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February 27, 2023

Mr. Ed Dexter
Maryland Department of the Environment
Land Management Administration
1800 Washington Boulevard, Suite 605
Baltimore, MD 21230-1719

Re: 2022 CCB Tonnage Report for Lanyard Power Holdings, LLC
Chalk Point and Morgantown Generating Stations

Dear Mr. Dexter,

Pursuant to COMAR 26.04.10.08, enclosed please find the 2022 CCB Tonnage Report for Lanyard Power Holdings, LLC ("Lanyard or Company") which includes Chalk Point and Morgantown Generating Stations.

As you are aware, the Chalk Point Coal Units were retired on June 1, 2021 and the Morgantown Coal Units were retired on June 1, 2022. As a result, CCBs are no longer being generated at our facilities and we anticipate that this will be the final CCB Report filed by Lanyard Power Holdings, LLC.

In summary, Lanyard generated a total of 84,941 tons of CCBs. 276,307 tons of CCBs from the Company's facilities were beneficially used in the State of Maryland.

- 28,184 tons of Fly Ash was generated in 2022 and 227,769 tons were beneficially used in Maryland.
- 5,946 tons of Bottom Ash was generated in 2022.
- 44,464 tons of Gypsum was generated in 2022 and 48,520 tons were beneficially used in Maryland.
- 5,334 tons of Off-Spec Gypsum was generated in 2022 and 18 tons were beneficially used Maryland.
- 1,013 tons of Waste Water Treatment Fines were generated in 2022.

If you have any questions regarding this report, please contact Michelle Wilkins at 301-843-4110 or email michelle.wilkins@genon.com.

Sincerely

Mark Gouveia
Sr. VP Operations

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 2022

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 2022. 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.

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, 2023:

A. Contact information:

Facility Name: Lanyard Power Holdings, LLC (Chalk Point and Morgantown Generating Stations)

Name of Permit Holder: Various

Facility Address:
Chalk Point: 25100 Chalk Point Road, Aquasco, MD 20608 – Prince George's Co.
Morgantown: 12620 Crain Highway, Newburg, MD 20664 – Charles Co.

Contact Information (Person filing report or Environmental Manager)

Facility Telephone No.: 301-843-4110 Facility Fax No.: N/A

Contact Name: Michelle Wilkins (Chalk Point)

Contact Title: Environmental Specialist

Contact Address: See Above
Street

Contact Address:
City State Zip

Contact Email: michelle.wilkins@genon.com

Contact Telephone No.: See Above Contact Fax No.: See Above

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:
To produce electricity, Eastern Bituminous coal with an ash content of approximately 10% and a Sulfur content of approximately 2-3% was burned in Lanyard's coal-fired generating units. Ash produced thru coal combustion is approximately 90% flyash and 10% bottom ash. Bottom ash is typically stored at the Company's Brandywine ash storage site. Some bottom ash is beneficially used in construction at the ash storage site. Fly ash produced at Morgantown was sold on site to SEFA. The fly ash was processed by SEFA in the STAR facility in Newburg, MD which produced a substitute for raw materials used in commercial products. In addition, ash from the now decommissioned Dickerson Generating Station is excavated from the adjacent Westland ash storage site and is also sold to vendors for beneficial use in the state of Maryland.

SO2 formed during coal combustion was removed from the flue gas through the use of Wet Scrubbers, which injected a limestone slurry into the flue gas to absorb the SO2. Gypsum formed as a by-product of the scrubber operation was captured and stored on-site in Morgantown's gypsum storage dome. Morgantown's gypsum storage dome has a conveying system that is used to load the gypsum onto barges where ownership was transferred to CertainTeed for beneficial use in Newburg, MD. CertainTeed uses the gypsum as a substitute for a raw material for making commercial products. Gypsum by-products which are not suitable for sale are disposed out of state at Republic Services Old Dominion landfill, which is located in Virginia, or at Cycle Chem's Yukon landfill facility in Pennsylvania. Gypsum by-products suitable for sale are sold to vendors for beneficially reuse in the State of Maryland.

C. The volume and weight of CCBs generated during calendar year 2022, 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 2022: 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 2022				
Flyash	Bottom Ash	Spec Gypsum	Off-Spec Gypsum	WWTP Fines
Type of CCB	Type of CCB	Type of CCB	Type of CCB	Type of CCB
28,184	5,946	22,762	2,731	519
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
28,184	5,946	44,464	5,334	1,012
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

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 Fly ash 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 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 CCBs 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 CCBs. Please attach this information to the report.

F. A description of how you disposed of or used your CCBs in calendar year 2022, 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:

FlyAsh: Ash produced at the Morgantown Generating Station was beneficially used in Maryland at the STAR Facility, located in Newburg, Md at the Morgantown site. Ownership of the ash is transferred to SEFA at receipt and a marketable product is produced at the STAR Facility. A total of 28,184 tons of flyash were generated at Morgantown in 2022. 365 tons of this ash were stored at the Company's Brandywine ash storage site and 27,819 tons were beneficially used in the state of Maryland. In addition, a net total of 199,950 tons of previously stored flyash was reclaimed from the Company's Westland ash storage site for sale for beneficial use in the state of Maryland, to yield a total of 227,769 tons of flyash produced for beneficial use in the state of Maryland.

Bottom Ash: A total of 5,946 tons of dry bottom ash were generated at Morgantown in 2022. 5,926 tons were disposed of at the Company's ash storage facility in Brandywine, Md., and 20 tons were stored on site at the end of 2022.

On-Spec Gypsum: 44,464 tons of On-Spec Gypsum were generated at Morgantown in 2022. 4,056 tons were temporarily stored at the site at the end of 2021 and zero tons were stored on-site at the end of 2022. Therefore, a total of 48,520 tons were sold to CertainTeed and ownership transferred when loaded onto the barge in Newburg, Maryland. The gypsum is beneficially used in the manufacture of wallboard.

Off Spec Gypsum: The total produced in 2022 was 5,334 tons. 124 tons were stored at Chalk Point at the end of 2021 and 4,053 tons were stored at Lanyard Facilities at the end of 2022. Of this total, 1,263 tons were disposed at Republic Services Old Dominion landfill in Richmond, Va, 18 tons were sold to PBCo for beneficial use in the State of Maryland and 124 tons were disposed of at Cycle Chem's landfill facility in Yukon, Pa.

WWTP Fines: The total produced in 2022 was 1,012 tons. 120 tons were stored at Chalk Point at the end of 2021 and 54 tons were stored at Lanyard Facilities at the end of 2022. A total of 1,078 tons were disposed at Cycle Chem's landfill facility in Yukon, Pa.

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

Flyash: Volume: 365 tons disposed and 27,819 tons sold
Use: Beneficially used to produce marketable construction products.

Bottom ash: Volume: 5,926 tons disposed.

Gypsum: Volume: 48,520 tons sold
Use: Beneficially used to produce Wallboard

Off-Spec Gypsum: Volume: 1.387 tons disposed and 18 tons sold
Use: Beneficially used to produce Wallboard

WWTP Fines:: Volume: 1,078 tons disposed

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:

FlyAsh: ZERO tons to be generated in at Morgantown in 2023 and thereafter. Approximately 150,000 tons/year to be mined from the Westland ash storage site and sold for beneficial use in the state of Maryland.
Bottom Ash: ZERO tons to be generated in 2023 and thereafter.
Gypsum: ZERO tons to be generated in 2023 and thereafter.

WWTP Fines: ZERO tons to be generated in 2023 and thereafter.

Off-Spec Gypsum: ZERO tons to be generated in 2023 and thereafter.

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

FlyAsh: See above.
Bottom Ash: See above.
Gypsum: See above.

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	Mark Gouveia Sr. VP Operations 202-580-5611 Name, Title, & Telephone No. (Print or Type) mark.gouveia@genon.com Your Email Address	2/28/2023 Date

V: Attachments (please list):

CCB Analyses