



Verso Corporation
Luke Mill
Environmental Department
300 Pratt Street
Luke MD 21540

ES-20-26

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February 28, 2020

Mr. Edward Dexter, Director Solid Waste Program
Maryland Department of the Environment
1800 Washington Boulevard
Baltimore, MD. 21230-1719

Dear Mr. Dexter:

Luke Paper Company generated approximately 18,863 tons of Coal Combustion By-Product during 2019 at our Luke Mill facility. All of the CCB material was hauled to a mine reclamation disposal facility (Permit No. CCB-10-001). Enclosed is our 2019 Coal Combustion By-Product Annual Generator Tonnage Report.

The Verso Luke Paper Company was officially closed on July 1, 2019 and all operations were shut down a month earlier. The coal fired boiler has not operated during the second half of 2019.

If you have any questions or need any additional information regarding this matter, please contact me at (301) 359-3311, Extension 3766

Sincerely,

A handwritten signature in blue ink, appearing to read 'Larry A. Johnson'.

Larry A. Johnson
Environmental Manager

LAJ:laj
Enclosure

RECEIVED

MAR 03 2020

**LANDMANAGEMENTADMIN
SOLIDWASTEPROGRAM**

MARYLAND DEPARTMENT OF THE ENVIRONMENT

Land and Materials 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 2019

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 2019. 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 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 MDE 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 – 2019

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 MDE 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 MDE by March 1, 2020:

A. Contact information:

Facility Name: Luke Paper Company

Name of Permit Holder: Verso Luke LLC

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 Manager

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) 359-3311

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:

Bituminous coal is delivered to the Luke Mill daily by (3) different coal suppliers. The coal is burned in (1) power boiler for the purpose of generating steam power, heat and electricity to the mill. The fly ash (CCB) from the boiler is collected in our fabric filter baghouse and the bottom ash is sent to our ash lagoon collection basin.

C. The volume and weight of CCBs generated during calendar year 2019, 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 2019: Please note that this table includes both the volume and weight of the types of CCBs your facility produces.

Volume and Weight of CCBs Generated for Calendar Year 2019			
Fly Ash	Bottom Ash		
Type of CCB 1 ton ash = 28 cu.ft. 13,602 tons x 28 cu.ft./ 27 cu.ft./cu.yd.	Type of CCB 1 ton ash = 28 cu.ft. 5,261 x 28 cu.ft./ 27 cu.ft./cu.yd.	Type of CCB	Type of CCB
14,106 cu.yds.	5,456 cu.yds.		
Volume of CCB, in Cubic Yards	Volume of CCB, in Cubic Yards	Volume of CCB, in Cubic Yards	Volume of CCB, in Cubic Yards
13,602 tons	5,261 tons		
Weight of CCB, in Tons	Weight of CCB, in Tons	Weight of CCB, in Tons	Weight of CCB, in Tons

Facility Name: Luke Paper Company **CCB Tonnage Report – 2019**

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

The intended use of the CCB material from the Luke Paper Mill is for the purpose of reclaiming an abandoned mine site that is permitted by our ash hauling contractor. Any future use of the Luke Mill CCB material by the contractor would be beyond the scope of this existing use. The contractor would be responsible for adhering to all federal and state regulatory requirements that would pertain to any use beyond the scope of this reclamation activity.

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 Luke Mill was officially closed on July 1, 2019 and the coal fired boiler was shut down one month earlier. Since the mill closure all CCB material has been removed from the mill and ash lagoon. In the event that the mill reopens it is expected that the future disposal of any CCB material will continue to be disposed of within the approved disposal sites identified below.

CCB-10-001 (6,000 tons/mon.), OPA 16-71 (5,000 tons/mon.), OPA 16-72 (8,000 tons/mon.), OPA 16-56 (2,000 tons/mon.), OPA 16-57 (2000 tons/mon.), OPA 16-58 (2,000 tons/mon.), OPA 16-59 (2,000 tons/mon.)

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

Any other use of the Luke Mill CCB material by the contractor would be beyond the intended use of reclaiming an abandoned mine site. The contractor would be responsible for adhering to all federal and state regulatory requirements for any different types of use.

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



JOHN W. STURM, PRESIDENT

COMPANY: VERSO CORP

DATE/TIME SAMPLED:* 04-17-19 1330

SAMPLE ID: #25 FLY ASH

DATE/TIME RECEIVED: 04-18-19 1200

SAMPLED BY: L. JOHNSON

LABORATORY ID: VERSO 190418-1

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	.059	SW 6010 B	.02	05-01-19 1406	DB	5.00
D005	BARIUM	.530	SW 6010 B	.002	05-01-19 1406	DB	100.0
D006	CADMIUM	U	SW 6010 B	.001	05-02-19 0521	DB	1.0
D007	CHROMIUM	U	SW 6010 B	.003	05-02-19 0521	DB	5.0
D008	LEAD	U	SW 6010 B	.02	05-01-19 1406	DB	5.0
D009	MERCURY	U	SW 7470 A	.0005	05-15-19 0942	DB	.5
D010	SELENIUM	.06	SW 6010 B	.02	05-01-19 1406	DB	1.0
D011	SILVER	U	SW 6010 B	.001	05-01-19 1406	DB	5.0
	% SOLIDS	100	EPA 160.3	0.5	04-29-19 1855	SW	
	Slurry pH	12.05	SW 1311	.1	04-29-19 1855	SW	≤ 2 OR ≥ 12.5 (20% (aq) liquids only)
	Final pH	5.20	SW 1311		04-30-19 1225	HN	

*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.
- 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.
- O Out of holding. Time does not meet 40 CFR 136.141 compliance.
- T This result is not supported by our certification ID.
- A Does not meet 40 CFR 136.141 compliance.
- C Does not meet 47 CSR 32 compliance.

Narrative:

Approved 

Sturm Environmental Services

JOHN W. STURM, PRESIDENT

COMPANY: VERSO CORP

DATE/TIME SAMPLED:* 04-17-19 1330

SAMPLE ID: #25 FLY ASH

DATE/TIME RECEIVED: 04-18-19 1200

SAMPLED BY: L. JOHNSON

LABORATORY ID: VERSO 190418-1

PARAMETER	TEST RESULTS	UNITS	METHOD	METHOD DETECTION LIMIT	DATE/TIME ANALYZED	ANALYST
As	11.8	mg/kg	3050B:6010B	1.0	05-01-19 1406	DB
Cd	.15 J	mg/kg	3050B:6010B	.05	05-01-19 1406	DB
Cr	12.6	mg/kg	3050B:6010B	.15	05-01-19 1406	DB
Cu	15.0	mg/kg	3050B:6010B	.15	05-01-19 1406	DB
Pb	3.00	mg/kg	3050B:6010B	1.0	05-01-19 1406	DB
Hg	.62	mg/kg	7472 Cold Vapor	.03	05-01-19 1406	DB
Ba	250.	mg/kg	3050B:6010B	.10	05-03-19 0544	DB
B	22.0	mg/kg	3050B:6010B	1.50	05-01-19 1406	DB
Se	3.19	mg/kg	3050B/7742	.09	05-02-19 1455	MM
Zn	14.2	mg/kg	3050B:6010B	.20	05-03-19 0544	DB
Li	28.8	mg/kg	3050B:6010B	.25	05-01-19 1406	DB
Al	9200.	mg/kg	3050B:6010B	1.00	05-01-19 0544	DB
Mo	.50 J	mg/kg	3050B:6010B	.50	05-01-19 0544	DB
Mn	93.0	mg/kg	3050B:6010B	.25	05-01-19 0544	DB
Ag	U	mg/kg	3050B:7010	.010	05-08-19 2350	ML

*Client Provided

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

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 T This result is not supported by our certification ID.
 A Does not meet 40 CFR 136.141 compliance.
 C Does not meet 47 CSR 32 compliance.

Narrative:

BASED ON 100% SOLIDS

Approved 

Sturm Environmental Services

JOHN W. STURM, PRESIDENT

COMPANY: VERSO CORP

DATE/TIME SAMPLED:* 04-17-19 1330

SAMPLE ID: BOTTOM ASH

DATE/TIME RECEIVED: 04-18-19 1200

SAMPLED BY: L. JOHNSON

LABORATORY ID: VERSO 190418-2

PARAMETER	TEST RESULTS	UNITS	METHOD	METHOD DETECTION LIMIT	DATE/TIME ANALYZED	ANALYST
As	6.00	mg/kg	3050B 6010B	1.0	05-01-19 1406	DB
Cd	.05 J	mg/kg	3050B 6010B	.05	05-01-19 1406	DB
Cr	7.55	mg/kg	3050B:6010B	.15	05-01-19 1406	DB
Cu	9.60	mg/kg	3050B:6010B	.15	05-01-19 1406	DB
Pb	2.00 J	mg/kg	3050B:6010B	1.0	05-01-19 1406	DB
Hg	U	mg/kg	7472 Cold Vapor	.03	05-01-19 1406	DB
Ba	191.	mg/kg	3050B:6010B	.10	05-03-19 0544	DB
B	12.0	mg/kg	3050B 6010B	1.50	05-01-19 1406	DB
Se	.70	mg/kg	3050B/7742	.09	05-02-19 1455	MM
Zn	9.0	mg/kg	3050B:6010B	.20	05-03-19 0544	DB
Li	146.	mg/kg	3050B 6010B	.25	05-01-19 1406	DB
Al	5600.	mg/kg	3050B 6010B	1.00	05-01-19 0544	DB
Mo	U	mg/kg	3050B 6010B	.50	05-01-19 0544	DB
Mn	52.5	mg/kg	3050B:6010B	.25	05-01-19 0544	DB
Ag	U	mg/kg	3050B 7010	.010	05-08-19 2350	ML

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Approved 

