

AUG 13 2012

SOLID WASTE
OPERATIONS DIVISION

**Coal Combustion Byproducts (CCB)
Annual Generator Tonnage Report
Instructions for Calendar Year 2011**

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 2011. Please answer the questions on the form provided, attaching additional information and any requested supplemental information to the back of the form. Note that there were some changes to the form for this year, requiring 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 edexter@mde.state.md.us.

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. "*

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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 SEPERATELY 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, 2012:

A. Contact information:

Facility Name: Chalk Point Generating Station

Name of Permit Holder: GenOn Chalk Point, LLC

Facility Address: 25100 Eagle Harbor Road
Street

Facility Address: Aquasco Maryland 20608
City State Zip

County: Prince George's County

Contact Information (Person filing report or Environmental Manager)

Facility Telephone No.: 301-843-4100 Facility Fax No.: 301-843-4281

Contact Name: Elizabeth A. Spitzer

Contact Title: Environmental Analyst

Contact Address: 8301 Professional Place, Suite 230
Street

Contact Address: Landover Maryland 20785
City State Zip

Contact Email: elizabeth.spitzer@genon.com

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

For questions on how to complete this form, please contact the Solid Waste Program at 410-537-3315

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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 volume and weight of coal combustion byproducts generated during calendar year 2011, 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. 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 2011: 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 2011 | | | | |
|---|----------------------------------|----------------------------------|----------------------------------|----------------------------------|
| Flyash | Bottom Ash | On-Spec Gypsum | Off Spec Gypsum | WWTP Fines |
| Type of CCB | Type of CCB | Type of CCB | Type of CCB | Type of CCB |
| 85,877 | 10,506 | 74,514 | 685 | 133 |
| Volume of CCB, in Cubic Yards | Volume of CCB, in Cubic Yards | Volume of CCB, in Cubic Yards | Volume of CCB, in Cubic Yards | Volume of CCB, in Cubic Yards |
| 85,877 | 10,506 | 145,558 | 1,339 | 259 |
| Weight of CCB, in Tons | Weight of CCB, in Tons | Weight of CCB, in Tons | Weight of CCB, in Tons | Weight of CCB, in Tons |

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Additional notes:

CCB Tonnages are reported in dry short tons. CCB volumes are reported in dry Cubic Yards.

WWTP Tons represent fines from the Flue Gas Desulfurization's Waste Water Treatment

Volumes of Flyash in Dry Cubic Yards are calculated from dry short tons using a density of 1.0 Tons/Dry CY.

Volumes of Bottom Ash in Dry Cubic Yards are calculated from dry short tons using a density of 1.0 Tons/Dry CY.

Volumes of On-Spec Gypsum, Off-Spec Gypsum and WWTP Fines are calculated from dry short tons using a density of 1.95 Tons/Dry CY.

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 calendar year 2011, identifying:

(a) The types and volume of coal combustion byproducts disposed of or used (if different than described in Paragraph C above) including any coal combustion byproducts stored during the previous calendar year, 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:

Of the 85,877 tons of flyash generated, 1,540 tons were sold to SEFA, headquartered in Columbia, SC, and 84,337 tons were disposed of at the Brandywine Ash Site, located in Brandywine, Md.

All of the 10,506 tons of bottom ash generated in 2011 was sent to the Brandywine Ash Site, located in Brandywine, Md for disposal.

On-Spec Gypsum generated in 2011 was 145,558 tons. A total of 152,805 tons was transported by barge to LaFarge, located in Buchanan, NY in 2011. This includes 145,558 tons produced in 2011 and 7,531 tons which were stored on site at the end of 2010. A total of 284 tons were stored on site at the Chalk Point Generating Station at the end of 2011.

Off-Spec Gypsum: A total of 1,421 tons was disposed of at Waste Management's Amelia Landfill located in Jetersville, Va in 2011. This includes 1,339 tons generated in 2011 and 82 tons stored on site in 2010.

WWTP Fines produced in 2011 was 259 tons, all of which was disposed of at Waste Management's Amelia Landfill located in Jetersville, Va.

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

FlyAsh:

Volume: 1,540 tons sold, all of which was put to beneficial use in Maryland.

Uses: 1,221 tons used for Portland Cement

319 tons used as Supplementary cementitious material for concrete and concrete products

On-Spec Gypsum:

Volume: 152,805 tons sold in 2011. This includes 145,558 tons produced in 2011, and 7,531 tons stored on-site in 2010.

Use: Wallboard

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 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:

FlyAsh: Approximately 86,000 tons to be generated, with about 1,500 tons to be sold to SEFA, headquartered in Columbia, SC, and 84,000 tons to be sent for disposal at the Brandywine Ash Site, located in Brandywine, Md.

Bottom Ash: Anticipate 11,000 tons to be generated and sent to the Brandywine Ash Site, located in Brandywine, Md for disposal.

On-Spec Gypsum: Anticipate 153,000 tons to be generated, with approximately 300 tons stored on site at the Chalk Point Generating Station and the remainder being and transported by barge to LaFarge, located in Buchanan, NY.

Off-Spec Gypsum: Approximate 1400 tons to be generated and disposed of at Waste Management's Amelia Landfill located in Jetersville, Va.

WWTP Fines: Approximately 300 tons to be generated and disposed of at Waste Management's Amelia Landfill located in Jetersville, Va.

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

FlyAsh:

Volume: 1,500 tons

Uses: 1,200 tons used for Portland Cement

300 tons used as Supplementary cementitious material for concrete and concrete products

On-Spec Gypsum:

Volume: 153,000 tons

Use: Wallboard

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

Steven Worrell - RE: MDE CCB Tonnage Reports Clarification

From: Steven Worrell
To: Elizabeth Spitzer
Date: 6/27/2012 9:02 AM
Subject: RE: MDE CCB Tonnage Reports Clarification
CC: Martha Hynson; Patrick Miglio

Thank you very much for your prompt reply. I will make sure that all of the beneficially used materials are properly accounted for.

Steve

Steve Worrell, Regulatory and Compliance Engineer
Solid Waste Program
Maryland Department of the Environment
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Baltimore MD 21230
Phone (410) 537-3315
Fax (410) 537-3842
>>> "Spitzer, Elizabeth" <elizabeth.spitzer@genon.com> 6/26/2012 4:34 PM >>>

Dear Mr. Worrell,

The ash that was used beneficially in Maryland did not cross state lines. The Morgantown and Chalk Point fly ash that was beneficially used in Maryland went directly to a cement kiln in Maryland, and the Dickerson fly ash went directly to a grout project located in Frederick, MD.

Please do not hesitate to contact me should you have any other questions or concerns regarding the GenOn CCB Tonnage Reports.

Regards,
Liz Spitzer

Elizabeth A. Spitzer
Environmental Analyst
GenOn Services
8301 Professional Place, Suite 230
Landover, Md. 20785
(O) 301-955-9051
(C) 240-375-3740

From: Steven Worrell [mailto:SWorrell@mde.state.md.us]
Sent: Tuesday, June 26, 2012 8:43 AM
To: Spitzer, Elizabeth
Cc: Martha Hynson
Subject: MDE CCB Tonnage Reports Clarification

Ms. Spitzer,

In reviewing the Coal Combustion Byproducts generator reports submitted for the three GenOn facilities, I have a question regarding the location of beneficial uses reported (and the method of reporting). For example, in the report submitted for Morgantown Generating Station, page 4 states that for Fly Ash, 44,667 tons were sold to SEFA, headquartered in Columbia, South Carolina. On page 5, there is also a statement that 40,706 tons of fly ash (of the previously reported 44,667 sold to SEFA) were used for portland cement and applied to a beneficial use in Maryland. My question concerns whether the 40,706 tons were transported out of Maryland, processed and then returned to Maryland, or if the conversion into portland cement took place at a facility within the State. This same reporting method is used in all three GenOn reports, so I assume that this clarification will be consistent throughout.

Please contact me if you would like to discuss this question, either via email or at the phone number below.

Thanks,

Steve

Steve Worrell, Regulatory and Compliance Engineer
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Martin O'Malley
Governor

Robert M. Summers, Ph.D.
Secretary

Anthony G. Brown
Lieutenant Governor

2011 CCB Annual Generator Report Notes:

Additional lab test results were submitted to the Department along with this generator report. Inquiries regarding these additional materials should be addressed to:

Ms. Martha Hynson
Chief, Solid Waste Operations Division
Land Management Administration
(410) 537-3315
mhynson@mde.state.md.us