



February 25, 2022

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

Re: Calendar Year 2021 Coal Combustion Byproducts Annual Generator Tonnage Reports for Brandon Shores and H.A. Wagner Electric Generating Stations

Dear Mr. Dexter:

Enclosed please find the 2021 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, 2021 to December 31, 2021 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@talenenergy.com.

Regards,

Edwin Much

Edwin Much Regional Environmental Director

Enclosures (2)

<u>B.</u> 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.

<u>III. Required Information.</u> The following information must be provided to MDE by March 1, 2022:

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: <u>Baltimore</u> ^{City}	MD State	21226 Zip		
County: Anne Arundel				
Contact Information (Person filing report or Enviro	onmental Manager)			
Facility Telephone No.: <u>410-787-6928</u>	Facility Fax No.: <u>410-255-1793</u>			
Contact Name: Edwin Much				
Contact Title: Regional Environmental Director				
Contact Address: <u>1005 Brandon Shores Road, Su</u> Street				
Contact Address: <u>Baltimore</u> City	MD State	21226 Zip		
Contact Email: <u>edwin.much@talenenergy.com</u>				
Contact Telephone No.: <u>410-787-5423</u>	Contact Fax No.: <u>410-255-7608</u>			
For questions on how to complete this form, p	lease contact the Solid Waste Progra	m at		

410-537-3315

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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. Sorbent is added to the coal for pollutant 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 reburned. 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 conveved 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. Wastewater fines are from CCB clean up or area wash downs and are sent to the settling basin at the internal wastewater treatment plant for storage. This basin is periodically de-watered and the CCBs are allowed to dry before being excavated, loaded on trucks, and sent for disposal.

C. The volume and weight of CCBs generated during calendar year 2021, 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.

	Volume and Weight of CCBs Generated for Calendar Year 2021			
Fly Ash	Bottom Ash	Gypsum	FGD Sludge	Wastewater Fines
Type of CCB	Type of CCB	Type of CCB	Type of CCB	Type of CCB
107,220	10,322	175,273	4,862	18,228
Volume of CCB,	Volume of CCB,	Volume of CCB,	Volume of CCB,	Volume of CCB,
in Cubic Yards	in Cubic Yards	in Cubic Yards	in Cubic Yards	in Cubic Yards
79,611	7,664	130,140	3,610	13,534
Weight of CCB,	Weight of CCB,	Weight of CCB,	Weight of CCB,	Weight of CCB,
in Tons	in Tons	in Tons	in Tons	in Tons

Table I: Volume and Weight of CCBs Generated for Calendar Year 2021: Please note that this table includes both the volume and weight of the types of CCBs your facility produces.

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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 2021.

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 2021.

F. A description of how you disposed of or used your CCBs in calendar year 2021, 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

65,170 tons (87,771 CY) of fly ash was delivered to Separation Technologies in Baltimore, MD for use in concrete.

1,915 tons (2,579 CY) of fly ash was delivered to Lehigh in Union Bridge, MD for cement manufacturing.

Fly Ash - Disposal

12,526 tons (16,870 CY) of fly ash was delivered to Fort Armistead – Lot 15 landfill in Baltimore, MD for landfilling.

Bottom Ash - Beneficial Reuse

7,664 tons (10,322 CY) of bottom ash was delivered to the Fort Armistead - Lot 15 Landfill in Baltimore, MD for drainage/protective layer above the liner.

Gypsum - Beneficial Reuse

125,085 tons (168,464 CY) delivered to USG in Baltimore, MD for use in wallboard manufacturing.

6,955 tons (9,367 CY) delivered to USG in Danville, PA for use in wallboard manufacturing.

Gypsum - Disposal

0 tons (0 CY) of gypsum was disposed of.

Gypsum – Storage

1,900 tons (2,559 CY) of gypsum stored on site at the end of 2020 was beneficially reused or disposed of in 2021. Note that stored gypsum was accounted for in Table I of reporting year 2020 and was not included in gypsum generated in 2021 (Table I).

Gypsum stored at the end 2020 is accounted for in beneficial reuse and disposal amounts above. 0 tons (0 CY) of gypsum was stored on site at the end of 2021.

FGD Sludge – Disposal

3,610 tons (4,862 CY) of FGD sludge was delivered to Fort Armistead Road – Lot 15 landfill in Baltimore, MD for landfilling.

Wastewater Fines - Disposal

13,534 tons (18,228 CY) of wastewater fines was delivered to the Fort Armistead - Lot 15 Landfill in Baltimore, MD for landfilling.

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

Fly Ash

67,085 tons (90,350 CY) of fly ash was used in cement/concrete manufacturing.

Bottom Ash

7,664 tons (10,322 CY) of bottom ash was used as drainage/protective layer above a landfill liner.

Gypsum

132,040 tons (177,831 CY) of gypsum was used in wallboard manufacturing.

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:

Brandon Shores Generating Station will cease burning coal by 2025; therefore, the projections are limited to the next four years.

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 and cement.

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.

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Wastewater Fines

Raven Power projects that as much as 5,000 tons (6,734 CY) of wastewater 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 and cement.

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.

	410 - 787 - 6928	
Charle Olwo Signature	<u>Charles Oliver Plant Mgr</u> Name, Title, & Telephone No. (Print or Type) <u>Charles, Oliver Stolen Europy. Co.</u> Your Email Address	<u>d/24/22</u> Date

V: Attachments (please list):

None.