

Verso Corporation
Luke Mill
300 Pratt Street
Luke, MD 21540

ES-16-28

T 301 359 3311

W versoco.com

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

February 10, 2016

Mr. Edward E. Dexter, Director
Solid Waste Division
Maryland Department of the Environment
1800 Washington Blvd., Suite 605
Baltimore, MD 21230-1719

Dear Mr. Dexter:

Luke Paper Company generated approximately 58,663 tons of Coal Combustion By-Product during 2015 at our Luke Mill facility. All of the CCB material was hauled to a mine reclamation disposal facility (Permit No. CCB-10-001). Our 2015 Coal Combustion By-Product Annual Tonnage Report is enclosed.

If you have any questions or need any additional information regarding this matter, please contact me.

Sincerely,

A handwritten signature in black ink that reads "Larry A. Johnson".

Larry A. Johnson
Environmental Engineer

LAJ:plt
Enclosure

MARYLAND DEPARTMENT OF THE ENVIRONMENT

Land Management Administration • Solid Waste Program
1800 Washington Boulevard • Suite 605 • Baltimore Maryland 21230-1719
410-537-3315 • 800-633-6101 x3315 • www.mde.maryland.gov

Coal Combustion Byproducts (CCBs) Annual Generator Tonnage Report Instructions for Calendar Year 2015

The following is general information relating to the requirement for reporting quantities of coal combustion byproducts (CCBs) that were managed in the State of Maryland during calendar year 2015. Please answer the questions on the form provided, attaching additional information and any requested supplemental information to the back of the form. *Note that the form for this year requires both volume and weight of the CCBs produced. If you know one of these parameters but not the others, for example, you have the tonnage produced but not the volume, you may calculate the other parameter; however, please provide the calculations and assumptions that you used in your estimate.* Questions can be directed to the Solid Waste Program at (410) 537-3315 or via email at ed.dexter@maryland.gov.

I. Background. This requirement that generators of CCBs submit an annual report was instituted in the Code of Maryland Regulations COMAR 26.04.10.08, that was promulgated effective December 1, 2008. The regulation requires that any non-residential generator of CCBs submit a report to the Department by March 1 of each year describing the manner in which CCBs generated within the State were managed during the preceding calendar year. Additional information and specific instructions follow. For more detailed information, please refer to COMAR 26.04.10.08.

II. General Information and Applicability.

A. Definitions. CCBs are defined in COMAR 26.04.10.02B as:

*“(3) Coal Combustion Byproducts. (a) “Coal combustion byproducts” means the residue generated by or resulting from the burning of coal.
(b) “Coal combustion byproducts” includes fly ash, bottom ash, boiler slag, pozzolan, and other solid residuals removed by air pollution control devices from the flue gas and combustion chambers of coal burning furnaces and boilers, including flue gas desulfurization sludge and other solid residuals recovered from flue gas by wet or dry methods.”*

A generator of CCBs is defined in COMAR 26.04.10.02B as:

*“(9) Generator.
(a) “Generator” means a person whose operations, activities, processes, or actions create coal combustion byproducts.
(b) “Generator” does not include a person who only generates coal combustion byproducts by burning coal at a private residence.”*

Facility Name: Luke Paper Company **CCB Tonnage Report – 2015**

B. Applicability. If you or your company meets the definition of a generator of CCBs as defined above, you must provide the information as required below. For the purposes of this report, "you" shall hereinafter refer to the generator defined above. Please note that COMAR 26.04.10.08 requires generators of CCBs to submit an annual report to the Department concerning the disposition of the CCBs that they generated the previous year. **THIS INCLUDES CCBs THAT WERE NOT SEPARATELY COLLECTED BUT WERE PRODUCED BY THE BURNING OF COAL AND WERE DIRECTLY CONTRIBUTED TO A PRODUCT, such as cement.** Where the amount cannot be directly measured, estimates based on the amount of coal burned can be used. The method of determining the volume of CCBs produced must be described.

III. Required Information. The following information must be provided to the Department by March 1, 2016:

A. Contact information:

Facility Name: Luke Paper Company

Name of Permit Holder: Luke Paper Company

Facility Address: 300 Pratt Street
Street

Facility Address: Luke MD 21540
City State Zip

County: Allegany

Contact Information (Person filing report or Environmental Manager)

Facility Telephone No.: (301) 359-3311 Facility Fax No.: (301) 359-2040

Contact Name: Larry Johnson

Contact Title: Environmental Engineer

Contact Address: 300 Pratt Street
Street

Contact Address: Luke MD 21540
City State Zip

Contact Email: Larry.Johnson@versoco.com

Contact Telephone No.: (301) 359-3311 Contact Fax No.: (301) 359-2040

For questions on how to complete this form, please contact the Solid Waste Program at 410-537-3315

B. A description of the process that generates the CCBs, including the type of coal or other raw material that generates the CCBs. If the space provided is insufficient, please attach additional pages:

Approximately 900 tons of bituminous coal is delivered to the Luke Mill daily by three (3) different coal suppliers. The coal was burned in two (2) power boilers for the purpose of generating steam power, heat and electricity to the mill. The fly ash (CCB) from the boilers is collected in our fabric filter baghouse and the bottom ash (CCB) from both boilers is sent to our ash lagoon.

C. The volume and weight of CCBs generated during calendar year 2015, including an identification of the different types of CCBs generated and the volume of each type generated. If the space provided is insufficient, please attach additional pages in a similar format. If converting from volume to weight or weight to volume, please provide your calculations and assumptions.

Table I: Volume and Weight of CCBs Generated for Calendar Year 2015: Please note the change to this table from previous years, to include both the volume and weight of the types of CCBs your facility produces.

Volume and Weight of CCBs Generated for Calendar Year 2015			
Fly Ash	Bottom Ash		
Type of CCB 1ton ash = 28 cu ft. 37,544 x 28 cu ft./ 27 cu. ft/cu yd.	Type of CCB 1ton ash = 28 cu ft. 21,119 x 28 cu ft./ 27 cu. ft/cu yd.	Type of CCB	Type of CCB
<u>38,934 cu.yds.</u> Volume of CCB, in Cubic Yards	<u>21,901 cu.yds.</u> Volume of CCB, in Cubic Yards	Volume of CCB, in Cubic Yards	Volume of CCB, in Cubic Yards
<u>37,544</u> Weight of CCB, in Tons	<u>21,119</u> Weight of CCB, in Tons	Weight of CCB, in Tons	Weight of CCB, in Tons

Additional notes:

D. Descriptions of any modeling or risk assessments, or both, conducted relating to the CCBs or their use that were performed by you or your company during the reporting year. Please attach this information to the report. N/A

E. Copies of all laboratory reports of all chemical characterizations of the CCBs. Please attach this information to the report. (See Attachment E)

F. A description of how you disposed of or used your CCBs in calendar year 2015, identifying:

(a) The types and volume of CCBs disposed of or used (if different than described in Paragraph C above) including any CCBs stored during the previous calendar year, the location of disposal, mine reclamation and use sites, and the type and volume of CCBs disposed of or used at each site:

All the CCB material generated from the Luke Paper Mill has been hauled away and disposed of in an abandoned mine reclamation site that is owned and permitted by Moran Coal Company. The mine reclamation site (Permit No. CCB-10-001) has been approved by the Land Management Administration, Bureau of Mines and the site is currently active.

Facility Name: Luke Paper Company

CCB Tonnage Report – 2015

and (b) The different uses by type and volume of CCBs:

N/A

If the space provided is insufficient, please attach additional pages in a similar format.

G. A description of how you intend to dispose of or use CCBs in the next 5 years, identifying:

(a) The types and volume of CCBs intended to be disposed of or used, the location of intended disposal, mine reclamation and use sites, and the type and volume of CCBs intended to be disposed of or used at each site:

The future disposal of the CCB material from the Luke Paper Mill will continue to be disposed of into the abandoned mine reclamation site, permit CCB-10-001. This permitted site is owned and operated by Moran Coal Company. The types of CCB material disposed of at this disposal facility include; 37,544 tons of fly ash and 21,119 tons of bottom ash.

and (b) The different intended uses by type and volume of CCBs.

N/A

If the space provided is insufficient, please attach additional pages in a similar format.

Sturm Environmental Services

JOHN W. STURM, PRESIDENT

COMPANY: NEWPAGE DATE/TIME SAMPLED:* 11-18-15 1400
 SAMPLE ID: COAL COMBUSTION BY-PRODUCTS ANNUAL DATE/TIME RECEIVED: 11-24-15 0800
 TESTING. #25 FLY ASH
 SAMPLED BY: L. JOHNSON LABORATORY ID: NP 151124-1

TOXICITY CHARACTERISTIC LEACHING PROCEDURE

EPA HAZARDOUS WASTE NUMBER	CONTAMINANT	CONCENTRATION FOUND (mg/L)	EPA METHOD	METHOD DETECTION LIMIT	DATE/TIME ANALYZED	ANALYST	MAXIMUM CONCENTRATION (mg/L)
D004	ARSENIC	1.15	EPA 200.7 REV 4.4-1994	.02	12-03-15 0945	RS	5.00
D005	BARIUM	.408	EPA 200.7 REV 4.4-1994	.002	11-30-15 1453	RS	100.0
D006	CADMIUM	.001 J	EPA 200.7 REV 4.4-1994	.001	11-30-15 1453	RS	1.0
D007	CHROMIUM	U	EPA 200.7 REV 4.4-1994	.003	11-30-15 1453	RS	5.0
D008	LEAD	U	EPA 200.7 REV 4.4-1994	.02	12-03-15 0945	RS	5.0
D009	MERCURY	U	EPA 200.7 REV 4.4-1994	.02	11-29-15 1432	DB	.2
D010	SELENIUM	.140	EPA 200.7 REV 4.4-1994	.001	12-03-15 0945	RS	1.0
D011	SILVER	U	EPA 200.7 REV 4.4-1994	.0002	12-03-15 0945	RS	5.0

% SOLIDS: 100
 SLURRY pH: 6.99
 Final pH of Extract: 4.90
 Extraction fluid used: 1


EXTRACTION PERFORMED BY: DB/SW

*Client Provided

**See Attached. The following results meet or exceed requirements and standards set forth by the certifying authority except where noted.

Data Qualifiers

- B Analyte found in reagent blank. Indicates possible reagent or background contamination.
 E Estimated Reported value exceeded calibration range.
 J Reported value is an estimate because concentration is less than reporting limit.
 N Organic constituents tentatively identified. Confirmation is needed.
 PND Precision not determined.
 R Sample results rejected because of gross deficiencies in QC or method performance. Re-sampling and/or re-analysis is necessary.
 RND Recovery not determined.
 U Compound was analyzed for, but not detected.


 APPROVED

Sturm Environmental Services

JOHN W. STURM, PRESIDENT

COMPANY: NEWPAGE

DATE/TIME SAMPLED:* 11-18-15 1400

SAMPLE ID: COAL COMBUSTION BY-PRODUCTS ANNUAL
TESTING. #25 FLY ASH

DATE/TIME RECEIVED: 11-24-15 0800

SAMPLED BY: L. JOHNSON

LABORATORY ID: NP 151124-1

PARAMETER	TEST RESULTS	UNITS	METHOD	METHOD DETECTION LIMIT	DATE/TIME ANALYZED	ANALYST
Al	2.02	mg/L	EPA 200.7 Rev 4.4-1994	.02	11-30-15 1453	RS
Mn	.154	mg/L	EPA 200.7 Rev 4.4-1994	.002	11-30-15 1453	RS
Zn	.098	mg/L	EPA 200.7 Rev 4.4-1994	.004	11-30-15 1453	RS
Cu	.0063	mg/L	SM22 nd 3113 B	.0006	12-09-15 1957	RC

*Client Provided

**See Attached. The following results meet or exceed requirements and standards set forth by the certifying authority except where noted.

Data Qualifiers

- B Analyte found in reagent blank. Indicates possible reagent or background contamination.
- E Estimated Reported value exceeded calibration range.
- J Reported value is an estimate because concentration is less than reporting limit.
- N Organic constituents tentatively identified. Confirmation is needed.
- PND Precision not determined.
- R Sample results rejected because of gross deficiencies in QC or method performance. Re-sampling and/or re-analysis is necessary.
- RND Recovery not determined.
- U Compound was analyzed for, but not detected.

Approved _____

Sturm Environmental Services

JOHN W. STURM, PRESIDENT

COMPANY: NEWPAGE DATE/TIME SAMPLED:* 11-18-15 1300

SAMPLE ID: COAL COMBUSTION BY-PRODUCTS ANNUAL DATE/TIME RECEIVED: 11-24-15 0800
TESTING. BOTTOM ASH

SAMPLED BY: L. JOHNSON LABORATORY ID: NP 151124-2

TOXICITY CHARACTERISTIC LEACHING PROCEDURE

EPA HAZARDOUS WASTE NUMBER	CONTAMINANT	CONCENTRATION FOUND (mg/L)	EPA METHOD	METHOD DETECTION LIMIT	DATE/TIME ANALYZED	ANALYST	MAXIMUM CONCENTRATION (mg/L)
D004	ARSENIC	U	EPA 200.7 REV 4.4-1994	.02	12-03-15 0945	RS	5.00
D005	BARIUM	2.89	EPA 200.7 REV 4.4-1994	.002	11-30-15 1453	RS	100.0
D006	CADMIUM	U	EPA 200.7 REV 4.4-1994	.001	11-30-15 1453	RS	1.0
D007	CHROMIUM	.003 J	EPA 200.7 REV 4.4-1994	.003	11-30-15 1453	RS	5.0
D008	LEAD	U	EPA 200.7 REV 4.4-1994	.02	12-03-15 0945	RS	5.0
D009	MERCURY	U	EPA 200.7 REV 4.4-1994	.02	11-29-15 1432	DB	.2
D010	SELENIUM	U	EPA 200.7 REV 4.4-1994	.001	12-03-15 0945	RS	1.0
D011	SILVER	U	EPA 200.7 REV 4.4-1994	.0002	12-03-15 0945	RS	5.0

% SOLIDS: 100
SLURRY pH: 9.13
Final pH of Extract: 4.97
Extraction fluid used: 1

EXTRACTION PERFORMED BY: DB/SW

*Client Provided

**See Attached. The following results meet or exceed requirements and standards set forth by the certifying authority except where noted.

Data Qualifiers

- B Analyte found in reagent blank. Indicates possible reagent or background contamination.
- E Estimated Reported value exceeded calibration range.
- J Reported value is an estimate because concentration is less than reporting limit.
- N Organic constituents tentatively identified. Confirmation is needed.
- PND Precision not determined.
- R Sample results rejected because of gross deficiencies in QC or method performance. Re-sampling and/or re-analysis is necessary.
- RND Recovery not determined.
- U Compound was analyzed for, but not detected.



APPROVED

Sturm Environmental Services

JOHN W. STURM, PRESIDENT

COMPANY: NEWPAGE

DATE/TIME SAMPLED:* 11-18-15 1300

SAMPLE ID: COAL COMBUSTION BY-PRODUCTS ANNUAL
TESTING, BOTTOM ASH

DATE/TIME RECEIVED: 11-24-15 0800

SAMPLED BY: L. JOHNSON

LABORATORY ID: NP 151124-2

PARAMETER	TEST RESULTS	UNITS	METHOD	METHOD DETECTION LIMIT	DATE/TIME ANALYZED	ANALYST
Al	1.21	mg/L	EPA 200.7 Rev 4.4-1994	.02	11-30-15 1453	RS
Mn	.346	mg/L	EPA 200.7 Rev 4.4-1994	.002	11-30-15 1453	RS
Zn	.156	mg/L	EPA 200.7 Rev 4.4-1994	.004	11-30-15 1453	RS
Cu	.0050	mg/L	SM22 nd 3113 B	.0006	12-09-15 1957	RC

*Client Provided

**See Attached. The following results meet or exceed requirements and standards set forth by the certifying authority except where noted.
Data Qualifiers

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Approved _____