



March 9, 2026

Nicholas M. Acklam
Section Manager, Toxics Cleanup Program
Washington Department of Ecology, Eastern Office
4601 N. Monroe Street
Spokane, WA 99205

RE: City of Airway Heights Comment on Department of Ecology Agreed Order No. DE 24355

Dear Mr. Acklam:

I am the City Manager of the City of Airway Heights (“Airway Heights”, or “the City”), a municipality located in Spokane County and neighboring the City of Spokane and the Spokane International Airport (“SIA”). Thank you for the opportunity to comment on the Department of Ecology’s (“Ecology”) Agreed Order No. DE 24355 (the “AO”), regarding Spokane County’s, and the City of Spokane’s joint responsibility for undertaking investigative and remedial actions for per- and polyfluoroalkyl substances (“PFAS”) contamination originating at the airport.

I would also like to thank Ecology for its assistance as the City navigates ongoing challenges related to PFAS contamination in our drinking water supply. Addressing PFAS contamination in the West Plains will require coordination between federal, state and local entities, and we welcome the opportunity to partner with Ecology. The comments below include suggestions on how Ecology can use its supervisory authority under the AO to drive optimal remediation of PFAS contamination in and around SIA.

Comment #1: Ensure that remedial investigations comprehensively evaluate the potential geographic migration of PFAS from SIA and other sources.

Given the complex hydrogeology of the West Plains and PFAS contamination from Fairchild Air Force Base (“Fairchild”), we request that Ecology coordinate the SIA PFAS investigation with the ongoing federal efforts to address PFAS contamination originating from Fairchild. Fairchild has already been identified as the source of significant PFAS contamination in municipal and private wells in Airway Heights and other surrounding communities, but further investigation is needed.

As stated in prior comments, the City remains particularly interested in greater information about PFAS contamination to 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"). These plans have remained paused since sampling during the well planning process detected PFAS in that water source. We thank Ecology for its earlier commitment to a remedial investigation that determines whether the SIA contamination plume has reached the area of the proposed New Well.

Comment #2: Ensure that the sampling regime requires comprehensive PFAS sampling at detection limits below regulatory standards.

The remedial investigations under the AO should also align with regulatory standards. Both the United States Environmental Protection Agency ("EPA") and Ecology have developed drinking water standards for several PFAS chemicals, with federal maximum contaminant levels ("MCLs") and Washington State Action Levels ("SALs") set at the following limits:

- PFOA and PFOS: 4 parts per trillion (ppt)
- PFHxS, PFNA, and HFPO-DA (GenX chemicals): 10 ppt
- Mixtures containing two or more of PFHxS, PFNA, HFPO-DA, and PFBS: Hazard Index of 1.

As a result, sampling efforts under the AO should use a detection threshold of at least 4 ppt or risk inadequately or inaccurately analyzing PFAS impacts. Additionally, Ecology has recognized all PFAS as hazardous substances under the Model Toxics Control Act ("MTCA").

Currently, Ecology plans to require sampling for 40 analytes under EPA Method 1633. If approved methodology for a wider range of PFAS becomes available, Airway Heights requests that Ecology amend the sampling protocol to require testing for additional PFAS chemicals. A comprehensive sampling regime is necessary to gather data that fully scopes the complex and long-term problem of contamination in the West Plains.

Comment #3: Grant the City access to reports and data.

The workstreams required by the AO will produce several deliverables and significant amounts of data regarding PFAS contamination at SIA and in the surrounding area. As a neighboring city and water user whose water sources are contaminated by PFAS, Airway Heights has a deep interest in the results of all investigations and plans for remedial work in the West Plains. The City requests copies of all deliverables generated under the AO and the prior Enforcement Order, as well as formal notification regarding opportunities for public engagement in the remedial action planning process. Most importantly, we request that Ecology actively involve Airway Heights in planning any interim or final remedial actions that might address PFAS impacts to our drinking water sources, including the Columbia River Basalt Group paleochannel aquifer system and the Spokane Valley/Rathdrum Prairie Aquifer.

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Thank you again for the opportunity to comment on the proposed AO regarding the investigation and remediation of PFAS in the West Plains. Airway Heights is grateful for Ecology's work on this important issue, and the City will look to provide assistance wherever possible.

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