



## REGION 1

BOSTON, MA 02109

Date: See signature stamp below

Ms. Thuane Fielding  
BRAC PMO East  
4911 South Broad Street  
Philadelphia, PA 19112-1303

**Re: Base Wide PFAS Remedial Investigation Work Plan, Former Naval Air Station Brunswick, ME**

Dear Ms. Fielding:

The United States Environmental Protection Agency (EPA) is requesting Navy initiate immediate discussions with EPA and MEDEP to review environmental data recently collected by MEDEP in response to the 19 August 2024 aqueous film-forming foam (AFFF) spill at Hangar 4 at the former Naval Air Station (NAS) Brunswick ("Brunswick Naval Air Station Superfund site" or "NAS Brunswick"). The AFFF within Hangar 4 is known to contain high concentrations of long-chain PFAS including PFOS. This spill resulted in a foam/water mixture discharging from the hangar's fire suppression system and entering subsurface sanitary and storm water conveyance systems as well leaking out from underneath the aircraft hangar doors and onto airfield pavements. Some of this foam/water mixture made its way into NAS Brunswick's storm water system impoundments, known as the Picnic Pond system and surrounding surface water bodies, and was also transported by wind that scattered clumps of foam across the surface of Brunswick Landing. Emergency cleanup actions have largely been completed and the Navy is currently in the process of removing remaining AFFF concentrate from Hangar 4 foam fire suppression system.

MEDEP has collected numerous soil, ground water, surface water, and shellfish samples to assess PFAS concentrations in these environmental media, post-spill. MEDEP has also collected private drinking water well samples down-gradient of Hangar 4. The Navy, as part of its ongoing Site-wide Superfund Remedial Investigation (RI) for Superfund Operable Unit 13/Basewide PFAS Contamination has identified these chemicals in many of these same media that was the result of past Navy releases of these same "legacy" PFAS AFFF materials. These historical releases have resulted in broad areas of PFAS ground water contamination across the former air station as well as impacts to surface water quality that has resulted in a "do not eat" advisory for freshwater fish found on NAS Brunswick surface water bodies.

As you are aware, EPA, MEDEP, and Navy entered into a Federal Facilities Agreement (FFA) in 1990 pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) section 120 to address contamination and cleanup at the Brunswick Naval Air Station Superfund site in Brunswick, Maine. In 2013, the Navy leased a portion of the property to the Midcoast Regional Redevelopment Authority (MRRA), where Hangar 4 is located, which is within the boundary of the

Superfund Site. Since the Navy owns the land and improvements where Hangar 4 is located, the Navy retains the ultimate responsibility to address any past or current contamination within this property pursuant to CERCLA sections 107 and 120. Therefore, EPA concludes that CERCLA, the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), and the NAS Brunswick FFA require the Navy to take any and all actions necessary to address the recent spill of AFFF at Hangar 4 and to ensure protection of human health and the environment.

Upon completion of the NAS Brunswick base cleanup team's review of all MEDEP's datasets, EPA will request modification to the Navy's July 2022 PFAS RI Sampling and Analysis Plan (SAP) to collect any additional environmental data necessary and to fully assess the nature and extent of PFAS contamination at the former NAS Brunswick environment taking into account the recent AFFF release at Hangar 4. Any request to modify this SAP will be consistent with FFA Section 6.10(a) (*Consultation with EPA and DEP*).

The base cleanup team's review and discussion of MEDEP's post-spill datasets should also include establishing a schedule to incorporate the Navy's new extraction well EW-11 into the Eastern Plume remedy's existing extraction well network. This extraction well was installed by the Navy to capture high concentrations of PFAS-contaminated ground water migrating away from the Hangar 4/Building 250 area along the eastern flightline. The Navy has been proactive in ensuring the Eastern Plume ground water extraction and treatment system is adequately removing PFAS from the extraction well network influent. While post-spill ground water sample collection by MEDEP may not indicate current impacts to the aquifer, the potential for this contamination to leach through the soil column and comingle with historic PFAS ground water contamination is high. Connecting and bringing online EW-11 would reduce the ground water contamination from further migrating the southeast where it eventually discharges to Mere Brook and Harpswell Cove.

I also want to take this moment to thank Navy for its actions to date to work with the Brunswick-Topsham Water District to ensure the construction of PFAS treatment to address PFAS detections at the Jordan Avenue Wellfield located north of the former base. The contamination detected in the Jordan Ave wellfield is associated with historical Navy releases of PFAS-containing AFFF near the northern boundary of the airfield. Should the base cleanup team determine that private drinking water wells have or will be potentially impacted by PFAS, either due to legacy PFAS or PFAS from the recent AFFF spill, EPA expects that Navy will conduct monitoring and take whatever other actions are necessary to ensure that drinking water sources are appropriately addressed.

Please contact me as soon as possible, but no later than 1 October 2024, to confirm Navy's intent to schedule a discussion with EPA and MEDEP. I can be reached at 617-918-1201 or [olson.bryan@epa.gov](mailto:olson.bryan@epa.gov). I look forward to hearing from you on this matter.

Sincerely,

Bryan Olson, Director  
Superfund and Emergency Management Division

cc: Rachelle Knight, USN-BRAC PMO  
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Nick Hodgkins MEDEP  
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