



# Spokane International Airport

9000 West Airport Drive, Suite 204 | Spokane, Washington 99224

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May 7, 2026

Mr. Casey Sixkiller  
Director  
Washington State Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504-7600

Ms. Brook Beeler  
Director, Eastern Region  
Washington State Department of Ecology  
4601 N. Monroe St.  
Spokane, WA 99205-1295

Re: Request for Correction of Inaccurate Statements in April 2026 Initial PFAS  
Investigation Summary – Spokane International Airport

Dear Mr. Sixkiller and Ms. Beeler:

Spokane International Airport appreciates the Department of Ecology's continued engagement regarding PFAS investigation activities conducted pursuant to the Enforcement Order issued under the Model Toxics Control Act (MTCA). We remain committed to a cooperative, transparent, and science-based process that protects public health and supports durable environmental outcomes.

After careful review of Ecology's April 2026 *Initial PFAS Investigation Summary* (Publication 26-09-023), however, the Airport must formally request correction of several statements that are inaccurate or materially misleading. As published, these statements risk undermining public understanding of the investigation, mischaracterizing the Airport's position, and obscuring relevant technical facts that are necessary for fair and defensible decision-making.

We respectfully submit the following clarifications and request that Ecology retract or correct the referenced content in the interest of accuracy and public trust.

## **1. No Name Ditch – Source Attribution and Access to Sampling**

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The Summary asserts that speculation regarding PFAS migration onto airport property via No Name Ditch is “not confirmed and irrelevant” due to the absence of sampling on Airport property.

This characterization omits critical facts.

On multiple occasions – and in the presence of representatives from Ecology, the U.S. Environmental Protection Agency, and Fairchild Air Force Base – SIA has **formally requested authorization to sample the No Name Ditch outfall on Airport property**. Ecology has stated that if PFAS were detected in that conveyance, the Airport would be deemed solely responsible for remediation, notwithstanding evidence regarding upstream sources.

Fairchild Air Force Base has identified No Name Ditch as a conveyance mechanism transporting spent AFFF from its firefighting training facilities across Craig Road and onto Airport property. I understand this conveyance was disclosed to you during a June 2025 in-person meeting and is readily observable in publicly available aerial imagery. PFAS concentrations exceeding **200,000 parts per trillion** have been documented in No Name Ditch water samples upstream.

The Summary’s current language inaccurately suggests that the lack of sampling confirmation is due to Airport inaction, rather than unresolved access and liability conditions. SIA requests that Ecology correct the record to reflect the Airport’s repeated sampling requests and the documented upstream context.

## **2. Improper Presentation of Soil PFAS Units**

The Summary converts PFAS soil results into units that deviate from those established in MTCA and commonly applied in technical investigations, doing so without sufficient clarification or justification.

MTCA prescribes soil PFAS concentrations in micrograms per kilogram (parts per billion). Converting these values to parts per trillion—and presenting them alongside groundwater results—creates an inflated numerical presentation that is not technically appropriate for soil media and risks misinforming the public.

This approach undermines the shared goal of providing clear, science-based information

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and departs from standard regulatory practice. SIA respectfully requests that Ecology correct the presentation of soil data to reflect established MTCA units or, at a minimum, clearly note that such conversions are non-standard and intended solely for internal comparison.

### **3. Joint Fire Training Area (JFTA) – Incomplete Attribution of Historic Users**

The Summary refers to the “Joint Fire Training Area” as an airport responsibility without acknowledging the documented involvement of other historic users.

The Joint Fire Training Area was created and operated by the Washington State Air National Guard. The Guard procured the firefighting foam, ignition fuels, and equipment used at the site. In addition, the Guard historically operated an area on its adjacent parcel which accepted solvents and degreasers known to contain PFAS. Groundwater from these areas migrates onto Airport property along similar flow paths.

Spokane International Airport has never denied training activity at the JFTA; however, the Summary omits the Air National Guard’s operational role and does not explain why they have not been formally included as a potentially liable party, despite repeated requests by the Airport. The title “Joint Fire Training Area” itself implies shared use.

The Airport requests that Ecology correct this omission to ensure that site history and potential liability are accurately represented.

### **4. Mischaracterization of the Airport’s Scientific Position on PFAS Migration**

The Summary states that the Airport has taken the position that PFAS migrates only from Fairchild Air Force Base while PFAS on airport property “disappears or remains in place,” asserting that such a position is “not scientifically justifiable.”

This characterization is incorrect.

At no time has Spokane International Airport asserted that PFAS does not migrate. The Airport’s position, consistently communicated both in writing and verbally, is that **migration pathways, extent, and source attribution must be demonstrated with site-specific data before regional or community-wide conclusions are drawn.** The Airport has repeatedly requested a technical, peer-level meeting among professional

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hydrogeologists to review data and underlying assumptions; those requests remain outstanding.

We respectfully request that Ecology retract or revise this statement to accurately reflect the Airport's documented position.

### **Request for Correction**

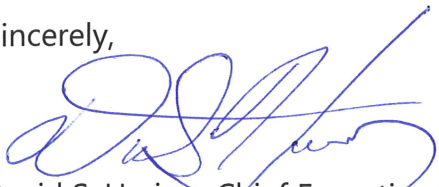
Spokane International Airport respectfully requests that the Department of Ecology:

1. Correct or retract the identified inaccuracies in the April 2026 *Initial PFAS Investigation Summary*;
2. Update the public record to reflect accurate site history, data presentation, and the Airport's stated positions; and
3. Confirm how and when these corrections will be made available to the public.

We believe these steps are necessary to preserve the integrity of the MTCA process, maintain public confidence, and support a productive, science-based collaboration moving forward.

Spokane International Airport remains fully committed to protecting public health, supporting interim safeguards, and working constructively with Ecology to reach effective and lawful outcomes. We appreciate your attention to these matters and welcome the opportunity to discuss them further.

Sincerely,



David S. Haring, Chief Executive Officer

cc: Jeremy Schmidt  
Ivy Anderson  
Spokane Airports

Enc.

# Focus on: Spokane International Airport PFAS investigation

## Initial PFAS Investigation Report

The [Initial PFAS Investigation Report](#)<sup>1</sup> provides groundwater and soil sampling results from Spokane International Airport (SIA) property, focusing on 11 areas where firefighting foam, or aqueous film-forming foam (AFFF), was or may have been used (see page 3). The report includes maps showing where samples were taken and the related results.

Groundwater samples were collected from 50 monitoring wells that already existed for other purposes, and some were not in the 11 areas where AFFF was or may have been used. **The highest PFAS (per-and polyfluoroalkyl substances) levels in groundwater were in the Joint Fire Training Area at 12,000 parts per trillion (ppt).** Safe levels range from 4 to 10 ppt, depending on the type of PFAS.

Soil samples were collected from 57 locations at multiple depths below the ground surface in the 11 areas. **The Joint Fire Training Area also had the highest PFAS levels in soil at 1,900,000 ppt.** (Soil levels are usually shown in micrograms per kilogram or parts per billion, but we converted them to match groundwater levels).

See Table 1 for the highest levels found in all areas.

## Ecology approved but didn't fully agree

Because we didn't want to slow progress, we approved the report, noting parts we disagree with in a [letter](#).<sup>2</sup> We asked SIA, the City of Spokane, and Spokane County (parties responsible for cleanup) to remove the summary of Fairchild Air Force Base's on-property soil and groundwater results and related claims that airport property is contaminated by the base through No Name Ditch. SIA has denied the Air Force's requests to sample on their property, so this claim is not confirmed and irrelevant to this report.

Table 1. Highest PFAS levels in groundwater and soil

Area sampled (letters match map, page 3)	Groundwater (ppt)	Soil (ppt)
A. Current Fire House	No well	610,000
B. FAA Inspection Testing	No well	2,800
C. Field Maintenance	No well	22,000
E. Historical Fire House	No well	330,000
F. Joint Fire Training Area	12,000	1,900,000
G. Park Drive West / Waste to Energy Plant	29	440*
H. Stormwater Recovery	1,100	49,000
I. Land Treatment Area	180*	2,800
J. Geiger Correctional / Delivery Facilities	57	Not sampled
L. Triangle Ramp Training Area	No well	Below detection
Other. West Peripheral	7.2*	Not sampled
<b>Detection limit</b>	<b>&gt;1 ppt</b>	<b>&gt;100 ppt</b>

**Table notes:** Highest levels are for 10 PFAS with cleanup levels. Results above safe levels are in gray cells. Results that meet safe standards are marked with an asterisk.\*

Among other issues noted in our letter, we disagree with the responsible parties' claim that PFAS coming from the airport has not affected private wells north and east of their property. **The apparent position of SIA, the City of Spokane, and Spokane County that PFAS freely migrates only from Fairchild Air Force Base, while PFAS on SIA property simply disappears or remains in place is not scientifically justifiable.**

We are requiring the responsible parties to provide safe water to contaminated private wells in the emergency interim action area (see page 4).

<sup>1</sup><https://apps.ecology.wa.gov/cleanupsearch/document/169127>

<sup>2</sup><https://apps.ecology.wa.gov/cleanupsearch/document/168564>

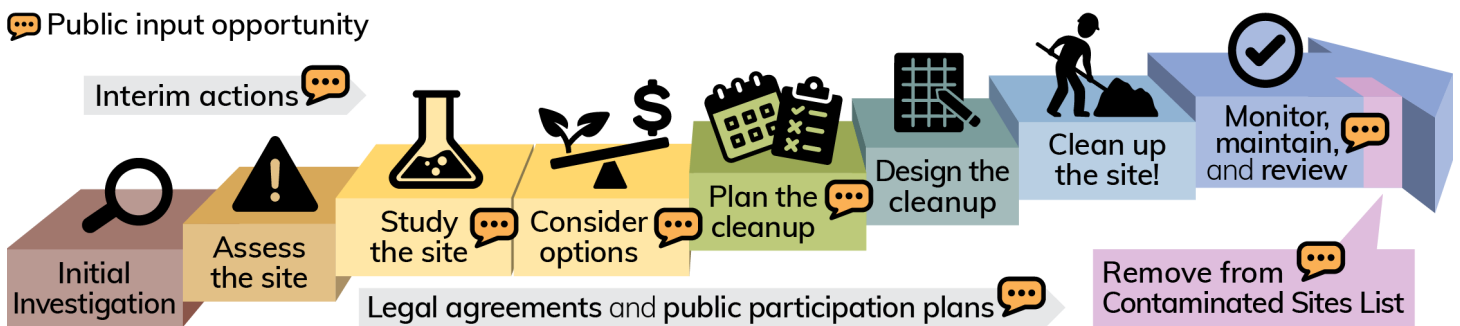
## Next steps

The results will be used to develop the Remedial Investigation Work Plan (see “Study the site” step in the cleanup process below). The draft plan is due in July 2026. This work plan will detail where and how soil and groundwater samples will be taken to fully discover where contamination from SIA is located. The plan will be updated if contamination continues to be found beyond the area identified in the first version.

## Site background

In 2023, Ecology issued an enforcement order to SIA requiring investigation and cleanup after receiving sample results that found PFAS in groundwater at SIA. We added the city and county to the investigation under an agreed order in January 2026.

The Model Toxics Control Act (MTCA) is Washington’s environmental cleanup law. It provides requirements for contaminated site cleanup and sets standards that protect people and the environment. Ecology implements the [MTCA cleanup process](https://ecology.wa.gov/MTCA-process)<sup>3</sup> shown below.



## About AFFF

AFFF contains PFAS, which can quickly put out jet fuel fires, but last a long time in the environment and affect human health. Until recently, the Federal Aviation Administration (FAA) required airports to use AFFF to meet safety requirements.

## Related information

- **SIA PFAS cleanup site page:** <https://go.ecology.wa.gov/SIA-PFAS>
- **PFAS in West Plains private wells website:** <https://ecology.wa.gov/west-plains>
- **Join the West Plains PFAS updates email list:** <https://go.ecology.wa.gov/WestPlainsPFASupdates>
- **Washington Department of Health’s PFAS website:** <https://doh.wa.gov/PFAS>

## Contact information

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Erika Beresovoy, public involvement  
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 509-385-2290

## ADA accessibility

To request an ADA accommodation, email [ecyadacoordinator@ecy.wa.gov](mailto:ecyadacoordinator@ecy.wa.gov), call 360-407-6831, or dial 711 to call through the Washington Telecommunications Relay for services like text telephone (TTY). Visit [Ecology.wa.gov/ADA](https://ecology.wa.gov/ADA) for more accessibility information.

<sup>3</sup> <https://ecology.wa.gov/MTCA-process>

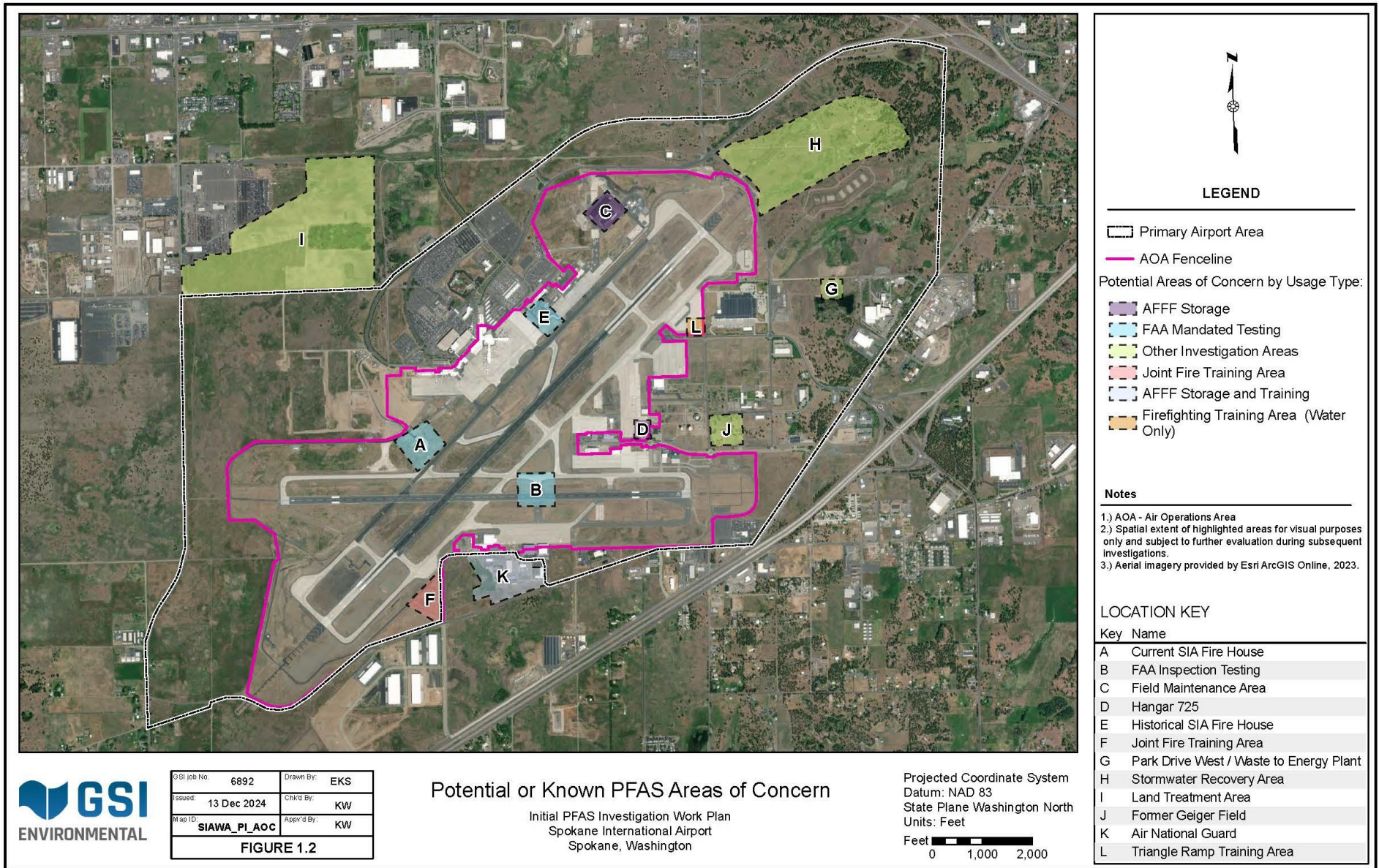


Figure 1. Areas where soil and groundwater were sampled, except for Hangar 725 where PFAS firefighting foam was stored but no known spills have occurred.  
 Note: This is Figure 1.2 in the Initial PFAS Investigation Work Plan (figure by GSI Environmental).

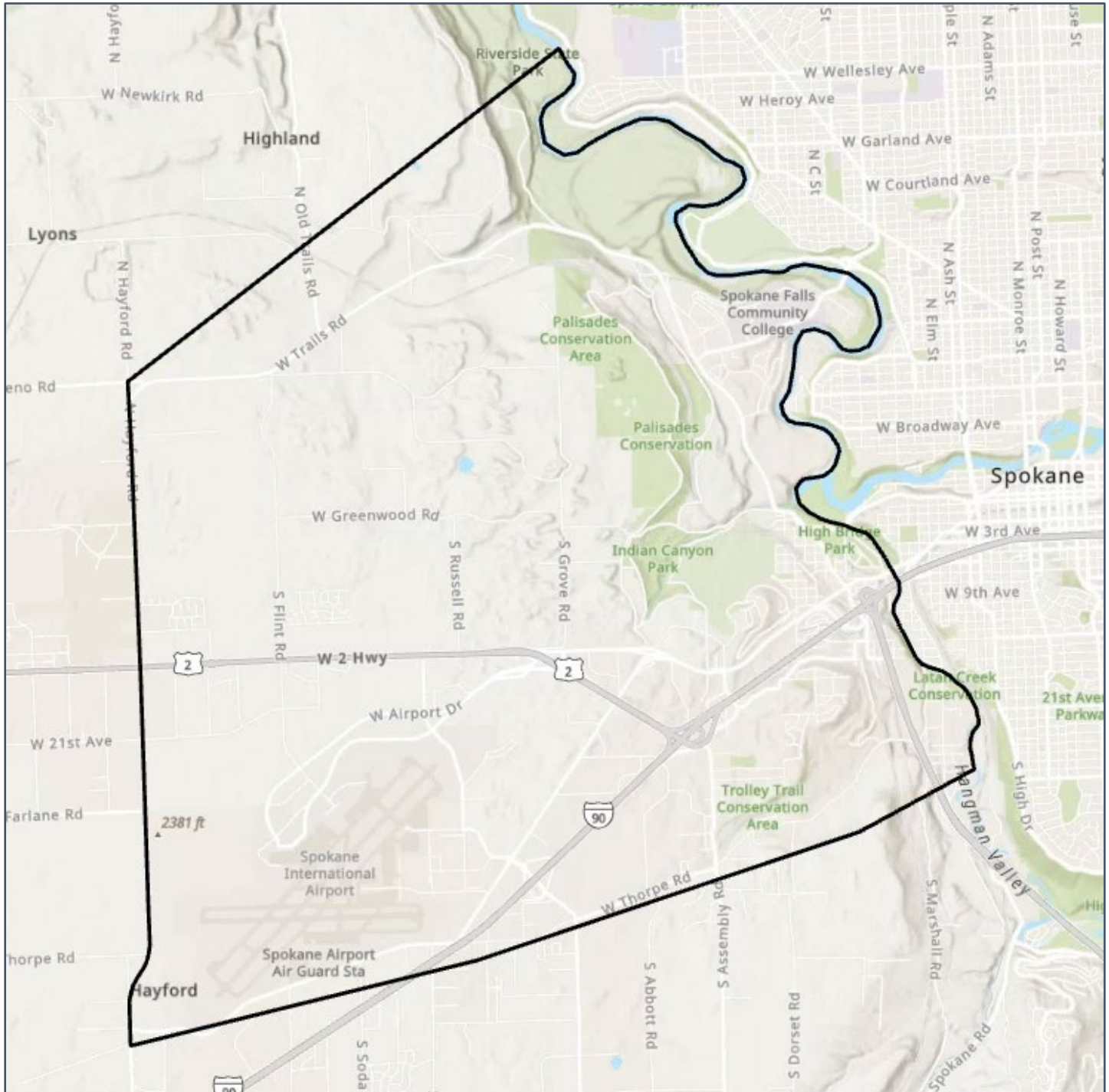


Figure 2. Emergency interim action area where safe water will be provided to residents and businesses with contaminated private wells. We based the boundaries on the airport’s on-property groundwater sampling from 2017 through 2025, [EPA’s sampling of 411 private wells in 2024](#), and [our groundwater investigation grant work](#)<sup>4</sup> with the City of Medical Lake and Eastern Washington University.

<sup>4</sup> <https://ecology.wa.gov/spills-cleanup/contamination-cleanup/cleanup-sites/sites-with-pfas-in-drinking-water/west-plains-pfas/sampling-results>