



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING SYSTEMS COMMAND
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE EAST
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PHILADELPHIA, PA 19112-1303

5000-45A
Ser BPMOE/097
April 23, 2025

Mr. Iver McCleod
Maine Department of Environmental Protection
Bureau of Remediation and Waste Management
17 State House Station
August, ME 04333

Dear Mr. McCleod:

**SUBJECT: MERE CREEK GOLF COURSE AT FORMER NAVAL AIR STATION (NAS)
BRUNSWICK, CUMBERLAND COUNTY, MAINE**

This letter is to confirm receipt of your letter dated February 27, 2025 and to describe Navy's course of action. The Navy is aware that the Maine Department of Environmental Protection (MEDEP) is conducting quarterly sampling of drinking water wells which includes Mere Creek Golf Course in response to the aqueous film forming foam (AFFF) discharge which occurred on August 19, 2024. According to your letter, the concentration of the sum of six (6) regulated per- and polyfluoroalkyl substances (PFAS) was 33.1 nanograms per liter (ng/L), exceeding Maine's interim standard for PFAS which is 20 ng/L as well as the Department of Defense (DoD) action level for certain PFAS triggering a removal action to address private drinking water wells caused by DoD activities. As you may be aware, the Midcoast Regional Redevelopment Authority (MRRA) has stated they will install an appropriate PFAS filtration device to treat water from this well prior to the start of the open season. We agree with your letter as it notes the source of PFAS in the Golf Course well is unknown. As you are aware, the Navy is in the Remedial Investigation (RI) phase of the CERCLA process. Consistent with the DoD guidance, the Navy is reviewing existing data and collecting new information to assess where PFAS plumes have migrated from former NAS Brunswick and may have impacted offsite drinking water. These actions include the following:

- Resampling private wells previously tested by the Navy to confirm prior detections;
- Collecting groundwater data in the vicinity of the golf course to confirm a hydrological connection between known Navy release sites and impacted drinking water wells; and
- Updating the PFAS RI to include investigative efforts associated with stormwater and pollutant source identification.

The Navy is in the process of scoping a background assessment which will aid in determining PFAS levels present in and around the former installation to ensure that Navy utilizes its appropriated funding to address impacts caused by Navy operations and activities. The Navy will continue to coordinate with the United States Environmental Protection Agency and MEDEP to evaluate background levels and determine and document final cleanup levels and remedies.

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These actions are consistent with the CERCLA process for addressing legacy PFAS contamination resulting from Navy activities.

As your letter points out, the monitoring wells closest to the golf course are two overburden wells at the southwest corner of the runway tested in 2014 for two (2) PFAS – perfluorooctane sulfonic acid and perfluorooctanoic acid – and that there is a general lack of information regarding groundwater flow. The Navy agrees and also contends that there is not enough data to definitively determine the cause of impacts to the golf course well at this time. However, executing the above steps strategically will allow Navy to collect the data necessary to make informed decisions about the PFAS remediation efforts at former NAS Brunswick.

The Navy has developed a private offsite drinking water sampling and analysis plan (SAP) as required by Navy policy which describes specific goals and data quality objectives for the sampling effort. The Navy is in receipt of MEDEP's comments on this SAP and will provide a written response to finalize the plan and initiate sampling, currently targeted for April 2025. Evaluation and testing of nearby private drinking wells is best addressed through this work plan.

Your letter includes a request to sample private wells within 1,000 feet of the golf course. However, the action alone does not account for source identification, will not confirm the hydrological connection and does not position Navy to take actionable steps in line with the CERCLA process. It is important that Navy collect data and refine the PFAS conceptual site model by determining the most likely anthropogenic source impacting the golf course well, resample existing wells including the golf course potable well, resample monitoring wells at the southwest corner of the runway and evaluate the need and plan for the installation of additional monitoring wells around the golf course based on the findings.

Furthermore, the Navy has expanded its PFAS RI to determine how stormwater is affecting groundwater quality across the installation beginning with areas in and around Hangar 4 as the recent discharge and time sequenced data collection by MEDEP provides invaluable data in furtherance of the Navy's understanding of how PFAS migrates at the former installation. The stormwater effort was briefed at the January 2025 Restoration Advisory Board meeting and the field effort associated with the stormwater data collection began March 17, 2025.

The Navy appreciates MEDEP's attention to this matter and continued engagement. Should you wish to discuss further, please don't hesitate to contact me at (215) 897-4916 or wynette.r.knight.civ@us.navy.mil.

Sincerely,

W. RACHELLE KNIGHT
BRAC Environmental Coordinator
By direction of the Director

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