

January 15, 2025

David Barney
W. Rachelle Knight
Department of the Navy BRAC Program Management
4911 South Broad Street,
Philadelphia, Pennsylvania 19112

Subject: PFAS/PFOA Contamination at Brunswick Landing and Groundwater Modeling

Dear David and Rachelle:

Recent developments at Brunswick Landing, the former Naval Air Station Brunswick (BNAS), have highlighted critical community and public concerns with gaps with existing environmental assessments and current land use controls (LUCs), particularly in light of emerging contaminants like PFOS and PFOA being added to the CERCLA list in April 2024. While the U.S. Navy has undertaken significant remediation efforts over the years, the public has expressed concern that key components of the contamination risks — particularly the flow of contaminated groundwater, which may affect the surrounding community and water resources, have not been adequately addressed.

Given the existing uncertainties, particularly regarding the movement of historical contamination into the Androscoggin River, Harpswell Cove, Mere Brook, and possibly adjacent off campus drinking water wells, it is imperative that the Navy take immediate action to fund and develop a comprehensive hydrogeological groundwater model for the former BNAS facility. as has been previously recommended in the past by the Brunswick Area Citizens for a Safe Environment (BASCE) and supported by MRRA. . MRRA continues to agree with BASCE that this model is essential to better understand the extent and nature of the geohydrologic system underlying the former base and the potential migration paths of contaminants, as well as to ensure that remediation efforts remain

In light of the above, we urge the U.S. Navy to establish a clear and detailed scope of work and allocate funding for the development of a comprehensive hydrogeological groundwater model at Brunswick Landing. This model should include, but not be limited to:

- 1. Assessment of Groundwater Flow Patterns:** Detailed study of groundwater flow beneath the former BNAS site, including the direction and speed of migration of contaminants (particularly PFAS) into adjacent areas.
- 2. Investigation of Contaminant Pathways:** Mapping of potential contaminant pathways from the base to nearby water bodies, including the Androscoggin River, Harpswell Cove, and Mere Brook. The model should also account for the possibility of contamination reaching off-campus drinking water wells, especially private wells in the region.

3. **Simulation of Future Contamination Scenarios:** The model should consider both existing and future contamination scenarios, particularly with the ongoing identification of additional PFAS compounds to be added to the CERCLA list in the coming years.
4. **Integration with Remediation Strategies:** The model should be integrated into ongoing and future remediation efforts to ensure that they are not disrupted by new development or remediation work, and that they align with established groundwater flow patterns.

The absence of such a critical model thus far is concerning and has delayed a full understanding of contamination risks to the surrounding environment and public health, as well as heightened public concerns about associated risks. It is essential that planning funding of this effort be moved on quickly given our growing understanding of the persistence and mobility of PFAS compounds in groundwater.

The Town of Brunswick and area residents are now raising questions continued development at Brunswick Landing. The absence of a comprehensive groundwater model puts both the integrity of future development projects and the potentially the health of residents at risk. We believe that it is the responsibility of the Navy, principal party to environmental remediation at the former NAS Brunswick facility to ensure that this critical piece of the environmental assessment puzzle is put into place.

We strongly urge the U.S. Navy to move forward without further delay in establishing a scope of work and funding for the development of a comprehensive hydrogeological groundwater model for Brunswick Landing. This model is necessary to properly assess the movement of historic contamination, protect public health, and ensure that future remediation and development efforts are not compromised. Failure to act now will leave critical questions unanswered and could jeopardize the safety of the surrounding community for years to come.

Sincerely,

Herman Nichols
Chair
MRRA Board of Trustees

cc Michael Daly, US EPA
Iver McLoed, Mine DEP
Julia Henze, Brunswick Town Manager
Brunswick Area Citizens for a Safe Environment
MRRA Board of Trustees
Jeffrey K. Jordan, Deputy Director