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April 3, 2023

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Senator Chip Curry, Representative Tiffany Roberts co-Chairs
Innovation, Development, Economic Advancement & Business
Maine State Legislature
c/o Legislative Information Office
100 State House Station
Augusta, ME 04333

RE: LD 941, HP0588; An Act Facilitating the Efforts of the Midcoast Regional Redevelopment Authority and the Town of Brunswick to Design and Carry Out Improvements to the Storm Water System and Other Infrastructure at the Former Brunswick Naval Air Station

Dear Chairman Curry and Chairman Roberts:

I am unable to attend the public hearing on this important bill tomorrow and would like to submit this letter in support of the bill. As the Town of Brunswick Representative to the Restoration Advisory Board, I am very familiar with the issues at the intersection between the re-development of the former base into civilian use and the environmental risks associated with legacy contaminants remaining at the site.

The major issue at the former Brunswick Naval Air Station (BNAS) is the high level of environmental and liability risk posed by the large volumes of legacy Perfluoro-octanoyl Sulfonate (PFOS)-containing aqueous fire-fighting foam (AFFF) concentrate remaining at the site. PFOS from this source has recently been found to have contaminated nearby public drinking water wells in Brunswick. The Navy is now working with the Brunswick Topsham Water District to develop a treatment plan for this contamination, which continues to flow from contaminated ground water at the former base.

The drinking water treatment is a palliative measure and does nothing to address the ongoing flow of PFAS-contaminated surface and ground water north into the Androscoggin River, and into the stormwater and surface waters at Brunswick Landing flowing south into Mere Creek and down to Harpswell Cove. Recent testing by the Navy shows concentrations of PFOA + PFOS in stormwater above 8,500 ng/L. These levels are 425 times higher than Maine's drinking water standard of 20 ng/L for the sum 6 PFAS species, including PFOA and PFOS and 17 times higher than the Surface Water Human Health Screening Level of 508 ng/L.

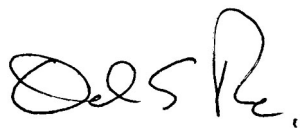
There is a large amount of PFAS-contaminated groundwater throughout Brunswick Landing, as documented by numerous Navy studies. PFAS-contaminated groundwater reaches the environment through infiltration into the stormwater system, which has been shown by a 2019 MRRA-sponsored video survey to have extensive groundwater seepage due to cracks and other damage. While the Brunswick Sewer District insisted that the Navy repair the sanitary system at the former base before taking ownership, MRRA did not do the same when it took ownership of the stormwater system.

Not only do we have ongoing impact from the existing PFAS contamination through groundwater inflow into the aged storm water system, but the MidCoast Regional Redevelopment Authority (MRRA) maintains approximately 9,300 gallons of older, now discontinued, PFAS-based AFFF, inherited from the Navy, that are stored in plastic tanks in hangars on the site. Approximately 2,000 gallons of this AFFF are the oldest, most dangerous, PFOS - based AFFF,

which is in the hangar closest to Mere Brook and where an unknown amount was released in 2019 that was not made known to the public at the time. One teacup of an inadvertent spill of this AFFF can contaminate millions of gallons of water posing a significant future threat to the community. To put this into context, the release of the 2000 gallons of PFOS-based AFFF stored in Brunswick into a volume of water the size of Lake Auburn (the City of Auburn's water supply) would result in a PFOS concentration of approximately 60 ng/L – 3 times the State of Maine limit.

Today I write strongly in support of LD941 and urge you to initiate, through this bill, a process to demand that the US Dept of Defense remove the 9,300 gallons of US Navy legacy AFFF currently being stored in hangars at the Brunswick Executive Airport at Navy expense, not State of Maine or Town of Brunswick expense. Removal of the 3,000 gallons of the oldest most dangerous PFOS-based AFFF, currently still owned by the US Navy, should be the first priority. There is no need for a small community airport to have the large volumes of AFFF appropriate for a large military air station. Neither MRRA, nor the Town of Brunswick have the ability to address the risk of an exposure of this magnitude, should an accident occur. Action on this is urgent because the US Navy is currently proposing to transfer the remaining stores of the most dangerous PFOS-based AFFF to MRRA in 2023.

Sincerely yours,

A handwritten signature in black ink, appearing to read "D. S. Page". The signature is fluid and cursive, with a large initial "D" and "P".

David S. Page, Bowdoin College Professor of Chemistry and Biochemistry Emeritus
<https://www.bowdoin.edu/profiles/faculty/dpage/index.html>