

Project 171.06108

Mason Station LLC 485 West Putnam Avenue Greenwich, Connecticut

February 19, 2020

RE: Mercury Assessment

Mason Station Wiscasset, Maine

Ransom Consulting, LLC. (Ransom) has prepared this report presenting the results of the mercury assessment performed at the property identified as the former Mason Station power plant (Mason Station), located on Birch Point Road in Wiscasset, Maine (the Site). The work was authorized by Mason Station LLC (Owner) and was conducted in accordance with Ransom's Proposed Scope of Work and Cost Estimate, dated August 21, 2018. The purpose of the work was to identify the nature and extent of remaining mercury-containing equipment at the Site.

Drawings for the Site buildings' interior, including locations of equipment still containing mercury or equipment that may contain residual amounts of mercury are provided as Figures 1 through 3. Please note that the interior drawings presented show only the Powerhouse Building ground floor, second, and third levels. Areas of the building which encompass a smaller footprint extend up to six stories high, however, mercury-containing equipment was not noted to be present in these areas.

A photograph log documenting our key findings is included as Attachment A.

### **EXECUTIVE SUMMARY**

Previous investigations and correspondence with the Maine Department of Environmental Protection (MEDEP) discussed herein indicate that mercury-containing equipment was identified and areas of uncontained mercury were observed in connection with the Mason Station Powerhouse building. This correspondence provided by Mason Station, LLC indicates actions were taken to drain the liquid mercury from remaining equipment and cleanup the uncontained mercury spills. However, much of the equipment formerly containing mercury remains within the Powerhouse building. Additionally, during the course of Ransom's hazardous building materials inventory (HBMI) conducted between November 5 and December 4, 2018; limited air screening for mercury vapor was conducted. The results of the air screening did not indicate a current exposure hazard from mercury. However, residual contamination associated with several former mercury-containing devices was noted. In a letter dated July 2, 2019, the MEDEP requested, among other things, that the equipment and components formerly containing liquid mercury must be removed and transported off site for proper disposal. Additionally, all mercury containing equipment should be inventoried in the absence of documentation detailing the draining and mercury removal actions conducted between 1993 and 2004. In anticipation of future off-site disposal, Ransom has completed the following inspection and inventory of equipment that either still contained mercury or that had the potential to contain residual amounts of mercury after being drained.

#### **FACILITY DESCRIPTION**

The Mason Station, LLC (Mason Station) property currently consists of one parcel of land identified by the Town of Wiscasset Assessor's Office as Lot 81 on Tax Map R-7A (the "Site"). The Site is developed with the former Powerhouse Building, and three ancillary structures identified as Screen House #1, Screen House #2, and Screen House #3. The property was historically part of a larger 33-acre site that was sub-divided.

The original portion of the Mason Station power plant ("Powerhouse Building") was constructed at the Site by Central Maine Power Co. (CMP) circa 1940-1946, consisting of the portion now referenced as (turbine) Units #1 and #2. The Powerhouse Building was expanded to the north in 1952, adding two additional turbines and associated boilers and other equipment, referenced as Units #3 and #4. The building was expanded again circa 1958, adding one more turbine and associated equipment on to the southern portion of the building, referred to as Unit #5. There are three associated screen house buildings to the east of the Powerhouse Building, (Screen Houses #1, #2, and #3) which were constructed concurrently with the respective Powerhouse turbine units they served. The Mason Station power plant generated electric power for CMP using coal- and oil-fired steam boilers, from circa 1961 until power generation initially ceased in 1984. The plant was brought back online in 1988, and then deactivated again in 1989. CMP briefly reactivated the plant in 1997 in preparation for the sale of the facility to Florida Power and Light (FPL). FPL purchased the Site from CMP and owned it from 1999 to December 2003, when it was purchased by Mason Station, LLC. A large amount of boiler and generating equipment was removed from the Powerhouse Building for purchase by an outside investor between 2009 and 2012. During this time period, each of the five main power generation turbines was removed from the building, along with much of the process equipment, including the boiler unit from Unit #5. Much of this equipment was reportedly shipped overseas for re-assembly and reuse, though some of the removed equipment remains staged onsite, shrink wrapped and stored just off the south end of the Powerhouse Building.

The scope of this mercury assessment includes only the Powerhouse Building and three associated screen houses

### **LIMITATIONS**

This mercury assessment is subject to certain limitations, which must be considered when interpreting the results. The information presented in this report is based upon work undertaken by trained professional and technical staff in accordance with generally accepted engineering and scientific practices current at the time the work was performed. Conclusions represent the professional judgment of Ransom based on the data obtained from the work and the site conditions encountered at the time the work was performed and are not to be construed as legal advice.

In addition to these general stipulations, additional site-specific limitations are as follows:

1. Ransom was not able to access the basement portion of the Site building in Unit #5 due to flooding and cannot attest as to whether mercury-containing equipment is present in this portion of the Powerhouse building.

2. Our inspection was conducted for Mason Station LLC and is representative of conditions observed at the time of this report. No reliance shall be made by other users, for additional purposes, or for future demolition/renovation projects at the Site without written authorization.

### **BACKGROUND**

Ransom was provided with correspondences between Mason Station, LLC, FPL Energy, Point East Sales Office, the MEDEP, and CMP. The letters are dated between April 15 and 27, 2005 and summarize the mercury remediation performed at Mason Station.

A letter dated April 15, 2005 from Mason Station, LLC to FPL Energy, discussed that CMP will be hiring a contractor to conduct mercury remediation that was observed during the course of a MEDEP site inspection on April 12, 2005. During the course of the MEDEP's site inspection, free, uncontained mercury was observed in two locations along with several other areas with trace amounts of uncontained mercury. The letter also discussed an outside contractor was brought in to drain and store mercury contained in a variety of switches and equipment. The timing of this letter corresponds with the dates presented on the tags of equipment that had reportedly been drained (circa 2004).

A letter dated April 19, 2005 from the MEDEP to Point East Sales Office describes the site inspection that previously took place and request a written report regarding the remedial measures taken to address the mercury prior to April 29, 2005.

A letter dated April 27, 2005 from CPM to the MEDEP describes the previous letter sent from the MEDEP to Point East Sales Office. In this letter, CMP agreed to take the lead in remediating the mercury spills identified at Mason Station. The letter also states that CMP will be meeting with Environmental Projects, Inc. (EPI) of Auburn Maine to investigate the spills and determine how they can best be remediated.

A letter dated April 27, 2005 from Mason Station, LLC to the MEDEP states that, regarding the releases of mercury observed during the site inspection, that CMP has taken responsibility regarding the remedial activities.

Copies of these letters are provided at Attachment B.

As previously stated, Ransom performed an HBMI at the Site in November and December 2018. The HBMI included a preliminary assessment and inventory of mercury-containing components, and field-sampling for mercury vapors.

This preliminary survey of mercury-containing universal wastes did not constitute the "Mercury Equipment Inventory" requested in the MEDEP letter dated July 2, 2019. As previously noted, former mercury-containing equipment have been observed in electrical and control panels and associated with process equipment throughout the Powerhouse Building. Much of this former mercury-containing equipment is tagged noting its mercury was removed between 1993 and 2004; however, no report detailing this removal action or an inventory of equipment containing mercury has been located to date. During our universal waste survey, Ransom did conduct limited air quality screening. The air screening

Mason Station Mason Station LLC

did not indicate current exposure hazards relative to mercury, but readings taken within the drained reservoirs of these units did indicate some residual mercury vapor.

### MERCURY ASSESSMENT

On August 19 and 20, 2019, Ransom conducted a mercury assessment and inventory at the Site. A photograph log is included as Attachment A. The methodology of the assessment consisted of a visual reconnaissance through accessible portions of each Site building in a serpentine pattern to search for, assess and quantify the remaining mercury-containing equipment present within the Site buildings. It should be noted that mercury-containing equipment was only noted within the Powerhouse building at the Site and was not observed within any of the associated outbuildings.

### Basement

Within the northern portion of the Powerhouse building in the vicinity of the #5 and #6 boiler (Location ID M01), a Mercoid® switch containing two mercury ampoules was present. Mercury-containing components were not observed to be present in other inspected portions of the Site building's basement, however; a portion of the basement in Unit #5 was flooded and could not be accessed.

### Ground Level

On the ground level within the Powerhouse Building, Ransom observed mercury-containing thermometers, Mercoid® switches containing mercury ampoules and former equipment with mercury-containing reservoirs. Some of the mercury-containing reservoirs did not have tags indicating whether they had been drained. The type, quantity and location of the mercury-containing equipment observed on the ground floor is described in the table below and depicted on Figure 1.

Location	<b>Location ID</b>	Description	Quantity
Units #3 and #4, ground floor, east of #6 boiler.	M02	Bailey meter with reservoir. Tag indicating that the reservoir was drained, but residual mercury is likely present within the unit.	1
Units #1 and #2, ground floor, east of #3 and #4 boiler.	M03	Bailey meter with reservoir. A tag indicating the reservoir had been drained was not present.	1
Units #1 and #2, Ground floor maintenance shop, east of #2 boiler.	M04	Within the maintenance shop there are three thermometers.  Two are attached to the walls while one is present on a work bench.	3
Units #1 and #2, ground floor, east of #2 boiler.	M05	Bailey meter with reservoir. A tag indicating the reservoir had been drained was not present.	1

Location	<b>Location ID</b>	Description	Quantity
Units #1 and #2, ground floor east of #1 boiler, north of former #5 turbine.	M06	Bailey meter with reservoir. A tag indicating the reservoir had been drained was not present.	1
Unit #5, ground floor, north of the former #5 turbine.	M07	Location of three Mercoid® switches with the mercury- containing ampoules still in place.	3
Unit #5, ground floor, centrally located along the wall dividing Unit #5 and Units #1 and #2.	M08	Bailey recorder with reservoir. A tag indicating the reservoir had been drained was not present.	1
Located in the northwest corner of Unit #5 of the ground floor.	M09	Location of three Mercoid® switches, two of which had the mercury-containing ampoules still in place.	2

### Second Level

On the second level within the Powerhouse building, Ransom observed mercury-containing switches located atop a wooden crate in the central area of the second level along with equipment lockers that housed reservoirs designed to contain liquid mercury. The type, quantity and location of the mercury-containing equipment observed on the second level are described in the table below and depicted on Figure 2.

Location	<b>Location ID</b>	Description	Quantity
Northwest corner of Units #3 and #4, second level.	M10	Equipment locker containing eight mercury reservoirs. All of which had tags indicating mercury had been drained, but likely to contain residual amounts of mercury.	8
Immediately south of the equipment locker described above.	M11	Equipment locker containing seven mercury reservoirs. All of which had tags indicating mercury had been drained, but likely to contain residual amounts of mercury.	7
Western wall of Units #1 and #2, between the #3 and #4 boilers.	M12	Equipment lockers containing mercury reservoirs. Three were observed with tags indicating mercury had been drained, but likely to contain residual amounts of mercury. Some of the lockers could not be opened, but based on the layout of the equipment; it is possible that an additional four reservoirs are present.	3 - 7
Western wall of Units #1 and #2, between the #1 and #2 boilers.	M13	Equipment lockers containing mercury reservoirs. The six observed had tags indicating mercury had been drained, but likely to contain residual amounts of mercury. Some of the lockers could not be opened, but based on the layout of the equipment; it is possible that an additional three are present.	6 - 9

Location	<b>Location ID</b>	Description	Quantity
Western wall of Unit #5, located to the west of the former #7 boiler.	M14	Equipment locker containing seven mercury reservoirs. All of which had tags indicating mercury had been drained, but likely to contain residual amounts of mercury.	7
Eastern wall of Unit #5, located east of former #5 turbine.	M15	Equipment locker containing three mercury reservoirs. All of which had tags indicating mercury had been drained, but likely to contain residual amounts of mercury.	3
Centrally located in Units #1 and #2 of the second level atop wooden crates.	M16	Three Mercoid® switches and one mercury thermometer all still contain mercury.	4

### Third Level

On the third level within the Powerhouse building, Ransom observed mercury-containing thermometers attached to piping along with mercury-containing reservoirs that had tags indicating that they had been drained. Additionally, Ransom observed what appeared to be a staging area for discarded meters, gauges and other equipment located to the east of the #1 boiler. In this area, Ransom observed 15 removed Bailey meters which, based on observations made throughout the Powerhouse building, are known to be associated with mercury-containing reservoirs/equipment. The type, quantity and location of the mercury-containing equipment observed on the third level are described in the table below and depicted on Figure 3.

Location	<b>Location ID</b>	Description	Quantity
Units #3 and #4, third level, located between the #5 and #6 boilers.	M17	Six mercury containing reservoirs between two equipment lockers (3 in each). One of the reservoirs had been removed from the locker and was located on the floor. All six had tags indicating mercury had been drained, but likely contain residual amounts of mercury.	6
Units #1 and #2, attached to piping on the eastern side of the #3 and #4 boilers.	M18	Two thermometers likely containing mercury.	2
Units #1 and #2, located on the mezzanine just below the third level, to the east of the #3 and #4 boilers.	M19	Two thermometers attached to piping which likely contain mercury.	2

Location	<b>Location ID</b>	Description	Quantity
Units #1 and #2, located to the east of the #1 boiler	M20	Broken and discarded equipment staging area. Ransom observed 15 Bailey meters that are associated with mercury. Ransom observed 33 other pieces of equipment (gauges, meters etc.) that have the possibility to currently or have historically contained mercury. Visual observations did not identify mercury currently present in connection with these pieces of equipment.	15

### CONCLUSIONS AND RECOMMENDATIONS

Based on the results of this mercury assessment, Ransom makes the following conclusions and recommendations.

- 1. Throughout the Powerhouse building, between the basement and third level, Ransom observed a total of seventy-eight (78) pieces of equipment that either currently contain or formerly contained (drained reservoirs) mercury. Out of the 78 pieces of equipment, eighteen (18) consisted of mercury containing ampoules or thermometers and 60 consisted of reservoirs. Fifty-six (56) reservoirs were tagged to indicate that hey had been drained, while four had no tag indicating that they had been drained. The number of reservoirs possibly containing mercury could increase by seven based on the potential for additional mercury containing reservoirs to be present in equipment lockers that Ransom could not access. These numbers are derived from Ransom's observations during the Site visits on August 19 and 20, 2019 along with the methodology and limitations described previously in this report.
- 2. The equipment still containing mercury along with the reservoirs that formerly contained mercury should be removed from the Powerhouse building and disposed of under Universal Waste guidelines.

If you have any questions regarding the information in this report please do not hesitate to contact any of the undersigned.

Sincerely,

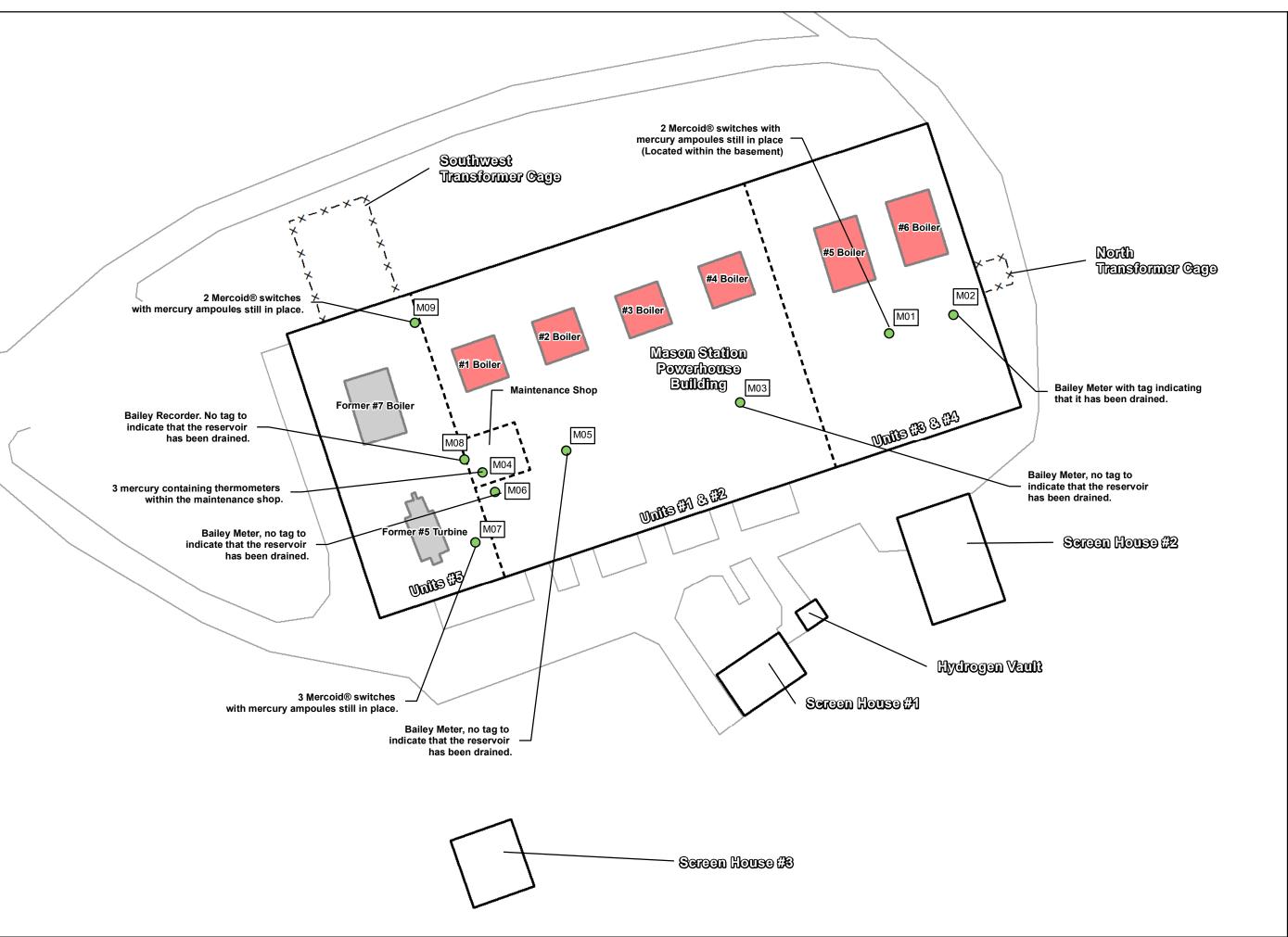
RANSOM CONSULTING, LLC

Christopher Veazie Project Geologist

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Stephen J. Dyer, P.E. Senior Project Manager

CMV/SJD: mes Attachments



# Legend & Notes





#### Notes

- 1. Site Plan based on State of Maine Orthophotography
- 2. Some features are approximate in location and scale
- This plan has been prepared for Mason Station, LLC. All other uses are not authorized unless written permission is obtained from Ransom Consulting, LLC.

### Scale & Orientation

1 inch = 50 feet

50

Prepared For

Mason Station, LLC 485 West Putnam Avenue Greenwich, Connecticut

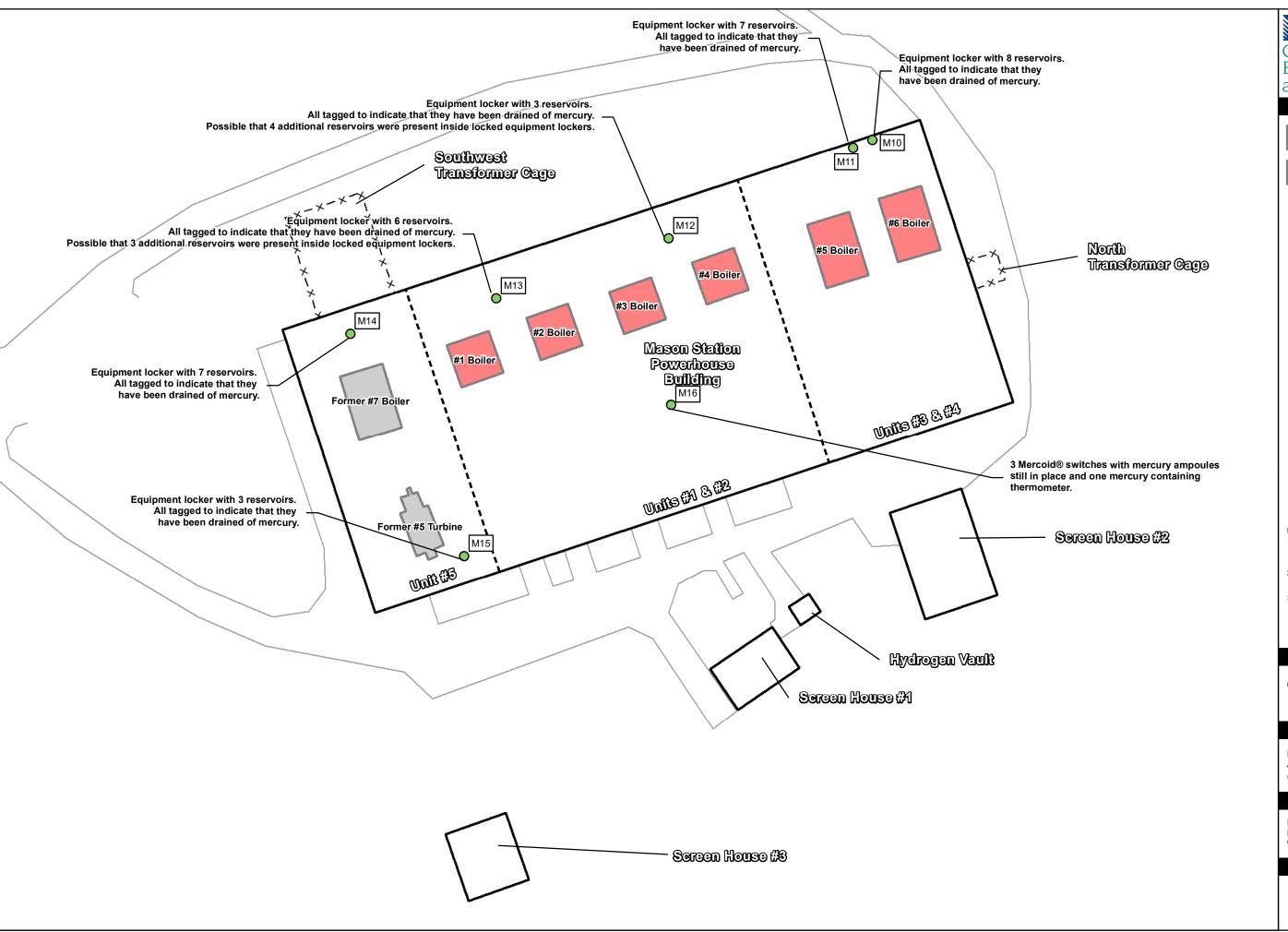
### Site Address

Mason Station Birch Point Road Wiscasset, Maine

# 171.06108 Feb 2020

Figure 1

**Ground Floor** 



# Legend & Notes



Former Features

Notes

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Mason Station, LLC 485 West Putnam Avenue Greenwich, Connecticut

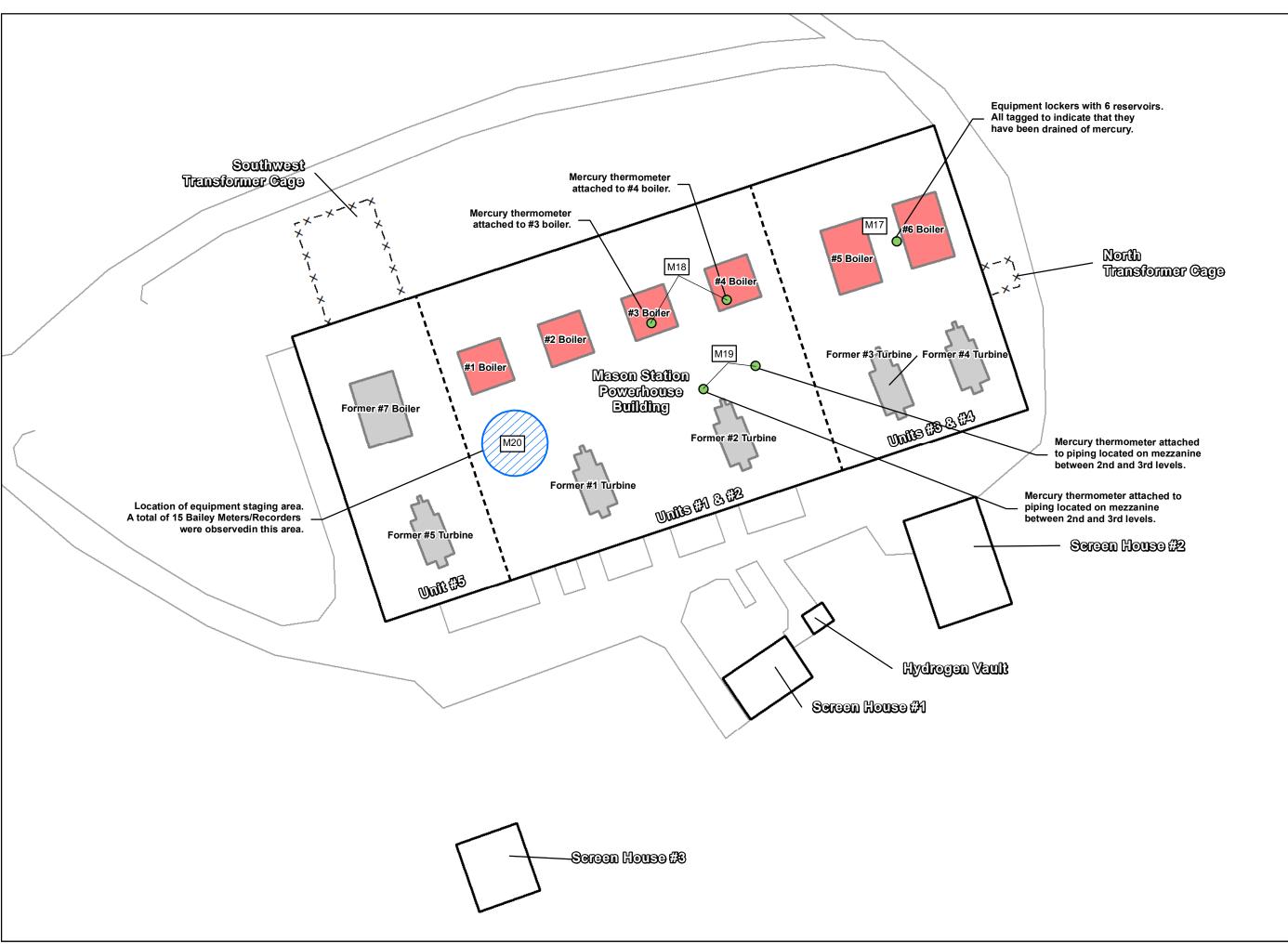
### Site Address

Mason Station Birch Point Road Wiscasset. Maine

### 171.06108 Feb 2020

Figure 2

Second Level



# Legend & Notes





#### Notes

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Mason Station, LLC 485 West Putnam Avenue Greenwich, Connecticut

### Site Address

Mason Station Birch Point Road Wiscasset, Maine

# 171.06108 Feb 2020

Figure 3

Third Level

# ATTACHMENT A

Photograph Log

Mercury Assessment Mason Station Wiscasset, Maine **Photograph Log** 



Location M01: View of two mercury ampoules located on a float switch in the basement towards the north portion of the powerhouse.



Location M02: View of Bailey meter located to the north portion on the ground level.



Location M03: View of reservoir on Bailey meter with no tag indicating if it has been drained. Located in central portion of ground floor.



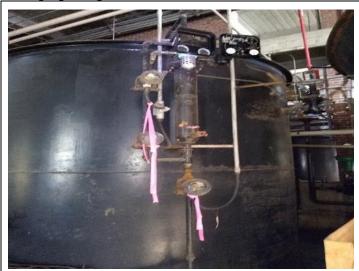
Location M04: View of two (out of three) mercury containing thermometers located within the maintenance shop on the ground level.



Location M05: Bailey Meter, no tag indicating if it has been drained.



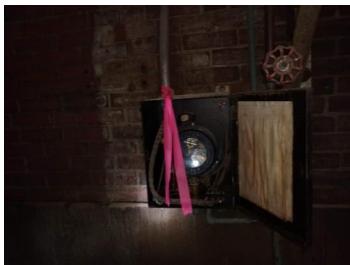
Location M06: Bailey Meter, no tag indicating if it has been drained.



Location M07: View of three Mercoid® switches located in the southern portion near the former #5 turbine.



Location M08: Bailey Meter, no tag indicating if it has been drained.



**Location M09: Two Mercoid® switches with the ampoules still in place.** 



Location M10 & M11: View of equipment locker located in the northwest portion of the building.



Location M12: View of equipment lockers located to the west of the #3 and #4 boilers.



Location M13: View of equipment lockers located to the west of the #1 and #2 boilers.



Location M14: View of equipment lockers located to the west of former #7 Boiler.



Location M15: View of equipment lockers located to the west of former #7 Boiler.



Location M16: View of three Mercoid® switches and one thermometer all still containing mercury. Centrally located second level.



Location M17: View of equipment locker situated between the #5 and #6 boilers on the third level.



Location M17: View of reservoir formerly containing mercury situated on the floor.



Location M18: Mercury thermometer attached to #3 boiler.

**Photograph Log** 



Location M18: Mercury thermometer attached to #4 boiler.



Location M19: Mercury thermometer attached to piping on mezzanine between  $2^{nd}$  and  $3^{rd}$  floors.



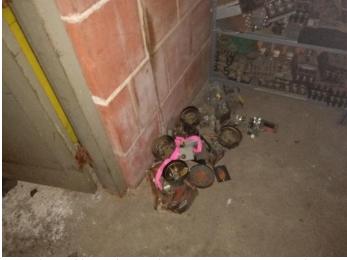
Location M20: Various Bailey Meters and other equipment that formerly or currently contain mercury.



Location M20: Various Bailey Meters and other equipment that formerly or currently contain mercury.



Location M20: Various Bailey Meters and other equipment that formerly or currently contain mercury.



Location M20: Various Bailey Meters and other equipment that formerly or currently contain mercury.

# ATTACHMENT B

Previous Correspondence

Mercury Assessment Mason Station Wiscasset, Maine

# **Mason Station, LLC**

# 485 West Putnam Avenue Greenwich, CT 06830

April 15, 2005

Mr. Al Wiley FPL Energy 160 Capitol Street Augusta, Maine 04330

SUBJECT: MASON STATION MERCURY

Dear Al,

I received a phone message yesterday from Ken Farber that CMP will be hiring a contractor to conduct the remediation of the mercury that was observed during the Maine DEP site inspection of Mason Station on Tuesday April 12. As you know, during the tour of the main building MEDEP's visual inspection uncovered two locations where free (uncontained) mercury was visible. In response to these initial findings, a more detailed search was performed by our plant staff and several additional areas with trace amounts of uncontained mercury were discovered. These areas should also be addressed.

As you are aware, last year an outside contractor was brought in to drain and store mercury contained in a variety of switches and other devices. We have contacted them and they have assured us that no spill or leakage of mercury resulted from their work. We have requested from them a list of any and all equipment and mechanisms where work was performed and an attestation that all mercury was contained, properly stored and that no spillage occurred.

If we can be of any further assistance please do not hesitate to call.

Sincerely,

Scott C. Houldin

Project Manager

SCH/mjf



### STATE OF MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN ELIAS BALDACCI

DAWN R. GALLAGHER

COMMISSIONER

GOVERNOR

April 19, 2005

Mr. Scott Houldin Point East Sales Office 262 Bath Road Wiscasset, ME 04578

Re:

Site Visit on April 12, 2005

Mason Station Generation Facility and Oil Terminal, Wiscasset, Maine

Dear Mr. Houldin.

I would like to thank you for providing the opportunity for Scott Whittier, Rick Kaselis and I to visit your Mason Station facility recently. I think we all agree that this visit was very helpful toward providing an understanding of the operations that took place at this facility and the some of issues that need to be considered in the event that you proceed to closure of this facility in the near future. We also are looking forward to receipt of the environmental assessments completed to date.

If the two mercury spills in the boiler control panels that were observed during our visit have not been remediated, they must be remediated as soon as possible. Please forward to my attention a written report of the spills, including the remedial measures taken, on or before April 29, 2005. The report should include a description of how and when the spills are likely to have occurred and what measures have been taken to prevent a recurrence.

If you have any questions or difficulties in that regard please contact the Department immediately. I plan to be out of the office during the week of April 18 but Rick Kaselis should be available at 287-6113. I will be back in the office the following week and can be reached at 287-7827.

Sincerely,

Edward J. Vigneault, Environmental Specialist III

Bureau of Remediation and Waste Management

Edward ! Unjude

Division of Oil and Hazardous Waste Facilities Regulation

Hazardous Waste Licensing Unit

 $\mathbf{Pc}$ 

Scott Whittier Rick Kaselis

Mason station llc visit

AUGUSTA 17 STATE HOUSE STATION AUGUSTA, MAINE 04333-0017 (207) 287-7688 RAY BLDG., HOSPITAL ST.

BANGOR 106 HOGAN ROAD BANGOR, MAINE 04401

PORTLAND 312 CANCO ROAD PORTLAND, MAINE 04103 (207) 941-4570 FAX: (207) 941-4584 (207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE 1235 CENTRAL DRIVE, SKYWAY PARK PRESQUE ISLE, MAINE 04769-2094 (207) 764-0477 FAX: 764-1507



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April 27, 2005

Mr. Edward J. Vigneault Bureau of Remediation and Waste Management Department of Environmental Protection State House Station 17 Augusta, ME 04333

Dear Ed:

Subject:

**Mason Station** 

Mercury Spill Clean Up

On April 19, 2005 you sent a letter to Scott Houldin of Point East requesting a report on the remediation of the mercury spills observed at Mason Station during your site visit of April 12. CMP received a copy of that letter on April 25, 2005. We have been unable to identify when the mercury-containing units were drained, or when the spills occurred. A recurrence of the spills should not be possible as we understand that all the mercury-containing units have now been drained. CMP has agreed to take the lead in remediating the mercury spills identified at Mason Station that occurred during the time CMP owned and operated the Mason Station to the extent required.

CMP has set up a meeting at Mason Station on May 3, 2005 with Environmental Projects, Inc. to investigate the spills and determine how they can best be remediated. Because the remediation activities may require movement of equipment and/or work around live electrical equipment, the meeting was scheduled when Mason Station personnel familiar with the station equipment would be available. We also understand that subsequent to your visit Mason Station personnel have identified several other areas where trace mercury amounts were found. These areas will also be investigated during the May 3<sup>rd</sup> meeting.

Mr. Edward J. Vigneault Page 2 of 2 April 27, 2005

A date to schedule the actual remediation of the mercury spills will be set as soon as possible after the May 3<sup>rd</sup> investigation. Once the remediation is completed, a report describing the work will be prepared for DEP. If you have any questions or we can provide additional information on this matter, please contact me.

Sincerely,

Roy A/Koster, P.E.

Seniør Environmental Specialist

cc: Scott Houldin, Mason Station LLC Al Wiley, FPLE

# **Mason Station LLC**

# 485 West Putnam Avenue Greenwich, CT 06830

April 27, 2005

Mr. Edward J. Vigneault Environmental Specialist III Bureau of Remediation and Waste Management Department of Environmental Protection 17 State House Station Augusta, Maine 04333-0017

### HAND DELIVERED

Dear Mr. Vigneault,

We are in receipt of your letter dated April 19, 2005 and would like to offer the following responses.

- 1) Four copies of the Phase II Environmental Site Assessment Report prepared by the Jacques Whitford Company, Inc.dated November 10, 2004 will be hand delivered to Rick Kaselis at the Maine Department of Environmental Protection office on April 28, 2005.
- In regards to the mercury releases that were observed during the site visit on April 2, 2005, Central Maine Power has taken responsibility and oversight for that remedial activity. We personally delivered a copy of your letter to Kenneth Farber, Senior Counsel at Central Maine Power on Monday, April 25, 2005 and asked him to contact you regarding this issue. We trust that he has made that contact and is taking appropriate action regarding the mercury. If this is not the case please contact us immediately.

We look forward to hearing back from you regarding the next steps. If you need any additional information please do not hesitate to call.

Scott C. Houldin

Principal and Project Manager

SCH/pcc

Since

Cc:

F. Allen Wiley - FPL Energy

Ken Farber – Central Maine Power