



JANET T. MILLS  
GOVERNOR

STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



MELANIE LOYZIM  
COMMISSIONER

October 7, 2024

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, Maine

Dear Ms. Fielding:

On August 19, 2024, a spill of aqueous film-forming foam (AFFF) occurred at Hangar 4 on the former Naval Air Station Brunswick (“Brunswick Naval Air Station Superfund site” or “NAS Brunswick”). The AFFF spill, which had high concentrations of long-chain PFAS, including PFOS, resulted in a foam/water mixture discharging from the hangar’s fire suppression system where it entered the subsurface sanitary and storm water systems, and then travelled along to NAS Brunswick’s storm water impoundment system (including Picnic Pond), eventually moving through Mere Brook to Harpswell Cove. In addition, foam/water was also discharged in the hangar and onto the surrounding airport impervious surfaces (pavement and concrete), with foam clumps becoming airborne and spreading to the surface of Brunswick Landing properties.

Since the date of the spill, the DEP and the Midcoast Regional Redevelopment Authority (MRRA), as lessee of Hangar 4 from the Navy, have spent considerable resources to contain and mitigate the effects of the spill, and have also collected numerous samples to determine the impact of the spill and the effectiveness of the mitigation measures. Continued monitoring related to the spill will further strain those resources, which are finite and were diverted from other DEP projects. The DEP requests reimbursement of those costs by the Navy and that future costs associated with the discharge are funded through the DSMOA grant.

An additional and equally important purpose of this letter, however, is to affirm the DEP’s concurrence with the conclusions in the letter from Bryan Olson, Director of the Superfund and Emergency Management Division at EPA, dated September 26, 2024, including the statement “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

AUGUSTA  
17 STATE HOUSE STATION  
AUGUSTA, MAINE 04333-0017  
(207) 287-7688 FAX: (207) 287-7826

BANGOR  
106 HOGAN ROAD, SUITE 6  
BANGOR, MAINE 04401  
(207) 941-4570 FAX: (207) 941-4584

PORTLAND  
312 CANCO ROAD  
PORTLAND, MAINE 04103  
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE  
1235 CENTRAL DRIVE, SKYWAY PARK  
PRESQUE ISLE, MAINE 04769  
(207) 764-0477 FAX: (207) 760-3143

National Oil and Hazardous Substances Pollution Contingency Plan (NCP), and the NAS Brunswick FFA (Federal Facilities Agreement) 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.” The EPA, Navy and the DEP entered into the FFA in 1990 to address the contamination and cleanup of NAS Brunswick.

The EPA letter requests the modification of the Navy’s July 2022 PFAS RI Sampling and Analysis Plan (SAP) to collect additional information and take into account the recent AFFF release from Hangar 4. DEP will share all data related to the spill with Navy and EPA to identify appropriate revisions to the SAP. The Department also supports EPA’s request to activate the extraction well identified as EW-11. Further, the Department believes that the discharges impact to existing buildings, including several local businesses, has not been properly assessed and that there is concern regarding occupancy of these properties.

Because of the good professional working relationship among members of the project team from each party to the FFA, the DEP suggests the project team work on revisions to the SAP and present that plan for management review.

The DEP looks forward to a preliminary discussion among the Navy, EPA and DEP. I can be reached at 207-287-6104 or [melanie.loyzim@maine.gov](mailto:melanie.loyzim@maine.gov). I look forward to hearing from you.

Sincerely,



Melanie Loyzim, Commissioner  
Maine Department of Environmental Protection

cc: Rachelle Knight, USN-BRAC PMO  
Derek Pinkham, USN-BRAC PMO  
Bryan Olson, EPA  
Dean Tagliaferro, EPA  
Anni Loughlin, EPA  
Cayleigh Eckhardt, EPA  
Mike Daly, EPA  
Jonathan Tso, EPA HQ/FFRRO  
David Madore, DEP  
Susanne Miller, DEP  
Nick Hodgkins, DEP  
Chris Swain, DEP  
Iver McLeod, DEP