



May 27, 2024

Mr. Jeremy Schmidt
4601 N. Monroe Street
Spokane, WA 99205

Re: Spokane International Airport Investigation

Dear Mr. Schmidt:

I am the City Manager of the City of Airway Heights (“Airway Heights”, or “the City”), a municipality neighboring Spokane International Airport (“SIA”). Thank you for the opportunity to comment on the Airport Board City of Spokane/Spokane County Enforcement Order, No. DE 22584 issued by the Department of Ecology (“Ecology”) on March 29, 2024 (“the Enforcement Order”), requiring investigation and remedial action targeting per- and polyfluoroalkyl substances (“PFAS”) contamination at SIA.

PFAS contamination is widespread in the West Plains, and the City is grateful for Ecology’s help in investigating and developing solutions to this crisis. Remediating local PFAS contamination will require engagement by all levels of government, and we welcome Ecology’s assistance in this work. The following comments provide suggestions on how Ecology can use its oversight role to maximize the benefits provided by remedial investigation and activities at SIA.

- **Comprehensively evaluate the geographic extent of PFAS contamination in the West Plains**

Airway Heights has been navigating the impact of PFAS contamination of its drinking water sources for the past seven years. In 2017, the Air Force informed the City that sampling had detected PFAS in the City's water system; the Air Force subsequently began investigating and planning response actions to address contamination originating from Fairchild Air Force Base ("Fairchild"), where PFAS was used for decades in aqueous film forming foam ("AFFF") and possibly other products. As a result of PFAS contamination originating at Fairchild, the Air Force is providing bottled water and filtration systems for households with PFAS detected in their private wells. However, the Air Force has declined to extend this assistance to private well owners east of Hayford Road, disclaiming responsibility for any PFAS contamination impacting water sources in that area.

Further investigation into PFAS contamination sources is needed. As the PFAS detections at SIA indicate, AFFF or other PFAS products used at SIA have likely also contributed to PFAS contamination in the surrounding area. The local hydrogeology is complex, and determining the extent of area contamination may be a difficult undertaking. Evaluating the region's major PFAS sources will indicate how and where PFAS entered the ecosystem, a crucial first step to determining where such contamination has reached.

While the City appreciates the Air Force's efforts to investigate PFAS contamination originating from Fairchild, the Air Force is not a neutral party. It has a financial interest in limiting its responsibility for addressing PFAS contamination in the West Plains. Accordingly, though the Air Force's investigations should be a resource for understanding local PFAS contamination, the City urges Ecology to critically evaluate what contamination may be linked to Fairchild while it determines the extent of any contamination originating from SIA.

Further, the preexisting investigation by the Air Force into local contamination has been guided by screening levels that are now superseded by the 4 parts per trillion ("ppt") maximum contaminant levels ("MCLs") for PFOS and PFOA that were finalized by the U.S. Environmental Protection Agency in April 2024. Any investigation into PFOS and PFOA contamination in the West Plains guided by sampling with detection limits above 4 ppt is incomplete and must be revisited. Sampling guided by the newer MCLs will likely cover a far wider geographic area; the edges of contamination plumes meeting health guidelines will most likely be more physically dispersed. The City hopes that a broader investigation will establish the party or parties responsible for contaminating drinking water supplies across the West Plains.

The City is also interested in determining the party or parties responsible for contaminating the Spokane Valley/Rathdrum Prairie Aquifer. To meet the City's need for

uncontaminated water, the City sought authorization to drill a new municipal well near the crossing of Seven Mile Road over the Spokane River (“New Well”). However, these plans were paused after the discovery of PFAS during the initial well planning process. The City requests that Ecology determine whether contamination from SIA may be reaching the area of the proposed New Well.

Given the limited geographic scope of the investigation conducted thus far, injured parties like the City are left with insufficient information on who should be responsible for contributing to the remediation of the local drinking water sources. The City urges Ecology to ensure that investigations conducted by SIA into its PFAS contamination adequately address potential impacts from its activities.

- **Conduct sampling for as many PFAS chemicals as feasible**

A comprehensive investigation must also analyze an appropriate spectrum of PFAS chemicals. PFOS and PFOA are not the only PFAS of concern; EPA finalized MCLs for four other PFAS as well (PFHxS, PFNA, HFPO-DA, and PFBS). Ecology itself recognizes the entire PFAS chemical family as hazardous substances under MTCA. Sampling in the City’s water supplies has already detected at least nine PFAS: PFOA, PFOS, 6:2 FTS, 8:2 FTS, PFBS, PFHpA, PFHxA, PFHxS, and PFNA.

There are thousands of chemicals in the PFAS family. The City urges Ecology to require as comprehensive an approach to sampling as is feasible during the investigation stage of the remedial planning. PFAS composed of longer molecular chains may degrade into new PFAS chemicals with shorter molecular chains, the risks associated with which have become clearer over time. Ecology’s approach to the SIA investigation should be shaped by the fast-evolving science on this issue. Ecology should require testing for a broad set of PFAS to ensure sufficient data gathering to scope adequate responses to this complex and long-term problem.

- **Prioritize investigating impacts on local private wells**

As discussed, certain neighborhoods in Airway Heights have not been able to access the water treatment resources provided by the Air Force. The City asks Ecology to prioritize investigating which sources of PFAS contamination are impacting this segment of the City. Although Ecology is now providing bottled water upon request to homes with levels detected above safe drinking water standards, these residences still do not have clarity on who contaminated their water and need such information to receive funding for more permanent solutions.

If contamination originating at SIA extends beyond SIA’s property line, the City hopes that Ecology will prioritize establishing whether SIA is culpable for contamination impacting local residents who are not yet receiving the financial support they need. If SIA is a

contamination source for the households east of Hayford Road, the City further asks that Ecology require immediate interim actions to help these residents secure permanent access to clean drinking water.

- **Keep the City informed regarding remedial activities**

The City requests copies of all deliverables from SIA under the Enforcement Order and formal notification regarding opportunities for public engagement in the SIA remedial action planning process. As a neighboring municipality managing PFAS contamination in its drinking water supplies, the City is deeply invested in adequate investigation of PFAS contamination originating at SIA. The City seeks to be a productive partner in ensuring that the investigation and planning process for this response occurs efficiently and effectively. In particular, the City requests early and active involvement in planning any interim or final remedial actions that might address PFAS impacts to our drinking water sources.

Thank you again for the opportunity to provide feedback on the Enforcement Order. We are grateful for Ecology's attention to this important issue, and hope that the investigation will yield greater clarity on the parties responsible for contaminating our City's drinking water sources. Information on responsible parties will be essential to ensuring that impacted parties like the City can access the resources they need to address this crisis.

Sincerely,

A handwritten signature in black ink that reads "Albert Tripp". The signature is written in a cursive, slightly slanted style.

Albert Tripp,
City Manager