



JANET T. MILLS  
GOVERNOR

STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



MELANIE LOYZIM  
COMMISSIONER

November 23, 2022

SENT VIA EMAIL

Mason Station LLC  
Attn: Daniel Pennessi and Joe Cotter  
485 West Putnam Avenue  
Greenwich, CT 06830  
[Dpennessi@nationalresources.com](mailto:Dpennessi@nationalresources.com)  
[Jcotter@nationalresources.com](mailto:Jcotter@nationalresources.com)

**Re: Status of Mason Station Power House Site, Wiscasset, Maine**

Dear Mr. Pennessi and Mr. Cotter:

This letter is in regard to the Mason Station Power House site located on Point East Drive in Wiscasset, Maine (“Site”). I am writing to follow up on prior correspondence, including, but not limited to, the letter from the Maine Department of Environmental Protection (“Department or MEDEP”) to Mason Station LLC dated September 26, 2022.

In that letter, the Department requested that Mason Station LLC provide written updates on remediation and waste removal efforts at the Site no later than October 10, 2022, including updated timelines for completion of the work. On November 22, 2022, Mason Station LLC provided a limited email response that did not adequately address the updates requested in that letter and failed to provide any of the requested timeline updates for completing the investigation and remediation of the Site. It continues to remain unclear when Mason Station LLC intends to complete the work, the extent of the investigation and remedial work that it intends to complete, and whether it is technically and financially capable of completing the investigation and remediation of the Site. Because such information has not been forthcoming, and in order to address public health concerns presented by the Site, the Department is requiring the submission of an expedited sampling plan for both interior Power House areas and surrounding outside areas, as set forth in the following schedule:

No later than December 6, 2022, provide a sampling plan, for Department review and approval, to collect the following: samples of water from interior Power House building trenches; samples of accumulated waste/solids from interior Power House building trenches; asbestos indoor air samples from inside the Power House building; samples of sediment from the Sheepscot River; and samples of effluent from outfall pipes

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

discharging into and adjacent to the Sheepscot River. Such a plan must include a schedule to collect all such samples by no later than December 16, 2022.

To facilitate the expeditious development of a sampling plan by a qualified environmental professional (e.g., Ransom Consulting LLC (“Ransom”)), I am attaching the sampling plan recently developed by the Department to collect limited near-shore sediment samples, limited outfall pipe effluent samples, and limited Power House building interior trench samples, which includes both the locations for the samples and a list of analytical methods. The Department expects that Mason Station LLC’s plan will target additional interior trench samples in areas where discharges of contaminants have been documented (both water and accumulated waste/solid samples), and that the Department will have the opportunity to be present during sampling to collect split samples. Depending on the results of initial sampling in these areas and other factors, subsequent rounds of sampling and investigation may be required by the Department. Asbestos air samples collected from inside the Power House building must be collected by a Maine licensed asbestos consultant and include general air samples analyzed by transmission electron microscopy and personal exposure samples analyzed by phase contrast microscopy. I am available to discuss questions your project team may have about the details of the plan as it is developed; please have them reach out to me directly.

The Department is giving Mason Station LLC until no later than November 29, 2022 to respond to this letter in writing indicating whether it will commit to the investigation sampling work and the schedule outlined above. However, if Mason Station LLC fails to respond to this letter in a timely manner, fails to submit an adequate sampling plan that incorporates all Department comments, or fails to execute such a plan in a timely fashion, then the Department will proceed with efforts to collect its own samples from the Site and its buildings and pursue recovery of associated costs.

The collection of samples by Department employees or its agents from the Site has been and will continue to be completed pursuant to the Department’s broad statutory authority, including 38 M.R.S. §§ 1364(3) and 347-C. The Department will proceed to analyze the initial samples already taken from outside the Power House structure on November 18, 2022, but for now will otherwise defer to Mason Station LLC’s expected forthcoming response and sampling plan. The Department remains committed to working with Mason Station LLC to expeditiously obtain and analyze all required samples. But, if necessary, the Department will consult with the Office of the Attorney General to ensure that the collection and analysis of all necessary samples from the Site occur in a timely manner. In that event, and in addition to pursuing recovery of costs associated with Department sampling, the Department may pursue other enforcement actions and remedies, including those set forth in 38 M.R.S. §§ 347-A, 348, and 349.

Despite years of Department requests that Mason Station LLC and the other Potentially Responsible Parties fully investigate and remediate this Site, and despite assurances that such investigation and remediation would occur, the Site continues to pose an actual and potential

threat to public health and safety and to the environment. The issues raised in this letter are to be considered in addition to the numerous issues raised and response activities requested by the Department and related to this Site, which are detailed in prior correspondence, including the draft Administrative Consent Order that was sent to Potentially Responsible Parties Mason Station LLC, FPL Energy Mason LLC, and Central Maine Power, on December 4, 2020, via email. Notably, none of the Potentially Responsible Parties have been voluntarily willing to enter into that agreement and commit to investigating and remediating the Site.

Sincerely,



Chris Redmond  
Manager, Uncontrolled Sites Program  
Bureau of Remediation & Waste Management  
Maine Department of Environmental Protection

Enc: MEDEP Sampling and Analysis Plan, November 8, 2022

cc: Danielle Obery, Project Manager, MEDEP Division of Remediation (via email)  
Finn Whiting, Project Geologist, MEDEP Division of Remediation (via email)  
Victoria Eleftheriou, Deputy Director, MEDEP Bureau of Remediation and Waste Management (via email)  
Carla Hopkins, Director, MEDEP Division of Remediation (via email)  
Ron Mongeon, MEDEP Enforcement Coordinator, Commissioners Office (via email)  
Jeff Skakalski, Office of the Maine Attorney General (via email)  
John McKeown, EPA Removal (via email)  
John Bowman, EPA TSCA (via email)  
Steve Dyer, Ransom Consulting LLC (via email)  
Tracy Backer, Esq., NextEra Energy Resources LLC (via email)  
Carlisle Tuggey, Central Maine Power Company (via email)  
Katherine McDonough, Central Maine Power Company (via email)  
Seth Jaffe, FoleyHoag LLP (via email)

Sampling and Analysis Plan  
Air, Outfall Pipe Discharge, and Sediment Investigation

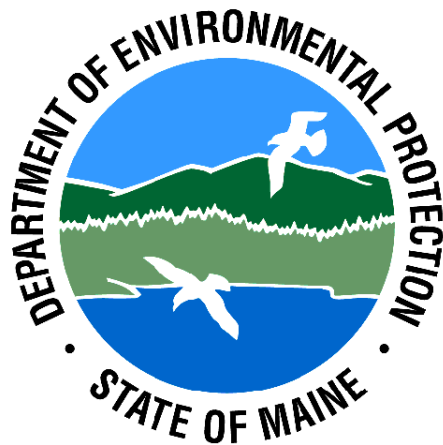
---

# MASON STATION

---

Wiscasset, Maine

Maine Department of Environmental Protection  
Bureau of Remediation and Waste Management



NOVEMBER 8, 2022



## **SAMPLING AND ANALYSIS PLAN – MASON STATION, WISCASSET ME**

**11/8/2022**

### **1.0 INTRODUCTION**

MEDEP has developed this sampling and analysis plan (SAP) to assess potential impacts to the environment from deteriorating building conditions that have released contaminants of concern (COC's): including, but not limited to, petroleum related compounds, polychlorinated biphenyls (PCB's), heavy metals, polycyclic aromatic hydrocarbons (PAH's), and asbestos within the Power House Structure of Mason Station, a former coal and oil fired power plant located in Wiscasset, Maine. Fifteen (15) outfall pipes, two (2) stormwater outfall pipes, and three (3) condenser discharge pipes connect the Power House Structure to the Sheepscot River and represent potential pathways for contaminant migration. Samples are needed to assess and improve the understanding of past, present, and suspected releases from the Power House structure to the environment.

This SAP is in general conformance with MEDEP/DR SOP# RWM-DR-014 – Development of a Sampling and Analysis Plan and presents the technical approach for the remedial investigation to be conducted by the MEDEP or its affiliates to gather representative samples of effluent discharge from the Power House structure and sediment from the Sheepscot River. Collection of air samples will be performed by a hired consultant to assess asbestos fibers in air and at the breathing zone of personnel performing routine activities in the building. The information gained from this investigation will aid in further development of the conceptual site model for the site.

### **2.0 BACKGROUND INFORMATION**

#### **2.1 Site History:**

The Mason Station Power House structure, located on Lot 81 of the Wiscasset Assessors Tax Map R-7A, was used for power generation from the mid 1940's to the early 1990's. The structure consists of a multi-story industrial building constructed of brick and steel and was initially a coal fired power plant and later converted to produce power through use of oil. The building has three sections: Units 1 & 2, Units 3 & 4, and Unit 5 which were constructed at different times over the course of the facility's operable years.

Some of the building's former power generation equipment has been removed but a significant portion of its operational contents remain onsite and in poor condition. The structure's roof and roof drain network leak water into the building's interior which exacerbates the deterioration of its contents. Many environmental investigations have been performed on the site beginning in 1992 including some partial remedial actions. Despite these efforts, the building continues to release COC's within the structure which pose a risk to human health and the environment. A series of basement vaults, floor trenches, and roof drains convey fluids from the building through outfall pipes to the Sheepscot river. There is not a complete understanding of these pathways due to the complexity of the building and incomplete records of its design.

#### **2.2 Contaminants of Concern:**

PCB containing transformers were removed from the interior and exterior of the Power House structure in 2020 under the oversight of EPA and MEDEP. The removal action



**SAMPLING AND ANALYSIS PLAN – MASON STATION, WISCASSET ME**  
**11/8/2022**

was completed in response to confirmed releases, however subsequent investigations to determine additional impacts to exterior soil and concrete and interior surfaces have not been provided to the agencies for review despite MEDEP's requests. The scope of investigation proposed by the Responsible Party was limited in scope and did not include MEDEP's requested sampling of outfall pipes or sediment within the Sheepscot River in the area adjacent to the outfall pipes. This, despite confirmed and suspected PCB oils and other COCs reaching the floor trench network.

Many pieces of equipment, storage tanks, and piping is wrapped in asbestos insulation. The poor building conditions have allowed the asbestos to deteriorate in many locations throughout the building. Asbestos can be observed in piles on the floor where it has fallen from overhead building components and has reached the floor trench network in some locations. Asbestos impacts to the environment have been confirmed during past investigations related to disposal areas exterior to the structure. It has never been determined if the outfall pipes are a current migration pathway for this contaminant.

Overhead piping and miscellaneous equipment have also begun to deteriorate due to poor building conditions and have released an unknown quantity of petroleum-based liquids which are still contained within. Numerous spills have been identified in all Units of the powerhouse structure, the majority of which are number 6 high viscosity oil while others are of an indeterminate composition. In several locations these petroleum-based releases have reached the floor trench network.

PAH's and metals are contaminants associated with the historic operation of the former coal and oil fired power plant. As equipment and the building continue to deteriorate, these contaminants may become mobilized. Due to the poor condition of the building and its contents, this investigation is necessary to determine potential impacts to the environment that may pose an unacceptable human risk.

### 2.3 Historic Sampling:

Sediment sampling has occurred in easily accessible areas located in wadable tidal flats north and south of the Power House structure. Areas previously sampled are situated away from the outfall locations which are the point source for any discharges from the Power House structure, including site COC's. Reference Figure 1.0 detailing historic sediment sample locations with respect to outfall pipes from the Power House structure.

Data from 2006-2008 identified PCBs, PAHs, and metals concentrations above NOAA screening criteria in several samples and isolated PCB hot-spots which cannot be discounted as outliers due to repeated detections in replicate samples. The correlation of TOC, grainsize, and total PCB concentrations in the 2008 data set provides evidence that discharges from the Power House structure occurred. PCBs are extremely hydrophobic and would correlate closely to TOC if homogenized in the environment, as would be expected in areas impacted from a distal source.



## SAMPLING AND ANALYSIS PLAN – MASON STATION, WISCASSET ME

11/8/2022

In 2018, outfall pipe NO. 006 was sampled in response to a leaking transformer in Unit 5 of the Power House structure documented as Spill No. A-678-2018 issued by the MEDEP. Petroleum fraction C19-C36 Aliphatics were detected at a concentration of 592 micrograms per liter (ug/L) and copper and nickel exceeded the Surface Water Quality Criteria for Toxic Pollutants in saltwater. Outfall pipe NO. 006 has not been sampled since. All other outfall pipes have not been sampled since the National Pollutant Discharge Elimination System (NPDES) permit lapsed in the early 2000's.

### 3.0 SAMPLING METHODOLOGY/ EQUIPMENT

Three media are proposed for sampling to investigate both current and past releases to the environment: air, sediment, and effluent water.

MEDEP has retained Air Quality Management Services, Inc. to collect two types of air samples to assess levels of airborne asbestos: general air samples and Short Term Exposure (STEL) samples. General air samples will be collected over a two hour sample period and STEL samples will be collected over a 30 minute period during activities where exposure is expected to be greatest.

Effluent water samples will be taken at the location where outfall pipes emanate in the shoreline east of the Power House building and at known locations where floor trenches and roof drains discharge from the building. Sample containers will be filled directly from the water exiting the outfall pipe prior to contact with the ground surface. Effluent discharge samples will be collected at low tide when the outflow pipes are exposed in the shoreline and following a light rain when flow exiting the structure is predicted to be greatest.

Sediment samples will also be collected at low tide when outfall pipes are exposed. Each sediment sample will be collected from the area closest to each outfall pipe or condenser discharge pipe utilizing stainless steel picks and trowels. A depth of 0" to 4" below ground surface will be collected and placed in laboratory provided containers. If enough suitable material is not present at the target location, the sample will be moved downgradient to the nearest location where sediment is present. Should no suitable material be achievable from shore or wading, a shallow draft vessel will be available onsite and a ponar grab sampler (or similar) will be utilized to attempt sample collection. If samples are still unobtained, conditions will be noted as preventing sample collection.

The personnel performing sample collection will adhere to the Departments Standard Operating Procedure: No. RWM-DR-004 – Surface Water and Sediment Sampling. Multiple days may be needed to complete sample collection. Following each samples collection, its location will be recorded using a Trimble GPS capable of sub meter accuracy.

Prior to collection of effluent water samples field measurements will be collected. The field parameters measured will include pH, conductivity, temperature, and turbidity. Results will be recorded in the sampling technicians field logbook and on sample log



**SAMPLING AND ANALYSIS PLAN – MASON STATION, WISCASSET ME**  
**11/8/2022**

sheets (Appendix A).

Prior to sampling each location, the sample handler must don nitrile gloves. It is recommended that all water samples will be collected using dedicated or disposable sampling equipment where possible. Any re-usable equipment, needed in certain cases to obtain a sample should be decontaminated using Alconox/Liquinox soap and rinsed with water prior to use and between locations following the Department's Standard Operating Procedure: No. RWM-DR-017 – Equipment Decontamination Protocol.

Upon sample event completion, samples will be placed on ice and transported to the MEDEP laboratory for package and shipment to the analytical laboratory. A temperature blank will be included in the sample cooler to ensure appropriate temperatures were maintained during transport. Sample personnel must comply with the Department SOP No. RWM-DR-012 – Chain of Custody Protocol.

#### **4.0 Sample Locations**

Sample locations were selected after reviewing historical data and are based on a judgmental (biased) design. The biased sample design was developed to optimize available resources and generate data to satisfy the objective of determining discharge of COC's to the building's exterior.

##### **4.1- Air Samples:**

General air sample locations will be determined at the time of collection. Two (2) locations will be selected inside the building and two (2) locations will be selected outside the building. Two (2) STEL samples will be collected while MEDEP staff perform a routine inspection of the building and while interior effluent discharge samples are collected.

##### **4.2-Effluent discharge:**

Field activities include collection of three (3) effluent discharge samples taken at the location where outfall pipes emanate in the shoreline east of the Power House building. Two (2) additional samples will be collected from within the powerhouse structure at known locations where floor trenches and roof drains discharge to outfall pipes. If available flow is identified from other outfall pipes at the time of sampling up to two (2) additional samples will be collected for analysis. Not all outfall pipes are exposed above tidal waters so MEDEP will collect samples from only the available discharge locations at the time of sampling. Two outfall pipes, NO. 006 and NO. 008 have both been observed with appreciable flow. Outfall NO.012 has been observed with minor flow. These three locations will be priority targets for sample collection exterior to the building.

Two samples will be collected interior of the Power House structure where floor trench water can be observed exiting the building, presumed to be both outfall pipes NO. 006 and NO. 008.





**SAMPLING AND ANALYSIS PLAN – MASON STATION, WISCASSET ME  
11/8/2022**

**4.3- Sediment:**

Field activities include collection of fifteen (15) sediment samples taken at the location where outfall pipes emanate in the shoreline east of the Power House building.

Sampling ID	Sample Location	Sample Coordinates (Easting)	Sample Coordinates (Northing)	Matrix	Number of Samples	Analytical Group
<b>Sediment</b>						
SD-401	Outfall NO. 010 NO. 012 NO. 013	446337.889	4871154.67	SD	1	Table 2 - Sediment Group
SD-402	Outfall NO. 008	446334.33	4871150.252	SD	1	
SD-403	Outfall NO. 003	446345.744	4871144.852	SD	1	
SD-404	Outfall NO. 009	446342.676	4871126.811	SD	1	
SD-405	Outfall NO. 007	446340.221	4871123.497	SD	1	
SD-406	Outfall NO. 021	446337.153	4871115.029	SD	1	
SD-407	Outfall NO.002	446335.435	4871105.824	SD	1	
SD-408	Outfall NO. 001	446336.785	4871083.611	SD	1	
SD-409	Outfall NO. 006	446331.753	4871068.883	SD	1	
SD-410	Outfall NO. 016	446331.262	4871060.661	SD	1	
SD-411	Outfall NO. 017	446331.63	4871050.72	SD	1	
SD-412	Outfall NO. 004	446321.689	4871033.047	SD	1	
SD-413	Units 3 & 4 Condensor Pipe	446346.235	4871162.647	SD	1	
SD-414	Units 1 & 2 Condensor Pipe	446344.64	4871106.683	SD	1 + Field Duplicate	
SD-415	Unit 5 Condensor Pipe	446325.003	4871042.129	SD	1	
<b>Effluent Discharge</b>						
EF-01	Outfall NO. 008	446334.33	4871150.252	SW	1	Table 2 - Effluent Water Group
EF-02	Outfall NO. 006	446331.753	4871068.883	SW	1 + Field Duplicate	
EF-03	Outfall NO.013	446337.889	4871154.67	SW	1	
EF-04	Building Discharge to Outfall NO.006	446282.483	4871083.011	SW	1	
EF-05	Building Discharge to Outfall NO.008	446319.112	4871158.229	SW	1	

*Sample locations are approximate and are subject to change based on field conditions.  
Coordinate System: NAD\_1983\_UTM\_Zone\_19N*

**5.0 Media Sampled**

The contracted analytical laboratory has not been selected but must be Maine certified to perform any method for which Maine provides certification. The contract lab must be able to accommodate the sample load and perform the analyses within holding times. The contract lab must be able to achieve PQLs, for all analyses, which are below the associated regulatory guideline value.

Containers, preservation, and holding times will be as recommended by the laboratory providing analytical services.



**SAMPLING AND ANALYSIS PLAN – MASON STATION, WISCASSET ME**  
11/8/2022

**TABLE 2**  
**Media/Analytical Methodology**

<b>MEDIA</b>	<b>ANALYTE</b>	<b>LABORATORY METHOD</b>
Effluent Water	PCB Arochlors	USEPA Method 8082
	Asbestos	EPA 100.2
	TAL Metals	USEPS Method 6010/6020/7470
	PAH's	USEPA Method 8270
	EPH/VPH	MA VPH 2.1/MA EPH 1.1
	VOC	USEPA Method 8260
	SVOC	USEPA Method 8270
Sediment	PCB Arochlors	USEPA Method 8082
	TAL Metals	USEPS Method 6010/6020/7470
	Total Organic Carbon	USEPA Method 9060
	PAH's	USEPA Method 8270E
	VOC	USEPA Method 8260
	SVOC	USEPA Method 8270
	EPH/VPH	MA VPH 2.1/MA EPH 1.1
Air	Asbestos	EPA 100.2
	Asbestos General Air	Transmission Electron Microscopy
	Asbestos Personal Exposure	Phase Contrast Microscopy

Other methods may be appropriate based on the data quality objectives of the sampling project or laboratory recommendation.

### 6.0 FIELD QC SAMPLES

General requirements for sampling events include one aqueous field blank, per field event, to be tested for the Effluent Water analytical group to determine if water samples have been contaminated by sources unrelated to the project area, and to assess the overall field procedures. The field blank is typically one bottle of water supplied by the laboratory, which is uncapped and poured to a second bottle. An equipment blank should be collected if non-dedicated equipment is used. If sampling should extend to two days, one blank per day will be collected.

One (1) blank air sample will be submitted for each testing method. For STEL samples, a time weighted average will be calculated based on the time of activities performed.

Field duplicate samples will be collected at a frequency of one (1) per 20 samples collected or one per matrix. Field duplicates will be labeled in the field following the naming convention XX-DUP-##. Where XX will denote the matrix as either SD or EF. The ## denotes the number of duplicate samples collected for that matrix in sequential order. For example, the first sediment sample duplicate collected on would have a sample identification of SD-DUP-01.

### 7.0 REPORT GENERATION

A Sampling Event Trip Report (SETR) will be developed for every sampling event according to MEDEP/DR SOP No. RWM-DR-013 – Documentation of Field Activities



**SAMPLING AND ANALYSIS PLAN – MASON STATION, WISCASSET ME**  
**11/8/2022**

and Development of a Trip Report. Results of the sampling event will be summarized in a memorandum of finding and including recommendations for future sampling.

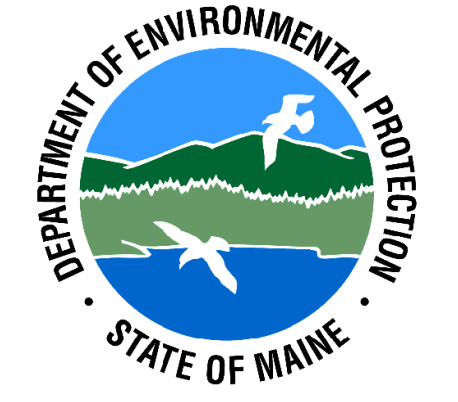
Air Quality Management Services, Inc. will provide an inspection report detailing the analytical results of the air sampling under separate cover of other media sampled.



**SAMPLING AND ANALYSIS PLAN – MASON STATION, WISCASSET ME**  
**11/8/2022**

Figure 1 - Historic Sediment Sample Locations & Outfall Pipes





Mason Station  
Power House Site  
Sediment Sample Locations

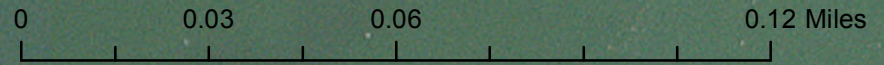
**Legend**

- 2006 Sediment Samples
- 2007 Sediment Samples
- 2008 Sediment Samples
- - - Outfall Pipes
- Natural Spring
- · - · - Transformer Enclosures
- Former Transformers Locations

**Notes**

1. This figure has been prepared to support the Maine Department of Environmental Protection's Department Designation of Uncontrolled Hazardous Substances Site and Order. Unauthorized use is prohibited without the explicit permission of the Maine Department of Environmental Protection.

2. Areas of concern are approximate in location, extent, and scale.







**SAMPLING AND ANALYSIS PLAN – MASON STATION, WISCASSET ME**  
**11/8/2022**

Figure 2 – Site Map & Proposed Sample Locations



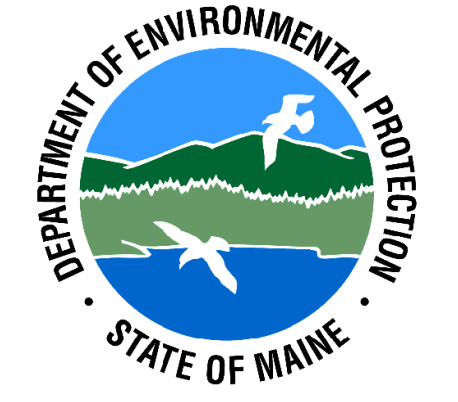
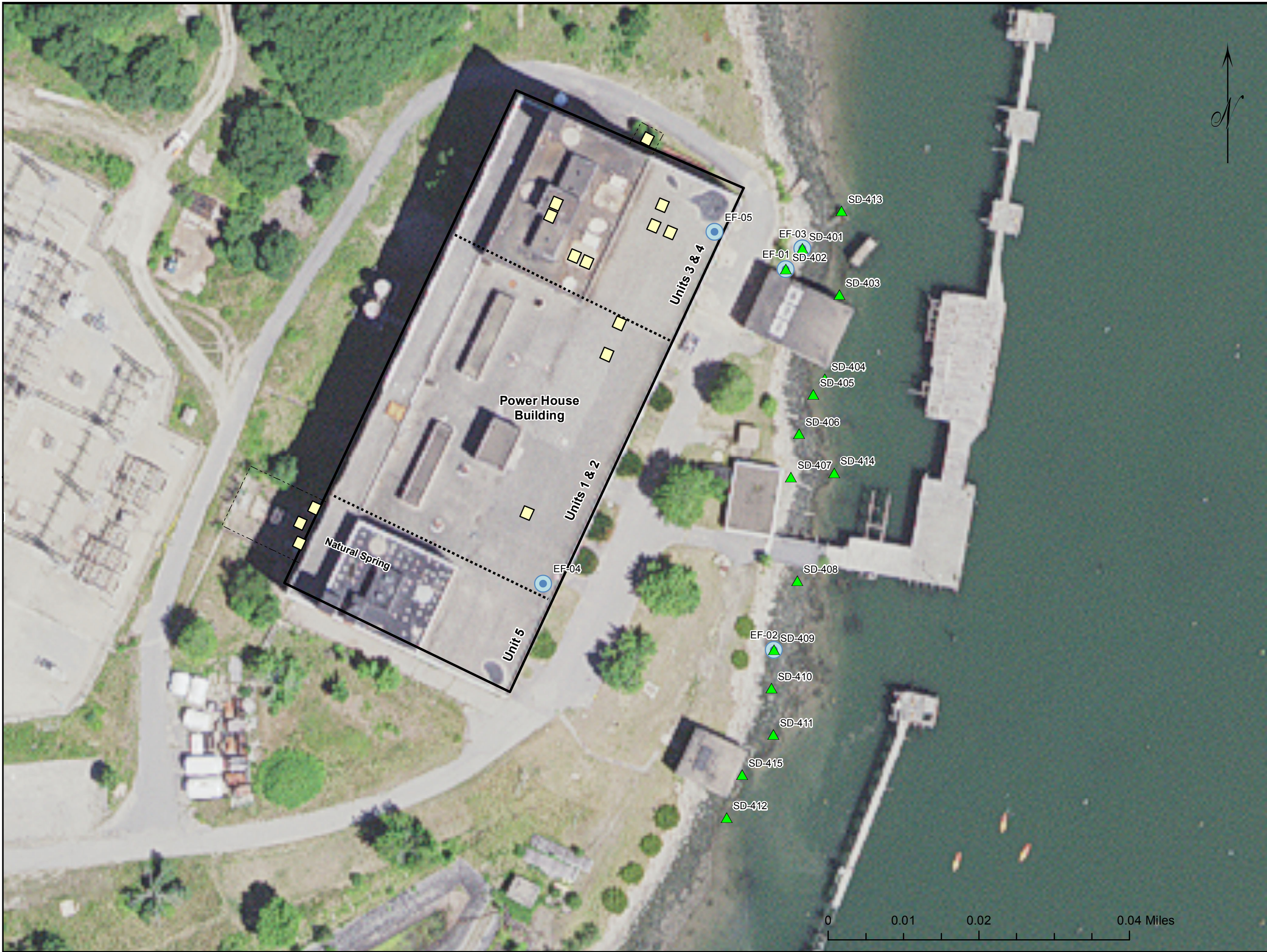


Figure 2  
Mason Station  
Power House Site  
Proposed Sample Locations

- Legend**
- ▲ Sediment Sample
  - Effluent Sample
  - Transformer Enclosures
  - Former Transformer Locations

**Notes**

1. This figure has been prepared to support the Maine Department of Environmental Protections Department Designation of Uncontrolled Hazardous Substances Site and Order. Unauthorized use is prohibited without the explicit permission of the Maine Department of Environmental Protection.

2. Areas of concern are approximate in location, extent, and scale.