



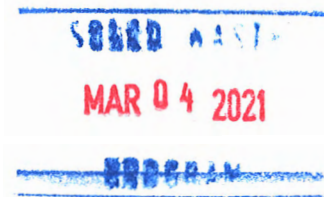
Verso Corporation
Luke Mill
Environmental Department
300 Pratt Street
Luke MD 21540

ES-21-9

T 301 359 3311
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February 26, 2021

Mr. Andrew Grenzer
Chief Solid Waste Operations Division
Maryland Department of the Environment
1800 Washington Boulevard
Baltimore, MD. 21230-1719



Dear Mr. Grenzer:

Luke Paper Company disposed of approximately 18,049 tons of Coal Combustion By-Product during 2020 from the mills ash lagoon storage area. All of the CCB material was hauled to a mine reclamation disposal facility (Permit No. CCB-10-001). Enclosed is our 2020 Coal Combustion By-Product Annual Generator Tonnage Report.

The closure of the Luke Mill in 2019 has resulted in no additional CCB material being generated and the only source of CCB material is from the mills ash lagoon site. The coal fired boiler has not operated since the closure of the mill in 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 black ink, appearing to read 'Larry A. Johnson'.

Larry A. Johnson
Environmental Manager

LAJ:laj
Enclosure

**Coal Combustion Byproducts (CCBs)
Annual Generator Tonnage Report
Instructions for Calendar Year 2020**

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 2020. 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 – 2020**

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, 2021:

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.: 301-359-2040

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:

The Luke Mill has been permanently closed for the entire 2020 report year. The mill has not generated any CCB material for 2020.

This report represents ash material dredged from the mills ash lagoon.

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.

Volume and Weight of CCBs Generated for Calendar Year 2020			
Bottom ash removed from ash lagoon only			
Type of CCB 1,560 loads @ 12 yds. per load	Type of CCB	Type of CCB	Type of CCB
18,720 cu. yds.			
Volume of CCB, in Cubic Yards 1,560 loads @ 11.57 tons per load	Volume of CCB, in Cubic Yards	Volume of CCB, in Cubic Yards	Volume of CCB, in Cubic Yards
18,049 tons			
Weight of CCB, in Tons	Weight of CCB, in Tons	Weight of CCB, in Tons	Weight of CCB, in Tons

Additional notes:

During the 4th quarter of 2020 Verso has been removing the accumulated ash material from the ash lagoon in order for it to be permanently closed. The ash removed has been taken to the permitted CCB disposal facility (Permit No. CCB-10-001)

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.

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:

All of the CCB material dredged from the mills ash lagoon has been hauled away and disposed of within the active CCB disposal facility permitted through the Maryland Department of the Environment, Land Management Administration, Bureau of Mines. Permit No. CCB-10-001.

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

The intended use of the CCB material dredged from the ash lagoon is for the purpose of reclaiming an abandoned mine site that has been permitted by the ash hauling company.

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:

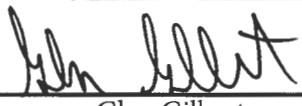
All additional ash material removed from the ash lagoon will be hauled to the existing CCB permitted facility (CCB-10-001).

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

Any other use of the Luke Mill CCB material by the ash hauling contractor would be beyond the intended use of reclaiming an abandoned mine site. The contractor would therefore 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.

IV. Signature and Certification. An authorized official of the generator must sign the annual report, and certify as to the accuracy and completeness of the information contained in the annual report:

This is to certify that, to the best of my knowledge, the information contained in this report and any attached documents are true, accurate, and complete.		
	 <hr/> Glen Gilbert Facility Manager (301) 359-3311	
Signature	Name, Title, & Telephone No. (Print or Type)	Date
	<hr/> glen.gilbert@versoco.com Your Email Address	<hr/> 2/26/21

V: Attachments (please list):

Attachment E

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

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	SW 6010 B	.02	05-01-19 1406	DB	5.00
D005	BARIUM	1.82	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	U	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	8.34	SW 1311	.1	04-29-19 1855	SW	≤ 2 OR ≥ 12.5 (-20% (aq) liquids only)
	Final pH	4.80	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: 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

*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:

BASED ON 100% SOLIDS

Approved 

