



ES-19-32

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

February 22, 2019

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 35,807 tons of Coal Combustion By-Product during 2018 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 2018 Coal Combustion By-Product Annual Generator Tonnage Report.

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 that reads 'Larry A. Johnson'.

Larry A. Johnson  
Sr. Environmental Engineer

LAJ:plt  
Enclosure

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

**T** 301 359 3311  
**F** 301 359 2040  
**W** versoco.com

**RECEIVED**

**MAR 01 2019**

**LAND MANAGEMENT ADMIN.  
SOLID WASTE PROGRAM**

# 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](http://www.mde.maryland.gov)

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MAR 01 2019

## **Coal Combustion Byproducts (CCBs) Annual Generator Tonnage Report Instructions for Calendar Year 2018**

LAND MANAGEMENT ADMIN.  
SOLID WASTE PROGRAM

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 2018. 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](mailto: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."*

**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, 2019:

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: Sr. 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:

Bituminous coal is delivered to the Luke Mill daily by three (3) different coal suppliers. The coal is burned in one (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 2018, 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 2018:** 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 2018</b>			
Fly Ash	Bottom Ash		
Type of CCB	Type of CCB	Type of CCB	Type of CCB
1ton ash = 28 cuft.	1ton ash = 28 cuft.		
25,821 x 28 cuft./ 27 cu. ft/cu yd.	9,986 x 28 cuft./ 27 cu. ft/cu yd.		
26,777 cu.yds.	10,356 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
25,821 tons	9,986 tons		
Weight of CCB, in Tons	Weight of CCB, in Tons	Weight of CCB, in Tons	Weight of CCB, in Tons

Additional notes:

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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 2018, 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 within an abandoned mine  
reclamation site (Permit No. CCB-10-001)that is permitted through  
the Maryland Department of Environment, Land Management Admin.,  
Bureau of Mines. This site is currently active.

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

Our intended use of the CCB material from the Luke Paper Mill is for the purpose of reclaiming an abandoned mine site of which the ash hauling contractor owns and has permitted for disposal and reclamation. Any future use of the Luke Mill CCB material by the contractor beyond this existing use is performed by the contractor and they would have to adhere to all federal and state regulatory requirements pertaining to CCB use.

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:

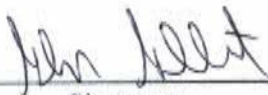
The future disposal of the CCB material from the Luke Paper Mill will continue to be disposed of at the abandoned mine reclamation site, and several active mining sites. The future disposal sites include; CCB-10-001 (6,000 tons/mon.), OPA 16-71 (5,000 tons/mon.), OPA 16-72 (8,000 tons/mon.), OPA 16-56 (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 different use of the Luke Mill CCB material by the contractor will be beyond our current intended use. The hauling contractor would have to adhere to all federal and state regulatory requirements for those different uses.

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	<u>Glen Gilbert for Jeff Yoder</u> _____ Jeffery Yoder Luke Mill Manager (301) 359-3311 _____ Name, Title, & Telephone No. (Print or Type)	_____ 2/27/19 _____ Date
	_____ jeffery.yoder@versoco.com _____ Your Email Address	

**V: Attachments (please list):**

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# Sturm Environmental Services

JOHN W. STURM, PRESIDENT

COMPANY: VERSO CORP

DATE/TIME SAMPLED:\* 12-18-18 1330

SAMPLE ID: #25 FLY ASH

DATE/TIME RECEIVED: 12-26-18 1400

SAMPLED BY: L. JOHNSON

LABORATORY ID: LUKE181226-1

## 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)
#004	ARSENIC	U	SW 6010 B	.02	01-18-19 1103	DB	5.00
#005	BARIUM	U	SW 6010 B	.002	01-18-19 1103	DB	100.0
#006	CADMIUM	U	SW 6010 B	.001	01-18-19 1103	DB	1.0
#007	CHROMIUM	U	SW 6010 B	.003	01-18-19 1103	DB	5.0
#008	LEAD	U	SW 6010 B	.02	01-18-19 1103	DB	5.0
#009	MERCURY	U	SW 7470 A	.0002	01-24-19 1436	DB	.2
#010	SELENIUM	U	SW 6010 B	.020	01-24-19 1103	DB	1.0
#011	SILVER	U	SW 6010 B	.001	01-18-19 1103	DB	5.0
	% SOLIDS	100	SW 1311		01-13-19 1530	SW	
#002	Slurry pH	11.2	SW 1311	.1	01-13-19 1530	SW	≤ 2 OR ≥ 12.5 (- 20% (aq)-liquids only)
	Final pH	4.62	SW 1311		01-14-19 0930	DB	

\*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**

COMPANY: VERSO CORP

DATE/TIME SAMPLED:\* 12-18-18 1330

SAMPLE ID: #25 FLY ASH

DATE/TIME RECEIVED: 12-26-18 1400

SAMPLED BY: L. JOHNSON

LABORATORY ID: LUKE181226-1

PARAMETER	TEST RESULTS	UNITS	METHOD	METHOD DETECTION LIMIT	DATE/TIME ANALYZED	ANALYST
Al	9.14	mg/L	SW 6010B	.02	01-19-19 1130	DB
Mn	.345	mg/L	SW 6010B	.004	01-19-19 1130	DB
Zn	.118	mg/L	SW 6010B	.004	01-19-19 1130	DB
Cu	.014	mg/L	SW 6010B	.003	01-19-19 1130	DB

\*Client Provided

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- C Does not meet 47 CSR 32 compliance.

Narrative:

Approved 

# Sturm Environmental Services

JOHN W. STURM, PRESIDENT

COMPANY: VERSO CORP  
 SAMPLE ID: #25 FLY ASH  
 SAMPLED BY: L. JOHNSON

DATE/TIME SAMPLED:\* 12-18-18 1330  
 DATE/TIME RECEIVED: 12-26-18 1400  
 LABORATORY ID: LUKE181226-1

PARAMETER	TEST RESULTS	UNITS	METHOD	METHOD DETECTION LIMIT	DATE/TIME ANALYZED	ANALYST
As	17.6	mg/kg	3050B/6010B	1.0	01-22-19 1327	DB
Cd	.41	mg/kg	3050B/7010	.005	01-23-19 0532	ML
Cr	11.0	mg/kg	3050B/6010B	.15	01-23-19 0532	DB
Cu	14.2	mg/kg	3050B/6010B	.15	01-23-19 0532	DB
Pb	2.70	mg/kg	3050B/6010B	.025	01-23-19 0532	DB
Hg	.83	mg/kg	7472 Cold Vapor	.03	01-30-19 1431	DB
Ba	305.	mg/kg	3050B/6010B	.10	01-23-19 0532	DB
B	48.6	mg/kg	3050B/6010B	2.50	01-23-19 0532	DB
Se	2.66	mg/kg	3050B/7742	.06	01-22-19 0957	MM
Zn	14.1	mg/kg	3050B/6010B	.20	01-23-19 0532	DB
Li	18.1	mg/kg	3050B/6010B	.25	01-22-19 1327	DB
Al	6350.	mg/kg	3050B/6010B	1.00	01-23-19 0532	DB
Mo	2.00	mg/kg	3050B/6010B	.50	01-23-19 0532	DB
Mn	60.5	mg/kg	3050B/6010B	.10	01-23-19 0532	DB
Ag	U	mg/kg	3050B/7010	.010	01-22-19 2202	ML
SO4	2930.	mg/kg	EPA 300.0 Rev 2.1-1993	5.0	01-04-19 1533	DC

\*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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 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 2g SAMPLE & 100% SOLIDS  
 \*MATRIX INTERFERENCE.

Approved



# Sturm Environmental Services

JOHN W. STURM, PRESIDENT

COMPANY: VERSO CORP

DATE TIME SAMPLED:\* 12-18-18 1355

SAMPLE ID: BOTTOM ASH

DATE TIME RECEIVED: 12-26-18 1400

SAMPLED BY: L. JOHNSON

LABORATORY ID: LUKE191226-2

## 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)
X004	ARSENIC	U	SW 6010 B	.02	01-18-19 1103	DB	5.00
X005	BARIUM	U	SW 6010 B	.002	01-18-19 1103	DB	100.0
X006	CADMIUM	U	SW 6010 B	.001	01-18-19 1103	DB	1.0
X007	CHROMIUM	U	SW 6010 B	.003	01-18-19 1103	DB	5.0
X008	LEAD	U	SW 6010 B	.02	01-18-19 1103	DB	5.0
X009	MERCURY	U	SW 7470 A	.0002	01-24-19 1436	DB	.2
X010	SELENIUM	U	SW 6010 B	.020	01-24-19 1103	DB	1.0
X011	SILVER	U	SW 6010 B	.001	01-18-19 1103	DB	5.0
	% SOLIDS	100	SW 1311		01-13-19 1530	SW	
X002	Slurry pH	7.88	SW 1311	.1	01-13-19 1530	SW	≤ 2 OR ≥ 12.5 ( 20% (aq) liquids only)
	Final pH	5.23	SW 1311		01-14-19 0930	DB	

\*Client Provided

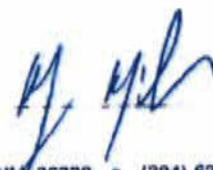
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- C Does not meet 47 CSR 32 compliance.

Narrative:

Approved





# Sturm Environmental Services

Attachment E

JOHN W. STURM, PRESIDENT

COMPANY: VERSO CORP  
 SAMPLE ID: BOTTOM ASH  
 SAMPLED BY: L. JOHNSON

DATE/TIME SAMPLED:\* 12-18-18 1355  
 DATE/TIME RECEIVED: 12-26-18 1400  
 LABORATORY ID: LUKE181226-2

PARAMETER	TEST RESULTS	UNITS	METHOD	METHOD DETECTION LIMIT	DATE/TIME ANALYZED	ANALYST
As	7.05	mg/kg	3050B/6010B	1.0	01-22-19 1327	DB
Cd	.45	mg/kg	3050B/7010	.005	01-23-19 0532	ML
Cr	8.55	mg/kg	3050B/6010B	.15	01-23-19 0532	DB
Cu	13.9	mg/kg	3050B/6010B	.15	01-23-19 0532	DB
Pb	1.90	mg/kg	3050B/6010B	.025	01-23-19 0532	DB
Hg	U	mg/kg	7472 Cold Vapor	.03	01-30-19 1431	DB
Ba	486.	mg/kg	3050B/6010B	.10	01-23-19 0532	DB
B	48.6	mg/kg	3050B/6010B	2.50	01-23-19 0532	DB
Se	.75	mg/kg	3050B/7742	.06	01-22-19 0957	MM
Zn	13.0	mg/kg	3050B/6010B	.20	01-23-19 0532	DB
Li	15.3	mg/kg	3050B/6010B	.25	01-22-19 1327	DB
Al	7050.	mg/kg	3050B/6010B	1.00	01-23-19 0532	DB
Mo	U	mg/kg	3050B/6010B	.50	01-23-19 0532	DB
Mn	85.0	mg/kg	3050B/6010B	.10	01-23-19 0532	DB
Ag	U	mg/kg	3050B/7010	.010	01-22-19 2202	ML
SO4	106.	mg/kg	EPA 300.0 Rev 2.1-1993	5.0	01-04-19 1533	DC

\*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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Narrative:

BASED ON 2g SAMPLE & 100% SOLIDS

Approved

