



**Spokane International Airport**  
BUSINESS PARK AND FELTS FIELD

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December 13, 2024

Jeremy Schmidt  
Eastern Regional Office, Department of Ecology  
4601 N. Monroe Street  
Spokane, WA 99205

Re: Spokane International Airport PFAS Site, Department of Ecology Order No. DE 22584  
PFAS Investigation Work Plan, Sampling and Analyses Plan, Health and Safety Plan, and  
Inadvertent Discovery Plan Approval

Dear Mr. Schmidt:

This letter is in response to your letter dated December 6, 2024, providing Ecology's approval of the Revised Work Plan pursuant to Task 1B in the Scope of Work of the Enforcement Order (Order) for the Initial PFAS Investigation Work Plan (Work Plan).

We are writing here to respond to statements from you in the cover letter that we believe need to be addressed. You stated that the Spokane International Airport (SIA) included "an incomplete historical land use and ownership description." As you are aware, the historical land use is thoroughly addressed in the Site Assessment Report prepared by SIA, dated August 13, 2024, approved by Ecology on August 20, 2024. The Work Plan highlights and contains information about ownership and historical land use specifically for the purpose of providing accurate characterization of the Site for the Work Plan.

The Airport does not believe substantial changes were made to the Work Plan that were not in-line with comments received from Ecology or a result from the discussion held on November 4, 2024. The changes made in response to Ecology's comments are summarized and included in the Response to Comments Table 1 of the submittal.

Comments that were not incorporated, for example, were associated to Ecology's requests for predetermining and providing data associated to groundwater gradient, flow direction, and contaminant fate and transport. This information is premature to include at this stage of the investigation, as it is not available and not part of Task 1B of the Order. Data collected pursuant to the approved Work Plan will inform the development of a conceptual site model depicting groundwater gradient and contaminant fate and transport. This will further be addressed in the Remedial Investigation to determine the nature and extent of contamination.

Similarly, as discussed on our call on November 4, 2024, the Airport continues to express its concern for contamination (including but not limited to Carbon Tetrachloride and other contaminants used in degreasers, and potentially PFAS) created by and conveying onto Airport

property by the Air National Guard, which is owned by the State. The Air National Guard site remains contaminated and was allowed to leave materials in place that exceeded MTCA levels. The Airport also is concerned about learning that Fairchild Air Force Base (FAFB) is draining its stormwater on to Spokane International Airport's property via the "No Name Ditch." This is identified and clearly depicted in the Site Assessment Report, approved by Ecology.

SIA believes it is important to iterate at this point our understanding that while Ecology's Order is intended to address potential PFAS contamination, Ecology has also stated it will require the Airport to test for other contaminants in all media throughout the site, including the previous closed sites requiring no-further action on Airport created by the military and the State. The Airport is committed to a scientific approach to understanding the circumstances involving Airport property. However, assigning responsibility to the Airport for military- and State-created contamination is overreaching. This effort will also be diverting resources to exploring past sites on the Airport that otherwise should be focused on PFAS.

Furthermore, on November 4, 2024, our consultant specifically asked about additional testing. You stated that if no PFAS was present within a PFAS sampling area, then in the absence of any known pathways for release of other hazardous materials, the source area would not require further investigation. It appears Ecology is now changing the previously discussed decision for establishing sampling areas.

Lastly, the December 6, 2024, approval letter states that Ecology would like to "reiterate the following **facts** for the project record" and then includes three bullets that contain legal characterizations and descriptions, not facts. SIA will respond to these contentions at the appropriate time and in the appropriate context.

If you have any questions regarding this letter, please contact me at 509-455-6406 or [lcorcoran@spokaneairports.net](mailto:lcorcoran@spokaneairports.net).

Sincerely,

A handwritten signature in black ink, appearing to read "Lisa Corcoran", with a stylized flourish at the end.

Lisa Corcoran, C.M.  
Chief Development Officer