Verso Corporation
Luke Mill
300 Pratt Street
Luke, MD 21540

T 301 359 3311
W versoco.com

ES-15-36

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

February 23, 2015

Mr. Edward E. Dexter, Director
Solid Waste Division
Maryland Department of the Environment
1800 Washington Blvd., Suite 610
Baltimore, MD 21230-1719

Dear Mr. Dexter:

Luke Paper Company generated approximately 79,404 tons of Coal Combustion By-Product during 2014 at our Luke Mill facility. All of the CCB material was hauled to a mine reclamation disposal facility (Permit No. CCB-10-001). Our 2014 Coal Combustion By-Product Annual Tonnage Report is enclosed.

The Luke Paper Company is a subsidiary of NewPage Corporation, NewPage Corporation is a subsidiary of Verso Corporation, following Verso's acquisition on January 7, 2015.

If you have any questions or need any additional information regarding this matter, please contact me.

Sincerely,

Larry A. Johnson
Environmental Engineer

LAJ:plt
Enclosure

MARYLAND DEPARTMENT OF THE ENVIRONMENT
Land Management Administration • Solid Waste Program
1800 Washington Boulevard • Suite 605 • Baltimore Maryland 21230-1719
410-537-3315 • 800-633-6101 x3315 • www.mde.maryland.gov

Coal Combustion Byproducts (CCBs)
Annual Generator Tonnage Report
Instructions for Calendar Year 2014

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 2014. 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 – 2014**

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, 2015:

A. Contact information:

Facility Name: Luke Paper Company

Name of Permit Holder: Luke Paper 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@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

Facility Name: Luke Paper Company **CCB Tonnage Report – 2014**

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 (CCB) from the boilers is collected in our fabric filter baghouse and the bottom ash (CCB) from both boilers is sent to our ash lagoon.

C. The volume and weight of CCBs generated during calendar year 2014, 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 2014: 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 2014

Fly Ash Type of CCB	Bottom Ash Type of CCB	Type of CCB	Type of CCB
1ton ash = 28 cu ft. 59,553 x 28 cu ft./ 27 cu. ft/cu yd.	1ton ash = 28 cu ft. 19,851 x 28 cu ft./ 27 cu. ft/cu yd.		
61,759 cu.yds. Volume of CCB, in Cubic Yards	20,586 cu.yds. Volume of CCB, in Cubic Yards	Volume of CCB, in Cubic Yards	Volume of CCB, in Cubic Yards
59,553 tons Weight of CCB, in Tons	19,851 tons Weight of CCB, in Tons	Weight of CCB, in Tons	Weight of CCB, in Tons

Additional notes:

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 2014, 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 that is 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 the site is currently active.

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 material 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 at this disposal facility include; 59,553 tons of fly ash and 19,851 tons of bottom ash.

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

N/A

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

Facility Name: Luke Paper Company **CCB Tonnage Report – 2014**

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:

Signature	Richard J. Watro Luke Mill Manager (301) 359-3311 Name, Title, & Telephone No. (Print or Type) Richard.Watro@versoco.com Your Email Address	2/23/15 Date

V: Attachments (please list):

Attachment E

Sturm Environmental Services

JOHN W. STURM, PRESIDENT

COMPANY: NEWPAGE

DATE/TIME SAMPLED:* 11-06-14 1100

SAMPLE ID: LUKE MILL #24 FLY ASH

DATE/TIME RECEIVED: 11-12-14 1500

SAMPLED BY:

LABORATORY ID: NEWPAGE 141112-1

TOXICITY CHARACTERISTIC LEACHING PROCEDURE

EPA HAZARDOUS WASTE NUMBER	CONTAMINANT	CONCENTRATION FOUND (mg/L)	MAXIMUM CONCENTRATION (mg/L)
D004	ARSENIC	.64	5.00
D005	BARIUM	.285	100.0
D006	CADMIUM	.025	1.0
D007	CHROMIUM	.005	5.0
D008	LEAD	<.020	5.0
D009	MERCURY	<.0002	.2
D010	SELENIUM	.077	1.0
D011	SILVER	.001	5.0

% SOLIDS: 100

SLURRY pH: 10.6

EXTRACTION PERFORMED BY: SW

Final pH of Extract: 5.20

Extraction fluid used: 1

*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: NEWPAGE

SAMPLE ID: LUKE MILL #24 FLY ASH

SAMPLED BY:

DATE/TIME SAMPLED:* 11-06-14 1100

DATE/TIME RECEIVED: 11-12-14 1500

LABORATORY ID: NEWPAGE 141112-1

PARAMETER	RESULTS mg/L	EPA METHOD	DETECTION LIMIT mg/L	DATE/TIME ANALYZED	ANALYST
Al	.90	200.7	.02	11-24-14 0803	TW
Mn	.849	200.7	.002	11-24-14 0803	TW
Zn	1.26	200.7	.004	11-24-14 0803	TW
Cu	.0335	3113B	.0006	12-04-14 2007	RC

* Client provided **NOTE: All detection limits based upon 100% solids and 1 gms sample digested except for Hg (0.6).

*Client Provided

**See Attached. The following results meet requirements and standards of the certifying authority.

Approved

Sturm Environmental Services

JOHN W. STURM, PRESIDENT

COMPANY: NEWPAGE

SAMPLE ID: LUKE MILL #24 FLY ASH

SAMPLED BY:

DATE/TIME SAMPLED:* 11-06-14 1100

DATE/TIME RECEIVED: 11-12-14 1500

LABORATORY ID: NEWPAGE 141112-1

PARAMETER	RESULTS mg/kg	EPA METHOD	DETECTION LIMIT mg/kg	DATE/TIME ANALYZED	ANALYST
As	23.4	3050B/7010	.05	11-07-14 1044	RC
Cd	.95	3050B/7010	.01	11-21-14 2326	SB
Cr	22.7	3050B/7010	.05	11-24-14 1121	SB
Cu	41.7	3050B/7010	.10	11-21-14 1918	SB
Pb	41.2	3050B/7010	.05	11-17-14 2247	RC
Hg	.66	7472 Cold Vapor	.03	11-25-14 1305	DB
Ba	880.	3050B/6010B	5.0	12-15-14 0738	TW
B	378.	3050B/6010B	5.0	12-15-14 1326	TW
Se	8.77	3050B/7010	.03	12-01-14 1419	RC
Zn	158.	3050B/6010B	.10	12-15-14 1326	TW
Li	29.4	3050B/6010B	5.0	12-15-14 0738	TW
Al	19000.	3050B/6010B	1.00	12-15-14 1326	TW
MO	30.8	3050B/6010B	.50	11-17-14 1531	TW
Mn	84.5	3050B/6010B	.10	11-17-14 1531	TW
Ag	.05	3050B/7010	.01	11-21-14 2124	SB

* Client provided **NOTE: All detection limits based upon 100% solids and 1 gms sample digested except for Hg (0.6).

*Client Provided

**See Attached. The following results meet requirements and standards of the certifying authority.

D. B

Approved

Sturm Environmental Services

JOHN W. STURM, PRESIDENT

COMPANY: NEWPAGE

DATE/TIME SAMPLED:* 11-06-14 1100

SAMPLE ID: LUKE MILL #25 FLY ASH

DATE/TIME RECEIVED: 11-12-14 1500

SAMPLED BY:

LABORATORY ID: NEWPAGE 141112-2

TOXICITY CHARACTERISTIC LEACHING PROCEDURE

EPA HAZARDOUS WASTE NUMBER	CONTAMINANT	CONCENTRATION FOUND (mg/L)	MAXIMUM CONCENTRATION (mg/L)
D004	ARSENIC	.05	5.00
D005	BARIUM	.424	100.0
D006	CADMIUM	.001	1.0
D007	CHROMIUM	.003	5.0
D008	LEAD	<.020	5.0
D009	MERCURY	<.0002	.2
D010	SELENIUM	.084	1.0
D011	SILVER	<.001	5.0

% SOLIDS: 100

SLURRY pH: 11.24

EXTRACTION PERFORMED BY: SW

Final pH of Extract: 5.19

Extraction fluid used: 1

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

D. Bu

APPROVED

Sturm Environmental Services

JOHN W. STURM, PRESIDENT

COMPANY: NEWPAGE

SAMPLE ID: LUKE MILL #25 FLY ASH

SAMPLED BY:

DATE/TIME SAMPLED:* 11-06-14 1100

DATE/TIME RECEIVED: 11-12-14 1500

LABORATORY ID: NEWPAGE 141112-2

PARAMETER	RESULTS mg/L	EPA METHOD	DETECTION LIMIT mg/L	DATE/TIME ANALYZED	ANALYST
Al	1.97	200.7	.02	11-24-14 0803	TW
Mn	.565	200.7	.002	11-24-14 0803	TW
Zn	.035	200.7	.004	11-24-14 0803	TW
Cu	.0057	3113B	.0006	12-04-14 2007	RC

* Client provided **NOTE: All detection limits based upon 100% solids and 1 gms sample digested except for Hg (0.6).

*Client Provided

**See Attached. The following results meet requirements and standards of the certifying authority.

Approved

Sturm Environmental Services

JOHN W. STURM, PRESIDENT

COMPANY: NEWPAGE

SAMPLE ID: LUKE MILL #25 FLY ASH

SAMPLED BY:

DATE/TIME SAMPLED:* 11-06-14 1100

DATE/TIME RECEIVED: 11-12-14 1500

LABORATORY ID: NEWPAGE 141112-2

PARAMETER	RESULTS mg/kg	EPA METHOD	DETECTION LIMIT mg/kg	DATE/TIME ANALYZED	ANALYST
As	2.62	3050B/7010	.05	11-07-14 1044	RC
Cd	.03	3050B/7010	.01	11-21-14 2326	SB
Cr	4.94	3050B/7010	.05	11-24-14 1121	SB
Cu	12.4	3050B/7010	.10	11-21-14 1918	SB
Pb	1.17	3050B/7010	.05	11-17-14 2247	RC
Hg	.77	7472 Cold Vapor	.03	11-25-14 1305	DB
Ba	1130.	3050B/6010B	5.0	12-15-14 0738	TW
B	21.5	3050B/6010B	5.0	12-15-14 1326	TW
Se	8.14	3050B/7010	.03	12-01-14 1419	RC
Zn	11.7	3050B/6010B	.10	12-15-14 1326	TW
Li	24.7	3050B/6010B	5.0	12-15-14 0738	TW
Al	8950.	3050B/6010B	1.00	12-15-14 1326	TW
MO	5.60	3050B/6010B	.50	11-17-14 1531	TW
Mn	77.5	3050B/6010B	.10	11-17-14 1531	TW
Ag	<.01	3050B/7010	.01	11-21-14 2124	SB

* Client provided **NOTE: All detection limits based upon 100% solids and 1 gms sample digested except for Hg (0.6).

*Client Provided

**See Attached. The following results meet requirements and standards of the certifying authority.

Approved

Sturm Environmental Services

JOHN W. STURM, PRESIDENT

COMPANY: NEWPAGE

DATE/TIME SAMPLED:* 11-06-14 1400

SAMPLE ID: LUKE MILL BOTTOM ASH

DATE/TIME RECEIVED: 11-12-14 1500

SAMPLED BY:

LABORATORY ID: NEWPAGE 141112-3

TOXICITY CHARACTERISTIC LEACHING PROCEDURE

EPA HAZARDOUS WASTE NUMBER	CONTAMINANT	CONCENTRATION FOUND (mg/L)	MAXIMUM CONCENTRATION (mg/L)
D004	ARSENIC	<.02	5.00
D005	BARIUM	2.28	100.0
D006	CADMIUM	<.001	1.0
D007	CHROMIUM	<.003	5.0
D008	LEAD	<.020	5.0
D009	MERCURY	<.0002	.2
D010	SELENIUM	<.020	1.0
D011	SILVER	.001	5.0

% SOLIDS: 100

SLURRY pH: 8.82

EXTRACTION PERFORMED BY: SW

Final pH of Extract: 4.96

Extraction fluid used: 1

*Client Provided

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

D. Burnett

APPROVED

Sturm Environmental Services

JOHN W. STURM, PRESIDENT

COMPANY: NEWPAGE

SAMPLE ID: LUKE MILL BOTTOM ASH

SAMPLED BY:

DATE/TIME SAMPLED:* 11-06-14 1400

DATE/TIME RECEIVED: 11-12-14 1500

LABORATORY ID: NEWPAGE 141112-3

PARAMETER	RESULTS mg/L	EPA METHOD	DETECTION LIMIT mg/L	DATE/TIME ANALYZED	ANALYST
Al	1.59	200.7	.02	11-24-14 0803	TW
Mn	.154	200.7	.002	11-24-14 0803	TW
Zn	.038	200.7	.004	11-24-14 0803	TW
Cu	.0083	3113B	.0006	12-04-14 2007	RC

* Client provided **NOTE: All detection limits based upon 100% solids and 1 gms sample digested except for Hg (0.6).

*Client Provided

**See Attached. The following results meet requirements and standards of the certifying authority.

D Bruce

Approved

Sturm Environmental Services

JOHN W. STURM, PRESIDENT

COMPANY: NEWPAGE

SAMPLE ID: LUKE MILL BOTTOM ASH

SAMPLED BY:

DATE/TIME SAMPLED:* 11-06-14 1400

DATE/TIME RECEIVED: 11-12-14 1500

LABORATORY ID: NEWPAGE 141112-3

PARAMETER	RESULTS mg/kg	EPA METHOD	DETECTION LIMIT mg/kg	DATE/TIME ANALYZED	ANALYST
As	.825	3050B/7010	.05	11-07-14 1044	RC
Cd	.02	3050B/7010	.01	11-21-14 2326	SB
Cr	3.76	3050B/7010	.05	11-24-14 1121	SB
Cu	18.6	3050B/7010	.10	11-21-14 1918	SB
Pb	.82	3050B/7010	.05	11-17-14 2247	RC
Hg	.05	7472 Cold Vapor	.03	11-25-14 1305	DB
Ba	218.	3050B/6010B	5.0	12-15-14 0738	TW
B	10.7	3050B/6010B	5.0	12-15-14 1326	TW
Se	.80	3050B/7010	.03	12-01-14 1419	RC
Zn	6.80	3050B/6010B	.10	12-15-14 1326	TW
Li	11.0	3050B/6010B	5.0	12-15-14 0738	TW
Al	4350.	3050B/6010B	1.00	12-15-14 1326	TW
MO	1.85	3050B/6010B	.50	11-17-14 1531	TW
Mn	24.8	3050B/6010B	.10	11-17-14 1531	TW
Ag	<.01	3050B/7010	.01	11-21-14 2124	SB

* Client provided **NOTE: All detection limits based upon 100% solids and 1 gms sample digested except for Hg (0.6).

*Client Provided

**See Attached. The following results meet requirements and standards of the certifying authority.

Approved