



# Oregon

Tina Kotek, Governor

## Department of Environmental Quality

Northwest Region  
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October 28, 2025

*via electronic delivery*

Lt Col Lydia Stefanik  
Acting Chief, Environmental Division, National Guard Bureau  
3501 Fetchet Avenue  
Joint Base Andrews, MD 20762

RE: Offsite private well sampling request at Kingsley Field Air National Guard Base  
ECSI #816

Dear Lt Col Lydia Stefanik:

The Oregon Department of Environmental Quality (DEQ) is reaching out to inform the Air National Guard (ANG) of new Oregon rules related to per- and polyfluoroalkyl substances (PFAS) and to request ANG take immediate action to sample offsite private wells downgradient of the Kingsley Field Air National Guard Base (Kingsley) in Klamath Falls, Oregon. DEQ also requests a virtual meeting with ANG representatives as soon as possible, and no later than November 21, 2025, to discuss steps forward.

As described below, six PFAS compounds are now regulated under Oregon cleanup law, giving DEQ additional authority to require responsible parties to investigate and cleanup releases of these compounds to protect people and the environment. Two of the six Oregon compounds are also hazardous substances under the federal Comprehensive Environmental Recovery, Compensation, and Liability Act (CERCLA). Kingsley has the highest PFAS groundwater detections in Oregon, and concentrations that pose a substantial potential risk to human health have been detected at the downgradient edge of the site. Given these high concentrations and nearby downgradient private drinking water wells, Kingsley is DEQ's highest priority PFAS site.

DEQ acknowledges and appreciates the investigation work ANG has completed to date at Kingsley and other installations in Oregon. However, the lack of data for drinking water wells downgradient of Kingsley presents a concerning and urgent data gap. Contamination in nearby private drinking water wells may be at levels detrimental to human health.

Further, ANG has communicated its decision not to complete sampling for these wells due to other potential sources of PFAS contamination. Both federal and state law have joint and several liability for the cleanup of hazardous substances. DEQ is neither aware of any firm evidence of another source of PFAS impacting the groundwater, nor the ANG facility being anything other than the primary source of contamination. Therefore, DEQ requests ANG take urgent action to accomplish the necessary sampling of downgradient private drinking water wells and prioritize funding the full remedial investigation in 2026.

### **Hazardous substances rulemaking**

Oregon adopted rules to add six PFAS to the definition of hazardous substances in [Oregon Administrative Rule 340-122-0115 \(30\)](#): perfluorooctanoic acid (PFOA), perfluorooctane sulfonic acid (PFOS), perfluorohexane sulfonic acid (PFHxS), perfluorononanoic acid (PFNA), hexafluoropropylene oxide

dimer acid (HFPO-DA, commonly known as GenX Chemicals), and perfluorobutane sulfonic acid (PFBS). This rule went into effect on September 12, 2025. Rulemaking documents are available on the [PFAS 2025 Rulemaking webpage](#).

Oregon [Hazardous Substance Remedial Action Rules](#) establish the standards and procedures for DEQ to investigate and cleanup releases of hazardous substances to the environment. DEQ's Cleanup Program will incorporate these six PFAS into existing processes for addressing environmental contamination, such as site investigations, risk assessments, and cleanup actions. This recent rulemaking and preexisting authority under CERCLA, allows DEQ to address, or require responsible parties to address, releases of these chemicals to protect human health and the environment. ANG is a responsible party as defined in both state and federal law.

### **Overview of PFAS investigations and detections at Kingsley**

PFAS investigations at the site began in 2015 and have included firefighting foam and non-firefighting foam potential PFAS sources.<sup>1</sup> Initial PFAS sampling at the site beginning in 2018 showed the highest PFAS detections in groundwater in the state to date. The highest concentrations at the site were detected at Area of Interest (AOI) 2 where most of the historical fire training activities were conducted. In this area, PFOS had the highest detections at 380,000 nanograms per liter (ng/L); this concentration is hundreds of thousands of times greater than the EPA-established PFOS drinking water standard of 4 ng/L. Amongst other areas, elevated PFAS concentrations were also detected at the downgradient edge of the site at AOI 10 and AOI 12; PFHxS had the highest detections in these areas at 800 ng/L and 2,700 ng/L, respectively, and are well above the PFHxS drinking water standard of 10 ng/L. Given the high levels detected on site, it is highly likely that offsite migration of contamination has occurred, with possible ongoing impacts to nearby offsite private wells.

### **Decision at AOI 10 and AOI 12**

*A Site Inspection Phase Closeout at Kingsley Field Air National Guard Base, Oregon (Klamath Falls)* Technical Memorandum (memo) dated Dec. 22, 2023, was provided to DEQ. In this memo, ANG outlines which AOIs will or will not be carried forward into future phases of investigation. Notably, the memo indicates that ANG will not further investigate AOI 10 or AOI 12. In further discussion with ANG, this decision to exclude AOI 10 and AOI 12 means ANG will not continue investigating within or downgradient of these areas, including downgradient offsite private drinking water wells.

The only rationale provided for this decision is that "At AOI 10 and AOI 12, potential releases from both DoD and non-DoD sources were present and laboratory sampling results indicated that non-DoD potential sources could be the predominant sources of PFAS in the environment at those locations." Based on available data and understanding of site historical operations, DEQ disagrees. It is highly likely that DoD sources are the predominant sources of PFAS in these areas. Further, based on joint and several liability in both federal and state cleanup laws, this distinction is irrelevant, because ANG clearly contributed to PFAS contamination in these areas and is very likely the predominant source of such contamination.

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<sup>1</sup> PFAS investigations at the site include: 2015 Preliminary assessment, 2018 Site Investigation, 2022 Supplemental Preliminary Assessment, and 2024 Supplemental Site Investigation

**Next steps**

DEQ would like to meet with ANG as soon as possible given the urgency of this matter. Please call me at 503-913-5091 or email at [laura.fredrickson@deq.oregon.gov](mailto:laura.fredrickson@deq.oregon.gov) by November 9, 2025 to determine a suitable meeting time.

Sincerely,

*Laura Fredrickson*

Laura Fredrickson

Eastern Region Administrator  
Department of Environmental Quality

cc: Leah Feldon, DEQ Director  
Gary Vrooman, Department of Justice  
Gabriela Goldfarb, Oregon Department of Health