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**MEMORANDUM**

To: Choctaw Generation Limited Partnership, LLLP – CCR Operating Record

From: Brian Ketchum, ECS  
Caitlin Golding, ECS

Re: Notification of change in CCR monitoring due to Alternate Source Demonstration (ASD).

Date: March 23, 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.

In May of 2019, three (3) new monitoring wells were installed on adjacent property of the Mississippi Lignite Mining Company, and identified as CCR-6, CCR-7, and CCR-8. These wells were installed downgradient from the CCR unit in the direction of potential contaminant migration and in response to CCR corrective measure requirements. CCR-6, CCR-7, and CCR-8 wells were installed to help assess the nature and extent of potential groundwater contamination as a result of the presence of lithium and cobalt at statistically significant levels (SSL) above the Groundwater Protection Standard (GWPS). Concentrations of lithium exceeded the GWPS in monitoring wells CCR-3, CCR-8, and MW-9, while concentrations of cobalt exceeded the GWPS in monitoring wells CCR-3, CCR-5, CCR-7, MW-9, MW-12, MW-15, MW-16 (before closing the well), and MW-17 (MW-16 replacement well).

An Alternate Source Demonstration (ASD) was developed on December 17, 2019 to demonstrate that a source other than the AMU caused the SSL in the groundwater as provided in the option listed in §257.95(g)(3)(ii). The evaluation outlined in the ASD provides a demonstration that the source of lithium and cobalt detected at SSLs above each respective GWPS is attributed to the naturally occurring soils and aquifer material at the site. As a result, Choctaw Generation immediately ceased corrective measure activities and will continue in assessment monitoring. Due to the demonstration that lithium and cobalt are naturally occurring, the three (3) wells installed on the mine property (CCR-6, CCR-7, and CCR-8) will cease to be monitored in future assessment monitoring events unless there is a new exceedance of the GWPS. At that time and upon further evaluation, the monitoring wells on the mine property may be reintroduced to the subsequent monitoring events.