



JANET T. MILLS  
GOVERNOR

STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



MELANIE LOYZIM  
COMMISSIONER

March 19, 2021

VIA EMAIL

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

NextEra Energy Resources LLC  
Attn: Tracy Backer, Esq.  
700 Universe Blvd.  
Juno Beach, Florida 33408  
[Tracy.backer@nexteraenergy.com](mailto:Tracy.backer@nexteraenergy.com)

Avangrid/CMP  
Attn: Ken Farber, Esq.  
One City Center, 5<sup>th</sup> Floor  
Portland, Maine 04101  
[Kenneth.farber@avangrid.com](mailto:Kenneth.farber@avangrid.com)

**Re: Need for Additional Sediment Sampling at Mason Station Power House Site, Wiscasset, Maine**

Dear Mr. Pennessi, Ms. Backer, and Mr. Farber:

During our March 11, 2021 meeting regarding to the Mason Station Power House site located on Point East Drive in Wiscasset, Maine (“Site”), we discussed the issue of additional sediment sampling. Additional sediment sampling is contemplated in the December 4, 2020 draft Administrative Order by Consent (“AOC”) issued to the Potentially Responsible Parties (“PRPs”) at the Site. During the meeting, the PRPs generally indicated that the additional sediment sampling requested by the Department was both unnecessary and unreasonable. I agreed to follow up with additional rationale for the requested sampling. Attached is a memo from the Department’s Project Geologist for the Site, outlining that rationale.

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

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

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

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

If you have any questions regarding this matter, or need further clarification on the Department's position, please contact me at 207-215-8597 or by email at [Christopher.Redmond@Maine.gov](mailto:Christopher.Redmond@Maine.gov).

Sincerely,



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

Enclosure: March 19, 2021 Department Memo, RE: Mason Station – Sediment Sampling Data Gaps

Cc: Danielle Obery, Project Manager, MEDEP Division of Remediation (via email)  
Finn Whiting, Project Geologist, MEDEP Division of Remediation (via email)  
David Wright, Director, MEDEP Division of Remediation (via email)  
Ron Mongeon, MEDEP Enforcement Specialist (via email)  
Jeff Skakalski, Office of the Maine Attorney General (via email)  
Steve Dyer, Ransom Consulting (via email)  
Joe Cotter, Mason Station LLC (via email)  
Michelle Blythe, NextEra Energy Resources LLC (via email)  
Carlisle Tuggey, CMP (via email)  
Seth Jaffe, FoleyHoag LLP (via email)

# Department of Environmental Protection

## MEMORANDUM

TO: Danielle Obery, Project Manager, Mason Station

FROM: Finn Whiting, Environmental Hydrogeologist, C.G. Division of Technical Services, Bureau of Remediation and Waste Management

RE: Mason Station – Sediment Sampling Data Gaps

DATE: March 19, 2021

---

The MEDEP Provides the following evidence supporting a need to collect additional sediment samples within the Sheepscot River adjacent to the Mason Station Power House and Peninsula.

### Spatial Coverage of Sediment Samples:

To date, all sediment sampling has occurred in easily accessible areas located in wadable tidal flats north and south of the Power House structure. Areas previously sampled are situated away from the outfall locations, which are the point source for any discharges from the Power House structure, including site contaminants of concern PCBs, PAHs, heavy metals, and petroleum related compounds. The attached figure details existing sediment sample locations with respect to outfall pipes from the Power House structure.

Data from 2006-2008 identified PCBs, PAHs, and metals concentrations above NOAA screening criteria in several samples and isolated PCB hot-spots which cannot be discounted as outliers due to repeated detections in replicate samples. The correlation of TOC, grainsize, and total PCB concentrations in the 2008 data set provides evidence that discharges from the Power House structure occurred. Although the data set is comprised of a limited number of samples, it suggests a local source where mixing by erosion, transport, and re-deposition has not occurred to any great degree. PCBs are extremely hydrophobic and would correlate closely to TOC if homogenized in the environment, as would be expected in areas impacted from a distal source.

### Temporal Coverage of Sediment Samples:

Sediment samples were last collected in 2008 at the Mason Station Peninsula. The time span from 2008 to present represents a significant data gap because documented PCB and oil releases to the Sheepscot River have occurred in that time period.

The Unit 5 transformer oil leak was documented as flowing through a network of floor trenches and conveyed via outfall #6 to the Sheepscot River. Aqueous samples collected from the Unit 5 floor trench on 10/29/2018 had a reported total PCB concentration of 6 ppb which is approaching the upper saturation limit for PCBs in water. The oil from the trench was never sampled as a standalone media and PCB concentrations could be much higher than what was detected in the aqueous sample. The duration and volume of transformer oil permitted to discharge to the Sheepscot river is unknown.

Leaking transformers identified in units #3 & #4 were removed in 2020 however, impacts to lower levels, floor trenches, and potential for discharges to the building exterior have not been adequately investigated.

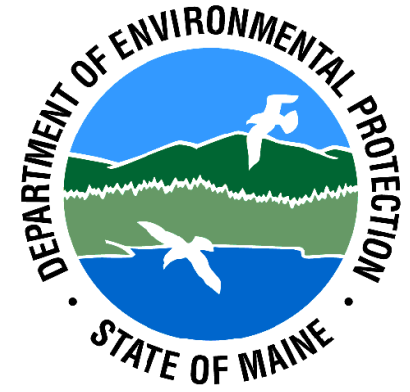
#### Building Condition:

MEDEP has conducted numerous site inspections and evidence of deteriorating surfaces and equipment have been documented. A poor understanding of the building's infrastructure, condition, and conveyance of substances to the exterior is apparent and therefore requires investigation to ensure known and suspected releases have not impacted sediment within the Sheepscot river.

Not all outfall pipes can be visually inspected but as a line of evidence suggesting their general condition, the 36-inch outfall pipe servicing the #2 Condenser has been conveying tidal waters into the basement vault and back to the Sheepscot river for an unknown period of time. This represents another conduit for contaminants within the building to be conveyed to the Sheepscot River and raises a need to expand the investigation to include all outfall pipe discharge locations. It also requires contaminants other than PCBs be investigated such as, but not limited to, metals, petroleum related compounds, and PAHs.

To summarize, the Power House structure is in disrepair and has been discharging to the Sheepscot river from multiple locations for an indeterminate period without adequate environmental monitoring. PCBs detected around Mason Station Peninsula in sediment from past investigations are heterogeneously distributed which could easily be missed if adequate sample coverage does not exist. The composition and distribution of previously detected PCBs in sediment are consistent with derivation from a source on-site. Known and suspected discharges of PCBs and petroleum related compounds to the Sheepscot River have occurred between 2008 and 2021 representing a need to investigate potential impacts. MEDEP recommends additional sampling be conducted as close to outfall locations as possible in suitable sediment to investigate any legacy and recent discharges. A sediment sampling work plan should be approved by regulatory agencies prior to carrying out the investigation.





Mason Station  
Power House Site  
Sediment Sample Locations

**Legend**

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

**Notes**

1. This figure has been prepared to support the Maine Department of Environmental Protection's Department Designation of Uncontrolled Hazardous Substances Site and Order. Unauthorized use is prohibited without the explicit permission of the Maine Department of Environmental Protection.
2. Areas of concern are approximate in location, extent, and scale.