



ES-14-29

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

February 24, 2014

Mr. Edward M. Dexter, Administrator
Waste Diversion and Utilization Program
Land Management Administration
Maryland Department of the Environment
Suite 610
1800 Washington Boulevard
Baltimore, Md. 21230-1719

SOLID WASTE
FEB 27 2014
PROGRAM

Dear Mr. Dexter:

NewPage Corporation generated approximately 76,548 tons of Coal Combustion By-Product during 2013 at our Luke Mill facility. The CCB material was hauled to a mine reclamation disposal facility (Permit No. CCB-10-001). I have enclosed the 2013 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,

Larry A. Johnson
Environmental Engineer
laj9@newpagecorp.com

LAJ:plt
Enclosure

**Coal Combustion Byproducts (CCBs)
Annual Generator Tonnage Report
Instructions for Calendar Year 2013**

SOLID WASTE
FEB 27 2014
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 2013. 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 for this year 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 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.”*

Facility Name: Luke Paper Company

CCB Tonnage Report – 2013

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, 2014:

A. Contact information:

Facility Name: Luke Paper Company

Name of Permit Holder: Moran Coal Company

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 Engineer

Contact Address: 300 Pratt Street
Street

Contact Address: Luke Md. 21540
City State Zip

Contact Email: larry.johnson@newpagecorp.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:

Approximately 1,200 tons of bituminous coal is delivered to the Luke Mill daily by three (3) different coal suppliers. The coal is burned in two (2) power boilers for the purpose of generating steam power, heat and electricity to the mill. The fly ash from the boilers are collected in our fabric filter baghouse and the bottom ash from both boilers is sent to our ash lagoon.

C. The volume and weight of CCBs generated during calendar year 2013, 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 2013: Please note the change to this table from previous years, to include both the volume and weight of the types of CCBs your facility produces.

Volume and Weight of CCBs Generated for Calendar Year 2013			
Fly Ash	Bottom Ash		
Type of CCB	Type of CCB	Type of CCB	Type of CCB
1 ton ash = 28 cu.ft. 57,411 tons x 28 / 27 cu.ft./cu.yd	1 ton ash = 28 cu.ft. 19,137 tons x 28 / 27 cu.ft./cu.yd		
59,537	19,846		
Volume of CCB, in Cubic Yards	Volume of CCB, in Cubic Yards	Volume of CCB, in Cubic Yards	Volume of CCB, in Cubic Yards
57,411	19,137		
Weight of CCB, in Tons	Weight of CCB, in Tons	Weight of CCB, in Tons	Weight of CCB, in Tons

Additional notes:

Facility Name: Luke Paper Company

CCB Tonnage Report – 2013

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 2013, 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 in an abandoned mine reclamation site owned and permitted by Moran Coal Company. The mine reclamation site (Permit No. CCB-10-001) has been approved by the Land Management Administration, Bureau of Mines and this site is currently active.

Facility Name: Luke Paper Company

CCB Tonnage Report – 2013

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

N/A

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 byproducts from the Luke Paper Mill will continue to be disposed of into the abandoned mine reclamation site, permit CCB-10-001. This permitted site is owned and operated by Moran Coal Company. The types of CCB material disposed of in this disposal facility include; 57,411 tons of fly ash and 19,137 tons of bottom ash.

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

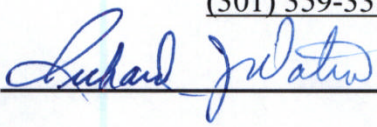
If the space provided is insufficient, please attach additional pages in a similar format.

Facility Name: Luke Paper Company

CCB Tonnage Report – 2013

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>Richard J. Watro</u> <u>Luke Mill Manager</u> <u>(301) 359-3311</u> 	<u>02/19/14</u> Date
	Name, Title, & Telephone No. (Print or Type) <u>RJW4@NewPageCorp.com</u> Your Email Address	

V: Attachments (please list):

Attachment E

Sturn **E**nvironmental **S**ervices

JOHN W. STURM, PRESIDENT

COMPANY: NEW PAGE CORPORATION

DATE/TIME SAMPLED: 12-11-13

SAMPLE ID: COAL CUMBUSTION BY-PRODUCTS #24 FLY ASH
ANNUAL TESTING

DATE/TIME RECEIVED: 12-18-13 0930

SAMPLED BY: L. JOHNSON

TOXICITY CHARACTERISTIC LEACHING PROCEDURE

EPA HAZARDOUS WASTE NUMBER	CONTAMINANT	CONCENTRATION FOUND (mg/l)	MAXIMUM CONCENTRATION (mg/l)
D004	ARSENIC	.09	5.00
D005	BARIUM	.660	100.0
D006	CADMIUM	.035	1.0
D007	CHROMIUM	.109	5.0
D008	LEAD	<.02	5.0
D009	MERCURY	<.0002	.2
D010	SELENIUM	.09	1.0
D011	SILVER	<.001	5.0

% SOLIDS: 100

SLURRY pH: 3.24

Final pH of Extract: 4.89

Extraction fluid used: 1

EXTRACTION PERFORMED BY: SW

*Client Provided

**See Attached. The following results meet or exceed requirements and standards set forth by the certifying authority except where noted.



APPROVED



JOHN W. STURM, PRESIDENT

COMPANY: NEW PAGE CORPORATION

DATE/TIME SAMPLED:* 12-11-13

SAMPLED BY: L. JOHNSON

DATE/TIME RECEIVED: 12-18-13 0930

SAMPLE ID	Al mg/L	Mn mg/L	Zn mg/L	Cu mg/L
COAL CUMBUSTION BY-PRODUCTS #24 FLY ASH ANNUAL TESTING	11.5	.402	3.55	1.20

*Client Provided

**See Attached.

The following results meet or exceed requirements and standards set forth by the certifying authority except where noted.

APPROVED 



JOHN W. STURM, PRESIDENT

COMPANY: NEW PAGE CORPORATION

DATE/TIME SAMPLED:* 12-11-13

SAMPLE ID: COAL CUMBUSTION BY-PRODUCTS #25 FLY ASH
ANNUAL TESTING

DATE/TIME RECEIVED: 12-18-13 0930

SAMPLED BY: L. JOHNSON

TOXICITY CHARACTERISTIC LEACHING PROCEDURE

EPA HAZARDOUS WASTE NUMBER	CONTAMINANT	CONCENTRATION FOUND (mg/l)	MAXIMUM CONCENTRATION (mg/l)
D004	ARSENIC	.13	5.00
D005	BARIUM	.972	100.0
D006	CADMIUM	.003	1.0
D007	CHROMIUM	.030	5.0
D008	LEAD	<.02	5.0
D009	MERCURY	<.0002	.2
D010	SELENIUM	.03	1.0
D011	SILVER	<.001	5.0

% SOLIDS: 100

SLURRY pH: 9.52

Final pH of Extract: 5.03

Extraction fluid used: 1

EXTRACTION PERFORMED BY: SW

*Client Provided

**See Attached. The following results meet or exceed requirements and standards set forth by the certifying authority except where noted.

APPROVED



JOHN W. STURM, PRESIDENT

COMPANY: NEW PAGE CORPORATION

DATE/TIME SAMPLED:* 12-11-13

SAMPLED BY: L. JOHNSON

DATE/TIME RECEIVED: 12-18-13 0930

SAMPLE ID	Al mg/L	Mn mg/L	Zn mg/L	Cu mg/L
COAL CUMBUSTION BY-PRODUCTS #25 FLY ASH ANNUAL TESTING	5.87	.384	.572	.025

*Client Provided

**See Attached.

The following results meet or exceed requirements and standards set forth by the certifying authority except where noted.

APPROVED



JOHN W. STURM, PRESIDENT

COMPANY: NEW PAGE CORPORATION

DATE/TIME SAMPLED: 12-11-13

SAMPLE ID: COAL CUMBUSTION BY-PRODUCTS BOTTOM ASH
ANNUAL TESTING

DATE/TIME RECEIVED: 12-18-13 0930

SAMPLED BY: L. JOHNSON

TOXICITY CHARACTERISTIC LEACHING PROCEDURE

EPA HAZARDOUS WASTE NUMBER	CONTAMINANT	CONCENTRATION FOUND (mg/l)	MAXIMUM CONCENTRATION (mg/l)
D004	ARSENIC	.04	5.00
D005	BARIIUM	1.77	100.0
D006	CADMIUM	<.001	1.0
D007	CHROMIUM	.023	5.0
D008	LEAD	<.02	5.0
D009	MERCURY	<.0002	.2
D010	SELENIUM	<.02	1.0
D011	SILVER	<.001	5.0

% SOLIDS: 100

SLURRY pH: 7.77

Final pH of Extract: 5.04

Extraction fluid used: 1

EXTRACTION PERFORMED BY: SW

*Client Provided

**See Attached. The following results meet or exceed requirements and standards set forth by the certifying authority except where noted.

APPROVED

Sturm Environmental Services

JOHN W. STURM, PRESIDENT

COMPANY: NEW PAGE CORPORATION

DATE/TIME SAMPLED:* 12-11-13

SAMPLED BY: L. JOHNSON

DATE/TIME RECEIVED: 12-18-13 0930

SAMPLE ID	Al mg/L	Mn mg/L	Zn mg/L	Cu mg/L
COAL CUMBUSTION BY-PRODUCTS BOTTOM ASH ANNUAL TESTING	.83	.160	.432	<.003

*Client Provided

**See Attached.

The following results meet or exceed requirements and standards set forth by the certifying authority except where noted.

APPROVED 