



**STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY**

Eastern Region Office

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

August 25, 2026

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

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

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

Re: Ecology Determination of Non-Compliance with Enforcement Order, Agreed Order, and Extension Approval Conditions for the Submittal of the Revised Long-Term Interim Action Work Plan at the following Hazardous Waste Site:

- **Site Name: Spokane International Airport PFAS**
- **Site Address: 9000 W. Airport Dr., Spokane, WA 99204**
- **Cleanup Site ID: 16774**
- **Facility/Site ID: 6332493**

Dear Lisa Corcoran, Marlene Feist, and Ben Brattebo:

The Washington Department of Ecology (Ecology) has determined the Spokane International Airport (SIA) has made insufficient progress and is not compliant with the requirements of Enforcement Order No. DE 22584 (EO), and the City of Spokane (City) and Spokane County (County) have made insufficient progress and are not compliant with the requirements of Agreed Order No. DE 24355 (AO). The EO and AO (Orders) require the same scope of work to be performed by SIA, the City, and the County (collectively potentially liable persons, or PLPs). Ecology review and oversight is a required part of the formal cleanup process, and it is our

responsibility to ensure documents developed under the Orders meet the requirements in the Model Toxics Control Act (MTCA). **Sufficiently modifying documents in accordance with Ecology's comments is not optional.**

Ecology has determined the PLPs have made insufficient progress and are non-compliant with the following sections of the Orders and Ecology's July 1 conditional approval letter for extending the due date of the revised Long-Term Interim Action Work Plan (LTIAWP):

1. Orders Exhibit B, Purpose: The PLPs have indicated remedial investigation work in the Joint Fire Training Area will commence without Ecology approval of the Remedial Investigation (RI) Work Plan. For this work to be considered in the RI, it must be completed in accordance with draft RI Work Plan and Ecology's comments provided via email on August 24, 2026.
2. Orders Exhibit B, Task 4, Ecology-required emergency interim actions: The PLPs failed to sufficiently incorporate Ecology comments on the draft LTIAWP outlined in our June 2, 2026, correspondence. The insufficiencies of the draft LTIAWP continue to include, but are not limited to:
 - a. Insufficient well sampling frequency.
 - b. Unnecessary screening steps to determine whether a parcel is eligible under the program, including:
 - i. A requirement that the property be developed or purchased by April 17, 2025.
 - ii. A requirement that the well must be installed by April 17, 2025.
 - iii. Determination *by* SIA *whether* SIA is the primary source of PFAS in the private well, even though all locations under evaluation are within the Ecology-identified emergency interim action area.
 - c. And most notably, **no schedule commitment to implement, install, or complete any element of the long-term interim action.**
3. Orders Exhibit B, Task 7, Progress reports: As detailed in email correspondence, the PLPs refuse to fully incorporate Ecology comments on the required content of emergency interim action progress reports.

4. The following conditions from Ecology's July 1, 2026, letter have not been met, which were required to extend the revised LTIAWP due date:
 - a. Interim action progress reports must include updates regarding evaluation and progress of municipal water extension projects.
 - b. Interim action progress reports must include information regarding the under-sink filter cartridge replacement program.
5. EO Section 8.2 and AO Section 8.1, Remedial Action Costs: The PLPs have failed to fully reimburse costs incurred by Ecology pursuant to the Orders and consistent with WAC 173-340-550(2). As of the date of this letter, the outstanding balance accruing interest exceeds \$236,000.

Each PLP remains strictly, jointly, and severally liable for performing all obligations under the Orders. This means that all PLPs are responsible for ensuring that the Orders are adhered to. In the event any PLP should fail to timely and properly complete all or any portion of its work, the other PLPs must perform that remaining work.

The PLPs must rectify the non-compliance issues identified above, which will include submitting by close of business on August 28, 2026, a revised July interim action progress report in accordance with all previous comments as well as the applicable requirements above; and revising the LTIAWP in strict accordance with upcoming Ecology comments on the second revision of the document.

Ecology believes these issues are partially caused by a lack of involvement in, or possibly awareness of, all work being done by the various PLPs. Therefore, we are requiring each PLP to include the order-designated project coordinators, or other technical staff, in all meetings and site-related correspondence involving Ecology. If the non-compliance issues identified above are not rectified, Ecology will evaluate its options to ensure the work required by the Orders is implemented expeditiously and in accordance with MTCA, which may include enforcement as described in the Orders.

Ecology understands that because of the Spokane Complex Fires, the City and County are currently navigating a response to an unprecedented emergency. Ecology and its Eastern Region staff are also responding to and are impacted by this emergency, both professionally and personally. It is important to note the issues outlined in this letter predate this emergency and that many residents of the West Plains, who have long been impacted by PFAS in drinking

Lisa Corcoran, Marlene Feist, and Ben Brattebo

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water, have now been affected by these fires. Collectively, we cannot postpone helping this overburdened community.

We urge SIA, the City, and the County to assign higher priority to this cleanup project and public health emergency. Ecology will continue to do everything within our authority to ensure impacted residents have access to clean drinking water and the work required by the Orders is implemented in a reasonable time frame. To that end, enclosed in this letter is Ecology's notice that we have completed the substantial progress review of Spokane County's Oversight Remedial Action Grant application. Ecology has determined that no changes at this time are needed to the total requested funding level of \$23,680,000 even though the additional supporting information requested has not been provided. The County's application will be included in the ranked list of grant applications and submitted to the Governor this fall. Final funding decisions are subject to legislative allocation.

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

Sincerely,



Jeremy Schmidt, P.E.

Site Manager

Toxics Cleanup Program

Enclosure (1)

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



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

PO Box 47600, Olympia, WA 98504-7600 • 360-407-6000

August 25, 2026

Scott Simmons
Spokane County Public Works
1116 W Broadway Avenue
Spokane, WA 99260

Re: Substantial progress review for the following site:

- **Site Name:** Spokane International Airport PFAS
- **Site Address:** 9000 West Airport Drive, Spokane, WA 99204
- **Cleanup Site ID:** 16774
- **Grant Application:** TCPRA-2729-SpCoPW-00037
- **Recipient Requested Amount:** \$23,680,000 Total Eligible Cost / \$17,760,000 State Share

Dear Scott Simmons:

Thank you for your commitment to cleaning up sites in your community.

In an effort to fund as many sites as possible, Ecology has implemented a new substantive review process for all Oversight Remedial Action Grant applications. This process, as outlined in our [public comment document](#)¹, takes into account legislative spending expectations, readiness to proceed, current spending, and any other factors needed to evaluate the funding level requested. This is in accordance with [WAC 173-322A-22](#)².

After reviewing your grant application, Ecology determined that no changes are needed to the requested funding level at this time. We recognize the significant impacts of PFAS-contaminated water and the importance of addressing this issue promptly to reduce community exposure. If funds are allocated by the legislature and the project moves toward an award, Ecology will request additional documentation to confirm the scope of work and associated costs.

We also wanted to make you aware of a few policies in the event your application is funded:

¹ <https://apps.ecology.wa.gov/publications/documents/2509043.pdf>

² <https://app.leg.wa.gov/WAC/default.aspx?cite=173-322A-220>

- **Environmental Justice Assessment³:** If funded, your grant application will have an additional step, as an award over \$12 million triggers a Significant Agency Action under the [HEAL Act⁴](#). Ecology will be in touch if funded on next steps for this process.
- **Retroactive Costs:** Your application appears to include substantial retroactive costs. These costs may be eligible for reimbursement under the grant based on the date negotiations began for the order or decree. Please be sure to review the most recent [Oversight Remedial Action Grant Guidance⁵](#) and [Ecology Yellow Book⁶](#) regarding backup documentation and cost eligibility requirements. If awarded funds, you will be able to work with your grant manager on a schedule to break up costs as needed to enable timely payment processing. We hope to have all grants with retroactive costs to be billed up to date within six months of grant activation.
- **Match Requirements:** We also recommend you review Section 4.4 of the grant guidelines regarding other funding sources. If the MTCA Capital allocation to Commerce is used as match it will need to be appropriately documented in EAGL with each Payment Request. This methodology will be determined by the grant manager assigned if the grant is awarded.

Your application is still in the process of being scored and ranked. Ecology will provide the ranked list to the Governor in Fall 2026. Applicants can expect to hear from Ecology regarding final decisions after the legislature passes the budget in May 2027. Please be sure to subscribe to our [email list⁷](#) for general updates throughout the process.

If you have questions, please contact Eastern Region Section Manager Nick Acklam at Nicholas.Acklam@ecy.wa.gov or Budget Analyst Michael Schuster at Michael.Schuster@ecy.wa.gov.

Sincerely,



Nhi Irwin
Toxics Cleanup Program Manager

cc: Benjamin Brattebo, Water Reclamation Engineer, Spokane County
Heather Arnold, Grants Administrator, Spokane County
Nicholas Acklam, Eastern Region Section Manager, Ecology
Jeremy Schmidt, Site Manager, Ecology
Laurie Dahmen, Competitive Grants Unit Supervisor, Ecology
Michael Schuster, Capital Budget Analyst and Finance Officer, Ecology

³ <https://ecology.wa.gov/about-us/who-we-are/environmental-justice/environmental-justice-assessments>

⁴ <https://ecology.wa.gov/about-us/who-we-are/environmental-justice/heal>

⁵ <https://apps.ecology.wa.gov/publications/documents/2609046.pdf>

⁶ <https://ecology.wa.gov/about-us/payments-contracts-grants/grants-loans/grant-loan-guidance>

⁷ https://public.govdelivery.com/accounts/WAECY/subscriber/new?topic_id=WAECY_110