



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Eastern Region Office

4601 North Monroe St., Spokane, WA 99205-1295 • 509-329-3400

March 27, 2026

Lisa Corcoran, C.M.
Spokane International Airport
9000 West Airport Drive, Suite 204
Spokane, WA 99224-9438

Marlene Feist
Public Works, City of Spokane
808 West Spokane Falls Blvd.
Spokane, WA 99201

Ben Brattebo
Public Works, Spokane County
1026 West Broadway Ave.
Spokane, WA 99260

Re: Spokane International Airport PFAS Site—Ecology Comments on March 20, 2026, Draft Short-Term Interim Action Work Plan

Site Name: Spokane International Airport PFAS
Cleanup Site ID (CSID): 16774
Facility/Site ID (FSID): 6332493

Dear Lisa Corcoran, Marlene Feist, and Ben Brattebo:

On March 20, 2026, the Washington Department of Ecology (Ecology) received the Draft Short-Term Interim Action Work Plan (Work Plan) submitted on behalf of Spokane International Airport (SIA) to fulfill the requirements of Task 4 of Enforcement Order No. DE 22584 (EO) and on behalf of the City of Spokane (City) and Spokane County (County) to fulfill the requirements of Task 4 of Agreed Order No. DE 24355 (AO).

Ecology has completed its review of the Work Plan, and it requires modifications. Ecology notes sporadic compliance by SIA, the City, and the County (collectively potentially liable persons, or PLPs), with Ecology-required modifications to previous deliverables for this project. Please note, in accordance with Exhibit B of the EO and AO, modifications to the document based on Ecology's comments are not optional. Please revise the Work Plan in accordance with the comments below:

1. Cover Letter: SIA again asserts in their cover letter that SIA is unclear whether they can use Airport revenue to implement work required by the EO. Ecology would remind SIA that the FAA's March 29, 2024 letter states "there is no bar on an airport using its own revenue to discharge its legal liabilities or to settle cases even where liability has yet to be adjudged."

Additionally, Ecology would note that the perceived limitation of SIA with respect to their federal law obligations certainly would not apply to the City of Spokane or Spokane County in implementing the work required by the AO. If SIA is refusing to conduct or fund the necessary interim action work, this needs to be clearly stated to Ecology so that work can commence with the City and County as lead as per the terms in their Agreed Order.

2. STIAWP General Comment: Ecology is disappointed the PLPs chose not to incorporate the advice Ecology provided in writing on March 5, 2026, which was based on over a year of experience interacting with, and supplying water and treatment to, West Plains residents. As we indicated, Ecology and the Washington Department of Health (DOH) have learned a great deal regarding public preferences and expectations for clean water which are relevant to the interim action, including the following:

- Many community members will not be physically capable of filling (or willing to fill) water bottles at the Garden Springs filling station and then transport full bottles to their homes. We received multiple complaints about having to carry water into their house when Culligan left it on the porch. The weight of carrying water, cost of gas and distance (up to 10 miles round trip for some), a lack of adjacent public transportation, bottle cleaning and sanitizing, and time needed to fill bottles daily or every other day will be significant obstacles for many residents. The Model Toxics Control Act (MTCA) requires that all cleanup actions must protect human health and the environment, including vulnerable populations and overburdened communities; Ecology believes allowing only those who are able to access the Garden Springs filling station creates a disparate impact to vulnerable populations. Therefore, Ecology is requiring the PLPs to amend the STIAWP and provide delivered bottled water service to all businesses and residents who find using the Garden Springs filling station an impractical burden. The requirement to provide delivered bottled water service only applies to locations where water exceeds safe standards. The PLPs must provide delivered bottled water within seven days to any locations that are found to have water that exceeds safe standards through the sampling effort required by this Work Plan.
- Ecology hand-delivered Zero-Water countertop filters to residences in the Garden Springs area who participated in the EPA/Ecology second June 2024 sampling event. These homes were in the “expanded sampling area,” which was outside the contracted area for bottled water delivery and had lower concentrations present in their well. Only 47 units were accepted and delivered to 33 homes serving 76 people. A countertop unit (and 8 replacement filters) was provided for every two people in the household so adequate water supply could be provided for all household activities (drinking, brushing teeth, boiling water for food, etc.). For example, a house with four people was provided with two countertop units and 16 replacement filters. The Zero-Water countertop filters were purchased through DOH’s Alternative Drinking Water Fund, and there are still unused replacement filters at our office due to low demand. The countertop dispensers

are slow to filter water and have been unpopular. Each home that received the countertop filters are set to receive point-of-use “under-sink” filters by DOH.

- Both self-filling bottles at the Garden Springs filling station and countertop dispensers or pitcher filters would likely be viewed as diminished service compared to the current efforts to provide delivered bottled water or install under-sink filters. As these are the only options provided in the STIAWP, Ecology expects the public to express extreme dissatisfaction. We encourage the PLPs to revise the Work Plan to provide replacement cartridges and operation and maintenance of currently installed systems for homes where DOH already installed under-sink filters and include installing under-sink filters for residents with drinking water that exceeds safe standards. The presence of existing, or installation of additional, under-sink filters would supplant the need to provide delivered bottled water.
3. Section 1.1: Revise the Work Plan to use the term “Site” as required under 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). When referring to the main operational area within the SIA Property Boundary, use the term “Main Operational Area” or similar.
 4. Section 2.2 and Appendix A: Ecology welcomes and encourages collaboration on all PLP-led outreach efforts, including, but not limited to, press releases, postcards, fact sheets, public meetings, open houses, websites, social media posts, and videos. Section 8.6.2 of the AO states, “For all press releases, fact sheets, meetings, and other outreach efforts by AO PLPs that do not receive prior Ecology approval, AO PLPs shall clearly indicate to its audience that the press release, fact sheet, meeting, or other outreach effort was not sponsored or endorsed by Ecology.” Please note this disclaimer was required to be included in the PLPs’ March 20 press release regarding the submittal of the STIAWP and must be included on future independent outreach efforts by the PLPs regarding work covered by the AO or EO.
 5. Section 2.2.1: Bottled water service does not produce more waste than countertop or pitcher filters. Once the bottle is empty, it is sanitized and refilled by the water delivery service, a task the draft Work Plan requires affected residents to do themselves. Please remove this statement.
 6. Section 2.3: Please revise the text to indicate one countertop pitcher will be provided for every two people in the household so adequate water supply could be provided for all household activities (drinking, brushing teeth, boiling water for food, etc.). This requirement is based on work completed by Ecology and DOH to calculate what would be necessary to supply an adequate amount of clean drinking and cooking water on a daily basis (minimum 1 gallon per person per day).

7. Section 2.4: Please indicate that in accordance with Section 8.6 of the EO and 8.5 of the AO, Ecology must be notified seven days in advance of private well sample collection.
8. Section 2.4: Please describe and include a figure of the “zonal area” well sampling process, including a description of how the zones will be staged and how sampling will occur within each zone.
9. Section 2.4 and as applicable in the appendices: The text indicates sampling results will be transmitted to property owners within 60 days of receipt of validated laboratory data. Revise the text to indicate sampling results will be transmitted to property owners within 14 days of PLPs’ receipt of the complete analytical report from the laboratory. Impacted residents have a right to know the results as soon as possible to reduce their ongoing exposure to PFAS, which may include exposure pathways other than through drinking water.
10. Section 2.4 and as applicable in the appendices: The text only references some of the federal MCLs. Revise the text to include the Hazard Index component of the federal MCLs and include a table of, or reference to, Washington State MCLs for PFAS.
11. Section 2.5 and as applicable in the appendices: In accordance with Section 8.5 of the AO, 8.6 of the EO, and Sections 8.7 of the AO and EO, all sampling data must be submitted to Ecology and uploaded to EIM. Ecology understands this will require a disclaimer, such as the following, on the Right-of-Entry Form: “By consenting to this sampling, your results will be shared with the Washington Department of Ecology. Data provided to Ecology becomes public record and may be subject to public records requests and disclosure. The Washington Public Records Act, Chapter 42.56 RCW, requires Ecology to promptly make identifiable public records available for inspection and provide records upon request.”
12. Section 3.2 and as applicable in the appendices: In accordance with Sections 7 of the AO and EO, documents required by the AO and EO (including the schedules within those documents) become integral and enforceable components of the respective orders. The schedule within the approved STIAWP may not be modified without an approved Extension of Schedule (AO) or a Minor Amendment (EO). Remove the second two sentences of the first paragraph of Section 3.2 and similar language in the appendices.
13. Section 3.2 and as applicable in the appendices: Additional schedule specificity is required. Revise the schedule to include the following milestones and timeframes:
 - a. Send Survey Letter: within 45 days of STIAWP approval
 - b. Begin providing clean water: within 60 days of STIAWP approval
 - c. Public meeting or open house: within 60 days of STIAWP approval
 - d. Begin sampling private wells: within 90 days of STIAWP approval

- e. Complete sampling private wells: within 210 days of STIAWP approval
14. DOH is currently contracting for the installation and maintenance of under-sink filters within the Interim Action Area. By June 30, 2026, DOH will have had contractors install 193 under-sink filters, most of which are within the Interim Action Area. DOH has indicated they will no longer maintain the systems within the Interim Action Area, as the PLPs have been identified as contributing to contamination within this area. Ecology believes it would be in the best interest of the impacted public for the PLPs to assume responsibility for the maintenance of these systems. Please revise the Work Plan to include this task.
15. Attachment A, Sample Outreach Materials: Consider using tools to increase the readability and use of plain language and reduce the number of words; Ecology can assist with this and provide the sampling mailers we completed with EPA as examples.
- a. Sample letter: The letter needs to inform residents that to qualify for additional assistance, such as POETs, a test result showing levels above safe standards from a certified laboratory will need to be provided by either past sampling efforts or from the sampling required in this Work Plan. Put the actions you are asking recipients to take first and the background information after.
 - b. PFAS investigation fact sheet: Please use Ecology's short link to our SIA PFAS webpage (<https://go.ecology.wa.gov/SIA-PFAS>). Create a short link for the ATSDR study; people are receiving this in print and shouldn't be expected to type that out.
 - c. POU fact sheet: Clarify whether people have the choice between the countertop dispenser or the pitcher (if you continue with the proposal to provide these rather than the more desirable under-sink units).
 - d. Water well survey: Add a line for an alternate phone number. After the sentence, "If you select "No," no further action is required on this form," add "You will not be eligible for a whole-house treatment system without well sampling results" (or something similar).
 - e. Portable filter consent form: Same as comment 15c. Also clarify if people can get a filter AND access to the fill station. As it reads now, it sounds like each residence only gets one or the other and like fill station access is not guaranteed ("You may also ... " should be "You will also ..."). The acronym "POUT" is used without being defined. Add a statement explaining that accepting any of these options doesn't prevent people from getting POETs later.
 - f. Sampling results letter: CAS Numbers are not needed. Remove "if offered" from the following sentence under "PFAS Were Not Detected": "You may choose to participate in future monitoring if offered."

Lisa Corcoran, Marlene Feist, and Ben Brattebo

March 26, 2026

Page 6

In accordance with the EO and AO, the Revised Draft Work Plan is due by April 3, 2026.

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

Sincerely,



Nicholas Acklam on behalf of Jeremy Schmidt, P.E.

Site Manager

Toxics Cleanup Program

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