge Site Identified in Prior Investigations.

At least three prior investigations of the Jorgensen Forge Site identified areas and activities at the Jorgensen Forge Site that were potential or likely sources of cVOC contamination in groundwater:

- Table 40 of the RI Report (Area 9 - Northwest Corner and Northern Property Boundary; Page 16) notes evidence of potential cVOC usage at the Jorgensen Forge Site in historical documentation, stating: “Historical documents suggest waste solvents, kerosene, and thinners may have been stored in the Former Waste Chemical Storage Building.”
- In Section 2.4.1.10 of their 2008 Final Source Control Evaluation Report, Anchor Environmental and Farallon Consulting stated, “used solvent was stored on a concrete pad within the covered storage building on the northwest corner of the Sediment Investigation Area (SIA).”
- In its 1990 Preliminary Site Assessment, Dames & Moore noted the following in regard to the Northwest Corner Drum and Waste Chemical Storage Area: “Drums were stored without secondary containment and uncharacterized.”

Together, these lines of evidence rebut the statement in the RI Report that all groundwater contamination at the Jorgensen Forge Site comes from adjacent Boeing properties. At most, VOC contamination from Boeing Plant 2 may have impacted a small area at the northern edge of the Jorgensen Forge Site.

The RI Report, including but not limited to Sections 4.23, 5.1, and 7.4, must be revised to accurately reflect that the evidence does not support the incorrect assertion that all of the VOC groundwater contamination at the Jorgensen Forge Site emanated from adjacent Boeing properties, and that other VOC sources on the Jorgen Forge Site may have existed. If you have questions about this letter, please feel free to reach out to me.

Response: Comment acknowledged. While there may be different technical interpretations regarding the source of cVOC contamination in groundwater, the contamination will be addressed via the cleanup action planned for the Jorgensen Forge Site, regardless of its source.

Comment from: The Suquamish Tribe

Suquamish Tribal Comments on the Jorgensen Forge Upland Remedial Investigation

1. Please include in this document (where appropriate) that the Lower Duwamish Waterway is within the Usual and Accustomed (U&A) harvest areas of three Washington Tribes (Suquamish, Muckleshoot, and Yakama). It should further be stated that PCUL's must ensure the protection of tribal harvesters, consistent with the LDW ROD and supporting risk assessments.

Response: Reference to the U&A harvest areas and Preliminary Cleanup Levels (PCULs) will be added to Section 2.1 of the feasibility study report.

2. Section 4.2, screening levels - The applicability of using a Simplified Terrestrial Ecological Evaluation (TEE) per WAC 173-340-747(9) (as outlined in section 6.3) only applies for determining a soil to groundwater pathway for protection of groundwater, not a soil to groundwater to sediment pathway based on recontamination of sediments. Therefore, the Soil Protection of Sediment via GW PCUL's for the Lower Duwamish Waterway should be used as the most protective PCUL for this site. The LDW PCUL's are based on protection of tribal harvesters.

Response: The Terrestrial Ecological Evaluation (TEE) is designed to evaluate exposures of terrestrial ecological receptors to soil. It is not involved in evaluating the soil to groundwater transport pathway or the soil to groundwater to sediment transport pathway. The text was edited to clarify that soil screening levels (SLs) considered direct human contact, the leaching pathway, and the erosion pathway in addition to the TEE.

3. Section 6 – As stated earlier, the use of a TEE appears inappropriate for this site. Furthermore, future land use should not be utilized as a basis within a RI for elimination of PCOC's; that is a discussion and evaluation that should take place in the FS.

Response: MTCA requires the TEE to be considered for every cleanup site. As discussed in relation to Section 4.2, soil SLs considered direct human contact, the leaching pathway, the erosion pathway, and the TEE. Soil SLs for human contact were based on unrestricted (residential) land use. Soil SLs for the TEE were based on industrial land use but only one chemical analyzed at the site had a soil SL based on the TEE (PFHxS). The TEE SL for this chemical is the same for unrestricted and industrial land use, and the maximum detected concentration was below the SL. Regarding future land use and COPCs, it is appropriate to consider future land use to inform selection of applicable screening levels as PCULs and thus

COPCs as part of the RI process. Heavy industrial and/or commercial use is assumed in perpetuity for the Jorgensen Forge Site based on zoning and adjacent land use.

4. Summary and Conclusions (and supporting appendices). The elimination of CPOC's is not appropriate in the RI unless based on a natural background or below an appropriate PCUL. Retain all detected CPOC's above screening levels.

Response: Soil and groundwater COPCs were selected and retained or eliminated using appropriate SLs as PCULs which considered the most conservative complete current or future exposure pathways. Soil SLs considered direct human contact, the leaching pathway, the erosion pathway, and the TEE. Groundwater SLs considered protection of surface water and sediment and vapor intrusion into a hypothetical future building. If no other groundwater SL was available, the SL for drinking water was used. If the soil or groundwater SL fell below natural background, it was adjusted up to natural background.

Appendices

Appendix A. Public comments in original format

DUWAMISH RIVER
COMMUNITY COALITION

Elevating the voices of those impacted by the Duwamish River pollution and other environmental injustices to advocate for a clean, healthy, and equitable environment for people and wildlife. We promote place-keeping and prioritize community capacity and resilience.

April 22nd, 2026

Letter to: the Department of Ecology
Re: Jorgensen Forge Corp Site Public Comment
On behalf of: the Duwamish River Community Coalition (DRCC)

Dear Department of Ecology,

Thank you for creating this draft remedial investigation report. When reading through this report, our priorities lie with our neighbors. As a community-based organization rooted in the Duwamish Valley, we bring forward the lived experiences, technical knowledge, and long-standing advocacy of residents most impacted by contamination in the Lower Duwamish Waterway. People who live in Georgetown and South Park have some of the most severe health inequities in our region. Childhood asthma hospitalization rates are among the highest in the City of Seattle, and life expectancy is approximately 10 years shorter when compared to wealthier neighborhoods and seven years shorter when compared to the King County average (*Public Health - Seattle & King County Assessment, Policy Development & Evaluation, 2023*). Our community also lives in close proximity to several contaminated waste sites and suffers from air pollution caused by both King County International and Seattle-Tacoma International airports, over 1400 industrial facilities operating in the Valley, drayage truck and traffic congestion, and three highways blanketing our neighborhoods. The straightening, widening, and deepening of the River to accommodate industry in the early 1900s, the continued settler occupation of the land, and zoning decisions thereafter changed the landscape so severely and legalized dumping of waste into the River for so many decades that this cleanup effort is just the beginning of the myriad reparations required to heal our lands and waters.

When viewing the Jorgensen Forge Corp site through this lens, we offer the following recommendations to the draft plan:

Tribal Considerations

We request that you explicitly acknowledge that the Duwamish Waterway is a Usual and Accustomed harvest area for the Suquamish, Muckleshoot, and Yakama federally recognized tribal nations, and is a site used for subsistence fishing for Duwamish Tribal members and additional Duwamish Valley neighbors, many of whom are immigrants, people of color, or low-income, and the source control cleanup sites are vital to the health and safety of the residents.

Alternatives

The preferred alternative in the Feasibility Study is Alternative 3, which consists of targeted excavation for LNAPL recovery and ISS in Areas 1 and 2, capping and monitored natural attenuation in other areas and institutional controls, as needed. This alternative will leave LNAPL and will not include a permeable reactive barrier (PRB) wall.

We are advocating for Alternative 4. Alternative 4 would provide the highest level of protectiveness by removing the greatest amount of LNAPL at the site. Because of the proximity to the LDW this consideration should receive higher weighting. As noted in the FS, Alternative 4 scores the highest for permanence because it would remove the greatest amount of LNAPL. Both Alternative 4b and 3b also provided a higher score for effectiveness because of the role of the PRB in controlling offsite migration of PFOS.

Final Contaminant Boundary Delineation

The FS states that the approximate footprint of the targeted excavation will be determined based on the estimated thirty-percent excess soils generated during ISS treatment. What is the plan of action if the LNAPL has shifted laterally, especially given the proximity to Boeing Isaacson?

Stormwater Drainage System

The FS notes that a stormwater treatment system and outfall will remain onsite following the cleanup. The treatment system is not mapped in the FS, limiting our ability to understand potential contaminant migration pathways to the Lower Duwamish River. Please provide an updated map showing the above and belowground (if applicable) stormwater infrastructure and any assessment that has been made of leakage.

Permeable Reactive Barrier

The preferred alternative, Alternative 3, does not include the PRB. The PFAS Release Area is located within the footprint of Area 2, occupying an area of roughly 18,000 square feet, and is in close proximity to Boeing Isaacson. Currently only two groundwater monitoring wells are

located south of the "inferred" LNAPL plume. If a PRB is not utilized, the number and depths of wells will likely need to be increased to detect potential migration.

Without the permeable reactive barrier wall how would PFAS movement be controlled or other contaminants that could migrate offsite? How would this affect potential migration into Boeing Isaacson?

Additionally, for treatment/cleanup of PFAS, an adaptive management approach should be taken. Treatment and cleanup levels for PFAS are continuing to rapidly develop and the cleanup should reflect that through an adaptive management approach. Most research related to PFAS-remediation is based on laboratory-scale studies under ideal conditions that do not represent the complexity of PFAS-contaminated media.[1] Excessive precipitation and tidal fluctuations may reduce effectiveness and should be evaluated as well.[2] ***A pilot scale PRB should be explored for any alternatives that propose the use of a PRB. Will there be a treatability study? What other sites have shown its effectiveness or not?***

Excavation of LNAPL

The FS proposes to excavate contaminated soil down to 12-15 feet below ground surface, and leave the hole open for an undetermined period of time while collecting additional LNAPL with sumps, skimmers and pumping systems. We are concerned about the potential impacts of this approach on contaminant migration, especially in the Alternatives where LNAPL will remain onsite. Given the dynamics at the site, such as tidal fluctuations, and groundwater connectivity to adjacent parcels, we are concerned that this approach has the potential to encourage additional vertical and lateral migration and distribution of contaminants.

LNAPL does not float on the water table in a uniform, high-saturation, flat layer. LNAPL is distributed above, at, and below the water table at saturations that vary vertically depending on past conditions such as LNAPL driving head and water table fluctuations.

During and after the excavation and the pumping, the remaining LNAPL could be redistributed in unanticipated ways that could affect the site, adjacent sites, and the Lower Duwamish River. The changes in pressure from the excavation and pumping (e.g., changes in head) may encourage LNAPL to move along a vertical gradient or lateral gradient depending on the porosity of the soils and rock. Once it encounters less permeable areas, it may move laterally. Depending on the depths and media, LNAPL then may be partitioned into various forms such as gas, groundwater and soil. ***How will partitioning of LNAPL that could occur after implementation be addressed?***

---

[1] Technology status to treat PFAS-contaminated water and limiting factors for their effective full-scale application
[2] In Situ Treatment‐Train Remediation of Per‐ and Polyfluoroalkyl Substance–Impacted Groundwater - Pourabadehei - 2025

How will potential for migration be addressed during implementation? Removal of soils and of floating LNAPL will likely change pressure head and may lead to enhanced migration. How will this be monitored and offsite movement be prevented? Has this potential impact been modelled? If this effort is being tested at the Boeing IT site, how are you going to factor those results into this plan?

LNAPL also often "smears" into sediment/soils as groundwater tables rise and fall and thus it may be left at greater depths as water tables fluctuate with tides. Since this site is proximal to the Lower Duwamish River it is tidally influenced and will experience rising and falling water tables, which could trap remaining LNAPL in pore spaces and fractures, where present. While the LNAPL contamination is not adjacent to the Lower Duwamish River, this area is still tidally influenced. ***We would like to better understand how the impacts of rising and falling tides, flooding, and salinity levels have been incorporated into the FS and what controls are necessary to reduce impacts?***

Sincerely,

Alexandra L Johnson

Marcus Griswold

Alexandra Johnson (she/her)
Senior Climate & Environmental Policy Analyst
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Marcus Griswold
Technical Advisor
mgriswold@calmwatersgroup.com

The Boeing Company
P.O. Box 3707
Seattle, WA 98124-2207

April 22, 2026
MT-2026-060

BY EMAIL

Beau Johnson
Washington State Department of Ecology
Toxics Cleanup Program
Northwest Regional Office
P.O. Box 330316
Shoreline, WA 98133-9716

Subject: Comments on Jorgensen Forge Corporation (Jorgensen Forge) Property (Jorgensen Forge Site) Remedial Investigation and Feasibility Study Reports

Dear Mr. Johnson:

The Boeing Company (Boeing) appreciates the opportunity to submit these comments on the Jorgensen Forge Corporation Site (Jorgensen Forge Site) public comment draft Remedial Investigation (RI) and Feasibility Study (FS) Reports (RI/FS Reports).

Boeing identified the following incorrect and/or incomplete and misleading information in the RI/FS Reports:

1. **The RI/FS Reports Incorrectly Identify the Source of Contamination Found in the South of OA-11 Area of Concern (AOC) as Boeing's Plant 2 Site and Not the Jorgensen Forge Site.**

(a) <u>There is no evidence that PCBs in the South of OA-11 AOC at the Jorgensen Forge Site are from Boeing's Plant 2 Site</u>

One of the AOCs identified in the RI/FS Reports is the South of Boeing's Other Area 11 AOC (South of OA-11 AOC). In regard to that AOC, the RI Report incorrectly states:

- "[I]t is apparent that PCB-impacted soil radiates out from the Boeing OA-11 Area of Discovery excavation." (RI Report, Section 4.24).

- "PCB-impacted soil is present on the Site within an area radiating out from the Boeing Plant 2 OA-11 Area of Discovery." (RI Report, Section 7.1.11).

- "Remedial activities were completed in 2016; however, additional investigations have identified contamination extending from OA-11 onto the Site." (RI Report, Section 1.6.1).

In addition, the FS Report incorrectly states:

- "PCB contamination in soil in this area has been attributed to historic releases of PCB-containing oil from transformers within a former Seattle City Light substation in OA-11 which was located approximately 12 feet north of the property boundary." (FS Report, Section 3.1).

Boeing's OA-11 was remediated in 2016 as an Interim Measure (IM) under an Administrative Order on Consent and in direct coordination with and oversight from the United States Environmental Protection Agency (EPA). A portion of the OA-11 excavation extended a few feet onto the Jorgensen property, but when PCB concentrations in sidewall samples were found to be increasing rather than decreasing as the excavation moved onto the Jorgensen property, the excavation was stopped in coordination with EPA.

During the Jorgensen Forge Site RI, a maximum concentration of 998 milligrams per kilogram (mg/kg) PCBs was detected in shallow soil on the Jorgensen property in the South of OA-11 AOC at boring SB-2021-052 (Table 21[1]). This concentration is greater than the maximum PCB concentration of 660 mg/kg detected in the Area of Discovery (AOD)[2] in OA-11, and PCB concentrations increase moving southward from the OA-11 IM excavation area onto Jorgensen property, which indicates a source of PCBs on the Jorgensen property. The RI Report also notes that PCBs on the Jorgensen property extend laterally to the west towards the LDW with concentrations greater than 10 mg/kg, which is beyond the westward extent of PCB impacts on Boeing property and in OA-11, which further supports a source of PCBs on the Jorgensen property.

EPA evaluated the source of PCB contamination in the South of OA-11 AOC in connection with the Corrective Measures Study, Statement of Basis (2019), and Response to Comments and Final Corrective Action Decision (2022) prepared for Boeing Plant 2 under the Resource Conservation and Recovery Act. Specifically, in its response to a comment from Earl M. Jorgensen (EMJ) on the draft Statement of Basis, EPA stated the following:

- "EPA relies on key information omitted from EMJ's technical comments, and notes where EMJs comments are not supported by data or other available information."

- "The EPA has also considered the former Seattle City Light substation transformer as a potential source of the PCB concentrations associated with the OA 11 area. These data, however, indicate that PCB concentrations in the former transformer were sufficiently low (<10 ppm total PCBs) such that the transformer is unlikely to have been the primary source explaining the observed PCB concentrations remaining on the Jorgensen Forge Property."

- "[T]here is insufficient justification for EMJ's comment that the concrete stormwater draining trench that ran along the southern edge of the AOD was a conduit for transmitting PCBs. … Therefore, EMJ's comment that the stormwater drainage trench could have been a source of PCBs is not supported by the facts and reasonable assumptions based on those

[1] Although Table 21 identified this as boring SB-2021-052, these data are displayed on Figure 32A-1 as SB-2021-053. Given this discrepancy, it appears that either the table or the figure is inaccurate. However, both sample stations are located some distance from the property line between the Jorgensen property and Boeing Plant 2.
[2] Area of Discovery (AOD) refers to the area where PCBs were first discovered in OA-11 along the Boeing/Jorgensen property line in 2001.

facts."

These EPA responses to EMJ and the supporting technical rationale refute EMJ's assertion that Plant 2 is the source of contamination in the South of OA-11 AOC.

(b) EPA Indicated There May Be PCB Sources on the Jorgensen Forge Site near the South of OA-11 AOC.

The RI Report incorrectly states: "there is no evidence that PCBs were used on the Site area south of and in the proximity to the Boeing OA-11 Area of Discovery while there is documented evidence that transformers with documented releases were present on the Boeing property." (RI Report, Section 4.24).

The potential presence of PCB sources at the Jorgensen Forge Site near the South of OA-11 AOC was evaluated by EPA in connection with the Corrective Measures Study, Statement of Basis, and Response to Comments and Final Corrective Action Decision prepared for Boeing's cleanup of Plant 2. Specifically, in its response to a comment from EMJ on the draft Statement of Basis, EPA stated:

> EMJ's comment that no source of PCBs is located on the Jorgensen Forge Property south of and in proximity to the AOD is a premature conclusion based on insufficient or incomplete facts. For example, information obtained by the EPA through a request issued pursuant to Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 U.S.C. § 9604(e), indicates that there are a number of potential sources on the Jorgensen Forge Property that may relate to the remaining PCB contamination on the Jorgensen Forge Property near the OA 11 area. Most of these potential sources will require additional characterization to determine to what extent, if any, they may explain the remaining PCB contamination in question. The EPA expects that this characterization work will, at least in part, occur as part of the Washington State Department of Ecology Remedial Investigation/Feasibility Study at the Jorgensen Forge Property conducted under the Model Toxics Cleanup Program. … Until such time as each of these potential sources have been adequately characterized such that the extent of their contribution to PCB contamination associated with the OA 11 area is known, it is not possible to eliminate the Jorgensen Forge Property as a source of that contamination.

Therefore, EPA concluded: **"[T]here is a lack of factual support for EMJ's conclusions that the Jorgensen Forge Property south of and in proximity to the AOD could not have been a source of PCBs, and that alleged sources of contamination on Boeing property explain the remaining PCB contamination associated with the OA 11 area."**

The RI Report does not include any information that would change the conclusions reached by EPA, nor does it address documented PCB contamination and releases at the Jorgensen Forge Site. Specifically:

- The RI Report does not include evidence to support its proposition that PCBs on the Jorgensen Forge Site in the South of OA-11 AOC came from the Plant 2 site rather than the Jorgensen Forge Site.

- The RI Report does not include a thorough evaluation of historical operations at the Jorgensen Forge Site near the South of OA-11 AOC, such that PCB sources on the Jorgensen Forge Site can be ruled out.

- The RI Report fails to address documented evidence of PCB contamination and releases at the Jorgensen Forge Site, such as (1) the detection of PCBs in asphalt samples, (2) the detection of PCBs in soil adjacent to the acid tank/former tote storage area, and (3) the discharge of PCBs to the LDW in treated stormwater during building demolition, as documented in an Ecology warning letter dated February 21, 2020. Additionally, little detail is provided about the dangerous waste accumulation area "black shack" adjacent to OA-11, specifically whether those dangerous wastes may have contained PCBs.

In sum, the evidence shows (or at minimum there is insufficient data to rule out) that the Jorgensen Forge Site is the source of PCB contamination in the South of OA-11 AOC.

The RI/FS Reports must be revised to accurately reflect that the evidence does not support the incorrect assertion that contamination in the South of OA-11 AOC came from Plant 2. Specifically, the inaccuracies identified above in RI Report Sections 1.6.1, 4.24, and 7.1.11 and FS Report Section 3.1 (and any similar incorrect statements regarding contamination in the South of OA-11 AOC) should be revised. In addition, the following paragraph in the RI Report should be revised: "Similarly, EMJ investigated PCB contamination along the northern end of the Site that emanates from the Property Line Outfalls and/or the adjacent Boeing property. Pending further discussion with Ecology, EMJ reserves its right to exclude this contamination from further investigation, and does not commit to investigating, containing, or cleaning it up." (RI Report, Section 7.4).

2. **The RI Report Incorrectly Asserts that All cVOC Contamination in Groundwater at the Jorgensen Forge Site Emanated from Adjacent Boeing Sites.**

The RI Report incorrectly states:

> During the RI, EMJ installed wells that monitor contaminated groundwater that emanates from the adjacent properties owned and operated by Boeing. EMJ collected and analyzed water samples from these wells. EMJ does not appear to have an obligation to perform such activities under MTCA Revised Code of Washington 70.105D.020(22)(b)(iv), which excludes from the definition of a liable owner or operator any person who owns or operates property on which hazardous substances have come to be located solely as a result of passive migration through groundwater from another property. Pending further discussion with Ecology, EMJ reserves its right to exclude this Boeing-sourced groundwater contamination from further investigations, and does not commit to investigating, containing, or cleaning it up.

(RI Report, Section 7.4). **This paragraph wrongly states, or at minimum implies, that <u>all</u> cVOC groundwater contamination on the Jorgensen Forge Site emanated from Boeing sites.**

Boeing acknowledges that some evidence supports the possibility that cVOC contamination in groundwater may have migrated from Boeing's Plant 2 site onto a small area on the northern edge of the Jorgensen Forge Site. However, the evidence does not support the assertion or implication

that Plant 2 is the sole source of all cVOC contaminated groundwater at the Jorgensen Forge Site. The RI Report does not provide any evidence that would indicate groundwater contamination at the Jorgensen Forge Site emanated from Boeing's Isaacson site.

(a) Groundwater Data Shows that Most Flow is Towards Plant 2, Not Away from It.

The updated RI Report groundwater elevation contours (shown in Figures 11A, 12A, 13A, and 14A) show that most groundwater flow in Level A of the aquifer *is toward Plant 2* (a fact not depicted in the COC iso-concentration figures cited), not toward the Jorgensen Forge Site. It is therefore highly implausible that contaminated groundwater from Plant 2 would be the sole source of all of the groundwater contamination at the Jorgensen Forge Site; rather, at most, contamination from Plant 2 may have impacted a small area at the northern edge of the Jorgensen Forge Site.

(b) The Shipping Area is a Likely Source of cVOCs; It is Just a Question of How Much.

The RI Report incorrectly finds that there isn't an onsite source of vinyl chloride, stating:

> The distribution and measured concentrations of vinyl chloride within groundwater samples taken from across the Site do not appear to be related to an on-site source. The only identified potential on-site source is the Shipping Area, where solvents were historically used to clean products prior to shipment. As discussed in Section 4.10, soil samples were taken from the boring for MW-58 within the Shipping Area. None of the soil samples taken from the boring contained detectable concentrations of vinyl chloride; in addition, none of the analyzed HVOCs were detected within soil samples taken from this location. Groundwater samples taken from the well did not contain detectable HVOCs.

(RI Report, Section 4.23). This statement ignores (i) that sampling has previously found vinyl chloride concentrations above the cleanup level (CUL) in MW-23 and (ii) that the water level data presented in RI Level A groundwater contour Figures 11A, 12A, 13A, and 14A show that MW-23 is positioned hydraulically downgradient from the Shipping Area. Clearly, the Shipping Area is a likely source of VOCs. Properly interpreted, the evidence shows that the Shipping Area is a likely source of VOC contamination on the Jorgensen Forge Site.

(c) The RI Report Fails to Discuss Likely Sources of cVOCs on the Jorgensen Forge Site Identified in Prior Investigations.

At least three prior investigations of the Jorgensen Forge Site identified areas and activities at the Jorgensen Forge Site that were potential or likely sources of cVOC contamination in groundwater:

- Table 40 of the RI Report (Area 9 - Northwest Corner and Northern Property Boundary; Page 16) notes evidence of potential cVOC usage at the Jorgensen Forge Site in historical documentation, stating: "Historical documents suggest waste solvents, kerosene, and thinners may have been stored in the Former Waste Chemical Storage Building."
- In Section 2.4.1.10 of their 2008 Final Source Control Evaluation Report, Anchor Environmental and Farallon Consulting stated, "used solvent was stored on a concrete pad within the covered storage building on the northwest corner of the Sediment Investigation Area (SIA)."

- In its 1990 Preliminary Site Assessment, Dames & Moore noted the following in regard to the Northwest Corner Drum and Waste Chemical Storage Area: “Drums were stored without secondary containment and uncharacterized.”

Together, these lines of evidence rebut the statement in the RI Report that all groundwater contamination at the Jorgensen Forge Site comes from adjacent Boeing properties. At most, VOC contamination from Boeing Plant 2 may have impacted a small area at the northern edge of the Jorgensen Forge Site.

The RI Report, including but not limited to Sections 4.23, 5.1, and 7.4, must be revised to accurately reflect that the evidence does not support the incorrect assertion that all of the VOC groundwater contamination at the Jorgensen Forge Site emanated from adjacent Boeing properties, and that other VOC sources on the Jorgen Forge Site may have existed.

If you have questions about this letter, please feel free to reach out to me.

Sincerely,

Molly Taptich
Boeing Plant 2 and Isaacson-Thomoson Project Coordinator
Global Enterprise Sustainability
Environmental Remediation
M/C 46-202; 206-883-7494; molly.h.taptich@boeing.com

From: Johnson, Beau (ECY)
To: Waldref, Meredith (ECY)
Subject: FW: Comments on Jorgensen Forge RI
Date: Tuesday, April 14, 2026 9:45:57 AM
Attachments: image001.png
Jorgensen Forge RI comments.pdf

FYI, received the attached comments from the Suquamish Tribe. I wasn't sure where to save these.

Beau A. Johnson, LG
Cleanup Site Manager
Toxics Cleanup Program, NWRO
Washington State Department of Ecology
Cell: (206) 638-0816

From: Shawn Blocker <SBlocker@suquamish.nsn.us>
Sent: Friday, April 3, 2026 8:36 AM
To: Johnson, Beau (ECY) <BEJO461@ECY.WA.GOV>
Cc: Denice Taylor <dtaylor@suquamish.nsn.us>
Subject: Comments on Jorgensen Forge RI

External Email

Beau;

Here are the Tribal comments on the RI. I'm holding off on FS comments because I think you are going to have an addendum that "might" affect the options presented in the FS. I glanced at the FS and your alternatives look "OK" as long as the meet the criteria to address the proposed PCUL's. Any questions, let me know!

Peace,

Shawn Blocker, LG, CESCL
Environmental Scientist
Suquamish Tribe
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(360) 271-4313
(253) 315-5902
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Suquamish Tribal Comments on the Jorgensen Forge Upland Remedial Investigation

1. Please include in this document (where appropriate) that the Lower Duwamish Waterway is within the Usual and Accustomed (U&A) harvest areas of three Washington Tribes (Suquamish, Muckleshoot, and Yakama). It should further be stated that PCUL's must ensure the protection of tribal harvesters, consistent with the LDW ROD and supporting risk assessments.

2. Section 4.2, screening levels - The applicability of using a Simplified Terrestrial Ecological Evaluation (TEE) per WAC 173-340-747(9) (as outlined in section 6.3) only applies for determining a soil to groundwater pathway for protection of groundwater, not a soil to groundwater to sediment pathway based on recontamination of sediments. Therefore, the Soil Protection of Sediment via GW PCUL's for the Lower Duwamish Waterway should be used as the most protective PCUL for this site. The LDW PCUL's are based on protection of tribal harvesters.

3. Section 6 – As stated earlier, the use of a TEE appears inappropriate for this site. Furthermore, future land use should not be utilized as a basis within a RI for elimination of PCOC's; that is a discussion and evaluation that should take place in the FS.

4. Summary and Conclusions (and supporting appendices). The elimination of CPOC's is not appropriate in the RI unless based on a natural background or below an appropriate PCUL. Retain all detected CPOC's above screening levels.