



JANET T. MILLS
GOVERNOR

STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



MELANIE LOYZIM
COMMISSIONER

January 25, 2023

SENT VIA EMAIL

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

Re: Comments on Draft Sediment and Outfall Pipe Sampling Plan, Mason Station Power House Site, Wiscasset, Maine

Dear Mr. Pennessi and Mr. Cotter:

This letter concerns the Mason Station Power House site located on Point East Drive in Wiscasset, Maine (“Site”). I am writing in regards to the revised draft sediment sampling workplan that Mason Station LLC recently submitted for the Site (*Supplemental Sediment Sampling Work Plan, Rev. 2, Mason Station, Wiscasset, Maine, Ransom Consulting, Dated December 9, 2022*). As you are aware, the Maine Department of Environmental Protection (“Department or MEDEP”) has been requesting such sampling for a number of years, most recently in a letter from the Department to Mason Station LLC dated November 23, 2022. The revised plan was submitted after the Department attempted to collect sediment and outfall pipe samples from the Site on November 18, 2022. Mason Station LLC requested the Department immediately cease the collection of such samples, indicating they would instead contract with an environmental professional to collect such samples in accordance with a Department-approved plan. Such samples are necessary to assess sediment near each outfall pipe for any impacts from historic operations as well as any recent or ongoing releases.

In that November 18, 2022 letter, I provided a Department-prepared sampling plan to use as a basis for and to facilitate Mason Station LLC’s development of an adequate sampling plan for the collection of sediment from the Sheepscot River and samples of effluent from outfall pipes discharging into the Sheepscot River. However, the draft plan submitted by Mason Station LLC and referenced above did not include an adequate number of sediment samples, did not include the collection of samples from any of the 24 outfall pipes that discharge to the Sheepscot River, and the proposed laboratory analyses did not include analysis of all the contaminants of concern

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associated with the Site. I am attaching some additional technical review comments that I trust will further assist with the development of an adequate plan.

Please submit a revised plan that adequately addresses the items outlined above within 15 calendar days. If Mason Station LLC fails to respond to this letter in a timely manner, fails to submit an adequate sampling plan, or fails to execute such a plan in a timely fashion, the Department will have no choice but to proceed with efforts to collect its own samples from the Site and its buildings and pursue recovery of associated costs. The collection of samples by Department employees or its agents from the Site has been and will continue to be completed pursuant to the Department's statutory authority, including 38 M.R.S. §§ 1364(3) and 347-C.

This Site continues to pose an actual and potential threat to public health and safety and to the environment. The issues raised in this letter are to be considered in addition to the numerous issues raised and response activities requested by the Department and related to this Site, which are detailed in prior correspondence, including the draft Administrative Consent Order that was sent to Potentially Responsible Parties Mason Station LLC, FPL Energy Mason LLC, and Central Maine Power, on December 4, 2020, via email.

Sincerely,



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

Enc: Additional Technical Comments on Draft Sampling Plan

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

Additional Department Review Comments on Sampling Plan Titled *Supplemental Sediment Sampling Work Plan Rev. 2, Mason Station, Wiscasset, Maine, Ransom Consulting, Dated December 9, 2022.* Note that these are in addition to comments provided in the Department's letter dated 1/5/2023 and any prior correspondence.

Section 1.3 Discharge Outfall Pipes (Page 3)

It is unclear whether outfall pipe No. 19 and any associated oil water separator, which formerly connected the Power House outflow to the ash ponds was demolished. Regardless, this and other conduits should be sealed where they leave the Power House building to prevent any future discharges.

This section states that Mason Station LLC "...is currently taking actions to abandon or otherwise prevent these outfall pipes from discharging to the adjacent river." Please provide detailed documentation of these efforts.

Section 2.1 Sampling Locations (Page 5)

Due to ongoing and historical releases within the Power House Building and the continued deterioration of the building and its leaking roof, it is critical to determine if discharges to the building's exterior are actively occurring. Samples should be collected from any outfall pipes that actively flow after rain events or during other times.

It is necessary to characterize sediment immediately surrounding each outfall pipe for impacts from historic operations and recent or any ongoing releases from the facility.

At each outfall location sediment should be sampled as close to the outfall pipe discharge as practical. MEDEP has observed the riprap armoring along the shoreline and has identified sufficient volumes of sediment for sampling. In instances where no sediment is present, the sample should be collected from the nearest location where sediment is available downgradient of the discharge pipe.

Section 2.2 Background Samples (Page 5)

The current background sample locations, as proposed, may be too close to the Mason Station Power House Site and other potential contaminant sources along the river, which has the potential to complicate comparison to those samples collected in front of the Site. Any background samples and their proposed locations should by design attempt to find sediment that averages any other potential sources along the river. Regardless, the priority should first be the collection of samples immediately adjacent to the Site.

Section 2.4 Analytical Testing (Page 6)

In addition to the analytical parameters listed in the sampling plan, please include extractable petroleum hydrocarbons (EPH), volatile petroleum hydrocarbons (VPH), volatile organic compounds (VOC's), semi volatile organic compounds (SVOC's), and asbestos analysis to all

samples. These analytes are required to assess risk from recent and historical releases within the Power House structure.

Section 4.0 Proposed Schedule (Page 8)

Data must be provided to the Department within 30 days of receipt from the analyzing laboratory. Provide an updated schedule for completing the sampling.