



STATE OF WASHINGTON  
**DEPARTMENT OF ECOLOGY**

Eastern Region Office

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March 19, 2026

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Spokane, WA 99224-9438

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Spokane, WA 99201

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1026 West Broadway Avenue  
Spokane, WA 99260

**Re: Spokane International Airport PFAS Site - Ecology Approval of the Revised Initial PFAS Investigation Report**

**Site Name:** Spokane International Airport PFAS

**Cleanup Site ID Number:** 16774

**Facility/Site ID Number:** 6332493

Dear Lisa Corcoran, Marlene Feist, and Ben Brattebo:

On March 13, 2026, the Washington Department of Ecology (Ecology) received the Revised Draft Initial PFAS Investigation Report (Report) that was submitted on behalf of Spokane International Airport (SIA) to fulfill the requirements of Task 1B of Enforcement Order No. DE 22584 (EO). On behalf of the City of Spokane and Spokane County, this submittal is also intended to fulfill the requirements of Task 1B of Agreed Order No. DE 24355 (AO). The Report was revised in response to comments Ecology provided on February 11, 2026.

Ecology appreciates many of the modifications made to the document in response to our comments. However, Ecology highlights the following issues regarding comments that were not fully addressed:

- The irrelevant (to the scope of this Task) summary of Fairchild Air Force Base's (FAFB) on-property soil and groundwater analytical results was relocated to Section 8.1, rather than being removed as requested. In addition, Ecology reiterates that SIA's continual claims of FAFB impact through No Name Ditch onto "SIA property" lack confirmation, primarily because SIA has repeatedly denied FAFB access to airport property to fully

delineate their impacts. In addition, this impact would be on “SIA property” two miles west of SIA’s Airport Operations Area, which also lies west of the Airway Heights paleochannel.

- Reference to anthropogenic PFAS (per- and polyfluoroalkyl substances) background studies were included from Sweden and New England; site-specific data in the Report do not show ubiquitous anthropogenic background PFAS concentrations in soil. Given the orders-of-magnitude difference in soil and groundwater detection limits, intermittently detectable levels of PFAS in precipitation at the local NOAA station do not translate to ubiquitously detectable levels of PFAS in surface soil at SIA.
- The Report and response to comments repeatedly indicate the PFAS concentrations in groundwater at LA-MW-8 are attributable to an upgradient source; however, PFAS detections in soil throughout the Land Treatment Area (including adjacent to LA-MW-8) indicate that past disposal practices by the Airport may have caused or contributed to these impacts. PFAS concentrations in soil and groundwater at the Land Treatment Area, and their causes, will be further explored during the remedial investigation.
- While the term “Site” within the Report refers to the Primary Airport Area, all future deliverables required under the Model Toxics Control Act (MTCA)-authorized EO and AO, must use the term Site as defined in MTCA (any site or area where a hazardous substance, other than a consumer product in consumer use, has been deposited, stored, disposed of, or placed, or otherwise come to be located).

While outside of the scope of this task, in the Report SIA, the City of Spokane, and Spokane County present selective regional data and hydrogeologic information to apparently indicate FAFB is responsible for all contamination across the West Plains, including east of the Airway Heights paleochannel and downgradient of SIA. However, only “the IPI dataset” (Report section 8.1, fifth bullet) is evaluated when analyzing SIA’s contribution to regional groundwater impacts. The apparent position of SIA, the City of Spokane, and Spokane County that PFAS freely migrates *only* from FAFB while any historical release of PFAS on SIA property simply disappears or remains in place is not scientifically justifiable. **After reviewing the data in its entirety, Ecology disagrees with the position of SIA, the City of Spokane, and Spokane County that SIA’s historical groundwater data, the IPI data, private well data, and published information on regional geology and hydrogeology do not substantiate a complete downgradient pathway to the drinking water consumed by many Spokane County residents.**

As detailed above, several major issues with the document remain; however, Ecology has determined further discussion of these issues would be unproductive, not be in the best interest of the citizens, and would only further delay implementing the remedial investigation, which will fully address these concerns. Therefore, Ecology approves the revised Report as final. Please provide an electronic PDF of the final Report for Ecology’s records within seven days of receipt of this letter.

Lisa Corcoran, Marlene Feist, and Ben Brattebo

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In accordance with the EO and AO, the Draft Remedial Investigation and Feasibility Study Work Plan, Sampling and Analysis Plan, Health and Safety Plan, and Inadvertent Discovery Plan are due by July 17, 2026. Ecology will reach out soon to schedule a remedial investigation planning meeting for the purpose of discussing the scope and expectations of the upcoming deliverables.

If you have any questions regarding this letter, please contact me at 509-724-1164 or at [jeremy.schmidt@ecy.wa.gov](mailto:jeremy.schmidt@ecy.wa.gov).


Sincerely,



Jeremy Schmidt, P.E.

Site Manager

Toxics Cleanup Program

cc via email: Nicholas Acklam, Ecology   
Ivy Anderson, Assistant Attorney General  
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Erika Beresovoy, Ecology  
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Ecology Site File