



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Northwest Region
700 NE Multnomah Street, Suite 600
Portland, OR 97232
(503) 229-5263
FAX (503) 229-6945
TTY 711

March 18, 2026

via electronic delivery

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

RE: DEQ Review: Draft Final PFAS Due Diligence Report
Kingsley Field Air National Guard Base
ECSI #816

Dear Lydia Stefanik:

The Oregon Department of Environmental Quality (DEQ) has reviewed the October 2025 *Due Diligence Research for Supplemental Sources of Per- and Polyfluoroalkyl Substances (PFAS) Draft Final Report* (report) prepared for the Kingsley Field Air National Guard Base (ECSI #816) located in Klamath Falls, Oregon. The report provides Preliminary Assessment-level information collected to evaluate potential PFAS sources other than aqueous film-forming foam (AFFF) at the site and identifies areas for further investigation.

DEQ's comments are presented below.

General Comments:

1. Given the long history of the site and incomplete records, DEQ does not consider lack of documentation of spills or releases to be sufficient rationale for excluding areas from future investigation. For example, Table A.1 includes several areas identified as having stored and/or used materials potentially containing PFAS where lack of documentation or awareness of spills or releases is cited as justification for no further response for PFAS investigation. All areas identified as having stored and/or used materials potentially containing PFAS should be included in future investigations.
2. The usefulness of the decision-making framework based on site categorization (i.e., categories A, B, C, D, or E) is not always clear. On a case-by-case basis, some of these areas may be reasonable to exclude from further evaluation, but DEQ does not consider the rationale provided for excluding all category B and C areas sufficient (see specific comments below).

Specific Comments:

3. Section 1.4 states that "To date, ANG has not sampled any private drinking water wells for PFAS near the Base." However, upgradient private domestic well sampling was completed in 2021-2022 and 2024, though no downgradient offsite sampling has been completed.
4. Section 1.5 describes the categorization of buildings/shops (i.e., categories A, B, C, D, or E) and which categories would or would not be carried forward for further investigation. DEQ is unsure of the usefulness of this categorization approach and the subsequent planned actions for these categories for the following reasons:
 - Category B includes areas possibly having materials containing PFAS but for which there is no documented release. DEQ does not consider lack of documentation of a release to be sufficient in determining no release occurred given the long history of the site and incomplete records and knowledge of site historical practices. As stated in the report, records related to releases and information from interviewees may be incomplete. On a case-by-case basis, some category B areas may be reasonable to exclude from future investigation, but DEQ disagrees with broad exclusion of these areas.
 - Category C includes areas with spill(s) documented with material possibly containing PFAS less than the reportable quantity and "presumed to pose no potential risk to human health or the environment." DEQ disagrees that spills with PFAS less than the reportable quantity is sufficient to determine there is no risk to human health or the environment. First, without detailed knowledge of the release (e.g., amount, material, concentrations), it is estimating at best whether the release exceeded the reportable quantity. Second, the reportable quantity does not directly correlate to exposure risk to human health or ecological receptors. DEQ considers it likely that many releases not exceeding the reportable quantity for PFAS may still result in unacceptable risk to human health and/or the environment. Areas with documented PFAS releases should be carried forward into future investigations. However, in this case no category C areas were identified.
5. Section 2.1 notes that "Installation-specific shops and processes not identified in Table 1-1, that may include other potential products containing PFAS, were considered." Please clarify what these additional considerations included.
6. Section 2.3.4 notes that residential wells are drilled to depths greater than 100 feet below ground surface (bgs), though section 2.3.5 notes that depths of residential wells nearby may be as shallow as approximately 60 feet bgs.
7. Section 4 footnote 2 indicates PFAS are not subject to CERCLA regulation. DEQ notes that both PFOA and PFOS are CERCLA hazardous substances.
8. Sections 4.1-4.6 include information about the 6 areas identified as category D suggested for future investigation, including a description, summary of operational history, and potential release and migration. DEQ appreciates these details and their usefulness in understanding the category D areas. As described in General Comment #1 and Specific Comment #9 additional areas where materials were stored and/or used that may have contained PFAS should also be included.
9. Table A.1:
 - a. Several areas described in this table are identified having stored and/or used products or materials potentially containing PFAS, such as some hazardous wastes, flammables, corrosives, POL, solvents, paints, hydraulic fluids, pesticides, cleaners, etc. All areas identified as having stored and/or used products potentially containing PFAS should be

included in future investigations. As noted in General Comment #1, DEQ does not consider lack of documentation or awareness of a spill or release sufficient rationale for excluding an area from future investigation. For example, the following areas, and potentially others, may warrant inclusion in future investigations: Buildings 109, 110, 120, 124, 209, 210, 211, 215, 220, 224, 226, 230, 234, 238, 239, 243, 306, 310, 325, 330, 331, 335, 500, 535, 536, 571, 575, 4005, 4062, 4063, and 4064.

- b. Building 3335 is described "as having served as a sanitary sewage pump station and encountered materials potentially containing PFAS. Any building connected to the station which produced PFAS waste would have had the potential to contribute to PFAS-containing material to the building." Given this history, this Building 3335 should be included in future investigations.

Please feel free to contact me with any questions at 503-709-8253 or at Sarah.VanGlubt@deq.oregon.gov.

Sincerely,

Sarah Van Glubt
Project Manager & Data Analyst
DEQ Cleanup Program

cc: Dan Hafley, DEQ
Ann Farris, DEQ
Project File – ECSI #816