

**Corporate Office:**

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August 24, 2020

Mr. Mark Williams, PE, Chief  
Waste Division  
Mississippi Department of Environmental Quality  
PO Box 2261  
Jackson, MS 39225

**Re: Notification of Alternate Source Demonstration (ASD) Amendment**

Choctaw Generation Limited Partnership, L.L.L.P.  
Ackerman, Mississippi (Choctaw County)  
Agency Interest No. 677

Dear Mr. Williams:

In accordance with the requirements of 40 CFR 257.95(g)(3)(ii), Choctaw Generation Limited Partnership, LLLP (Choctaw Generation) developed an Alternate Source Demonstration (ASD) to demonstrate that an alternate source other than the CCR unit, or Ash Management Unit (AMU), caused the exceedance of the ground water protection standard (GWPS) for lithium and cobalt. The ASD was deemed a successful demonstration on December 17, 2019 in accordance with the requirements of 40 CFR 257, Subpart D – Standards of Disposal of Coal Combustion Residuals (CCR).

The ASD has now been amended to also demonstrate that an alternate source other than the CCR unit, or AMU, has caused the exceedance of the GWPS for beryllium. As a result, Choctaw Generation will continue in assessment monitoring at this time.

A summary of the ASD results will be included in the 2020 CCR Groundwater Monitoring and Corrective Action Annual Report per §257.90(e) which is due January 31, 2021. In addition, the amended ASD has been placed in the facility's operating record and will also be made available on the publicly accessible internet site within 30 days of placing the notice in the operating record.

Should you have any questions regarding this notification, please contact Jim Ward of Choctaw Generation at (662) 387-5758 or me at (662) 840-5945.

Sincerely,



Brian Ketchum, PE  
Principal, Senior Engineer

cc: Jim Ward, PG, Environmental Compliance, Choctaw Generation (via email)  
Keith Cuevas, Plant Manager, Choctaw Generation (via email)  
Shane McCray, Compliance Manager, Choctaw Generation (via email)  
Matt Cauthen, Compliance Team Leader, Choctaw Generation (via email)  
Kirk Shelton, ECS (via email)

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**MEMORANDUM**

To: Choctaw Generation Limited Partnership, L.L.P. – CCR Operating Record

From: Brian Ketchum, ECS  
Kirk Shelton, ECS

Re: Notice of Alternate Source Demonstration (ASD) Amendment

Date: August 24, 2020

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Choctaw Generation Limited Partnership, LLLP (Choctaw Generation), located in Ackerman, Mississippi, operates a single unit electrical generation facility designed to generate electricity for dispatch to the Tennessee Valley Authority (TVA) electrical system. Choctaw Generation owns and operates an existing Ash Management Unit (AMU) required to meet the requirements for landfills under the Coal Combustion Residuals (CCR) Rule of 40 CFR 257, Subpart D.

Per the requirements of §257.95(g)(3), within 90 days of finding that any of the constituents listed in Appendix IV to Part 257 have been detected at a statistically significant level (SSL) exceeding a groundwater protection standard (GWPS), the owner or operator must initiate an assessment of corrective measures or demonstrate that a source other than the CCR unit caused the contamination. Choctaw Generation developed an Alternate Source Demonstration (ASD) according to the regulations outlined in §257.95(g)(3)(ii) and it was deemed successful on December 17, 2019. Originally, the ASD addressed lithium and cobalt. On June 16, 2020, beryllium was detected and verified to be above the GWPS. As a result, the ASD has now been amended, within 90 days of the verified exceedance, to address beryllium as well. The demonstration that an alternate source other than the CCR unit, or Ash Management Unit (AMU), caused the exceedance of the ground water protection standard (GWPS) for beryllium was deemed successful.

The amended ASD will be included in the 2020 CCR Groundwater Monitoring and Corrective Action Annual Report required by §257.90(e) which is due January 31, 2021. This memorandum serves as notification that as a result of a successful ASD, Choctaw Generation will continue in assessment monitoring at this time. This notification will be placed in the facility's operating record and will also be made available on the publicly accessible internet site within 30 days of placing the notice in the operating record.