BRUNSWICK AREA CITIZENS FOR A SAFE ENVIRONMENT
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November 19, 2025

TO: Julia Henze and Brunswick Town Council,
Daniel Ankeles, State Representative for House District 100
Poppy Arford, State Representative for House District 101
Cheryl Golek, State Representative for House District 99
Mattie Daughtry, State Senator for District 23

RE: Letter of Concern Regarding the Permitting of Construction at the former Brunswick Naval Air Station

Dear Readers,

As members of the public actively involved in the Superfund Remediation at the former Naval Air Station Brunswick through the Restoration Advisory process, we write to you with great concern regarding the chronic lack of oversight for all projects being constructed at the former Brunswick Naval Air Station (now 'Brunswick Landing'). Of particular concern is the lack of any planning in the permitting process to consider the substantial PFAS contamination which exists in the groundwater and related soils throughout Brunswick Landing.

Although the former BNAS is regulated under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as Superfund, we have encountered gaps in coordination, compliance and public transparency under which these projects are being permitted and constructed. As explained in more detail throughout this letter, the entirety of the former base and therefore all of Brunswick Landing property has groundwater restrictions due to the presence of historical contamination including PFAS which exists in substantial quantities in the groundwater throughout the property. However, there is no evidence in the public record that this considerable contamination is being considered in the current regulatory and permitting processes. Projects are being permitted notwithstanding the substantial impact it places on the existing PFAS-contaminated conditions.

Unfortunately, the environmental studies undertaken as part of the closure and reuse of the Naval Air Station Brunswick were all conducted prior to the time that PFAS was a CERCLA regulated pollutant and are not referenced in the historical administrative records for site closure. PFAS is not addressed in the Navy's Finding of Suitability to Transfer (FOST) for parcels transferred to civilian use because PFAS was not a priority pollutant under CERCLA at the time the FOST was issued, nor was its toxicity well characterized. In 2022, the Navy began a multi-year Remedial Investigation to define the nature and extent of PFAS contaminants in soil, groundwater, surface water, sediment, stormwater, pore water, seeps, and fish tissue. The results of the Remedial Investigation will be used to evaluate whether the presence of PFAS represents an unacceptable

risk to human and ecological receptors (Sixth Five Year Review, 2025). As part of these investigations the Navy has installed monitoring wells around the former BNAS to define the nature and extent of PFAS in the groundwater. Even in its initial stages, the Navy has discovered very high concentrations of PFAS in the groundwater throughout Brunswick Landing. The Navy is undertaking a multiyear study to make a determination for a plan for PFAS remediation because the PFAS exists not only within the bounds of the property, but also in off-site public and private wells including the Brunswick Topsham Water District Jordan Avenue well field. This Navy study also includes investigation of the existing stormwater system, which is known to be structurally impaired, allowing PFAS impacted groundwater to infiltrate into the piping and be transported throughout the base and be discharged into surface waters both on and off site.

As explained more fully below, construction now being permitted fails to consider how this proposed construction will impact the existing PFAS contaminated groundwater and what effect the development will have for an effective remediation strategy to address the widespread PFAS contamination. While the Navy is investigating the property, the on-going development is proposing to add new sub-surface stormwater structures in areas where PFAS contaminated groundwater is known to exist and also to add a substantial increase to impervious surfaces creating additional runoff to a dilapidated stormwater system. Both of these activities create significant risks in moving PFAS contaminated groundwater throughout the property as well as off-site increasing the public's and the natural environment's risk to ongoing exposure to PFAS contamination.

As explained in more detail below it is urgent that all responsible parties be brought to the table to review the new and additional risk of exposure to PFAS created by the development as it impacts the entire site. The multi-dimensional nature of the permitting on the property requires the Town of Brunswick, State Elected officials, MRRA, DEP (Land Bureau and Federal Facilities) Navy BRAC and RAB members to communicate directly with each other to understand the condition of the property, the status of Navy investigation, the role of the Town in permitting and ensuring the safety of its residents from the spread of toxic PFAS and the role each development plays in ultimately limiting future PFAS remediation for the Brunswick Landing and the community at large. These developments are seen as beneficial to the Town's economic condition, but this development needs to be implemented responsibly with an understanding of an accurate description of the condition of the property and the impact any additions/deletions or redirections of groundwater and stormwater will have on the spread of PFAS contamination.

BACKROUND INFORMATION

The Superfund cleanup is at a critical stage

The Navy is currently conducting two significant investigations for the former Naval Air Station:

1. **PFAS contamination Remedial Investigation**: This base-wide investigation began in 2021 and is expected to conclude in late 2028,[1] although this timeline could be complicated by the 2024 accident at Hangar 4, which spilled 1,450 gallons of PFAS-containing aqueous film-forming foam (AFFF) concentrate mixed with 50,000 gallons of water into the environment. The RI includes an investigation of the stormwater system near Hangers 4 and 5, where groundwater is known to be infiltrating the stormwater system.

2. **Stormwater System Evaluation:** The RI includes investigation of the stormwater system. The Navy has acknowledged that "some stormwater systems may be deteriorating,"[2] and current investigations have discovered piping previously not known to have existed. These aging systems and discovery of old practices and unknown piping are exacerbating the spread of PFAS within and off the former base.[3]

As you may remember it was only in 2022 that the Jordan Avenue drinking water source was confirmed to have been contaminated with PFAS. To mitigate this, a PFAS treatment system is now being constructed under an Environmental Services Cooperative Agreement (ESCA) between the Navy and Brunswick/Topsham Water District.[4]
While the two-pronged RI is actively ongoing; plans for PFAS cleanup have not yet been finalized in a "Record of Decision," a legal document that establishes enforceable performance standards for the cleanup under CERCLA.

All of these existing activities highlight that, until we fully understand the scope of PFAS contamination, including the impacts from the 2024 spill, and have enforceable plans for remedial actions in place, construction activities pose significant risks as they impact groundwater, disturb

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[1] Because of its complexity, the Brunswick Superfund site has been divided into multiple areas or "Operable Units." The **Base-wide PFAS contamination Operable Unit 13 (OU 13)** is the problem area whereby the Navy is currently investigating the entire former Naval Air Base groundwater, as well as some off-site private drinking water wells, for contamination by PFAS ("forever chemicals"). OU 13 in an early stage of the Superfund process, termed "Remedial Investigation." Once this investigation is completed (anticipated fall/winter 2028), and plans for cleanup have not yet been announced.

[2] Meeting Minutes of the Restoration Advisory Board for the Former Naval Air Station Brunswick, May 25, 2025: https://media.defense.gov/2025/Jul/01/2003746556/-1/-1/0/NASB_28MAY2025_RAB_MTGMINS_FINALREV.PDF#page=10.

[3] See BACSE Letter dated October 10, 2019, entitled "BACSE Additional Comments *Final Sediment Feasibility Study, Former Picnic Pond Stormwater Retention System, Former Naval Air Station (NAS) Brunswick, Brunswick, Maine,*" available at https://www.brunswickme.gov/AgendaCenter/ViewFile/Agenda/_10212019-1785

[4] US EPA Letter dated August 10, 2022 entitled "Historical Releases of PFAS Contamination at the Former NAS Brunswick Site and On-going Impacts to the Jordan Avenue Brunswick-Topsham Water District Drinking Water Source," available at https://www.btwater.org/Engineering_PDFs/22_08_10_EPA_Region_I_Letter.Navy_PFAS_Contamination_Impacts_to_JA_Wellfield-1-.pdf.

soil, increase impervious surfaces, and/or connect to the aging stormwater system. Particularly in regions where we know the groundwater was already contaminated with PFAS even before the 2024 spill, these risks are substantial and necessitate careful design, mitigation, coordination among the multi-permitting agencies and monitoring throughout the construction process. Furthermore, because the complete characterization of the PFAS at a given development site is not yet complete, there is inherent danger in developing at a PFAS contaminated location without long range understanding of the implications for the development increasing an already serious problem condition.

To date we express concern that the transfer documents from the Navy (FOST) that fail to acknowledge the presence of PFAS enable proper permitting which considers the risks to the base-wide groundwater flow in the proposed permitting for new construction. The FOST sets forth the land use restrictions for the safe civilian use of a given parcel. Because the relevant FOSTs for the development parcels were created well before PFAS became a priority pollutant[5], they are effectively obsolete until updated. The risks are not solely for the site under development but in changing groundwater flow or additions to a stormwater system create risks for all residents and the environment.

Proposed expansion by Mölnlycke Health Care

It has been reported that Mölnlycke Health Care "*broke ground [September 23, 2025] on a 78,000-square-foot expansion at Brunswick Landing*."[6] We understand that the Town has not yet issued any permits.[7] While we are encouraged about the expansion of the Molnlycke business in Brunswick, we have concerns, given that this proposed expansion is situated in a not yet completely characterized contaminated area of the former base we have concerns that all issues regarding the existing contamination are being adequately considered.

Mölnlycke Health Care is located at 192 Admiral Fitch Avenue (Navy Parcel EDC-2), adjacent Brunswick Executive Airport: east of the runway, south of Hangar 6 in close proximity, and

[5] PFOS and PFOA were listed as priority pollutants under CERCLA in April, 2024.
[6] The Times Record, "*Brunswick breaks ground on medical tech facility expansion,***"** September 23, 2025, https://www.pressherald.com/2025/09/23/brunswick-breaks-ground-for-medical-tech-facility-expansion/.
[7] Town Planning Office staff also stated they do not have a *Brunswick Landing Construction Permission Request Form* on file for this property. We do not know whether this "groundbreaking ceremony" involved actual soil disturbance, which is restricted under the Land Use Controls (LUCs) for this property (Navy Parcel EDC-2). Note Finding of Suitability for Transfer (FOST), available at https://www.maine.gov/dep/gis/datamaps/brwm_bnas/FOST%202011-1%20Final%20Signed%20072711.pdf:
"Soil Disturbance Restriction:
The GRANTEE, its successors, and assigns agree that no soil excavation, drilling, digging or other ground-disturbing activities, including disturbance of building slabs, roads and other structures and paved areas, shall be allowed on Parcel EDC-2 (Figure B- 6), Parcel EDC-4, and Building 730 on Parcel EDC-3 (Figure B-8) without prior written approval of the Navy, and the applicable federal and state regulatory agencies, as appropriate. The GRANTEE, its successors and assigns, or their subcontractors, shall stop all work and notify the Navy immediately if previously unknown contamination, such as, but without limitation, buried debris, stained soil, unusual odors, is discovered during soil disturbing activity on any of the Transfer Parcels."

northeast of Hangar 4 (Figures 2-3). The proposed expansion involves newly created subdivision Lot 16B, adjacent to the north and west of the current building[8].

Even prior to the 2024 accident at Hangar 4, which spilled 1,450 gallons of PFAS-containing aqueous film-forming foam (AFFF) concentrate mixed with 50,000 gallons of water into the surrounding area, the Navy had already inferred PFAS contamination of groundwater in this region (Figure 3). While a post-spill PFAS map has not yet been published by the Navy, others have reported extremely high levels of PFAS in nearby surface water following the spill.[9]

The Mölnlycke development plan follows the STARC design with proposed subservice retention tanks and four bioretention areas. However there is no reference made concerning the existing PFAS contamination and how this project will address and mitigate the impact to the existing groundwater contamination and flow of groundwater. All of this may be because as stated in their application:

> **"Permitting History and Requirements**
> Previous development, begun in 2010 and completed in 2013, was subject to amendment of an existing Site Location of Development Act (SLDA) which encompasses the areas of the former Brunswick Naval Air Station then owned by the Midcoast Regional Redevelopment Authority (MRRA). Permit #L-20116-26-O-B was issued in December of 2010 for the original manufacturing facility as a Minor Amendment to MRRA's permit.
>
> Adherence to SLDA is determined by the Town of Brunswick, which has been granted Site Capacity by the Maine DEP. Brunswick does not have Stormwater Capacity, therefore Maine DEP will review stormwater design and issue a Maine Construction General Permit. Brunswick will provide a Development Review permit in addition to the SLDA."

The SLDA Permit in reference was created PRIOR to the knowledge of the existence of the extensive historical PFAS contamination and prior to the tragic release of PFAS contamination during MRRA's ownership. NONE of the parties involved in the Brunswick Landing development are managing the risk of this now infamous contamination issue.

[8] Town of Brunswick, Department of Planning and Development Amended Subdivision Plan, Lots 16B, 16C, and 16D: https://www.brunswickme.gov/AgendaCenter/ViewFile/Item/2874?fileID=32860.
[9] Friends of Merrymeeting Bay email dated May 17, 2025 (copied to the Town Manager), regarding surface water testing near the former Building 653.

Current Construction Permit Process for Brunswick Landing

The existing permit process, which has not been augmented since the August 2024 spill, is intended to involve coordination among the Town, MRRA, the Navy, Maine DEP, and the US EPA. The Navy outlines the current procedure as follows:[10]

"For properties within Brunswick Landing, if planned construction activities involve any soil displacement and/or potential contact with groundwater, the Navy, in consultation with USEPA and MEDEP, must provide approval before the Town of Brunswick will approve a construction permit.

- Applicants are required to complete the Brunswick Landing Construction Permission Request form available from the Navy or on the Permits and Applications page of the Town of Brunswick Planning & Development website:
  https://www.brunswickme.org/235/Permits-Applications

- Completed forms are submitted to MRRA for initial review. MRRA will forward the request to the Navy for review and approval. The Navy will notify MRRA when all permissions have been acquired."

However, it's important to note that copies of these documents (approved by the Navy) are not available online, contributing to a lack of transparency that prevents the public from easily verifying compliance with established procedures. Furthermore, it appears this consideration occurs only after permitting from the State and the Town have already occurred, none of which is providing any micro nor macro management of known environmental toxins on site. All of this leads to a fragmented management system leaving nobody to account for the risks posed by the current condition of the property.

Recent Example of how failure to regulate transparently leave Citizens at risk and without information to protect themselves.

Starting around October 2024, large piles of excavated soil began appearing north of Admiral Fitch Ave, near the Sandpiper Apartments (Figure 1). Over the ensuing months, more soil was deposited, and more piles appeared. The piles were never adequately managed: they remained uncovered with no means to prevent dust blowing around; no silt fences to prevent runoff, and no fencing to restrict access. This situation raised safety concerns among Brunswick residents, both as potential physical hazards (footprints appeared in the soil, indicating children climbing the piles with unknown potential chemical risks from PFAS and other contaminants known to be on the former base) as well as winds blowing the soils onto newly constructed residential property and tenants.

In sum, questions were directed to the Navy, DEP, MRRA, and the Town of Brunswick and never was there any responsibility for oversight confirmed by any entity nor at a minimum, violations

[10] Restoration Advisory Board for the Former Naval Air Station Brunswick, May 25, 2025, slide 31: https://media.defense.gov/2025/Feb/26/2003652222/-1/-1/0/NASB_22JAN2025_RAB_SLIDES_FINAL_V1.PDF#page=31.

noted for failure to conform with any erosion and Sediment Control Plan or Best Practice Management which continues to this date.

BACSE has attempted to assist residents with these inquiries, but after multiple inquiries spread over more than a year, there has still not been a comprehensive, public account of where these soil piles originated from, whether they are contaminated, whether Land Use Controls are being followed, and whether the groundwater in the sites where the soil was taken is contaminated with PFAS.

Inquiries began as early as November 1, 2024, but the first substantial explanation was not provided until May 2025. The information offered, that the piles were "screened loam" trucked in from off-site, was not consistent with visual inspection of the piles, which included large rocks. At the May 2025 Restoration Advisory Board, Maine DEP offered a different explanation, stating that the soil was the top layer taken from a wooded area on-site. BACSE was told in August that the soil piles originated from two construction projects: a MRRA utility project, and the new STARC Systems warehouse.

Requests for the Navy to test the soil piles for PFAS have been denied, on the basis that "[regulators] do not believe there was anything on that parcel that required management."[11] However, construction dewatering data (obtained from Maine DEP[12]) showed PFAS contamination in groundwater associated with recent construction activities. These data show that for 8 excavation dewatering samples from utilities improvements in the Katahdin Drive/STARC area taken between January 8, 2025 and June 3, 2025, PFAS6 concentrations ranged from Non-Detect to 17956 ng/L, with a mean of 1950 ng/L. We have been unable to get answers as to whether the excavated soil piles were in contact with this contaminated groundwater.

Another pressing concern and of greater significance is the transport of contaminants around the base and to off-base private and public drinking water. The STARC Systems building was constructed in the vicinity of PFAS-contaminated groundwater and how the building was permitted in light of the Superfund designation of Operable Unit (OU) 13 which covers the entirety of the base property. The primary restriction is a base-wide notification and approval prior to any digging into or extracting groundwater. Exposure to construction workers was theoretically managed by the developer but all of these activities and permanent construction structures impact the flow of the existing PFAS contaminated groundwater.

BACSE has requested the stormwater application associated with the STARC Systems building but has not received this information from Maine DEP after multiple inquiries. It is of significant concern that what appears to be an underground catchment system for a portion of the stormwater contributing to the groundwater plume of contamination as well as runoff directed to the dilapidated stormwater system making the groundwater restrictions meaningless. This activity greatly increases the risk of further transport of this contaminant due to the substantially increasing

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[11] Meeting Minutes of the Restoration Advisory Board for the Former Naval Air Station Brunswick, May 25, 2025: https://media.defense.gov/2025/Jul/01/2003746556/-1/-1/0/NASB_28MAY2025_RAB_MTGMINS_FINALREV.PDF, pages 13-16.

12 Communication from I. McLeod, Maine Department of Environmental Protection to S. Johnson, BACSE, July 25, 2025.

the amount of impervious surfaces. Newly constructed buildings that connect to this aging infrastructure will accelerate the movement of contaminants around and off the former base, endangering residents and further polluting the environment. The risks of the STARC system appear poised to be duplicated in the Mölnlycke construction process.

Conclusions and Reccommendations

Public transparency has been lacking; members of the public (including BACSE) have struggled to get timely, accurate information when they have safety concerns about construction projects. The same questions asked by multiple residents go unanswered for months, and there is no designated, central point-of-contact who is responsible for collecting and answering these inquiries, so inquiries are redirected to another party, often in circles. Even when information is received, it is not made public to benefit others who have the same question. Moreover, information distributed has been changing and inconsistent, contributing to confusion and mistrust.

These sensitive construction projects necessitate coordination, public transparency, and accountability. If Brunswick Landing is to be fully integrated with Brunswick, residents should receive direct representation within the Town, rather than being automatically referred to MRRA, who stifles concerns by eliciting that they are not an enforcement entity, or the Navy who defers because they claim no control over property no longer under their ownership, or the DEP who claims various department within the State are responsible for various management concerns.

To that end, following a meeting of all responsible parties we propose having a designated contact person (perhaps a "Brunswick Landing Ombudsman") who would maintain a comprehensive contact list of all involved parties and respond to resident inquiries by following up directly with answers, instead of redirecting questions to other parties. Regularly posting answers to frequently asked questions on the Town website would also streamline communication and reduce the workload on staff and residents.

Additionally, we propose creating a central repository on the Town website where all pertinent information for each Brunswick Landing construction project is maintained. This should include Town permits, Maine DEP permits, including stormwater plans, approved Construction Permission Forms, Land Use Controls, testing results for PFAS or other contaminants in connection with the project, etc., so that the information is publicly accessible online and not housed separately and out of reach of public review.

Lastly, we warmly invite Town staff and elected officials to connect with BACSE members, who are always ready to offer their technical assistance having decades of experience with these superfund sites. Thank you for your time, and we look forward to discussing more specific suggestions to ensure the safety of the greater Brunswick Community.

Sincerely,

Brunswick Area Citizens for a Safe Environment

Attachments: BACSE Letter dated October 10, 2019, entitled "BACSE Additional Comments *Final Sediment Feasibility Study, Former Picnic Pond Stormwater Retention System, Former Naval Air Station (NAS) Brunswick, Brunswick, Maine,*" available at https://www.brunswickme.gov/AgendaCenter/ViewFile/Agenda/_10212019-1785 *Manager's Report, Attachment C.*

CC:
Christopher Harding, Navy
Michael Daly, Remedial Project Manager, US EPA Region #1
Julie Erdman, Director of Planning & Development, Town of Brunswick
Ashley Charleson, Environmental Planner, Town of Brunswick
Iver McLeod, MEDEP
Finn Whiting, MEDEP
Midcoast Regional Redevelopment Authority:
Daniel Stevenson, Executive Director
Curtis Memorial Library, BNAS Repository
BACSE Internal Distribution

FIGURES

Figure 1: Excavated soil piled on the north side of Admiral Fitch Dr., between Line Dr. and Pegasus (across from the Sandpiper Apartments). The soil piles began appearing in October 2024; more soil and more piles were added over the ensuing months.

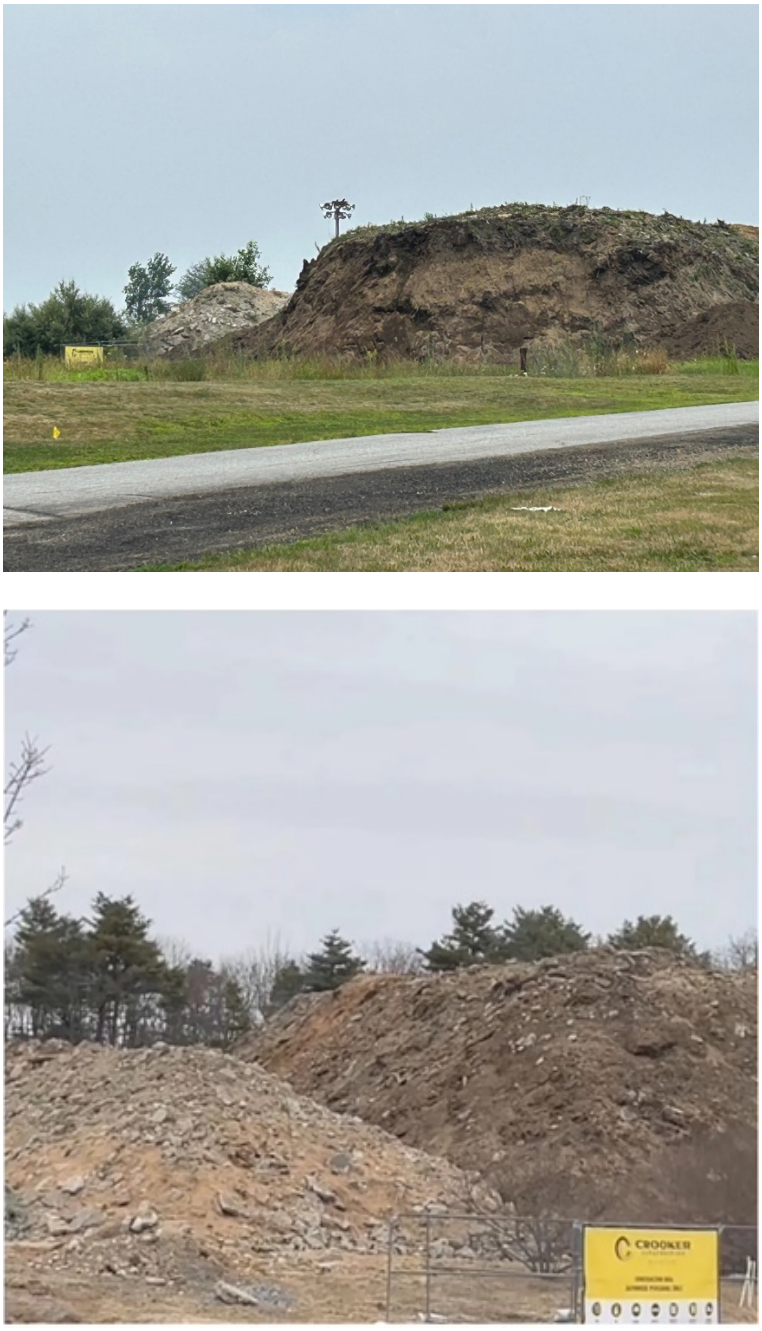

Figure 2: Google Maps view showing Hangars 4 and 6 of the Brunswick Executive Airport, the current Mölnlycke Health Care building proposed for expansion, the approximate location of the new STARC warehouse (constructed in 2024-2025). Significant historical releases of PFAS-containing firefighting foam have occurred in both Hangar 4 and Hangar 6.

Also shown is the approximate location of former Building 653, the site of the former AFFF storage "foam house."; Friends of Merrymeeting Bay detected high surface water levels of PFAS on 4/23/25 in a wet area immediately south of the concrete slab that was the site of Building 653.

Figure 3: Heat map showing color-coded contours of ground water PFAS contamination (source: Navy RAB meeting, October 2024), with approximate locations of Mölnlycke Health Care, STARC warehouse, and soil piles added in ORANGE.

Original:
https://www.brunswickme.gov/AgendaCenter/ViewFile/Item/2681?fileID=32543#page=16.