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Mirant Mid-Atlantic, LLC
8301 Professional Place, Suite 230
Landover, MD. 20785
T 301-955-9051 F 301-955-9015

MIRANT

Mr. Edward M. Dexter, Administrator
Solid Waste Program, Suite 605
Maryland Dept. of the Environment
1800 Washington Boulevard
Baltimore, MD. 21230

February 24, 2010

Re: 2009 CCB Tonnage Report – Mirant Mid-Atlantic, LLC – Dickerson Generating Station
2009 CCB Tonnage Report – Mirant Mid-Atlantic, LLC – Morgantown Generating Station

Dear Mr. Dexter,

Pursuant to COMAR 26.04.10.08 that states that generators of coal combustion byproducts (CCBs) file an annual report by March 1 describing the manner in which CCBs were managed during the preceding year, Mirant Mid-Atlantic, LLC hereby submits reports for coal combustion byproducts generated at its Dickerson Generating Station located in Montgomery County, and its Morgantown Generating Station located in Charles County.

Please feel free to contact me at 301-955-9051 should you have any questions or concerns regarding this report.

Sincerely,

Elizabeth A. Spitzer
Environmental Analyst
8301 Professional Place
Suite 230
Landover, MD. 20785

Enclosures

MARYLAND DEPARTMENT OF THE ENVIRONMENT
1800 Washington Boulevard • Suite 605 • Baltimore, Maryland 21230-1719
410-537-3375 • 800-633-6101 x3375 • www.mde.state.md.us
Land Management Administration • Solid Waste Program

Coal Combustion Byproducts (CCB) Annual Generator Tonnage Report

Instructions for Calendar Year 2009

The following is general information relating to the requirement for reporting quantities of coal combustion byproducts that were managed in the State of Maryland during calendar year 2009. Please answer the questions on the form provided, attaching additional information and any requested supplemental information to the back of the form.

I. Background. This requirement that generators of coal combustion byproducts (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. Coal combustion byproducts 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."*

B. Applicability. **If you or your company meet 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

Facility Name: Dickerson Generating Station **CCB Tonnage Report – 2009**

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.

III. Required Information. The following information must be provided to the Department by March 1, 2010:

A. Contact information:

Facility Name: Dickerson Generating Station

Name of Permit Holder: Mirant Mid-Atlantic, LLC

Facility Address: 21200 Martinsburg Rd.
Street

Facility Address: Dickerson MD. 20842
City State Zip

County: Montgomery

Contact Information (Person filing report or Environmental Manager)

Facility Telephone No.: 301-601-6500 Facility Fax No.: 301-601-6556

Contact Name: Elizabeth Spitzer

Contact Title: Environmental Analyst

Contact Address: 8301 Professional Place, Suite 230
Street

Contact Address: Landover MD. 20785
City State Zip

Contact Email: elizabeth.spitzer@mirant.com

Contact Telephone No.: 301-955-9051 Contact Fax No.: 301-955-9015

For questions on how to complete this form, please call Mr. Edward Dexter, Administrator, Solid Waste Program at 410-537-3318.

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

See Attachment A.

C. The annual volume of coal combustion byproducts generated during the last calendar year, including an identification of the different types of coal combustion byproducts generated and the volume of each type generated. If the space provided is insufficient, please attach additional pages in a similar format:

Table I: Volume of CCBs Generated for Previous Calendar Year:

Reporting Year	Volume of CCB Type: Flyash	Volume of CCB Type: Bottom Ash	Volume of CCB Type:
2009	61,924.9 tons	8,444.3 tons	

Additional notes:

CCBs reported in dry short tons.

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

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

F. A description of how you disposed of or used your coal combustion byproducts in the last calendar year , identifying:

(a) The types and volume of coal combustion byproducts disposed of or used (if different than described in Paragraph C above), the location of disposal, mine reclamation and use sites, and the type and volume of coal combustion byproducts disposed of or used at each site:

Amount of fly ash generated in 2009 was 61,924.9 tons, all of which was disposed of at the Westland Ash Site, which is located adjacent to the Dickerson Generating Station in Montgomery County, MD.

Bottom Ash generated in 2009 was 8,444.3 tons of which 1335 tons were sold to SEFA, whose headquarters are in Columbia, SC.

and (b) The different uses by type and volume of coal combustion byproducts:

Bottom Ash:
Volume: 1335 tons
Uses: 1100 tons roadway snow and ice removal
235 tons Portland Cement Kiln Feed

If the space provided is insufficient, please attach additional pages in a similar format. . (Please note that in subsequent years you need only provide the information in Section F for the last calendar year).

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

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

Fly ash: Anticipate approximately 62,000 tons generated of which all will be transported for disposal to the Westland Ash Site in Montgomery County, MD.

Bottom Ash: Approximate about 8500 tons to be generated, all of which is expected to be transported for disposal at the Westland Ash Site in Montgomery County, MD.

On-spec Gypsum: An estimated 302,200 tons generated, all of which to be transported to LaFarge in Buchannan, NY.

Waste Water Treatment Plant Fines (WWTP Fines): Anticipate 12,000 tons to be generated all of which will be shipped to Waste Management's Amelia Landfill in VA.

Note: Projected annual figures.

and (b) The different intended uses by type and volume of coal combustion byproducts.

On-Spec Gypsum:
Volume: 302,200 tons
Uses: Wallboard
Note: Projected annual figures.

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.		
Signature	James P. Garlick, SR VP - Operations 678-579-5040 Name, Title, & Telephone No. (Print or Type) jim.garlick@mirant.com Your Email Address	2-17-10 Date

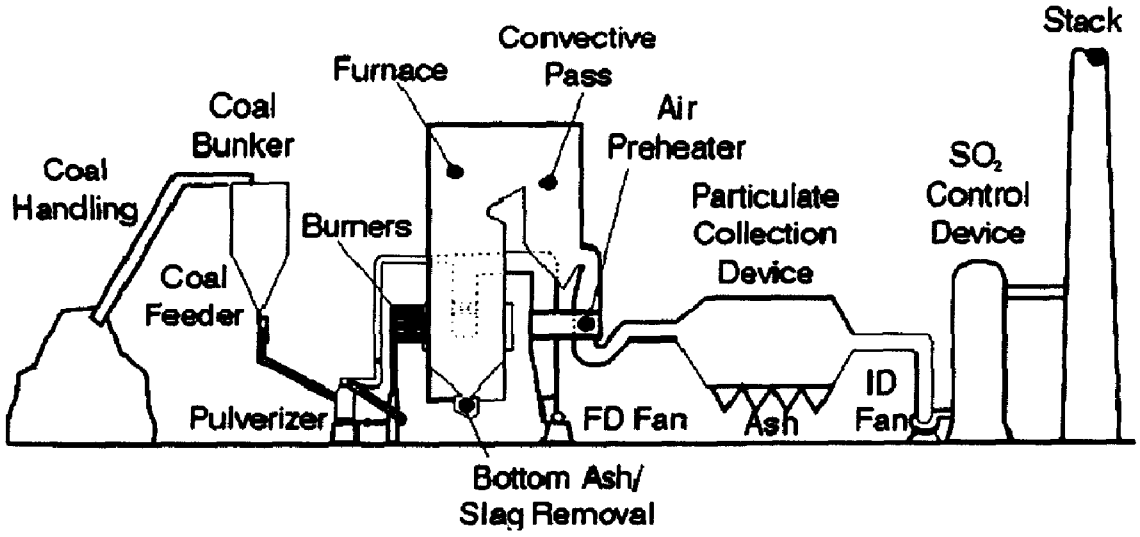
Attachment A

Dickerson Generating Station
21200 Martinsburg Road,
Dickerson, Montgomery County, MD. 20842
301-601-6500

The Dickerson Generating Station is located on the Potomac River, south of the Monocay River in upper Montgomery County, near Dickerson, MD. The facility is engaged in the generation of electric energy for sale. The primary SIC code for this facility is 4911. The facility consists of three steam units, each rated at 191 MWs (base loaded), firing bituminous coal. Each unit is tangentially fired, with a superheater, reheat and economizer. Electrostatic precipitators (ESPs) and a baghouse are installed for particulate control. Low NOx burners, Separated Over-Fired Air (SOFA), Selective Non Catalytic Reduction (SNCR) along with an advanced combustion control system are installed on each unit to reduce and control emissions of oxides of nitrogen (NOx). A Wet Scrubber (FGD) was installed and went in service on the three units in late 2009. The units exhaust through the scrubber stack or, when the FGD is not in service, through a common 700 ft. stack.

Coal is delivered to the Dickerson facility by rail. The rail cars are emptied using a rotary dumper, then transferred by conveyor to either a storage pile or fed directly to a unit's bunker.

The illustration below shows a simple schematic diagram for a typical pulverized coal combustion system. The coal is prepared by grinding to a very fine consistency for combustion.



Attachment A

The CCBs currently produced and used are a result of the combustion of pulverized coal.

Ash is formed in the boiler while coal combusts. In general, pulverized coal combustion results in approximately 10 % ash, of which 65%–85% is fly ash, and the remainder is coarser bottom ash. Bottom ash is a coarse material and falls to the bottom of the boiler. Fly ash is finer than bottom ash and is carried along the combustion process with flue gas. Particulate collection devices remove fly ash from the flue gas and the collected ash is transferred to two ash silos. Fly ash that is not marketed is sent to the Westland Ash Site, whose property is separated from the Dickerson facility by a public road, and is also located in Montgomery County. The bottom ash is conveyed out of the bottom of the boiler via a wet sluice system to hydrobins, where the water is then decanted and the bottom ash sent to the Westland Ash Site, where it is often used in the construction of flyash disposal cells.

Gypsum is a byproduct of SO2 removal by the Flue Gas Desulfurization (FGD) system, commonly known as a scrubber. Dickerson uses wet scrubbers for SO2 removal. Wet scrubbing utilizes a chemical reaction with limestone alkaline sorbent to remove SO2, - as well as some mercury contaminants - from the air stream. The byproduct - gypsum - is sent to the Morgantown Generating Station where it is then conveyed to a barge and transported to La Farge located in Buchannan, New York where it is made into wallboard. Waste Water Treatment Plant Fines (WWTP Fines) are removed from the Scrubber's WWTP as needed and transported to Waste Management's Amelia Landfill in Virginia for disposal.