



**DEPARTMENT OF THE NAVY**  
NAVAL FACILITIES ENGINEERING SYSTEMS COMMAND  
BASE REALIGNMENT AND CLOSURE  
PROGRAM MANAGEMENT OFFICE EAST  
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5000-33A  
Ser BPMOE/22-315  
October 4, 2022

Mr. Michael J. Daly  
Remedial Project Manager  
OSRR07-3  
U.S. Environmental Protection Agency, Region I  
5 Post Office Square, Suite 100  
Boston, MA 02109-3912

Dear Mr. Daly:

Your letter of August 10, 2022 succinctly summarizes the actions Navy, with oversight from EPA and MEDEP, has put forth since 2014 when the Navy voluntarily initiated sampling for PFAS at the Jordan Avenue Well station. These early efforts concluded no action warranted with respect to PFAS at the Jordan Avenue well station since the measured analytical values of PFAS were well below the criteria of the time.

Our recent expedited investigation coupled with data obtained by the Brunswick & Topsham Water District demonstrated a clearer link between the PFAS identified at the Jordan Avenue Well station and historical releases at the former NAS Brunswick. While much of the current data is consistent with historical data, it is significant to note that results from the expedited effort identified a point (MW-JA 03D) on the former NASB that exceeded the 2016 EPA Health Advisory level for PFOA and PFOS. This new data suggests an exceedance of the 2016 Health Advisory could occur at the well station if no action is taken. To this end, the Navy agrees a removal action is warranted.

On the date of your letter, the Navy had already begun discussion with the Brunswick Topsham Water District (District) which is expected to result in an Environmental Services Cooperative Agreement (ESCA) between the Navy and the District and will address the impacts seen at the Jordan Avenue Well station. The identification and effective implementation of appropriate removal actions at the site will need to be a coordinated effort between the District, Navy, EPA and MEDEP.

Managing PFAS impacts at the Jordan Avenue Well station necessarily consist of immediate, short-term, and long-term actions. As you are aware, the District is continuously extracting groundwater from the lower wellfield, treating and discharging to ground surface in order to maintain hydraulic containment of the PFAS plume and prevent it from migrating into the upper well field. This was an immediate and responsive action by the District. Concurrent with completing the ESCA we are drafting an Engineering Evaluation and Cost Analysis (EE/CA) which will inform the Statement of Work under the ESCA, which should address the short-term needs and maintain the immediate action until the short-term needs are achieved. We contemplate that an alternate treatment system will be required in order to transition the current,

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immediate action treatment system into a long-term system of providing treated groundwater to the District that meets appropriate criteria as promulgated. The proposed schedule for the above near-term major milestones are as follows:

Engineering Evaluation/Cost Analysis (EE/CA)	March 1, 2023
Environmental Services Cooperative Agreement (ESCA)	June 15, 2023

The Navy will also continue progress with Operable Unit 13, complete the Remedial Investigation, and commence the Feasibility Study phase leading to a Record of Decision to address the long-term needs of the Basewide PFAS.

If you have any questions, or would like to discuss, please contact me at (781) 626-0105.

Sincerely,



DAVID BARNEY  
BRAC Environmental Coordinator  
By direction of the Director.

Copy to:  
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