



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

4601 N Monroe Street • Spokane, Washington 99205-1295 • (509)329-3400

June 26, 2008

Mr. Matt Breen
Manager, Construction & Environmental Services
Spokane International Airport
9000 West Airport Drive, Suite 204
Spokane, WA 99224

Dear Mr. Breen:

RE: Spokane International Airport - Deicer Management GEG Position Paper

The Department of Ecology is extremely pleased to see the airport's leadership regarding management of deicing discharges. The retention of consultants by the airport and airlines is a positive move toward improved management of wing deicing discharges.

The Department of Ecology agrees that, if there are significant impacts of the deicer discharges at GEG, they are to groundwater. However, the existing permits held by the airport and its tenants are National Pollution Discharge Elimination System permits, authorized under the authority of the Federal Clean Water Act. If the airport wishes coverage under the State of Washington Waste Discharge Permit (SWDP) system, it should be an individual permit issued to one entity – Spokane International Airport.

Washington State law is clear that groundwater is *water of the state* and subject to state water quality regulations. The Department of Ecology is confident that sufficient evidence of groundwater contamination exists for us to issue an order for further data to be collected. However, because of the current co-operative approach, we are willing to work with the airport in an adaptive management approach. This approach could limit data collection exercises and expedite the schedule of actual improvements in groundwater quality.

Although we have some flexibility in the point of compliance (POC), it is a complex topic for this site. It is likely the POC will not be finalized until later in the permitting process. However, the POC will guide data collection needed for treatment design considerations; therefore, POC discussions should begin very soon.

We look forward to discussion of any reasonable design addressing the variability in operations and environmental factors present at this particular site. The airport should submit a proposed schedule for the following tasks:

- Data collection milestones
- Design milestones
- Implementation milestones
- Final issuance of a State Waste Discharge Permit to the Airport.



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If you or your consultants need additional information, please feel free to call me at (509) 329-3414. We are happy to share any literature we have concerning the biochemistry of the iron or arsenic cycles to facilitate this project.

Sincerely,

A handwritten signature in cursive script that reads "Kim H. Sherwood". The signature is written in dark ink and is positioned above the printed name.

Kim H. Sherwood, P. E.
Water Quality Program

KS:dw