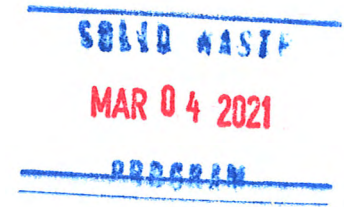




February 26, 2021

Mr. Ed Dexter  
Program Administrator  
Maryland Department of the Environment  
Land and Materials Administration  
Solid Waste Program  
1800 Washington Boulevard, Suite 605  
Baltimore, Maryland 21230-1719



Re: Calendar Year 2020 Coal Combustion Byproducts Annual Generator Tonnage Reports for Brandon Shores and H. A. Wagner Electric Generating Stations

Dear Mr. Dexter:

Enclosed please find the 2020 Coal Combustion Byproducts (CCBs) Annual Generator Tonnage Reports for Raven Power's Brandon Shores and H.A. Wagner Generating Stations. These reports cover the period from January 1, 2020 to December 31, 2020 for the coal-fired units at these facilities and reflect CCBs production, beneficial reuse, and disposal.

For any questions regarding these reports, please contact me at 410-787-5423, or by email at [edwin.much@talenergy.com](mailto:edwin.much@talenergy.com).

Regards,

Edwin Much  
Digitally signed by Edwin Much  
DN: cn=Edwin Much, o=Talen Energy, ou, email=edwin.much@talenergy.com, c=US  
Date: 2021.02.26 12:39:52 -05'00'

Edwin Much  
Regional Environmental Director

Enclosures (2)

**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 MDE by ~~March 1,~~ MAR 04 2021 2021:

A. Contact information:

Facility Name: Brandon Shores Generating Station

Name of Permit Holder: Brandon Shores LLC

Facility Address: 2030 Brandon Shores Road  
Street

Facility Address: Baltimore MD 21409  
City State Zip

County: Anne Arundel

Contact Information (Person filing report or Environmental Manager)

Facility Telephone No.: 410-787-6928 Facility Fax No.: 410-255-1793

Contact Name: Edwin Much

Contact Title: Regional Environmental Director

Contact Address: 1005 Brandon Shores Road, Suite 100  
Street

Contact Address: Baltimore MD 21409  
City State Zip

Contact Email: edwin.much@talenergy.com

Contact Telephone No.: 410-787-5423 Contact Fax No.: 410-255-7608

*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:

Brandon Shores electrical generating station consists of two coal fired units which produce electricity for commercial sale. Units are equipped with Babcock & Wilcox natural circulation radiant boilers. Bituminous coal is delivered by barge and stored in a pile adjacent to the plant. A proprietary additive, Chem-Mod™, is added to the coal for NOx, and mercury reduction as it is conveyed by belt from the coal pile to storage bunkers in the plant. The coal is pulverized and fed by air to the boilers where it is burned using low NOx burners. Heavier bottom ash drops to the bottom of the boilers where it is conveyed by high-pressure water to settling bins before being loaded onto trucks for beneficial reuse or disposal. Lighter fly ash is conveyed by furnace air flow to electrostatic precipitators where the ash is collected on charged plates and falls into storage hoppers. Fly ash from the hoppers is conveyed pneumatically to storage silos before being trucked off site for beneficial reuse or disposal. High carbon fly ash is retained and re-burned. Pulse jet fabric filters downstream of the precipitators remove remaining fly ash which has been mixed with powdered activated carbon and hydrated lime injected into the flue gas stream for emissions control. This fly ash is conveyed to storage silos for reuse or disposal. The wet flue gas desulfurization (FGD) scrubber produces CCBs including fly ash, gypsum, and FGD sludge. These CCBs are stored under cover before being loaded onto trucks for beneficial reuse or disposal. Waste water fines are from CCB clean up or area wash downs and are sent to the settling basin at the internal waste water treatment plant for storage. This basin is periodically de-watered and the CCBs are allowed to dry before being dug out, loaded on trucks, and sent for disposal.

C. The volume and weight of CCBs generated during calendar year 2020, 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 2020:** Please note that this table includes both the volume and weight of the types of CCBs your facility produces.

<b>Volume and Weight of CCBs Generated for Calendar Year 2020</b>				
Fly Ash	Bottom Ash	Gypsum	FGD Sludge	Waste Water Fines
Type of CCB	Type of CCB	Type of CCB	Type of CCB	Type of CCB
37,075	3,238	78,593	1,013	8,752
Volume of CCB, in Cubic Yards	Volume of CCB, in Cubic Yards	Volume of CCB, in Cubic Yards	Volume of CCB, in Cubic Yards	Volume of CCB, in Cubic Yards
27,528	2,404	58,355	752	6,498
Weight of CCB, in Tons	Weight of CCB, in Tons	Weight of CCB, in Tons	Weight of CCB, In Tons	Weight of CCB, in Tons

Additional notes:

Coal combustion byproducts (CCBs) are reported in dry tons. Cubic yards are calculated using a conversion factor of 1 ton equals 1.3468 cubic yards (CY).

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.

No modeling or risk assessments were completed during 2020.

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

No chemical characterization of CCBs were performed during 2020.

F. A description of how you disposed of or used your CCBs in calendar year 2020, 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:

Fly Ash - Beneficial Reuse

20,537 tons (27,659 CY) of fly ash was delivered to Separation Technologies, LLC in Baltimore, MD for use in concrete.

2,516 tons (3,389 CY) delivered to Lehigh in Union Bridge, MD for use in cement manufacturing.

Fly Ash - Disposal

4,475 tons (6,027 CY) of fly ash was delivered to Fort Armistead - Lot 15 Landfill in Baltimore, MD for landfilling.

Bottom Ash - Beneficial Reuse

2,404 tons (3,238 CY) of bottom ash was delivered to Fort Armistead - Lot 15 Landfill in Baltimore, MD for drainage/protective layer above the liner.

Gypsum - Beneficial Reuse

49,877 tons (67,175 CY) delivered to USG in Baltimore, MD for use in wallboard manufacturing.

6,483 tons (8,731 CY) delivered to USG in Danville, PA for use in wallboard manufacturing.

47 tons (63 CY) delivered to Zimmerman Farms in Lititz, PA for use as a soil amendment.

22 tons (30 CY) delivered to McIntyre Farm Princess Anne, MD for use as a soil amendment.

Gypsum - Disposal

29 tons (39 CY) of gypsum was delivered to Fort Armistead - Lot 15 Landfill in Baltimore, MD for landfilling.

Gypsum – Storage

3 tons (4 CY) of gypsum stored on site at the end of 2019 was beneficially reused or disposed of in 2020. Note that stored gypsum was accounted for in Table I of reporting year 2019 and was not included in gypsum generated in 2020 (Table I).

Gypsum stored at the end of 2019 is accounted for in beneficial reuse and disposal amounts above.

1,900 tons (2,559 CY) of gypsum was stored on site at the end of 2020.

FGD Sludge - Disposal

752 tons (1,013 CY) of FGD sludge was delivered to Fort Armistead Road - Lot 15 Landfill in Baltimore, MD for landfilling.

Waste Water Fines - Disposal

6,498 tons (8,752 CY) of waste water fines was delivered to Fort Armistead - Lot 15 Landfill in Baltimore, MD for landfilling.

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

**Fly Ash**

23,053 tons (31,048 CY) of fly ash was used in cement/concrete manufacturing.

**Bottom Ash**

2,404 tons (3,238 CY) of bottom ash was used as drainage/protective layer above a landfill liner.

**Gypsum**

56,360 tons (75,906 CY) of gypsum was used in wallboard manufacturing.

69 tons (93 CY) of gypsum was used in agriculture as a soil amendment.

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:

**Fly Ash**

Raven Power projects that as much as 25,000 tons (33,670 CY) of fly ash will be generated each year for the next five years. Approximately 22,500 tons (30,303 CY) of fly ash will be beneficially used in cement products and the remaining 2,500 tons (3,367 CY) will be disposed of in the Fort Armistead Road - Lot 15 Landfill in Baltimore, MD.

**Bottom Ash**

Raven Power projects that as much as 5,000 tons (6,734 CY) of bottom ash will be generated each year for the next five years, all of which will be beneficially used as drainage/protective layer above the liner in the Fort Armistead Road - Lot 15 Landfill in Baltimore, MD.

**Gypsum**

Raven Power projects that as much as 50,000 tons (67,340 CY) of gypsum will be generated each year for the next five years, all of which will be beneficially used in wallboard, cement, and agriculture.

**FGD Sludge**

Raven Power projects that as much as 5,000 tons (6,734 CY) of FGD sludge will be generated each year for the next five years, all of which will be disposed of in the Fort Armistead Road - Lot 15 Landfill in Baltimore, MD.

**Waste Water Fines**

Raven Power projects that as much as 5,000 tons (6,734 CY) of waste water fines will be generated each year for the next five years, all of which will be disposed of in the Fort Armistead Road - Lot 15 Landfill in Baltimore, MD.

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

**Fly Ash**

Approximately 22,500 tons (30,303 CY) of fly ash each year will be beneficially used in the manufacturing of cement.

**Bottom Ash**

Approximately 5,000 tons (6,734 CY) of bottom ash each year will be beneficially used as drainage/protective layer above a landfill liner.

**Gypsum**

Approximately 50,000 tons (67,340 CY) of gypsum each year will be beneficially used in wallboard, cement, and agriculture.

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

