STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION
STATE HOUSE STATION 17 AUGUSTA, MAINE 04333

BOARD ORDER

IN THE MATTER OF

CENTRAL MAINE POWER COMPANY	)	MAINE HAZARDOUS WASTE
NORTH AUGUSTA SERVICE CENTER	)	SEPTAGE SOLID WASTE
AUGUSTA, KENNEBEC COUNTY, MAINE	)	MANAGEMENT ACT
RENEWAL OF COMMERCIAL HAZARDOUS	)	
WASTE STORAGE FACILITY LICENSE	)	
LICENSE #O-000001-HA-D-R	)	
(APPROVAL WITH CONDITIONS)	)	LICENSE RENEWAL

Pursuant to the provisions of the Maine Hazardous Waste, Septage and Solid Waste Management Act, 38 M.R.S. §§ 1301 through 1319-Y, and Maine Hazardous Waste Management Rules, 06-096 CMR 850 through 857 (effective July 23, 2008) (hereinafter the "Rules"), and 38 M.R.S. §§ 1319-R et seq., under the authority delegated by the United States Environmental Protection Agency and the Resource Conservation and Recovery Act, the Board of Environmental Protection (hereinafter the "Board") has considered the renewal application for a commercial hazardous waste storage facility for CENTRAL MAINE POWER COMPANY (hereinafter "CMP") with its supportive data, public hearing comments, agency review comments, and other related materials on file and FINDS THE FOLLOWING FACTS:

1. APPLICATION SUMMARY

A. Application: On July 14, 2003 CMP submitted an application to renew its commercial hazardous waste storage facility license at its North Augusta Service Center facility (hereinafter "NASC") located at 53 Anthony Avenue, Augusta, Maine. This facility is considered a commercial facility as defined in 38 M.R.S. § 1303-C for facilities that handle hazardous waste generated off the facility site.

The purpose of the NASC license is for the storage of polychlorinated biphenyls (hereinafter " PCBs") and PCB contaminated debris generated by CMP as a result of their operations in Maine. Substances containing 50 parts per million (on a dry weight basis) or greater of PCBs are identified by the Board of Environmental Protection as toxic hazardous waste and are assigned the hazardous waste number M002.

CMP implemented a number of minor changes to the NASC facility between 2000 and 2012, only one of which affected the handling and storage of hazardous waste at the facility. This change involved a modification to the type of waste being handled and stored at the NASC facility. Instead of storing reclaimed mineral oil contaminated with less than 50 parts per million (ppm) PCBs, as of

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2007 Tank #7A/7B is now used for the storage of new non-PCB FR3 (vegetable-based) oil. The Department of Environmental Protection (hereinafter "the Department" or "DEP") was notified of this change in June of 2008 and the Department immediately approved this change in operation. Additional changes involved minor updates to the infrastructure of the NASC facility, the Transformer Storage Building and to some outdoor areas located adjacent to these buildings.

CMP is proposing a number of changes to the operations at the NASC facility as part of this license renewal. These proposed changes include: 1) a reduction in the frequency of ultrasonic testing of the tanks and piping from annually to once every five (5) years; 2) a reduction in the frequency of liner coupon sampling and analysis from annually to once every five (5) years; 3) allowing NASC to receive up to 20 shipments per year of "stand-alone" PCB wastes from non-CMP equipment that is not accompanied by electrical equipment; 4) a reduction in the frequency of groundwater, surface water and sediment sampling from 4 times per year (once every three months) to three times per year (once every 4 months); 5) allowing oil spill clean up contractors who are hired by CMP to conduct routine servicing of off-site PCB containing equipment and to transport PCB waste to the NASC facility under the exemptions outlined in 06-096 CMR 853(10) and in 06-096 CMR 857(6) of the Department Rules; and 6) allowing non-CMP entities (CMP contractors) to transport CMP owned equipment and/or waste to the NASC facility via Leighton Road instead of Route 27, thereby increasing the volume of NASC related non-CMP traffic on Leighton Road by approximately 1 to 2 trucks per day.

In accordance with Special Condition #12 of the existing license (#O-000001-HA-C-A), this license was due to expire on October 14, 2003. By letter dated April 15, 2003 CMP requested an extension of the submission deadline for the renewal application. In response to this request, the Department approved an extension on April 18, 2003, thereby extending the deadline to July 3, 2003. On July 2, 2003 CMP requested another extension to extend the submission deadline to July 11, 2003. The Department approved this extension. In accordance with 5 M.R.S. § 10002 the terms and conditions of the existing license remain in effect until the Board takes final action on the renewal Order.

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B. Regulatory History: CMP provides electricity and electrical service to citizens of the State of Maine. In support of this service, CMP operates the NASC hazardous waste storage facility at 53 Anthony Avenue in Augusta, Maine for which CMP maintains hazardous waste storage facility license # O-000001-HA-C-A issued by the Board on October 14, 1998. The renewal application for license #O-000001-HA-D-R was the fifth received by the Department for the operation of the NASC storage facility. The original license (#O-000001-95-A-N) was issued on July 25, 1984. At that time, pursuant to 38 M.R.S. § 1319-R, four citizens of the community were appointed to the Board for the consideration of the original license. On November 2, 1995 CMP submitted a plan for partial closure of this facility. The Partial Closure Order (#O-000001-HH-A-N) was approved by the Board on December 13, 1995. This Order excluded lot 12B from the NASC license, which was an unused parcel of land, reducing the size of the NASC facility parcel from 17.32 acres to approximately 12.42 acres. On November 14, 1990 CMP submitted an application for the renewal of the facility license. The license renewal (#O-000001-HA-B-R) was approved by the Board on October 9, 1996. This renewal license included provisions that allowed CMP to service oil-filled equipment belonging to other companies provided that the PCB content was less than 50 ppm. On January 29, 1997 CMP submitted an application to amend the existing license at NASC. This license amendment (#O-000001-HA-C-A) was approved on October 14, 1998 and approved a number of changes in the scope of operations at NASC. These changes included: the handling of equipment containing PCBs; the disposal of PCB equipment off-site; and handling of PCB contaminated wastes, including PCB waste containing 50 ppm or greater PCBs from other companies not affiliated with CMP.

C. Siting History and Information: In 1983 CMP purchased several contiguous lots in the Augusta Business Park for the purpose of constructing the NASC facility (Figure 1). There was a pre-existing 60,000 square foot building located on one of the lots, which was converted to the NASC Warehouse Building (NASC facility). This building is connected via an enclosed walkway to an office building located on an adjacent parcel of land to the east of the CMP owned property. The office building is currently owned by another entity. CMP does not

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allow this walkway to be used and the doors at each end are not accessible from either side, as both sets of doors have knobs on one side only. An alarm would be triggered if either of these doors were opened.

In 1985 new facility construction consisted of several additions to the existing NASC Warehouse Building including: an enclosed Loading Dock Area, a High Bay Area and an enclosed Tank Farm. A new 54,000 square foot Transformer Storage Building was also constructed about 200 feet to the west of the NASC Warehouse Building. CMP also installed security structures as well as provisions to control surface water runoff from the facility.

The NASC facility is located close to the intersection of Interstate 95 and Route 27, with access to Route 27 via Anthony Avenue (Figure 1). The facility is located within one mile upgradient of several groundwater wells, which are part of the City of Augusta water supply. This facility is also located within 1,000 feet of several residential water wells. The facility is located in the watershed of Stone Brook, which discharges into Bond Brook and ultimately into the Kennebec River. Stone Brook, Bond Brook, including tidal portions of Bond Brook, and the Kennebec River are Class B waters. Class B waters are suitable for the following designated uses: drinking water supply after treatment; fishing; agriculture; recreation in and on the water; industrial process and cooling water supply; certain hydroelectric power generation activities; navigation; and as habitat for fish and other aquatic life.

A number of minor changes were implemented at the NASC facility from 2000 to 2012 upon receiving approval from the Department. These changes are as follows:

1) The change out and upgrade of the Programmable Logic Control (PLC) System. This system controls oil pumping as well as several other functions at the facility (April 2000);

2) The construction of a parking lot, driveway, sidewalk and stormwater detention basin on Lot #11A, (the former EnvisioNet parking lot), located northwest of the Transformer Storage Building (Spring/Summer 2000);

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3) The installation of a snow gate and bituminous paved ramp near the rear fence of the facility (October 2000);

4) The replacement of NASC's gas-fired emergency generator (30 kW Onan) with a new #2 fuel oil-fired emergency generator (230kW Kohler) (December 2000);

5) The installation of an airduct/hood and exhaust fan above the meter washer to vent steam to the outside of the building (December 2001);

6) The pedestrian door located outside the NASC gate was formerly only kept locked during non-business hours, but now remains locked at all times for security purposes with card access to authorized individuals only (January 2002);

7) The ventilation in the welding area of NASC's Machine Shop was modified to allow the air to exhaust outside (March 2002);

8) Security cameras were added to the front of the Transformer Storage Building to allow CMP to remotely monitor all three High Bay doors as well as the uncovered Loading Dock Area located at the rear of the NASC facility (August 2002);

9) A perimeter fence was installed around the former EnvisioNet parking lot to create a secure storage area for construction material. This area is located west of the Transformer Storage Building (April 2007);

10) The installation of 50 power outlets on the southeastern exterior wall of the Transformer Storage Building for the purpose of allowing circuit breaker heaters to be plugged in while they are being temporarily stored in the NASC yard during cold weather conditions (2007);

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11) The use of Tank #7A/7B for the storage of new FR3 (vegetable-based) oil instead of reclaimed mineral oil containing less than 50 ppm PCBs (2008);

12) The removal of two bituminous end caps along the northeastern ends of two landscape islands in the former EnvisionNet parking lot. The purpose of this project was to improve the turning radius in this lot and to create space for the construction of a crowned paved berm. The berm was needed in order to properly direct stormwater runoff into the detention basin (December 2008);

13) The installation of power panels on three existing light posts located within the former EnvisioNet parking lot to provide electricity to mobile substation heaters during cold weather conditions (December 2008); and

14) The installation of a 20 foot by 30 foot by 6 inch thick concrete slab to support a 30 cubic yard rolloff dumpster that is used to store clean (untreated) waste wood, such as pallets and packing crates, prior to disposal. This slab is located adjacent to the southwestern corner of the Transformer Storage Building (May 2011).

15) Ignitable waste is now stored in Annex III instead of in the Paint and Flammables Storage Room (pre-2000).

D. Current Operations: CMP is currently operating a hazardous waste storage facility under existing license #O-000001-HA-C-A for the storage of oils containing 50 ppm or greater of PCBs and for the storage of debris contaminated with oil having PCBs at 50 ppm or greater. This debris typically consists of contaminated soil, oil absorbent materials, rags and wipes and other solid materials that have been contaminated with PCBs. This waste is generated as a result of electrical power distribution operations in the State of Maine. The source of this waste is oil-filled electrical equipment that is leaking, requires repairs, or is no longer serviceable and is being scrapped. The waste is received as intact equipment, leaking equipment in overpack drums or as debris in drums. The waste is either generated at the NASC facility, is transported by CMP from another one of its facilities, or is from service operations performed on CMP

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equipment within the company's service area. CMP is a Maine licensed Hazardous Waste Transporter and currently holds a transporter license (#HWT-0258), which is issued to the NASC facility.

CMP's current license also allows them to provide to other companies, repair or salvage of oil-filled equipment not owned by CMP, including equipment that contains 50 ppm or more of PCBs. Handling of equipment from outside companies is done in the same manner as for CMP equipment with the exception of a requirement for the pre-determination of the non-hazardous status (the material is allowed to be hazardous waste for PCBs only, not for other wastes) prior to allowing the equipment to be shipped to the NASC facility. Small amounts of PCB wastes may be generated by CMP technicians while sampling and evaluating non-CMP equipment. This waste is accompanied by the equipment and undergoes a screening procedure for ensuring that non-CMP waste is hazardous for PCB content only, as outlined in Attachment W of the application. Any waste generated by and under the continuous control of CMP technicians is transported to the NASC facility as CMP hazardous waste and, in accordance with 06-096 CMR 853(10) and 857(6) does not require a manifest.

The procedure that CMP follows for handling oil-filled equipment at NASC begins when a vehicle carrying the equipment enters the security gate of the facility. The vehicle is only allowed to travel across the paved yard area when the runoff control system is in containment mode and the vehicle is only allowed to go to one of two locations: the covered Loading Dock, if the vehicle is transporting small equipment, or the High Bay Area, if the vehicle needs to unload large equipment. Any small equipment awaiting service is stored in the Annex III storage area and is moved to the repair and testing area for servicing and/or oil removal. Large equipment is serviced in the High Bay Area.

All hazardous wastes transported to NASC or generated on-site are stored either in containers in the Annex III area or piped directly into the hazardous waste tanks that are located in the enclosed Tank Farm area. Most intact transformers are stored in the Transformer Storage Building, which is located across the yard from the NASC Warehouse Building (Figure 2).

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In accordance with the existing license, NASC accepts equipment containing PCBs, PCB equipment for off-site disposal and PCB contaminated wastes from non-CMP entities such as private companies, government agencies or other utilities, provided the wastes are hazardous for PCB content only. CMP has a screening procedure that is designed to insure that wastes manifested to this facility are hazardous for PCB content only and that waste is managed on-site in the same manner as CMP generated waste and is neither treated nor disposed of at this facility.

E. Summary of Proposal: CMP is proposing the following changes to the existing license:

1) A reduction in the frequency of ultrasonic testing of tanks and piping from annually to once every five (5) years;
2) A reduction in the frequency of liner coupon sampling and analysis from annually to once every five (5) years;
3) Authorization to receive up to 20 shipments per year at NASC of "stand-alone" PCB wastes from non-CMP equipment that is not accompanied by electrical equipment. Types of "stand-alone" wastes include but are not limited to: PCB contaminated materials, debris or media, and drums of PCB contaminated waste;
4) A reduction in the frequency of groundwater, surface water and sediment sampling from 4 times per year (once every three months) to three times per year (once every 4 months);
5) Allowing outside oil spill clean-up contractors who are hired by CMP to conduct routine servicing of off-site PCB containing equipment and to transport PCB contaminated waste to the NASC facility under the exemptions outlined in 06-096 CMR 853(10) and 06-096 CMR 857(6) of Department Rules; and
6) Allowing non-CMP entities to transport CMP owned equipment and/or waste to the NASC facility via Leighton Road instead of Route 27, thereby increasing the volume of NASC related non-CMP traffic on Leighton Road by approximately 1 to 2 trucks per day.

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2. GENERAL APPLICATION REQUIREMENTS

A. Application Processing:

On July 11, 2003 CMP submitted an application for the renewal of license #O-000001-HA-C-A, for the NASC hazardous waste storage facility. The Department determined the renewal application and its supporting material to be complete on August 4, 2003. Subsequent to the initial filing, CMP amended its application several times, as finally amended August 30, 2012. The application was signed and certified by CMP's Director of Legal and Professional Services. An application fee is not required for a renewal.

B. Evidence of Title, Right and Interest to the Property:

Central Maine Power has demonstrated sufficient title, right and interest in the facility property by deeds recorded in Book 2902 pages 342-343 and Book 5208 pages 163-164 at the Kennebec County Registry of Deeds in Augusta.

C. Public Notice of Application:

Public notice of the filing of the renewal application appeared in the Kennebec Journal on July 15, 2003. A public announcement was made on WMME daily during the period of July 8, 2003 through July 14, 2003. A copy of the application was filed with the City of Augusta on July 11, 2003. CMP also notified all abutters to the property via certified mail on January 18, 2012 as CMP was not able to confirm that proper notification had been provided to all abutters of the property in 2003 when the application was first submitted to the Department. This has met the public notice requirements for submission of this application.

D. Local Board Representation:

In 38 M.R.S. § 1319-R, under siting requirements for a commercial hazardous waste facility, any municipality where a commercial hazardous waste facility is proposed is granted an opportunity to appoint up to four local representatives to serve on the Board of Environmental Protection. These representatives would be adjunct

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members for all decisions that come before the Board on this particular application. As part of the original 1984 license review, the City of Augusta appointed four interested persons to serve on their behalf.

There is no statutory provision for local representation for a renewal application.

E. Public Notice of Draft Order:

The draft order was presented to the Board of Environmental Protection for review and approved for the purpose of posting the draft license for public comment on September 6, 2012. The draft license was the subject of a public notice in the Kennebec Journal newspaper on September 10, 2012. The 45 day public comment period on this draft license closed on October 25, 2012. No comments from the public were received; however, the Department did receive comments from CMP.

3. FINANCIAL REQUIREMENTS

A. The Maine Hazardous Waste Management Rules state that the owner or operator of a hazardous waste facility must provide liability insurance, a detailed written cost estimate to close the facility, and establish financial assurance for this future closure. CMP has provided a copy of its liability insurance policy, a detailed written cost estimate and a financial report that provides for the financial test and corporate guarantee to establish financial assurance. Therefore, CMP has met these requirements.

4. DESCRIPTION OF THE PROJECT

A. Facility Description:

CMP currently operates a power delivery operation and a commercial hazardous waste storage facility for the storage of PCB contaminated oils and oily debris at the NASC facility. This facility is located on a 12.42 acre parcel on Anthony Avenue in the Augusta Business Park. CMP is a public utility that supplies electrical power to a large part of the State of Maine and operates the NASC facility primarily in support of that activity. CMP has identified the following

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Standard Industrial Classification (S.I.C.) Codes as best reflecting the activities at this site:

4911- Electrical Services
7629- Electrical and Electronic Repair Shop
4225- General Warehousing and Storage
9999- Non-classifiable Establishment (for lack of any other appropriate number)

The NASC facility is not located on a mapped sand and gravel aquifer but is located within 1,000 feet of residential drinking water wells and within one mile upgradient of City of Augusta drinking water supply wells. The facility is also located within 1,000 feet of a surface water flow, known as Stone Brook, which is a tributary of Bond Brook.

B. Facility Activities:

The NASC storage facility includes seven main areas. As described below, some of these areas are underlain with a synthetic liner. All synthetic liner applications in these areas utilize a 40 mil (.040 inch thickness) high density polyethylene (HDPE) liner material. This liner material was tested for compatibility prior to construction of the facility and found to be compatible with PCB contaminated mineral oil.

(1) Transformer Storage Building

The Transformer Storage Building is a 54,000 square foot building located approximately 200 feet to the west of the NASC Warehouse Building (Figure 2) and is used primarily for the storage and handling of intact oil-filled equipment. This building is unheated but is fully enclosed and secured. It was constructed over a minimum of a one foot thickness of compacted clay having a permeability of less than or equal to $1x10^{-7}$ cm/sec. Above the clay, sandwiched between two 6 inch layers of sand, is a 40 mil HDPE synthetic liner. On top of the upper sand layer is a 6 inch

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layer of blue stone dust. In the event of a need to excavate the layers above the stone dust, this layer will serve as a visual indicator that the synthetic liner is close by and may potentially be damaged by further machine excavation. Above the blue stone dust is an 18 inch layer of gravel topped with a 6 inch layer of stone dust having a permeability of less than or equal to $1x10^{-5}$ cm/sec. In the event of a spill, this would allow for removal of the contaminated material before it penetrates to the synthetic and clay liners. A number of liner samples, also referred to as coupons, were buried in this floor for the purpose of later excavation to be tested for signs of liner deterioration. Liner observation wells are located in each of the four corners of the building to allow for visual inspection of the liner to determine if any liquids have collected on top of the liner. CMP inspects these observation wells on a weekly basis. CMP states that they have never observed any liquids on top of the liner.

In addition to equipment storage, other activities in this building include: utilizing a tank truck to pump out and retrofill oil-filled equipment when necessary; minor repairs and electrical testing of transformers; storage of non-PCB (containing less than 50 ppm PCBs) oily waste and non-PCB burnable waste awaiting off-site disposal or incineration; and the removal of transformer peripheral components in preparation for disposal.

(2) Paved Area

The area between the Transformer Storage Building and the NASC Warehouse Building consists of approximately 134,000 square feet of bituminous pavement. This is the pathway over which all oil-filled equipment travels when being transported into the facility or between the two buildings.

The paved area is sloped to a central catch basin which either drains to a stormwater discharge pipe or to an underground detention tank depending upon which valves are open. When the detention tank valve is closed, water discharges through the piping to an outlet adjacent to the NASC

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facility and into Stone Brook. When the discharge valve is closed between the catch basin and the discharge pipe, the water flows into the detention tank. The 12,000 gallon detention tank is designed to contain the volume of the largest oil-filled piece of equipment that could be moved across this area.

Most of the paved area at the NASC facility is graded so that it will drain to the stormwater containment system. However, there is one small section of the parking lot that is located beyond the covered loading dock that slopes away from this containment system. As a result, it is possible that drivers who may be unfamiliar with the facility could move their vehicles carrying oil-filled equipment beyond the boundaries of this system. Therefore, in order to clearly delineate the containment area from the parking area, CMP has installed warning signs and a broad white pavement stripe at the boundary of this parking area.

A combination of a beacon lighting system that is clearly visible to yard workers as well as the security gate ensures that no movement of oil-filled equipment occurs across the pavement unless the run-off discharge valve is closed, diverting all run-off to the detention tank. A green light is activated only when the system is in surface water detention mode. During surface water detention mode the run-off discharge valve remains open to the detention tank, allowing surface water to collect in the detention tank, and the valve to the discharge pipe of the detention tank remains closed, detaining all surface water in the detention tank. During surface water detention mode, there must also be at least 7,500 gallons of storage available in the detention tank. The excess capacity of the detention tank is sufficient to allow limited movement of equipment during a precipitation event. A red light is activated only when the system is in discharge mode. During discharge mode the discharge pipe valve is open, which directs run-off from the pavement off-site through the outlet to Stone Brook. Movement of oil-filled equipment, not including motor vehicles whose only oil is non-PCB oil within integral fuel tanks, across the pavement is prohibited unless the green light is lit; however, CMP has

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provided for one exception in the event the valve control/status panel becomes inoperable due to either a valve indicator system failure or maintenance work:

> During times when the valve control/status panel is inoperable, movement of equipment across the pavement will be allowed only after the following actions have been completed: 1) the status of the valves has been confirmed to be in the surface water detention mode by visual inspection of the valve pit, and 2) the available storage capacity of the detention tank has been confirmed to be at least 7,500 gallons.
>
> A written log has been established which documents the date, time and duration of all valve indicator system failures or maintenance work, and the name of the individual responsible for controlling traffic during the period when the valve indicator system is inoperable.

Following the movement of equipment, provided no oil was spilled, the stormwater runoff system is reset to the discharge mode (discharge valve opened and detention tank valve closed) as indicated by a red light. If no oil was spilled during transportation activities, any water that was collected during the period of transport is pumped into the discharge line for discharge to Stone Brook.

The paved area, through its sloping design, can fully contain the rainfall from a 100-year storm event.

To further enhance the designed pavement system, CMP has submitted a training program stating that operators transporting oil-filled equipment are trained in spill response procedures and will immediately confine the spill to a small section of the pavement using the procedures specified in the Integrated Contingency Plan (ICP). CMP has also developed a

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procedure for inspecting loads of oil-containing equipment before it is allowed to enter the secured area of the NASC facility.

(3) NASC Warehouse Building:

The NASC Warehouse Building is a 60,000 square foot building where maintenance and repair work is conducted on oil-filled equipment (Figure 2). There are no floor drains in the area where oil-filled equipment is being serviced. All run-off or liquids from this area drain to an in-floor concrete pipe trench which is underlain by a 40 mil HDPE synthetic liner. The pipe trench has a holding capacity of 5,000 gallons, which is well in excess of the capacity of the largest piece of equipment serviced in this area. In the base of this trench at both ends (Oil Processing Room and Tank Farm) are sumps with float contact devices which are activated when liquid is detected in the sumps. Once these devices have detected the presence of liquid, a local enunciator is activated as well as an alarm in CMP's 24-hour security office located at their main office on Edison Drive in Augusta. Detection of liquid in the sumps will trigger an investigation and implementation of the contingency plan if a spill has occurred. CMP states that no liquid has ever been detected in the sumps.

(i) Oil Processing Area:

The oil processing area is located in the NASC Warehouse Building. This area measures 900 square feet in size and includes a section for oil processing equipment such as pumps, intermediate tanks and control panels. This area also includes an oil analysis lab.

The oil processing area is the central control location for the facility's mineral oil operation. This area houses the oil pumps, vacuum tanks, oil purification unit and main control panel for the system. The control panel consists of a computer for the control of

CENTRAL MAINE POWER COMPANY	16	MAINE HAZARDOUS WASTE
NORTH AUGUSTA SERVICE CENTER	)	SEPTAGE SOLID WASTE
AUGUSTA, KENNEBEC COUNTY, MAINE	)	MANAGEMENT ACT
RENEWAL OF COMMERCIAL HAZARDOUS	)	
WASTE STORAGE FACILITY LICENSE	)	
LICENSE #O-000001-HA-D-R	)	
(APPROVAL WITH CONDITIONS)	)	LICENSE RENEWAL

pumps, valves, indicator lights to show the status of the various pumps and valves, liquid level indicators and a panel for the control and selection of operations of the movement of oil. A programmable controller enables only compatible routes to be selected for a given pumping operation and allows for blockage of all other selections which would conflict with an operation in progress. The main control panel directs all bulk oil handling activities including the movement of PCB contaminated oil.

There is also an oil purification unit, which is used for the processing of transformer oil that is located in the oil processing area. This unit is composed of two tanks containing a Fuller's earth clay filtration media, also referred to as "Cranite". As the oil is being processed, it is first heated and then passed through the two tanks to remove fine particulate matter and any minor amounts of water that may be present in the oil. Tanks #13, 14, 15 whose capacities are 350 gallons, 317gallons and 317 gallons, respectively, are located within the oil processing area. These tanks are utilized as part of the oil processing system.

(ii) Repair and Testing Area:

The distribution transformer, regulator and recloser repair area is used for the maintenance and/or repair of small oil-filled electrical equipment including the retro-filling or removal of oil from these units by the use of hose reels at three locations within this area. (A recloser is a modified circuit breaker that quickly resets itself several times before finally tripping completely). With the exception of the reclosers, the equipment handled in this area may contain oil with a PCB content of $\geq$ 50 ppm. Recloser oil (mineral oil) usually has somewhat different characteristics than transformer oil and in accordance with USEPA Regulations 40 CFR part 761 (PCB Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions) reclosers are assumed to contain non-PCB oil.

CENTRAL MAINE POWER COMPANY	17	MAINE HAZARDOUS WASTE
NORTH AUGUSTA SERVICE CENTER	)	SEPTAGE SOLID WASTE
AUGUSTA, KENNEBEC COUNTY, MAINE	)	MANAGEMENT ACT
RENEWAL OF COMMERCIAL HAZARDOUS	)	
WASTE STORAGE FACILITY LICENSE	)	
LICENSE #O-000001-HA-D-R	)	
(APPROVAL WITH CONDITIONS)	)	LICENSE RENEWAL

The repair and testing of small oil-filled equipment is conducted in this area. If equipment repair is delayed for any reason, the equipment is stored in the secured temporary storage area adjacent to Annex III. Upon completion of all repairs, and/or adjustments, the equipment is moved to the test cell using either a forklift or the overhead monorail system. If painting is necessary after testing, the equipment is moved into the paint room in the same manner. After all servicing, the equipment is moved into the general warehousing area for transfer to the storage building or shipment to a service center or substation for reuse.

In accordance with the previous license, a modification was made to the recloser repair section of the Repair and Testing Area of the facility whereby the recloser oil system is no longer part of the transformer oil system. Rather, it was made into a closed loop system with its own five stage filtration system that utilizes tank #3 for storage capacity. This system also includes the addition of tank #16, which is a 115-gallon tank used to regulate the oil flow in the multiple filtration system. Since recloser oil does not contain PCBs, this system is no longer considered part of the hazardous waste handling system.

In late 2007, CMP began purchasing certain new transformers containing FR3 oil rather than mineral oil. FR3 oil is a vegetable-based oil that has similar properties to mineral oil. However, in September 2010, CMP stopped purchasing new transformers containing FR3 oil and once again began purchasing new equipment containing mineral oil. Since CMP is still using oil-filled equipment containing FR3 oil, Tank #7A/7B will continue to be used for the storage of new FR3 oil until the FR3 oil is completely phased out of the system. Therefore, CMP has requested that Tank #7A/7B be allowed to resume its original use

CENTRAL MAINE POWER COMPANY	18	MAINE HAZARDOUS WASTE
NORTH AUGUSTA SERVICE CENTER	)	SEPTAGE SOLID WASTE
AUGUSTA, KENNEBEC COUNTY, MAINE	)	MANAGEMENT ACT
RENEWAL OF COMMERCIAL HAZARDOUS	)	
WASTE STORAGE FACILITY LICENSE	)	
LICENSE #O-000001-HA-D-R	)	
(APPROVAL WITH CONDITIONS)	)	LICENSE RENEWAL

for storage of mineral oil containing less than 50 ppm PCBs upon the complete phase out of FR3 oil.

(4) High Bay Area:

The High Bay Area is a 4,000 square foot structure attached to the west side of the NASC Warehouse Building. It is used for the repair of large oil-filled equipment and also for use as an indoor loading and unloading area for bulk oil shipments. Equipment is transported into the High Bay Area through one of the overhead doors located on either end of the building. Loading and unloading of large transformers is accomplished either by use of an overhead crane or by "blocking and rolling" extremely heavy units. The oil is removed via the appropriate hose reel, based on the concentration of PCBs present as well as the quality of the oil. Necessary maintenance is then performed on the equipment. Upon completion of the required work, the transformer is refilled with non-PCB (less than 50 ppm PCB) oil.

The High Bay Area has testing capabilities for the necessary electrical tests on 3 phase equipment after it has been repaired and refilled with oil. After testing, the equipment is moved into the paint room if necessary. After completion of all maintenance activities, the equipment is dispatched to its installed location or moved to the Transformer Storage Building for storage.

Another operation that takes place in the High Bay Area is the handling of Cranite for the oil purification equipment in the oil processing room. Cranite is used to remove solids and water that may be present in the oil. Waste Cranite is emptied into a Cranite bin which is located in a six-inch curbed pan located in the High Bay, and a sample is analyzed to determine the concentration of PCBs for proper disposal of the Cranite. If the PCB concentration is less than 50 ppm, the Cranite is handled as a special waste and disposed of at Waste Management of Maine's Crossroads Landfill in Norridgewock. If the PCB concentration is 50 ppm or greater, the material

CENTRAL MAINE POWER COMPANY	19	MAINE HAZARDOUS WASTE
NORTH AUGUSTA SERVICE CENTER	)	SEPTAGE SOLID WASTE
AUGUSTA, KENNEBEC COUNTY, MAINE	)	MANAGEMENT ACT
RENEWAL OF COMMERCIAL HAZARDOUS	)	
WASTE STORAGE FACILITY LICENSE	)	
LICENSE #O-000001-HA-D-R	)	
(APPROVAL WITH CONDITIONS)	)	LICENSE RENEWAL

is drummed and moved into the Annex III storage area for storage as a hazardous waste and disposal at an approved hazardous waste facility.

The High Bay is also used for the transfer of bulk shipments of oil to or from the Tank Farm. Oil tank level indicators are also located in the High Bay Area as part of the sub-control panel for all tanks that can be utilized for this purpose.

(5) Annex III Area:

The Annex III area is located inside the NASC Warehouse Building and occupies 2,400 square feet. This area has the capacity to store up to one hundred and sixty (160) 55-gallon drums of PCB contaminated wastes. The Annex III Area is utilized for the storage of hazardous waste containers awaiting shipment off-site to authorized disposal facilities and for the temporary storage of oil-filled equipment awaiting repair or off-site disposal. No other types of wastes are permitted to be stored in this area in accordance with this license.

Other hazardous wastes are routinely generated at NASC as a result of maintenance operations. All hazardous wastes (ignitable and non-ignitable) are temporarily stored in the Annex III Area and are managed in accordance with the hazardous waste generator requirements in 06-096 CMR 851.

As part of the construction of the Annex III Area, a 40 mil HDPE synthetic liner was placed over the existing concrete floor. A new concrete floor was poured over the liner and the area was surrounded by a low dike with a ramped access for wheeled vehicles. The dike gives this area a secondary containment capacity of more than 25% of its maximum storage capacity. In 1991, two 5-ton ceiling cranes were installed in the Annex III Area that service this area as well as the adjacent warehousing areas. These cranes are used for the loading and unloading of equipment from

CENTRAL MAINE POWER COMPANY	20	MAINE HAZARDOUS WASTE
NORTH AUGUSTA SERVICE CENTER	)	SEPTAGE SOLID WASTE
AUGUSTA, KENNEBEC COUNTY, MAINE	)	MANAGEMENT ACT
RENEWAL OF COMMERCIAL HAZARDOUS	)	
WASTE STORAGE FACILITY LICENSE	)	
LICENSE #O-000001-HA-D-R	)	
(APPROVAL WITH CONDITIONS)	)	LICENSE RENEWAL

pallets and for the removal of equipment from overpack drums and 55-gallon drums.

(6) Loading Dock:

Attached to the NASC Warehouse Building is an enclosed loading dock for receiving and shipping of the oil-filled equipment going to and from the Annex III Area or the Repair and Testing Area. This dock area was constructed in 1985 as a 1,450 square foot addition to the south wall of the building. The Loading Dock was designed to include an impervious bituminous paved driveway that is sloped down to the dock with a berm at the top of the driveway to direct precipitation away from the loading area. At the lower end of the driveway is a trench with a sump to collect any spill material; the trench and sump have no outlet. The entire driveway is fully enclosed to the berm at the top of the slope.

(7) Tank Farm:

The Tank Farm contains 12 tanks used for oil storage with a total combined storage capacity of 100,000 gallons (Figure 4). Table #1 shows the capacities and uses of each tank located in the Tank Farm. Tank #16 has a capacity of 115-gallons and is used to regulate the oil flow of the multiple filtration system. This tank is part of the recloser closed loop system and is located in the Repair and Testing Area adjacent to the Tank Farm.

CENTRAL MAINE POWER COMPANY	21	MAINE HAZARDOUS WASTE
NORTH AUGUSTA SERVICE CENTER	)	SEPTAGE SOLID WASTE
AUGUSTA, KENNEBEC COUNTY, MAINE	)	MANAGEMENT ACT
RENEWAL OF COMMERCIAL HAZARDOUS	)	
WASTE STORAGE FACILITY LICENSE	)	
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Table 1-Tank Farm Oil Storage					
		PCB Content (PPM)			
Tank #	Capacity (gal)	<50	≥50 assumed	≥50	Comments
1	15,000			X***	Storage
2	5,000	X			Storage
3	15,000	X			Recloser oil
4	15,000	X			Storage
5	10,000			X	Storage
6	10,000	X			New oil storage
7A*	2,500	X			FR3 (vegetable) oil
7B*	2,500	X			FR3 (vegetable) oil
8	5,000	X			Holding tank
9	5,000	X			Processing tank
10	5,000	X			Processing tank
11	5,000	X**			Batching tank
12	5,000		X		Batching tank
16	115				Regulates oil flow

* Tank #7 is a 5,000 gallon tank with 2 chambers of 2,500 gallons each

** Oil is assumed <50 ppm (pending analysis)

***Tank #1 is currently being used to store waste oil with a PCB content of <50ppm.

Tank #1 is licensed for the storage of oil with a PCB content of ≥50 ppm. However, CMP is currently using Tank #1 to store oil with a PCB content of <50ppm. The tank has been appropriately labeled to reflect this change.

The Tank Farm is totally enclosed to prevent contact with or accumulation of precipitation. A 40 mil HDPE synthetic liner underlies the Tank Farm with a concrete floor poured on top of the liner. Surrounding the Tank Farm is a concrete dike with a containment capacity of 30,000 gallons which is equal to 30% of the maximum storage capacity of the area and

CENTRAL MAINE POWER COMPANY	22	MAINE HAZARDOUS WASTE
NORTH AUGUSTA SERVICE CENTER	)	SEPTAGE SOLID WASTE
AUGUSTA, KENNEBEC COUNTY, MAINE	)	MANAGEMENT ACT
RENEWAL OF COMMERCIAL HAZARDOUS	)	
WASTE STORAGE FACILITY LICENSE	)	
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200% of the largest tank. Each tank bottom is supported on sand surrounded by a concrete ring to contain the sand and support the rim of the tank. Pipes were installed to allow early detection of oil leakage into the sand beneath the tanks.

In the floor of the Tank Farm is a pipe trench underlain by a 40 mil HDPE synthetic liner. In case of a leak or spill, at the bottom of the pipe trench is a sump with a float contact device which will activate alarms at the facility and at CMP's Edison Drive offices. CMP states that no liquid has ever come in contact with the sump; therefore, the remote alarms have never been activated except for weekly routine testing.

C. Wastes Stored:

(1) Storage and handling of PCBs at concentrations at or above 50 ppm at this facility are the only hazardous waste activities covered by the existing license. CMP handles PCBs and PCB contaminated debris owned and generated by CMP at its various facilities and equipment locations throughout Maine. CMP also handles PCB containing equipment and PCB wastes generated at non-CMP facilities.

PCBs are identified as a hazardous waste in accordance with 06-096 CMR 850 of the Maine Hazardous Waste Management Rules. This includes any chemical substance containing 50 ppm or more of PCBs (on a dry weight basis). PCBs are non-biodegradable, fire resistant synthetic liquids whose properties vary depending on which isomer or combination of isomers is present. PCBs have sometimes been used in their pure form but were most often used in a mixture with mineral oil. PCBs were originally used in the utility industry for their fire resistant properties.

(2) Separate from the existing license, small quantities of other hazardous waste, such as solvents, batteries, and spent chemicals are periodically generated on site. These wastes are stored on a rack either in over-pack drums or lab packs and are managed in accordance with the hazardous

CENTRAL MAINE POWER COMPANY NORTH AUGUSTA SERVICE CENTER AUGUSTA, KENNEBEC COUNTY, MAINE RENEWAL OF COMMERCIAL HAZARDOUS WASTE STORAGE FACILITY LICENSE LICENSE #O-000001-HA-D-R (APPROVAL WITH CONDITIONS)	23)))))))	MAINE HAZARDOUS WASTE SEPTAGE SOLID WASTE MANAGEMENT ACT LICENSE RENEWAL

waste generator requirements which include removal of full containers within 90 days of generation. CMP operates a hazardous waste storage area for storage of ignitable wastes for periods of 90 days or less located within Annex III.

As part of this license renewal, CMP proposes to receive at the NASC facility up to 20 shipments per year of "stand-alone" PCB wastes from non-CMP equipment at the NASC facility. This "stand alone" waste would not be accompanied by electrical equipment and would be received on an infrequent basis, at the request of outside entities. Furthermore, CMP states that they will not solicit any "stand-alone" waste.

5. In support of its application, CMP has submitted the following:

A. Facility Traffic Information:

The main access road to the NASC facility is via Darin Drive to Anthony Avenue; however, some CMP related truck traffic utilizes Leighton Road.

In accordance with the existing license, Route 27 is the only route that non-CMP carriers are allowed to use for transporting CMP-owned oil or oil-filled equipment to and from the NASC facility. CMP staff must also use Route 27 for transporting all non-CMP owned oil-filled equipment to or from this facility. Leighton Road is only utilized by CMP carriers who are carrying CMP owned oil and/or CMP-owned oil-filled equipment (Figure 1).

CMP has provided a current traffic estimate of approximately 93 vehicles per day entering the NASC facility. Approximately 20 of these 93 vehicles are trucks and CMP states that approximately 10 of these trucks are owned by CMP and are carrying CMP generated waste and/or equipment to the facility. The remainder of the truck traffic is non-CMP owned vehicles carrying CMP owned and/or non-CMP owned equipment.

CENTRAL MAINE POWER COMPANY NORTH AUGUSTA SERVICE CENTER AUGUSTA, KENNEBEC COUNTY, MAINE RENEWAL OF COMMERCIAL HAZARDOUS WASTE STORAGE FACILITY LICENSE LICENSE #O-000001-HA-D-R (APPROVAL WITH CONDITIONS)	24)))))))	MAINE HAZARDOUS WASTE SEPTAGE SOLID WASTE MANAGEMENT ACT LICENSE RENEWAL

As part of this renewal license, CMP is requesting that non-CMP entities be allowed to transport CMP owned equipment to the NASC facility via Leighton Road instead of Route 27. This would increase the volume of traffic on Leighton Road by approximately 1 to 2 trucks per day and would not exceed the total number of trucks (approximately 20) that currently enter the NASC facility on a daily basis. These trucks would be non-CMP owned trucks carrying CMP owned waste and/or equipment. CMP states that non-CMP carriers of non-CMP owned equipment traveling to or from the NASC facility would continue to be required to use Route 27.

In accordance with the existing license, CMP is responsible for making a record of any citizen complaints received in regards to CMP vehicle traffic to or from the NASC facility via Leighton Road in Augusta, and copies of any such complaints must be forwarded to the Department within 5 working days of receipt by CMP. In addition, CMP has been required to act to resolve any complaints to the Department's satisfaction. To date, CMP has not received any complaints regarding CMP-related traffic on Leighton Road.

B. Facility Operating Hours:

The normal operating hours for the NASC hazardous waste storage facility are 7:00 a.m. to 3:30 p.m. Monday through Friday with the option of operating extended hours (up to 24 hour a day) as needed to meet business requirements and emergencies. The after-hours security procedures (3:30 p.m. to 7:00 a.m.) remain in effect during the extended hours of operation to insure that security remains stringent even during times of limited staffing.

C. Facility Security Plan:

Security at the NASC facility consists of a chain link perimeter fence, security lighting and regular security patrols by contract security guards. After normal operating hours (7:00 a.m. to 3:30 p.m.) security guards routinely inspect the facility four (4) times during an eight hour shift on a random basis.

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RENEWAL OF COMMERCIAL HAZARDOUS	)	
WASTE STORAGE FACILITY LICENSE	)	
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(APPROVAL WITH CONDITIONS)	)	LICENSE RENEWAL

The NASC facility can only be entered through the employee/visitor entrance in the NASC Warehouse Building or via the main gate of the security fence during normal operating hours. All other building doors located outside of the fence are locked and electronically monitored.

The main gate of the security fence, a chain link gate, operates by a magnetic card reader located along the driveway on the outside of the gate or by an operator in the facility operations office who overlooks the gate area. This gate is kept closed to prevent unauthorized traffic from entering the facility during normal operating hours. The gate opens automatically when a vehicle approaches it from within the secured area.

During non-working hours, the fence gate and all doors are kept locked and are electronically monitored. Fire alarms and detector alarms are electronically routed to CMP's security office which is located about four miles away on Edison Drive in Augusta. A security guard is available at the Edison Drive facility to respond to any alarm that is activated. Alarms are also electronically routed to Seacoast Security of West Rockport, Maine, which immediately notifies local (Augusta Area) emergency services as necessary.

Warning signs are located along the perimeter fence at all outside access doors as well as at the fence gates. The signs read in both English and French: "DANGER Unauthorized Personnel Keep Out".

In August 2002 security cameras were added to the front of the Transformer Storage Building to monitor all three High Bay doors as well as the uncovered Loading Dock located at the rear of the NASC facility. Both of these areas are remotely monitored by CMP.

In April of 2007, CMP also installed a 38-foot wide locking gate near the entrance to the former EnvisionNet parking lot, directly adjacent to the Transformer Storage Building. CMP utilizes the former parking lot for the storage of miscellaneous oil-containing and non-oil containing equipment.

CENTRAL MAINE POWER COMPANY	26	MAINE HAZARDOUS WASTE
NORTH AUGUSTA SERVICE CENTER	)	SEPTAGE SOLID WASTE
AUGUSTA, KENNEBEC COUNTY, MAINE	)	MANAGEMENT ACT
RENEWAL OF COMMERCIAL HAZARDOUS	)	
WASTE STORAGE FACILITY LICENSE	)	
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(APPROVAL WITH CONDITIONS)	)	LICENSE RENEWAL

CMP has made adequate provision for facility security to prevent unauthorized entry into the hazardous waste handling and storage areas.

D. Facility Inspection Plan:

The areas of the facility where hazardous waste handling occurs are inspected for leaks and other problems on a daily basis during the normal work week (Monday-Friday). In addition, the control panels and status panel lights of the oil control system are tested for their operating order. All motorized valves are checked to insure that they are in the closed position and all pumps are checked to insure that they are off. A check is also made of the liquid level in the stormwater detention tank, the position of the valves in the stormwater catch basin and the compressed air system which operates the valves.

Daily inspections of the former EnvisioNet parking lot are done to check the asphalt around the stored equipment for signs of oil leaks, to check the surface of the detention pond for signs of oil and to check the gate and fence for signs of vandalism. Weekly inspections are also done to inspect the asphalt berms and to inspect the catch basins and surface ditch that drains from the parking lot to the detention pond. Daily inspections on the air compressor are conducted by the repair shop staff.

Weekly inspections of the facility include verification of the containment capacities, the integrity of all floors, walls, curbs, and other containment areas, diversion structures, spill containment equipment, spill detection devices, remote alarms and security systems.

Monthly inspections of the facility are conducted to ensure that the fire fighting, spill containment and clean-up equipment is in the appropriate location, in adequate supply, and in good operating condition. The outside paved area is also inspected monthly for major cracks and other breaks in the pavement.

Inspections of the underground stormwater detention tank are conducted on an annual basis to check for corrosion, silt and dirt buildup. These inspections are

CENTRAL MAINE POWER COMPANY	27	MAINE HAZARDOUS WASTE
NORTH AUGUSTA SERVICE CENTER	)	SEPTAGE SOLID WASTE
AUGUSTA, KENNEBEC COUNTY, MAINE	)	MANAGEMENT ACT
RENEWAL OF COMMERCIAL HAZARDOUS	)	
WASTE STORAGE FACILITY LICENSE	)	
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also done after the tank has been decontaminated. Annual measuring and recording of the internal tank measurements at pre-determined locations is also done to confirm that there has been no collapse or deformation of the tank.

In accordance with the current license, ultrasonic thickness tests are done annually on the tanks and piping in the Tank Farm and internal inspections are performed at five year intervals. The tanks are measured ultrasonically at sixteen (16) locations on each of the twelve tanks and at fifty-four (54) locations on the piping system. The data are then transferred to spreadsheets allowing for comparisons of year-to-year variations. As part of the renewal license, CMP is proposing to reduce the frequency of the ultrasonic thickness testing of tanks and piping from annually to once every five years based on 25 years of consistent test results indicating no degradation of tank or pipe thickness as outlined in Attachment HH of the application.

E. Facility Training Plan:

CMP's two-level training program has been substantially revised since the issuance of the original license to reflect the "as built" design of the facility. No changes have been made to this plan since July, 2007.

The NASC Superintendent is responsible for assuring that the training programs are conducted on schedule and in accordance with the training plan. Level One training is for all employees, including non-operations employees who are either assigned to the facility or who report to another CMP facility but have card access to NASC. These employees are not directly involved with PCBs. This first level of training is designed to ensure that employees are trained to respond effectively to emergencies involving a fire or discharge of mineral oil or PCB mixture. This training also includes instruction and implementation of the facility evacuation plan and a review of the facility inspection requirements to familiarize the employees with the facility's operational procedures. After the initial two hour training, Level One training is repeated annually for all employees receiving this level of training.

CENTRAL MAINE POWER COMPANY	28	MAINE HAZARDOUS WASTE
NORTH AUGUSTA SERVICE CENTER	)	SEPTAGE SOLID WASTE
AUGUSTA, KENNEBEC COUNTY, MAINE	)	MANAGEMENT ACT
RENEWAL OF COMMERCIAL HAZARDOUS	)	
WASTE STORAGE FACILITY LICENSE	)	
LICENSE #O-000001-HA-D-R	)	
(APPROVAL WITH CONDITIONS)	)	LICENSE RENEWAL

Level Two training is required for all operations employees who are directly involved with PCBs. This second level of training includes detailed instruction on the operations of the facility, inspection and testing requirements, record keeping, emergency response procedures and general facility operating procedures. Level Two employees are required to take part in an annual review of the initial Level Two training program.

CMP has made adequate provision for an employee training plan for employees of this facility in accordance with 06-096 CMR 854 (6)(C)(6).

F. Facility Preparedness and Prevention Plan:

CMP has an Integrated Contingency Plan (ICP), last revised December 2011, which supersedes the Facility Preparedness and Prevention Plan. The ICP includes emergency agreements with the Maine State Police, Augusta Department of Public Safety for fire, police, and ambulance services, Maine General Medical Center for emergency room and other medical services, and a commercial pollution clean-up company. In addition, a communication system for the facility provides intercom and telephone capabilities within the buildings. Phones and/or internal communication systems are available in locations where hazardous waste is handled and portable radios are available for use where needed. Portable fire extinguishers and fire alarm pull boxes have been installed in a number of locations throughout the facility. Many are in close proximity to fire exit doors. The fire alarm system will activate an alarm at CMP's main office on Edison Drive and at the Augusta Fire Department. Water for firefighting will be available through fire hydrants and an automatic sprinkler system located in specific areas throughout the facility.

G. Facility Closure Plan:

CMP anticipates the eventual cessation of PCB handling at NASC and that at that time all oil used in the system will be below 50 ppm of PCBs and the hazardous waste license will no longer be required. At that time, and/or if this facility should cease to operate, CMP proposes to decontaminate all tanks and piping that

CENTRAL MAINE POWER COMPANY	29	MAINE HAZARDOUS WASTE
NORTH AUGUSTA SERVICE CENTER	)	SEPTAGE SOLID WASTE
AUGUSTA, KENNEBEC COUNTY, MAINE	)	MANAGEMENT ACT
RENEWAL OF COMMERCIAL HAZARDOUS	)	
WASTE STORAGE FACILITY LICENSE	)	
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(APPROVAL WITH CONDITIONS)	)	LICENSE RENEWAL

has been previously exposed to oil contaminated with PCBs at or above 50 ppm by draining and triple rinsing them with an appropriate solvent. All previously exposed work areas will be cleaned using appropriate solvents and stiff bristled brushes. The High Bay garage floor, Annex III floor and pipe trenches will all be tested for any signs of contamination and any contaminated surfaces will be cleaned and/or removed and properly disposed of. All non-PCB hazardous waste at this facility will also be removed and properly disposed of.

All of the work will be done by a firm specializing in hazardous waste removal and cleanup. Upon the completion of the cleanup, the facility will be inspected by an independent registered professional engineer to certify proper closure. Closure will also be certified by CMP. The sum of the current Closure and Post-Closure estimate for this facility is $337,780.

H. Facility Contingency Plan:

CMP submitted an updated Integrated Contingency Plan (ICP), last revised December 2011. As outlined in the ICP, the facility is equipped with fire control, communications, security alarms, security patrols, personnel safety equipment, and clean-up equipment. The plan includes a maximum response time of 30 minutes and details response procedures for fire, discharges or spills of hazardous waste, and/or failures of the containment systems. The spill or discharge procedures in the contingency plan are addressed by incorporating CMP's Spill Prevention Control and Countermeasures Plan (SPCC) prepared as required by the EPA in 40 CFR Part 112.

The emergency equipment available at the facility includes: sand bags, a pick-up truck, communications equipment, portable CO_2 and dry chemical extinguishers, an eye wash station, spill control and clean-up equipment, protective clothing, absorbent pads and booms, rags, Power Cleaner 155, drums, plastic bags and speedy-dry. In addition there is a stormwater detention system built into the paved area of the facility and CMP has immediate access to Augusta Water District fire hydrants for fire fighting purposes.

CENTRAL MAINE POWER COMPANY	30	MAINE HAZARDOUS WASTE
NORTH AUGUSTA SERVICE CENTER	)	SEPTAGE SOLID WASTE
AUGUSTA, KENNEBEC COUNTY, MAINE	)	MANAGEMENT ACT
RENEWAL OF COMMERCIAL HAZARDOUS	)	
WASTE STORAGE FACILITY LICENSE	)	
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(APPROVAL WITH CONDITIONS)	)	LICENSE RENEWAL

I. Facility Financial Information:

In April, 2012, CMP estimated the annual operational costs of the licensed hazardous waste facility at $30, 203. This is in addition to the current closure cost estimate of $337,780.

CMP has filed a report in accordance with 06-096 CMR 854(6)(C)(16) providing for the financial test and corporate guarantee for closure costs. For the fiscal year ending December 31, 2011 CMP's independently audited year-end financial statement reports a tangible net worth of $801,793,000. Greater than 90% of CMP's total assets are located in the United States.

J. Facility Insurance Information:

CMP has established insurance coverage for the hazardous waste facility through a liability insurance policy with Associated Electric & Gas Insurance Services Limited of Hamilton, Bermuda in the amount of ten (10) million dollars for each occurrence and ten (10) million dollars Annual Aggregate.

K. Facility Waste Analysis Plan:

CMP has provided a waste analysis plan for PCBs. This is the only hazardous waste which requires a waste analysis plan because it is the only hazardous waste stored at the facility for greater than 90 days.

Much of the oil-filled equipment is not specifically analyzed by CMP; rather the PCB content is determined based on the name plate information on the unit. Any capacitor not labeled is considered to contain $\geq$ 500 ppm PCBs. Any transformer, voltage regulator, or switch not labeled is assumed to be between 50 and 499 ppm and is either managed as PCB contaminated or is tested for PCB content and managed in accordance with analytical results. Unless a label or other marking indicates possible PCB content, CMP assumes that circuit breakers, reclosers and cables are non-PCB equipment based on the allowable PCB concentration assumptions for different types of equipment set forth in 40 CFR Part 761.

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CMP currently has all PCB analytical work done by outside commercial laboratories and plans to continue to do so.

L. Facility Monitoring Program:

CMP maintains an on-going quarterly monitoring program which consists of groundwater, surface water and sediment sampling at locations around this hazardous waste storage facility. The sampling plan includes groundwater samples from each of the five monitoring wells located in a semi-circular pattern downgradient of the facility (Figure 2) as well as one surface water and one sediment sample taken from Stone Brook at a location downstream of the facility's surface runoff discharge point. Table #2 provides a summary of the analysis done for this monitoring program.

Table 2 - Analysis Plan Summary

Analysis done	**Media**		
Constituents	Groundwater (5 Monitoring Wells)	Surface Water (Stone Brook)	Sediment (from Stone Brook)
Oil & grease	X	X	X
Volatile Organics	X		
PCBs	X	X	X
Total Solids			X

In 1985, prior to operation of the facility, a more extensive baseline sampling and analysis was done on soil, groundwater, surface water and surface water sediment in the vicinity of this facility.

CMP is proposing to reduce the sampling frequency from quarterly (once every 3 months) to 3 times per year (once every 4 months) based on the previous 25 years of quarterly analytical results from groundwater, surface water and sediment sampling. These analyses have never detected PCBs, and with the exception of

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WASTE STORAGE FACILITY LICENSE	)	
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oil and grease in a well near an abutting residential property, the results have consistently been below reporting limits for contamination.

M. Facility Liner Testing:

Prior to the installation of the liner, compatibility testing of the liner with oil contaminated with PCBs was done by CMP's consultant using a modified version of the National Sanitary Foundation Test. CMP has not demonstrated liner compatibility with any other waste that they may wish to store in the lined areas of the facility.

In accordance with the existing license, CMP established a long-term liner testing program which was initiated with the burial of 172 liner samples (coupons) in the floor of the Transformer Storage Building. These 4x6 inch and 8x10 inch samples were buried in the stone dust and gravel layers above the liner in one of the main traffic areas of the storage building and the location of each sample was documented. In accordance with the existing license, one 8x10 inch and three 4x6 inch samples are recovered each year for examination and testing. After excavation, the 4x6 inch samples are tested for tensile strength and percent elongation in both machine and transverse directions. The excavated 8x10 inch sample is tested for puncture resistance. These tests are designed to simulate the type of stresses that would be put on the liner material in the event of failure of other parts of the containment system. The tests are designed to measure any deterioration of the liner material's ability to absorb these stresses.

As part of this renewal license, CMP is proposing to reduce the frequency of buried liner coupon testing from annually to once every five years based on 25 years of consistent and positive test results that show no degradation of the buried liner. CMP also states that a reduction in the frequency of testing would allow the remaining coupon samples to last five times as long as annual testing would allow for. The goal is for the liner samples to last for the same amount of time that PCBs are being managed at this facility.

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6. The NASC facility maintains an 8,000 gallon underground storage tank containing #2 heating oil that is used for heating the NASC buildings (except for the unheated Transformer Storage Building). This tank was installed in 1996 and conforms to the requirements of the Department's Underground Oil Storage Tank Rules 06-096 CMR 691.

7. As part of this renewal license, CMP is requesting that the Department apply the exemptions outlined in 06-096 CMR 853(10) and 06-096 CMR 857(6) to allow any CMP hired oil spill clean-up contractor to conduct routine servicing and spill cleanup of CMP owned off-site PCB containing equipment and to transport PCB waste to the NASC facility without requiring a hazardous waste transporter license or hazardous waste manifest.

   The provisions of 06-096 CMR 853(10) and 06-096-CMR 857(6) are intended in part to allow the movement of PCB spill debris from a discharge or routine servicing of off-site equipment to be moved to a more secure location that is under the control of the waste generator without a hazardous waste transporter license or manifest. In the case of a contractor working under contract for CMP, the waste being generated and the NASC facility are owned by the same entity but the contractor would not, without additional protections, be under the control of CMP. The types of additional protections necessary are:

   a. a contract specifying that CMP is contracting with the entity for transport of CMP's PCB spill debris from discharge and routine servicing of off-site equipment and for transport of this PCB waste directly from the off-site location to the NASC facility. The contract needs to also state that the contractors are under CMP's direction. CMP must submit only the specific portions of a contract that are pertinent to the Order and all contracts must state that all of the information that is required in accordance with Condition 9 of this Order has been provided to the Department and that no information was either intentionally or unintentionally excluded.

   b. procedures for the proper identification and handling of PCB spill debris and routine service of PCB waste;

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c. training on appropriate spill response procedures;

d. designation to the Department of contractors authorized to move PCB spill debris waste and routine servicing PCB waste from off-site locations directly to NASC on CMP's behalf;

e. CMP must track the quantities of PCB oil and PCB contaminated material transported on CMP's behalf by CMP and its contractors to the NASC facility from a discharge or routine servicing of equipment and make that information available to the Department upon request; and

f. CMP will be responsible for the contractors' actions on transporting these wastes.

8. CMP has filed a Notification of Regulated Waste Activities with the U.S. Environmental Protection Agency (EPA) and has been assigned an EPA Identification number of MED 981069644 for this facility.

9. CMP obtained a Site Location of Development Permit for this site on July 27, 1983 which was subsequently modified on July 25, 1984. Since 1984, the Department has approved a number of Orders approving compliance with conditions and modifications associated with the development.

10. No underground storage of hazardous waste is proposed or has occurred under this license. In the event that a spill on the paved area of the facility results in the accumulation of a hazardous waste in the run-off detention tank, the contents of the tank must be promptly removed.

11. The facility property is not located within the boundaries of a state or federal park or designated wilderness area.

12. The facility does not overlie any portion of a surface or subsurface sand and gravel aquifer or its primary recharge zone or a high yield bedrock aquifer. There are several

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private drinking water wells located within 1,000 feet and several public water supply wells located within one mile of the facility.

13. The facility is not located in such a way that it may pose a threat to fisheries, wildlife or other natural resources provided the facility, including the surface water containment system, is operated as outlined in CMP's application.

14. CRITERIA FOR FACILITY DEVELOPMENT

Compliance with the facility siting criteria section of 38 M.R.S. § 1319-R must be demonstrated for a full facility license to be issued pursuant to 06-096 CMR 856(17). CMP has provided the following information in support of continued operation at this site.

A. CMP has demonstrated the financial capacity and technical ability to operate the storage facility in a manner consistent with State environmental standards. This demonstration is supported by the safe and successful operation of the facility since its construction in 1985. CMP has an estimated operational cost of $305,203 annually and reports a tangible net worth of over eight hundred million dollars.

B. The facility is located in a business park along side other office, warehouse and light industrial facilities. The facility blends with the surrounding environment and will not adversely affect existing uses and natural resources in the area.

C. The facility will not pose unreasonable risks that a discharge to a significant groundwater aquifer will occur. The facility is not located on a mapped sand and gravel aquifer and secondary containment, liners and a runoff detention system are employed along with a contingency plan to insure there are no discharges to soils or surface waters.

D. The facility is located on suitable soil types with all slopes properly graded and vegetated to prevent erosion. Runoff is directed through a pipeline to Stone Brook.

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E. CMP has adequately provided for traffic movement into and out of the facility. The total projected traffic flow for this facility is 93 vehicles per day, with approximately 20 of these being trucks. This is well within the capacity of the access roads which run only a short distance to the junction of the major thoroughfares of Route 27 and Interstate 95. CMP has also maintained a reduced traffic flow on Leighton Road by minimizing the number of trucks utilizing this road for access to this facility.

F. Most utilities were in place when this facility was constructed. The requirements of this facility do not place an unreasonable burden on these facilities which were designed to service an industrial business park.

G. This facility is not constructed in a flood zone and its design will not contribute to the flooding of adjacent properties or structures.

15. CORRECTIVE ACTION

A. The corrective action provisions in State and Federal law include investigating and remediating releases to the uppermost aquifer at a hazardous waste facility. This work includes detecting, characterizing and responding to releases. The Department adopted this requirement in 06-096 CMR 854(6)(C)(18) pursuant to the March 1994 Rules. If warranted, an investigation would require identification of all solid waste management units (SWMUs) at a facility. A SWMU is defined as any unit, active or inactive at a facility from which hazardous waste or hazardous constituents might migrate, irrespective of whether the unit was intended for the management of solid and/or hazardous waste that may result in harm to human health or the environment.

B. CMP will continue to monitor their facility to determine if any releases are occurring from any SWMUs. If necessary, CMP will evaluate and propose corrective measures to remediate any releases detected during the course of on-going groundwater monitoring. Information gathered must include but is not limited to:

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(1) information on releases or potential releases;
(2) information on all solid waste management units associated with the facility;
(3) evaluation of solid waste management units for releases or potential releases to groundwater, surface water and sediment, soil, air and subsurface gas;
(4) identification of any of the five media affected by a release or likely to be affected by a potential release;
(5) identification of migration pathways for releases to potential receptors;
(6) preliminary determinations regarding potential environmental harm, interim measures, and the need for corrective action measures; and
(7) definition of the scope of any further facility investigation.

C. In accordance with 06-096 CMR 854 (12)(E)(5) and 856(10)(B)(17) of the Rules, the Department can also determine if corrective action is necessary. This determination shall be based, in part, upon information submitted by CMP that the Department has determined to be sufficient. The Department will develop a schedule of compliance for any corrective action necessary and require financial assurance for corrective actions.

D. The Department can require corrective action at a facility whenever releases to the environment are identified. In addition, in accordance with Title 38 M.R.S. § 1319-V, the facility owner may be required to undertake corrective action beyond the site boundary to remove any danger to public health and the environment.

16. OTHER FINDINGS

A. CMP has demonstrated sufficient title, right and interest in the property constituting the NASC facility. In a previous Order, CMP granted a 20-foot grading easement along the northwest boundary of the facility property extending 600 feet along this property line. This easement was granted to the purchaser of the parcel of land identified as lot 12B which was removed from this facility in 1995 through the action of the Partial Closure Order #O-000001-HH-A-N. The

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area included in this easement has not affected the operation of the present facility since it is downgradient and well away from both the physical structures of the facility and the facility groundwater monitoring wells.

B. CMP has demonstrated compliance with 06-096 CMR 854 (12)(B)(4) which requires each storage area to have an adequate containment collection system.

C. CMP has provided an alternative inspection plan for internal inspection of all hazardous waste tanks and piping valves in accordance with Special Condition #16 of license # O-000001-HA-B-R.

In accordance with 06-069 CMR 851 (C)(2) and 854 (12)(C)(2), any pipeline and pipeline valves that transfers hazardous waste to or from a tank must be inspected and pressure tested at least annually by a method reviewed and approved by the Department to determine structural integrity. All tanks and piping valves must also be internally tested at least annually to determine fitness for use.

In accordance with Special Condition #16 license # O-000001-HA-B-R, CMP submitted an alternative inspection plan to the Department to identify and internally inspect, on an annual basis, the valve subjected to the most severe service, as measured by frequency of use, fluid pressures, and other conditions of use.

During the review of CMP's alternative inspection plan, the Department determined that disassembling all piping valves annually for internal inspection would increase the likelihood of leaks and other failures. Therefore, the Department approved CMP's proposed alternative internal inspection plan. In accordance with this plan, CMP also conducts internal inspections of the hazardous waste tanks' sides and bottoms to detect corrosion and cracks once every five (5) years.

The alternative inspection plan also provides for all other inspections described in the Facility Inspection Plan including daily visual inspection for oil leaks in all hoses, piping, valves and tanks used to manage hazardous waste.

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D. CMP has provided an Integrated Contingency Plan (ICP) for this facility which supersedes the Facility Preparedness and Prevention Plan and incorporates elements of the Contingency Plan. The ICP satisfies all of the requirements of 06-096 CMR 854 (6)(C)(8).

E. Since 1987, CMP has conducted annual testing on liner samples for tensile strength, elongation, and puncture resistance. Tensile and elongation values have not changed substantially from the baseline values established in 1985. The test method used in 1985 to determine the baseline puncture resistance values for the liner material was later found to have been an inappropriate test method for this application. Therefore, since 1987, another method has been used for the puncture resistance test which yields values much lower than the method which had been used to establish the baseline values. The resultant puncture resistance values, though much lower than the baseline values, have been relatively consistent from 1987 to present and are still approximately four times the minimum design value for the liner material in this application. Based on the analyses of the liner sample testing, no deterioration has been observed to date. Therefore, the Department agrees that a reduction in the frequency of testing to once every five years is appropriate provided that subsequent analyses confirm that no deterioration of the liner occurs. Should deterioration be observed at any time, the Department may request more frequent sampling of the liner as necessary.

F. CMP has conducted a facility monitoring program since 1986 that has included quarterly sampling of five groundwater wells, one surface water sampling location (Stone Brook) and one stream sediment sampling location (Stone Brook). The results of these analyses over the years have not shown any evidence of contamination from the facility. The sampling event in the second quarter 1992 showed some VOC's (Toluene, Benzenes, and Xylene) in well #3 but it was determined that this was related to a nearby homeowner's storage of gasoline engines near the well. The engines were removed from the immediate vicinity of the well and no further contamination was observed in that well until 1996 at which time, grease and oil was detected at 6.2 mg/l and 5.0 mg/l in two of the

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sampling quarters. These levels are just above the practical quantification limit for this analysis. No other abnormal results have been detected in this well since 1996 and no abnormal results have been detected in any of the other sampling sites to date. Based on the sampling history of this site and the design and operation of the facility, the Department has determined that CMP may reduce the frequency of sampling for all five groundwater wells, as well as the surface water and the sediment sites from four times per year (once every three months) to three times per year (once every 4 months) provided that no abnormal results are detected. If any of the results indicate contamination above the reporting limit, these results must be clearly identified in a summary. The summary must also include a detailed plan of investigation and remediation for any results indicating contamination above the reporting limit. If any of the samples reveal that contamination for which CMP is responsible is present, the Department may request that CMP return to sampling and reporting all groundwater, surface water and sediment sampling results on a quarterly basis.

G. Pursuant to the Department's legal authority at 10 M.R.S. section 9412(1) and 9418(2)(A), the Department requires electronic submission of data in a specified format. All monitoring results must be provided electronically in the Department's Electronic Data Deliverable (EDD) format for the Environmental and Geographic Analysis Database (EGAD). This must include field parameter data, water level and flow data, and laboratory analytical data for all environmental media. Laboratory analytical data must include field and lab quality control sample results including but not limited to blanks, duplicates, surrogate recoveries in percent, and matrix spike/matrix duplicate recoveries in percent. All reports that include discussion of new data must include that data in the EDD format as an electronic deliverable. Specific EDD formats and additional information can be found on the Department's EGAD web page at http://www.maine.gov/dep/maps-data/egad/index.html. Any additional questions about the EDD or EGAD should be referred to the Department's groundwater database manager.

H. The original license requirements specified that the groundwater analysis be sent by the Department to a designated contact person for the local citizens group

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"Citizens Concerned About PCBs". At last contact, a representative of this group expressed an interest in continuing this reporting requirement. During the last license renewal, CMP assumed responsibility for the task of providing this report to the citizens group.

I. The Department finds that it is necessary for CMP to provide written notification to the Department at least 15 days prior to a change in operation, should CMP decide to use Tank #7A/7B for the storage of mineral oil containing less than 50 ppm PCBs and to address with the Department any issues associated with such a change.

J. The receipt of up to 20 shipments per year of "stand-alone" PCB wastes from non-CMP equipment at NASC will not negatively affect the hazardous waste storage facility operations provided that CMP remains in compliance with their storage area limits.

K. Given the number of recently approved changes to the Plan of Operation that have been implemented since July of 2003, the Department finds that CMP must submit an updated Plan of Operation to the Department. This updated plan must include a revised screening procedure for ensuring that all non-CMP "stand-alone" wastes are hazardous for PCB content only.

L. Non-CMP carriers carrying CMP owned waste and/or equipment will not result in an unreasonable increase in the number of trucks accessing NASC via Leighton Road provided that the number of non-CMP vehicles carrying CMP equipment entering NASC from Leighton Road does not exceed 1 or 2 trucks per day and that this route is only used on an infrequent basis, as Route 27 must be used as the main access road to the facility.

M. The Department reviewed the tank and piping thickness testing results beginning with the 1987 startup of the facility and finds no indication that internal corrosion is occurring. These results are consistent with the properties of mineral oil, which provides a protective coating inside the tanks and the piping components. Furthermore, in accordance with the existing license, CMP is currently conducting annual internal inspections of the piping valves to identify wall thinning due to

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corrosion or abrasion; none has been found to date. This is also due, in part, to the relatively low velocity of the oil moving through the piping components. Therefore, the Department has determined that a reduction in the frequency of ultrasonic thickness testing of the tanks and piping walls from annually to once every five years will not increase the risk of a hazardous waste release. However, should significant thinning or other deterioration be observed at any time, the Department may request that CMP conduct more frequent sampling of the thickness of the tanks and/or piping as necessary.

N. CMP maintains a facility monitoring program which consists of monitoring of groundwater, surface water and sediments. CMP's quarterly sampling results have shown no indication of a release from the hazardous waste storage facility since it began operating. During the winter months, the surface water is often frozen. The combination of facility design and operation and the properties of PCBs make a reduction in the frequency of monitoring acceptable at this facility. A reduction in the frequency of sampling from quarterly (four times per year) to three times per year (once every 4 months) is appropriate for this facility. CMP will continue to provide a copy of the results to the citizens group as well as the Department. If any analytical results indicate contamination above the reporting limit, the results must be clearly identified in a summary. The summary must also include a detailed plan of investigation and remediation for any results indicating contamination above the reporting limit. If any of the samples reveal that contamination is present, the Department may request that CMP return to sampling and reporting all groundwater, surface water and sediment sampling results on a quarterly basis as necessary.

O. CMP proposes to reduce the frequency of liner coupon sampling from annually to once every five years. There has been no degradation of the buried liner since the hazardous waste storage facility was constructed and a reduction in the frequency of sampling would potentially extend the coupons for the full duration of the period when PCBs will be handled at the facility. The Department finds this to be an appropriate modification. However, should the liner begin to show signs of deterioration during any of the sampling events, the Department may request that CMP increase the frequency of sampling as necessary.

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17. DRAFT LICENSE PUBLIC COMMENTS

The public comment period for the draft license closed at 5:00 pm on October 25, 2012, 45 days following the posting of the public notice of availability of the draft license in the Kennebec Journal newspaper. During this timeframe, CMP submitted comments on the draft Order. No other comments from the public were received.

The following comments were submitted:

1. CMP commented that additional language should be added to Condition #4 of the draft license to clarify that should a spill occur within the paved NASC yard area, the spill material only needs to be tested if the spill is from non-FR3 (vegetatble) oil containing electrical equipment. The Order was revised to reflect this clarification.

2. CMP commented that in accordance with Condition #9 of the draft license, CMP would prefer not to submit entire copies of their contracts (either edited or unedited) to the Department due to confidentiality concerns. The Order has been revised to clarify this request.

3. CMP commented that Condition #14 of the draft license, which requires CMP to submit a detailed corrective action plan if any analytical result from a well, stream, or stream sediment sample is elevated above the reporting limit, should clarify that CMP's corrective action obligations would be limited to identification of the source of any contamination and cleanup of that contamination for which it was found to be responsible. Therefore, CMP is requesting that the Order explicitly state the Department's intention to pursue a responsible party should an entity other than CMP be responsible for causing contamination on the NASC property. The Order was not revised in response to this comment. The Department would determine responsible party status based on specific facts surrounding the release and in accordance with the laws and rules of the State of Maine.

4. CMP requested that Condition #22 of the draft license be revised to state that CMP would only be required to submit and implement a corrective action plan to abate any releases of hazardous waste or constituents for which CMP is responsible. The Order was not revised in response to this comment, as it is CMP's responsibility to investigate any contamination and to determine the source of the contamination. The Department would determine responsible party status for a release based on the specific facts surrounding the release and in accordance with the laws and rules of the State of Maine.

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WASTE STORAGE FACILITY LICENSE	)	
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BASED on the above Findings of Fact, and subject to the conditions listed below, the Board makes the following CONCLUSIONS:

1. CMP's application and supporting documents attached therein for a commercial hazardous waste storage facility are consistent with the requirements set forth in the Maine Hazardous Waste Management Rules 06-096 CMR 854, Standards for Hazardous Waste Facilities and 06-096 CMP 856, Licensing of Hazardous Waste Facilities, except as noted below:

   The Department has reviewed the tank and piping thickness testing results since the startup of the facility in 1987 and found only slight changes in the thickness of the tanks and piping over the past 25 years. These results are consistent with the properties of mineral oil, which provides a protective coating inside the tanks and the piping. In addition, the mineral oil moves through the pipes at a relatively low velocity, further aiding in the prevention of flow-induced corrosion or erosion in the pipes. Additionally, CMP also conducts annual internal inspections of the piping valves to identify wall thinning due to corrosion or abrasion. Based on this information, the Department has determined that a reduction in the frequency of ultrasonic thickness testing of the tanks and piping walls from annually to once every five years will not increase the risk of a hazardous waste release. However, should significant thinning or other deterioration be observed at any time, the Department may request that CMP conduct more frequent sampling of the thickness and integrity of the tanks and/or piping as necessary.

2. The NASC facility should not result in adverse effects on the groundwater, surface water quality, air quality, or migration of wastes to the subsurface environment, or a threat to public or private water wells. No hazardous waste or derivative thereof shall escape from the facility to groundwater or surface waters or to adjacent subsurface soils at any time during the life of the facility. The facility is or will be located, designed, constructed, operated, maintained and properly closed in a manner that will assure protection of human health, welfare and the environment.

   The facility will not pose an unreasonable risk that a discharge to a significant groundwater aquifer will occur, provided that:

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A. The facility is operated in accordance with Maine's Hazardous Waste Management Rules and this Order.

B. The boundaries of the stormwater management system, designed to contain and manage any spills or runoff in the paved travel area of the facility, are clearly marked in all places and all movement of oil-filled equipment is confined to this containment area.

C. In the event of a spill in the paved travel area at the facility, the spilled material is cleaned up properly and any surface water runoff after a spill event will be tested for PCBs before the clean runoff is discharged to surface water.

D. The paved travel area is maintained in good condition. The pavement must be sealed with the appropriate sealant as necessary to maintain the integrity of the surface and the ability to contain spills and stormwater.

E. The handling of oil-filled equipment and all oil filling and removal activities are done only in the approved locations.

F. Only hazardous wastes for which acceptable liner compatibility results can be demonstrated are stored in the lined areas of the facility and the liner testing program approved by the Department remains in effect.

3. CMP has demonstrated adequate financial capacity and technical ability to operate, maintain and properly close this facility in accordance with the requirements of all applicable statutes and rules. As the financial capacity of any business may change over time, CMP must annually demonstrate, to the Department's satisfaction, proof of current financial capacity.

4. CMP has demonstrated that the criteria for facility development have been satisfied in accordance with 38 M.R.S. § 1319-R. This facility fits harmoniously into the existing natural environment and will not adversely affect existing uses, scenic character, air quality, water quality or other natural resources in Augusta or neighboring communities. This area is zoned for commercial/industrial use.

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5. The facility is constructed on suitable soil types and in a manner that will not cause or increase the flood hazard to either this facility or any neighboring facility. This facility is located and constructed in such a manner as to provide for adequate traffic flow into and out of the facility. No unreasonable burden has been placed upon the utilities and the community in order to service this facility.

6. CMP has demonstrated sufficient title, right and interest for the NASC facility property.

7. CMP repairs or salvages oil-filled equipment containing 50 ppm PCBs or greater as a service for other companies. CMP modified the facility operational plan under the previous license (#O-0000001-HA-C-A) to verify that any equipment or debris from outside companies is hazardous only for PCB content before CMP authorizes shipment to NASC.

8. All non-CMP hazardous waste coming into NASC will be transported by licensed hazardous waste transporters and will be accompanied by a hazardous waste manifest. CMP has provided for the proper handling of both incoming and outgoing manifests.

9. CMP must identify the hazardous wastes (ignitable and non-ignitable) stored in Annex III and assess such wastes for compatibility and safety concerns as a part of this license.

10. CMP has adequately provided for after-hours receiving of hazardous waste shipments to insure that trucks containing hazardous waste are not held outside of the facility for extended time periods.

11. CMP's projected total volume of oil-filled equipment to be handled at NASC with the implementation of this license renewal remains substantially below the reported total capacity of this facility. CMP has not provided a limit on the volume of additional equipment from non-CMP entities to be handled at this facility.

12. CMP has provided adequately for spill prevention and containment in the High Bay work area.

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13. CMP has provided for adequate control at the boundary of the stormwater containment area. In addition to the instructional signs and white stripes on the pavement, all regular drivers are trained in proper use of the facility's spill control features and all others will be specifically instructed where to drive and where to unload prior to being allowed into the facility.

14. CMP has provided an Operations Plan that adequately addresses the handling of potentially leaking equipment about to enter the facility. If a leak is found to be too large to control outside of the facility, the NASC staff have the option to move the leaking equipment into the facility to take advantage of the containment and control features available. The stormwater control system must be verified to be in containment mode prior to allowing the equipment through the gate.

15. CMP has modified the property boundaries of the licensed facility through a partial closure Order #O-000001-HH-A-N dated December 13, 1995.

16. CMP previously granted a grading easement on part of the facility property to the purchaser of the adjacent lot, 12B. This easement has not affected operations of the facility.

17. CMP has an underground fuel oil storage tank which was installed and is maintained in accordance with 06-096 CMR 691.

18. CMP maintains a facility monitoring program which consists of monitoring of groundwater, surface water and sediments. CMP will reduce its sampling frequency from quarterly (once every three months) to three times per year (once every four months). A local concerned citizens group has been and wishes to continue receiving copies of the analysis results. CMP must provide a copy of these results to the citizens group as well as to the Department. If any of the results indicate contamination above the reporting limit, these results must be clearly identified in a summary. The summary must also include a detailed plan of investigation and remediation for any results indicating contamination above the reporting limit. If any of the samples reveal that contamination for which CMP is responsible is present, the Department may request that CMP return to analyzing and reporting all groundwater, surface water and sediment sampling results on

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a quarterly basis. In addition, CMP must submit the electronic monitoring data using the EGAD format.

19. CMP is currently using Tank #7A/7B for the storage of new FR3 oil. If CMP plans to discontinue using FR3 oil in Tank #7A/7B and to instead use this tank for mineral oil containing greater than or less than 50 ppm PCBs, CMP must notify the Department in writing at least 15 days prior to this change in operation.

20. CMP's receipt of up to 20 shipments per calendar year of "stand-alone" PCB wastes from non-CMP equipment at NASC will not adversely affect CMP's operations, provided they remain in compliance with their storage area limits and that all waste is tested to ensure that it is hazardous for PCB content only.

21. For the purpose of this license, a contractor working under contract for CMP can move PCB waste resulting from a discharge or routine servicing of off-site CMP owned PCB containing equipment without a hazardous waste transporter license or manifest to the more secure location of NASC in accordance with the provisions outlined in 06-096 CMR 853(10) and 06-096-CMR 857(6), provided that CMP maintains control over this waste by meeting the requirements outlined below:

    a. a contract is in place specifying that CMP is contracting with the entity for transport of CMP's PCB spill debris contaminated with oil containing 50 ppm or greater PCBs from discharge and routine servicing of off-site equipment and for transport of this PCB waste directly from the off-site location to the NASC facility. The contract needs to state that the contractors are under CMP's direction;

    b. procedures for the proper handling of PCB spill debris and PCB waste from routine service must be in place;

    c. the contractors must have received training on appropriate procedures;

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d. the names of the contractors authorized to move PCB waste resulting from a discharge or routine servicing of off-site CMP owned PCB containing equipment directly to NASC on CMP's behalf are provided to the Department in advance;

e. CMP must track the quantities of PCB oil and PCB contaminated material transported on CMP's behalf by CMP and its contractors to the NASC facility from a discharge or routine servicing of equipment and make that information available to the Department upon request; and

f. CMP will be responsible for the contractors' actions managing and transporting this waste.

22. Non-CMP carriers transporting CMP-owned waste and/or equipment accessing NASC via Leighton Road will not significantly affect traffic conditions on Leighton Road such that the number of non-CMP carriers entering the NASC facility does not exceed 1 or 2 trucks per day and provided that this route is used on an infrequent basis, as Route 27 is the main access road to the facility.

23. CMP's reduction of the frequency of coupon sampling from annually to once every five years will not negatively affect the ability to evaluate the liner integrity provided that the liner does not begin to show signs of deterioration during any of the sampling efforts. The Department may request that CMP increase the frequency of sampling as necessary. In the event that any deterioration is detected, CMP must investigate the liner integrity and recommend appropriate remedial actions to the Department on a timetable approved by the Department. The Department may require remedial action or modification or an increase in sampling frequency as appropriate.

24. CMP may be required to implement corrective action as deemed necessary by the Department or Board.

THEREFORE the Board APPROVES the Order for CENTRAL MAINE POWER COMPANY, SUBJECT TO THE ATTACHED CONDITIONS and all applicable standards and regulations.

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1. The Standard Conditions of Approval, a copy is attached as Appendix A.

2. The invalidity or unenforceability of any provision, or part thereof, of this License shall not affect the remainder of the provision or any other provisions. This License shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

3. CMP shall insure that the transportation of all oil-filled equipment occurring within the fenced in area of the outdoor portion of the facility will at all times remain within the paved area that drains to the stormwater containment system. The perimeters of the containment system collection area shall be clearly delineated at all times. This delineation shall consist of physical barriers such as building walls, fences or gates. Where this is not practical, clear instructional signs and pavement striping shall be maintained to restrict movement of oil-filled equipment. CMP shall insure that all operators transporting oil-filled equipment within the facility are instructed of the importance of operating within the containment areas at all times.

4. If a spill of fluid from electrical equipment (other than FR3 (vegetable) oil containing electrical equipment) should occur during transportation across the paved area, the drainage system shall remain in containment mode until the next precipitation event and until the liquid in the detention tank is determined to contain no PCBs at the analytical reporting limit of 0.5 ppb. If the first precipitation event retained in the detention tank contains detectable levels of PCBs, then the contents of the tank shall be handled in a manner approved by the Department, but in no event shall the detained liquid be discharged to Stone Brook. Each subsequent precipitation event shall be handled as above until PCBs cannot be detected in the detained runoff at a reporting limit not to exceed 0.5 ppb. A wash down not to exceed 7,500 gallons of non-contaminated water may be used in lieu of a precipitation event provided the water is directed over the spill area and provided that the wash down occurs after the area has been decontaminated and sealed.

5. CMP shall determine the suitability of a pavement sealant type to meet the needs of this application and submit this information to the Department at least 10 days prior to the use of this sealant. The sealant must be applied to the pavement whenever:

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A. CMP determines that it is necessary;

B. CMP is requested in writing by the Department to do so; or

C. a spill occurs. In this instance, after the spill area has been decontaminated, the sealant shall be applied or reapplied over the decontaminated area.

6. CMP shall be authorized to accept hazardous wastes and oil-filled equipment from other entities under the following conditions:

A. All hazardous waste must be hazardous for PCB content only. It must be transported by a hazardous waste transporter licensed in Maine and must be accompanied by a Maine hazardous waste manifest. An exception is made for insignificant amounts of PCB wastes which may be generated by CMP technicians as a result of sampling and evaluating non-CMP equipment. Such wastes are generated by and under the continuous control of CMP technicians and are accompanied by the equipment. This waste will be transported to the NASC facility as CMP hazardous waste and, in accordance with 06-096 CMR 853(10) and 857(6) will not require a manifest.

B. Prior to picking up or authorizing shipment of non-CMP oil-filled equipment, CMP must determine if the PCB content of the oil within the equipment is less than or greater than 50 ppm. If the oil in a piece of equipment has a PCB content of 50 ppm or greater, that equipment can be accepted without a manifest only if it is non-leaking and is not intended to be discarded.

Any oil-filled equipment that is leaking or is intended to be discarded and contains oil with 50 ppm or greater PCBs is considered hazardous waste. Such equipment must be transported into the NASC facility by a hazardous waste transporter licensed in Maine and must be accompanied by a Maine hazardous waste manifest.

C. The volume of hazardous waste and oil-filled equipment from non-CMP entities shall not exceed 2,000 units per year, shall not cause CMP to exceed storage and

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handling capacities for such equipment and shall not interfere with the handling, storage or transportation of hazardous wastes at this facility.

7. CMP shall instruct all non-CMP carriers transporting non-CMP owned oil or oil-filled equipment to or from the NASC facility to access this facility via State Route 27. CMP shall make a record of any citizen complaints received in regards to CMP vehicle traffic to or from the NASC facility via the Leighton Road in Augusta. Copies of such complaints shall be forwarded to the Department within 5 working days of receipt by CMP. CMP shall act to resolve such complaints to the Department's satisfaction. Non-CMP carriers carrying CMP owned waste and/or equipment shall be allowed to access NASC via Leighton Road provided that the number of non-CMP carriers entering NASC does not exceed 1 or 2 trucks per day and that this road shall be used on an infrequent basis, as Route 27 shall remain the main access road to the facility.

8. CMP may receive at NASC up to 20 shipments per calendar year of "stand-alone" PCB wastes from non-CMP equipment provided the facility does not exceed its Annex III storage area limits. This waste is not accompanied by equipment and shall be tested to ensure that it is hazardous for PCB content only.

9. For the purposes of this license, a contractor working under contract for CMP can move PCB waste resulting from a discharge or routine servicing of off-site CMP owned PCB containing equipment without a hazardous waste transporter license or manifest to the more secure location of NASC in accordance with the provisions outlined in 06-096 CMR 853(10) and 06-096-CMR 857(6), provided that CMP maintains control over this waste by complying with the following requirements:

   a. CMP shall submit a copy of the contract agreement signed by both parties to the Department at least 10 working days prior to a contractor handling or transporting any PCB contaminated equipment or waste. This contract shall list all contractors who are authorized by CMP to operate under the provisions of this condition. Should CMP decide to change or add contractors for any reason, a copy of the signed contract document(s) shall be sent to the Department at least 10 working days prior to implementing this change. CMP shall submit only the specific portions of a contract that are pertinent to the Order. The contract submission shall certify that all the

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information required in accordance with this Condition has been provided to the Department and that no information was excluded.

b. CMP shall be responsible for the contractors' actions managing and transporting this waste;

c. CMP shall submit a spill response plan to the Department for review and approval that is specific to contractors handling and transporting PCB contaminated waste or equipment. This plan shall be submitted to the Department at least 10 working days prior to implementation. A copy of this plan shall be provided to each individual contractor;

d. CMP shall provide formal training to all contractors who handle PCB contaminated waste or equipment prior to any handling or transporting of any PCB contaminated waste or equipment;

e. the names of the contractors authorized to handle CMP-owned PCB waste resulting from a discharge or routine servicing of off-site CMP-owned PCB containing equipment directly to NASC on CMP's behalf are provided to the Department in advance; and

f. CMP shall track the quantities of PCB oil and PCB contaminated material transported on CMP's behalf by CMP and its contractors to the NASC facility from a discharge or routine servicing of equipment and shall make that information available to the Department upon request.

10. CMP shall load and unload oil-filled equipment from conveyances only in the Transformer Storage Building, High Bay Area or at the covered Loading Dock.

11. CMP shall conduct oil handling activities, disassembly and repairs on oil-filled equipment only in the High Bay Area or the Repair and Testing Area. Oil removal and retrofilling utilizing a tank truck, and testing, minor repair and partial disassembly may be done in the Transformer Storage Building. Oil removal elsewhere on the facility shall

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only be for the emergency removal of oil from large equipment that begins leaking and cannot readily be transported to the High Bay Area.

12. CMP shall test the buried liner samples once every five years. The appropriate liner samples shall be collected and submitted for testing no later than June 15 of each year. The results shall be submitted to the Department within 10 business days of receipt from the testing facility. If at any time the liner testing results show significant deterioration in any of the test properties as determined by CMP or the Department, CMP shall notify the Department within 5 days of the receipt of these tests and the testing frequency shall be modified to an interval determined appropriate by the Department. In the event that any deterioration is detected, CMP shall investigate the liner integrity and recommend appropriate remedial actions to the Department on a timetable approved by the Department. The Department may require remedial action or modification or increased sampling frequency as the Department determines is necessary.

13. CMP shall not store any hazardous wastes other than PCBs on any HDPE lined areas of the facility until it has demonstrated to the Department's satisfaction that the waste is compatible with this liner material and will not compromise the liner integrity in the event of a spill.

14. CMP shall conduct sampling of groundwater, surface water and sediments three times per year (once every four months) as described in the Facility Monitoring Plan. Within 10 business days of receipt of the analytical results, CMP shall send copies to the Department and to the designated representative of the group "Citizens Concerned about PCBs". These reports shall include a summary of the sampling results and shall identify any samples that are above the reporting limit. CMP shall also include a detailed plan for corrective action should any of the sampling results be elevated above the reporting limit. The Department may require more frequent analysis should the Department determine that it is necessary to protect public health or the environment.

15. All monitoring results shall be provided electronically in the Department's Electronic Data Deliverable (EDD) format for the Environmental and Geographic Analysis Database (EGAD). This shall include field parameter data, water level and flow data, and laboratory analytical data for all environmental media. Laboratory analytical data shall include field and lab quality control sample results including but not limited to blanks, duplicates, surrogate

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recoveries in percent, and matrix spike/matrix duplicate recoveries in percent. All reports that include discussion of new data shall include that data in the EDD format as an electronic deliverable. Specific EDD formats and additional information can be found on the Department's EGAD web page at http://www.maine.gov/dep/maps-data/egad/index.html. Any additional questions shall be referred to the Department's groundwater database manager at 287-2651.

16. CMP shall submit the appropriate financial assurance mechanism for closure and the annual closure cost estimate update as required by 06-096 CMR 854 (6)(C) of the Maine Hazardous Waste Management Rules by no later than April 30 of each year.

17. This renewal license shall expire on October 14, 2017. CMP shall re-apply for renewal of this license no sooner than 210 days nor later than 180 days prior to the date of expiration unless required otherwise by regulation.

18. CMP shall pay the annual license fee by the anniversary date of this license unless billed at an alternate date by the Department.

19. CMP shall conduct ultrasonic tank and piping thickness testing at a frequency of once every five years provided that no significant thinning or deterioration of either the tanks or the piping is observed at any time. Should any deterioration be observed, CMP shall submit the testing data to the Department within 30 days of the testing and resume conducting annual testing of the tanks and/or piping within one year of testing that shows significant thinning or deterioration of the tanks or piping.

20. Should CMP decide to discontinue storing new FR3 oil in Tank #7A/7B and to use this tank for the storage of mineral oil containing less than 50 ppm PCBs, CMP shall notify the Department in writing at least 15 days prior to this change in operation.

21. CMP shall identify the ignitable wastes to be stored in Annex III and submit a plan for Department review and approval for the safe storage of such waste in this area, including addressing any compatibility and fire concerns by December 15, 2012.

22. The Department shall require CMP to submit and implement a corrective action plan to abate any releases of hazardous wastes or constituents to sediment, soil, air, surface water

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or groundwater to ensure that the facility is in compliance with Maine's performance standards. This plan shall address the possible need for groundwater or soil remediation, as well as the need for a post-closure plan upon closure. This plan shall be prepared upon request of the Board or the Department and shall be due by the date specified in that request.

23. CMP shall submit one consolidated copy of the application with plans that depict the facility structure and operation as finally amended and approved within 120 days of issuance of the final Order approved by the Board. This shall include an updated Plan of Operation. The purpose of this submission is to consolidate and compile the facility application and various revisions such that the Department receives an accurate document.

BOARD OF ENVIRONMENTAL PROTECTION

BY:_____ DATE:_____
Robert Foley, Chair

Date of Initial receipt of application: July 11, 2003

Date of application acceptance: August 4, 2003

This Order was prepared by Becky Blais, Bureau of Remediation & Waste Management.

XBB50596