



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Northwest Region

700 NE Multnomah Street, Suite 600

Portland, OR 97232

(503) 229-5696

FAX (503) 229-6124

TTY 711

March 11, 2026

via electronic delivery (email)

Amber Judd, Director
Rogue Valley International - Medford Airport
1000 Terminal Loop Highway, Suite 201
Medford, OR 97504

Subject: Request for PFAS Investigation

Amber Judd:

Last year, the Oregon Department of Environmental Quality (DEQ) Cleanup Program reached out to Rogue Valley International-Medford Airport with a letter and questionnaire requesting information on historical use of aqueous film-forming foam (AFFF) at your aviation facility. You completed the questionnaire and indicated that fire training was historically performed (as required by the Federal Aviation Administration) using products containing per- and polyfluoroalkyl substances (PFAS).¹

At the time of DEQ's request, PFAS were not regulated as Oregon hazardous substances. Since that time, our Cleanup Program completed rulemaking, and six PFAS chemicals² were designed as hazardous substances by Oregon's Environmental Quality Commission (September 2025) in [OAR 340-122-0115](#).

Commercial airports with historical AFFF use fall into a category of high concern to DEQ, as training typically involved discharge of PFAS-containing foam to ground surface. Given the mobility of the contaminants, there is a high likelihood that they have migrated to groundwater. If surface water is present in area(s) of historical training, storage, or where a fire response occurred, it may also be impacted.

We are requesting that you engage with the DEQ Cleanup Program (via a voluntary agreement) to continue investigation of PFAS in environmental media at your facility. Information on the program can be found on the DEQ Cleanup website.³ If you choose not to complete work, DEQ will consider whether use of enforcement authority is necessary. We would be happy to meet

¹ DEQ records indicate that soil in fire training areas was excavated to remove contaminants including petroleum and methylene chloride; no groundwater was analyzed prior to site closure, and PFAS were not regulated contaminants of interest at that time. This work was conducted prior to site closure in 1995.

² Designated PFAS are: PFOA, PFOS, PFHxS, PFNA, HFPO-DA (or GenX), and PFBS.

³ <https://www.oregon.gov/deq/hazards-and-cleanup/env-cleanup/pages/voluntary-cleanup.aspx>

with you to talk about options for working with the Cleanup Program and next steps. We request that you provide a response to this letter/request within 60 days.

Information on DEQ's recent rulemaking effort can be found at the PFAS 2025 webpage.⁴ Further information can be found at our PFAS in Cleanup webpage,⁵ including a link to our PFAS Fact Sheet,⁶ which outlines DEQ's cleanup prioritization framework and approach for addressing PFAS. General inquiries about PFAS and the Cleanup Program can be addressed to the DEQ Cleanup PFAS Workgroup at CleanupPFASWorkGroup@deq.oregon.gov.

Respectfully,



Brian Church

Toxicologist
Northwest Region Cleanup Program

Ec: Brad Shultz, DEQ
Tina Elayer, DEQ
Margaret Oscilia, DEQ
Sarah Van Glubt, DEQ
Daniel Hafley, DEQ
ECSI# 0076 file

⁴ <https://www.oregon.gov/deq/rulemaking/pages/pfas-2025.aspx>

⁵ <https://www.oregon.gov/deq/hazards-and-cleanup/env-cleanup/pages/pfascleanup.aspx>

⁶ <https://www.oregon.gov/deq/Hazards-and-Cleanup/Documents/Cleanup-PFAS-Fs.pdf>