



**KUHLMAN ELECTRIC
CORPORATION**

Tel: (601) 892-6462

Fax: (601) 892-6476

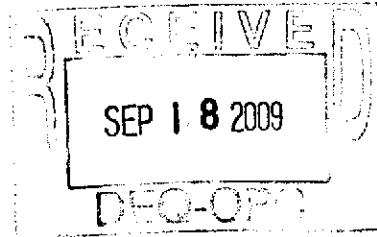
Email: athomas@kuhlman.com 101 Kuhlman Drive • Crystal Springs, Mississippi 39059

Website: www.kuhlman.com

Power Transformers
Instrument Transformers
Distribution Transformers

September 17, 2009

Mr. Tony Russell
Assessment Remediation Branch Chief
Mississippi Department of Environmental Quality
P. O. Box 2261
Jackson, MS 39225



Dear Tony;

I am writing today to summarize the excavation of potentially impacted soil and concrete to a) repair a floor in the Winding Department, b) construct a pit to recess supporting rails for transporting loads to the Vapor Phase manufacturing process, and c) to recess a drip pan in the concrete floor of the Assembly Department in the Kuhlman Electric facility in Crystal Springs, MS. Figure 1 illustrates the approximate locations inside the Crystal Springs facility. Figures 2-4 illustrate the area following construction.

KEC completed the three projects in July of 2009. The Winding Department floor repair is the subject of the March 23, 2009 letter to MDEQ, the Vapor Phase Rail Pit is Phase II of the letter of September 23, 2008 and the Assembly Department Drip Pan is the subject of the letter of July 1, 2009.

Walker Hill Environmental was contracted to excavate the soil and concrete for all three areas. Walker Hill was selected because they have completed several environmental projects competently at the KEC site in past years.

Soil and concrete was removed to covered roll-offs. Composite samples of each of the roll-offs were taken. Analysis (found in Micro Methods report in Appendix I) for PCB concentration was completed on the composites. Analysis showed that Arochlor 1260 was present in the soil at concentrations less than 10 mg/kg.

Work to remove the soil was conducted during a plant shutdown when the plant was nearly empty of KEC personnel. KEC employees were informed of the excavation prior to its taking place.

Soil was disposed of in accordance with regulatory requirements. Manifests of the roll-offs are included as Figures 5 thru 11 inclusive.

Please call me @ 601-892-6462 with any questions or comments.

Sincerely,

Alan Thomas
Maintenance Manager

Cc: Messrs. Paul Acheson, Phillip James, KEC; Ms. Anastasia Hamel/ Borg Warner/ Mr. Steve Levine/ Phelps, Dunbar, Mr. James Barrett/Latham and Watkins

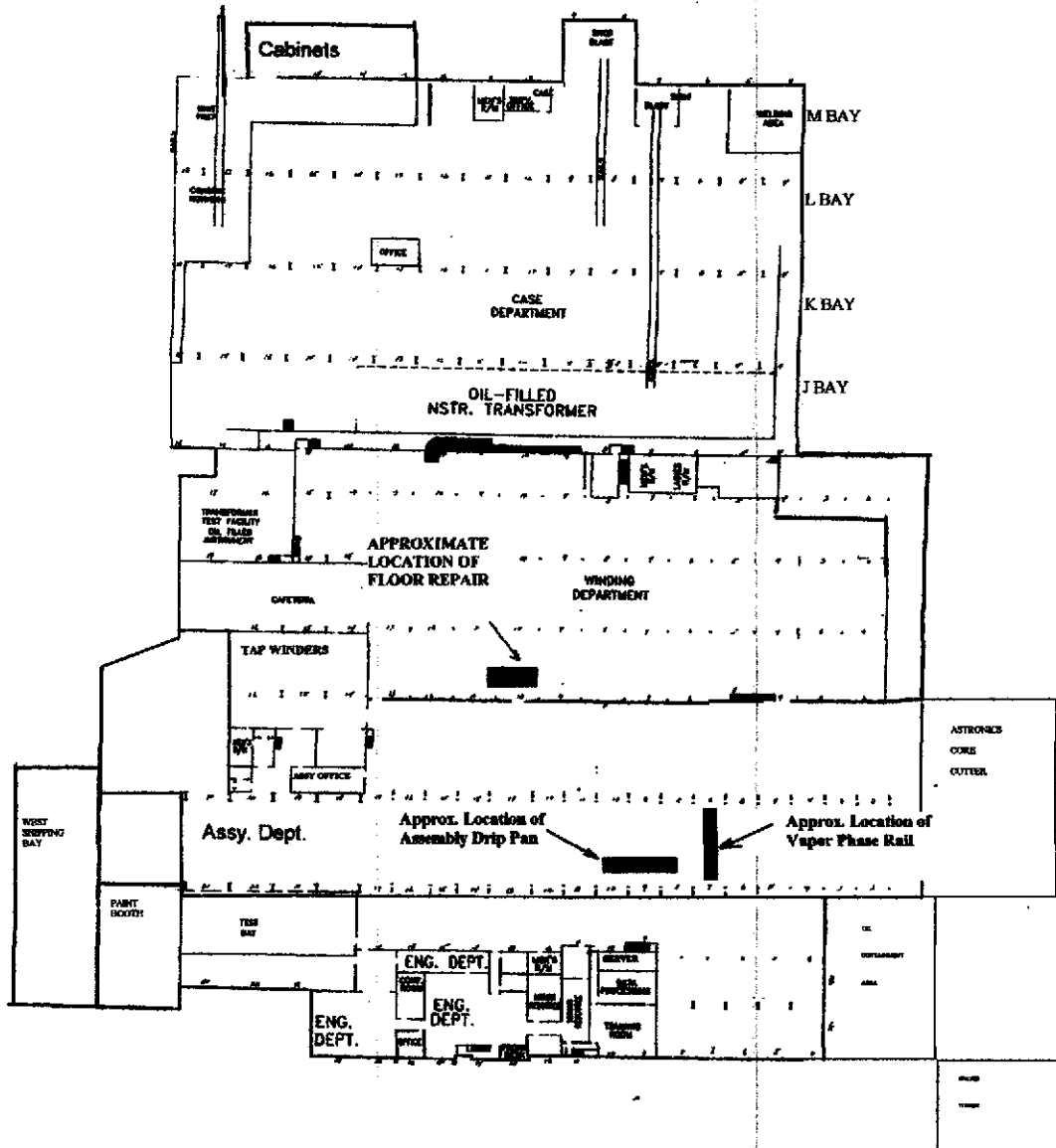


Figure 1

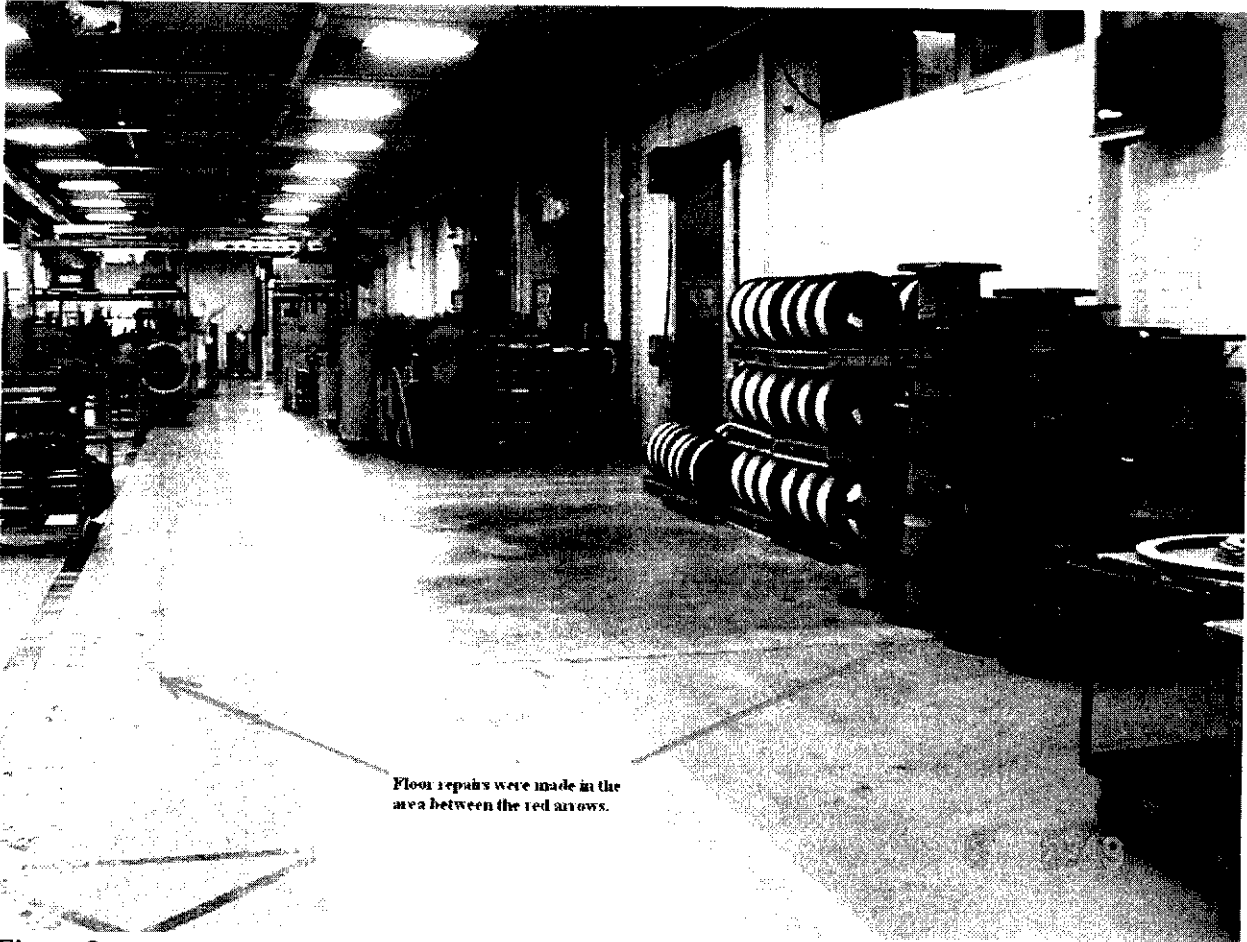


Figure2

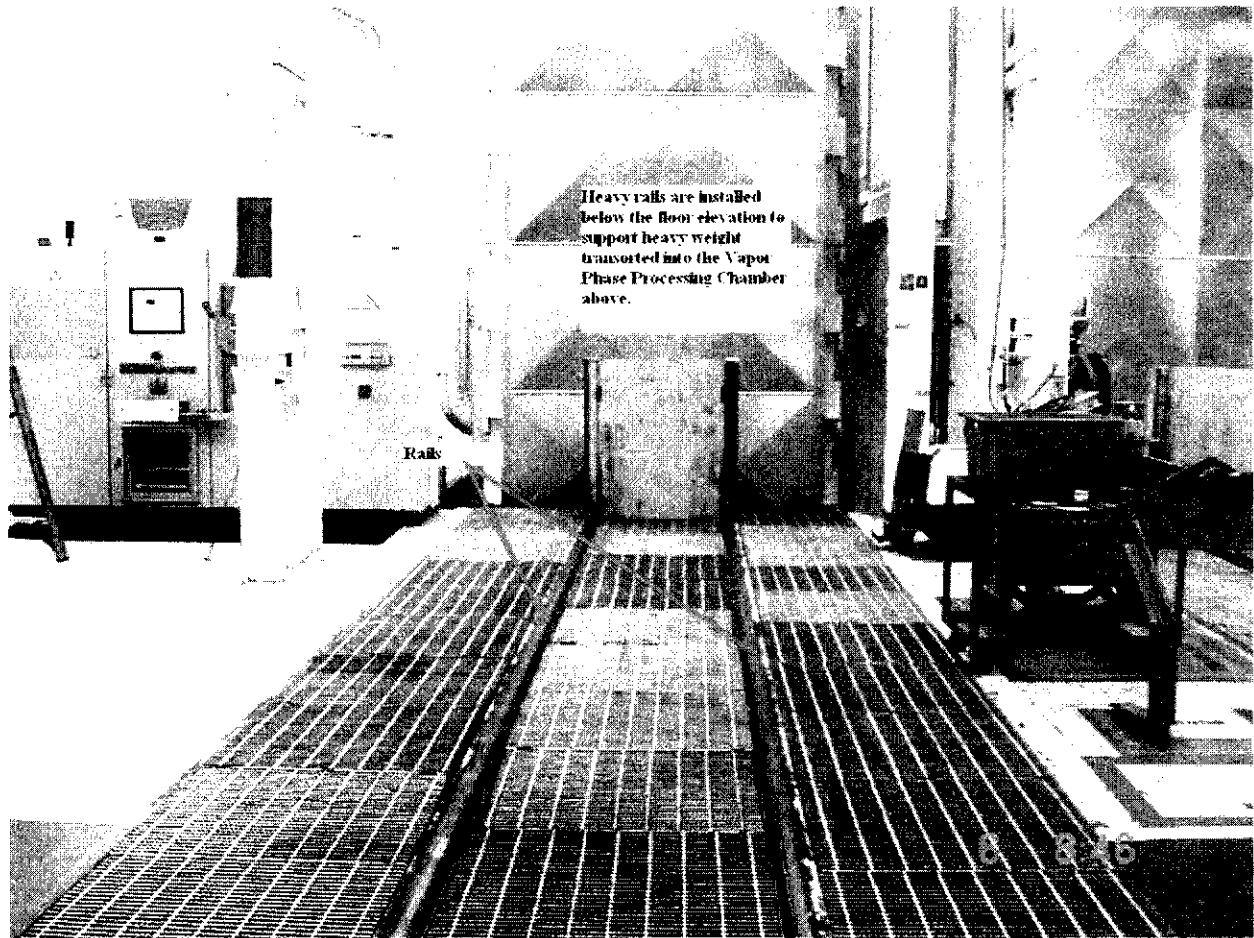
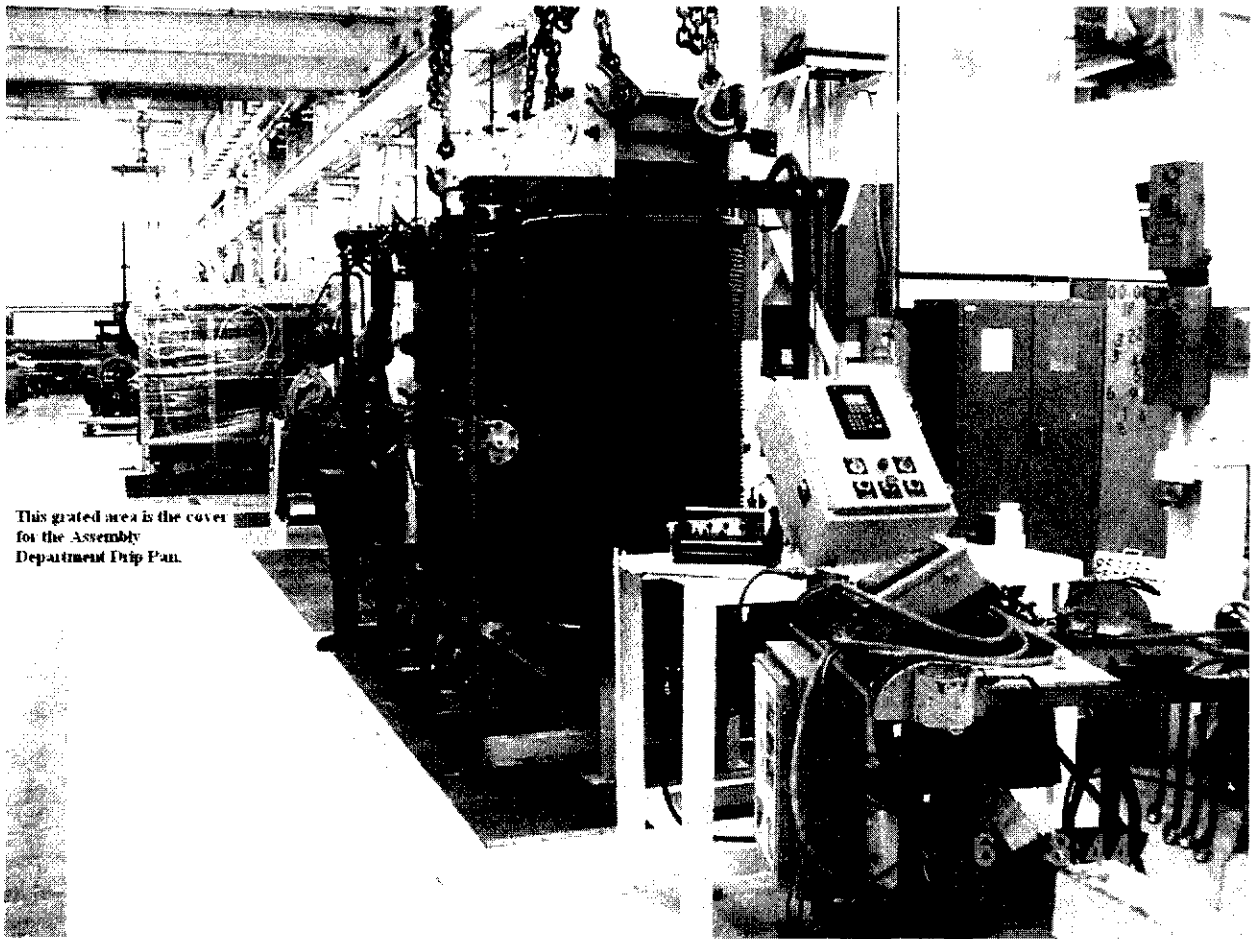


Figure 3



This grated area is the cover
for the Assembly
Department Drip Pan.

Figure 4

NON-HAZARDOUS WASTE MANIFEST **0927234**

Manifest Document Number 2, Page 1 of

1. Generator's US EPA ID Number		5. Generating Location (if different) KUHLMAN ELECTRIC CORP	
3. Generator's Name and Mailing Address KUHLMAN ELECTRIC CORP 181 KUHLMAN DR CRYSTAL SPRINGS, MS 39058		6. Phone ()	
4. Phone ()		8. US EPA ID Number LAB-0003748	9. Transporter #1's Phone 1-877-330-2304
7. Transporter #1 Company Name STEVE Koot Trucking		11. US EPA ID Number	12. Transporter #2's Phone
10. Transporter #2 Company Name		15. Facility's Phone 601 992 9488	
13. Designated TSD Facility Name and Address LITTLE DUCK LANDFILL 1718 N COUNTY LINE RD RIDGELAND, MS 39157		14. US EPA ID Number	
16. Waste Shipping Name and Description		17. Allocated Waste Approval # and Exp. Date	20. Unit Wt/Vol
a. SOIL AND CONCRETE WITH PCB			
b. L-38 Y9 9109		EXPIRES 12/31/2009	
c.			
d.			
21. Additional Descriptions for Materials Listed Above			
22. Special Handling Instructions and Additional Information BILL TO: KUHLMAN ELECTRIC CORP ACCTS 661109 ATTN: AL THOMAS Roll off - 180235107			
23. GENERATOR'S CERTIFICATION: I certify the materials described on this manifest are not subject to federal registration or reporting requirements of hazardous waste.			
Printed/Typed Name David Thomas		Signature <i>David Thomas</i>	Month Day Year 2/9/09
24. Transporter #1: Acknowledgment of Receipt of Materials		Signature <i>Alan Thomas</i>	Month Day Year
Printed/Typed Name Alan Thomas		Signature <i>Alan Thomas</i>	Month Day Year
25. Transporter #2: Acknowledgment of Receipt of Materials		Signature <i>Kelvin Gray</i>	Month Day Year 2/9/09
Printed/Typed Name Kelvin Gray		Signature <i>Kelvin Gray</i>	Month Day Year
26. Discrepancy Indication Space			
27. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest (except as noted in item 18)			
Printed/Typed Name		Signature	Month Day Year

GENERATOR'S COPY

Figure 5




NON-HAZARDOUS WASTE MANIFEST

0927235

1. Generator's US EPA ID Number		Manifest Document Number		2. Page 1 of	
3. Generator's Name and Mailing Address KUHLMAN ELECTRIC CORP 181 KUHLMAN DR CRYSTAL SPRINGS, MS 39058			5. Generating Location (if different) KUHLMAN ELECTRIC CORP		
4. Phone ()			6. Phone ()		
7. Transporter #1 Company Name STEVE Kent Trucking		8. US EPA ID Number LAR000037408		9. Transporter #1's Phone 1-877-330-2304	
10. Transporter #2 Company Name		11. US EPA ID Number		12. Transporter #2's Phone	
13. Designated TSD Facility Name and Site Address LITTLE DIXIE LANDFILL 1716 N COUNTY LINE RD RIDGELAND, MS 39157		14. US EPA ID Number		15. Facility's Phone 601 962 9488	
16. Waste Shipping Name and Description		17. Allocated Waste Approval # and Exp. Date		18. Containers	
a. SOIL AND CONCRETE WITH PCB				No. Type	
b. L-38 Y8 8189		EXPIRES 12/31/2009		19. Total Quantity	
c.				20. Unit Wt/Vol	
d.					
21. Additional Descriptions for Materials Listed Above					
22. Special Handling Instructions and Additional Information BILL TO: KUHLMAN ELECTRIC CORP ACCT# 851100 ATTN: AL THOMAS Roll Off-AB-D325304					
23. GENERATOR'S CERTIFICATION: I certify the materials described on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.					
Printed/Typed Name ALAN THOMAS		Signature <i>[Signature]</i>		Month Day Year	
24. Transporter #1: Acknowledgement of Receipt of Materials					
Printed/Typed Name Kelvin Gray		Signature <i>[Signature]</i>		Month Day Year 08/09/09	
25. Transporter #2: Acknowledgement of Receipt of Materials					
Printed/Typed Name		Signature		Month Day Year	
26. Discrepancy Indication Space					
27. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest (except as noted in Item 19)					
Printed/Typed Name		Signature		Month Day Year	

GENERATOR'S COPY

Figure 6



NON-HAZARDOUS WASTE MANIFEST **0927236**

1. Generator's US EPA ID Number		Manifest Document Number		2. Page 1 of			
3. Generator's Name and Mailing Address KUHLMAN ELECTRIC CORP 191 KUHLMAN DR CRYSTAL SPRINGS, MS 39058			5. Generating Location (if different) KUHLMAN ELECTRIC CORP				
4. Phone () <i>662-371-2314</i>		6. US EPA ID Number		9. Transporter #1's Phone			
7. Transporter #1 Company Name <i>King Trucking</i>		8. US EPA ID Number		12. Transporter #2's Phone			
10. Transporter #2 Company Name		11. US EPA ID Number		16. Facility's Phone 601 982 9480			
13. Designated TSD Facility Name and Address LITTLE DIXIE LANDFILL 1716 N COUNTY LINE RD RIDGELAND, MS 39157		14. US EPA ID Number		17. Allied Waste Approval # and Exp. Date EXPRES 12/31/2009			
18. Waste Shipping Name and Description		17. Allied Waste Approval # and Exp. Date		19. Containers			
a. SOIL AND CONCRETE WITH PCB b. L-38 YB 6100		17. Allied Waste Approval # and Exp. Date EXPRES 12/31/2009		19. Containers			
				No.	Type	20. Total Quantity	20. Unit Wt/Vol
21. Additional Descriptions for Materials Listed Above <i>254</i> <i>RT</i>							
22. Special Handling Instructions and Additional Information BILL TO: KUHLMAN ELECTRIC CORP ACCT# 851109 ATTN: AL THOMAS <i>Roll # RT2514</i>							
23. GENERATOR'S CERTIFICATION: I certify the materials described on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.							
Printed/Typed Name <i>AL THOMAS</i>		Signature <i>[Signature]</i>		Month Day Year <i>6/1/08</i>			
24. Transporter #1: Acknowledgment of Receipt of Materials		Signature		Month Day Year			
25. Transporter #2: Acknowledgment of Receipt of Materials		Signature		Month Day Year			
26. Discrepancy Indication Space							
27. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest (except as noted in item 13)							
Printed/Typed Name		Signature		Month Day Year			

GENERATOR'S COPY

Figure 7



NON-HAZARDOUS WASTE MANIFEST

0927237

1. Generator's US EPA ID Number		Manifest Document Number		2. Page 1 of	
3. Generator's Name and Mailing Address KUHLMAN ELECTRIC CORP 101 KUHLMAN DR CRYSTAL SPRINGS, MS 38908			5. Generating Location (if different) KUHLMAN ELECTRIC CORP		
4. Phone ()		6. US EPA ID Number LARGAIN 37408		8. Transporter #1's Phone 1-877-330-2364	
7. Transporter #1 Company Name STEVE Kent Trucking		11. US EPA ID Number		12. Transporter #2's Phone	
10. Transporter #2 Company Name		14. US EPA ID Number		15. Facility's Phone 601 982 9488	
13. Designated Disposal Site Name and Address LITTLE DIXIE LANDFILL 3740 N COUNTY LINE RD RIDGELAND, MS 38157		17. Allied Waste Approval # and Exp. Date		19. Total Quantity	
16. Waste Shipping Name and Description		18. Containers		20. Unit Wt/Vol	
a. SOIL AND CONCRETE WITH PCB		No.		Type	
b. L-38 Y9 9108		EXPIRES 12/31/2009		25 yds	
c.					
d.					
21. Additional Descriptions for Materials Listed Above					
22. Special Handling Instructions and Additional Information BILL TO: KUHLMAN ELECTRIC CORP ACCT# 851106 ATTN: AL THOMAS ROLL OFF # RB-0625320					
23. GENERATOR'S CERTIFICATION: I certify the materials described on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.					
Printed/Typed Name Alan Thomas		Signature <i>[Signature]</i>		Month Day Year 02 09 09	
24. Transporter #1: Acknowledgement of Receipt of Materials Printed/Typed Name Kevin Gray		Signature <i>[Signature]</i>		Month Day Year 02 09 09	
25. Transporter #2: Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year	
26. Discrepancy Indication Space					
27. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest (except as noted in item 19)					
Printed/Typed Name		Signature		Month Day Year	

GENERATOR'S COPY

Figure 8




NON-HAZARDOUS WASTE MANIFEST

0927238

1. Generator's US EPA ID Number		Manifest Document Number		2. Page 1 of	
3. Generator's Name and Mailing Address KUHLMAN ELECTRIC CORP 181 KUHLMAN DR CRYSTAL SPRINGS, MS 39059			5. Generating Location (if different) KUHLMAN ELECTRIC CORP		
4. Phone ()			6. Phone ()		
7. Transporter #1 Company Name <i>Steve Kest Trucking</i>		8. US EPA ID Number <i>LARUNGA 3740K</i>		9. Transporter #1's Phone <i>601-330-2244</i>	
10. Transporter #2 Company Name		11. US EPA ID Number		12. Transporter #2's Phone	
13. Designated Facility Name and Address LITTLE DICK LAWNMILL 1716 N COUNTY LINE RD RIDGELAND, MS 39157		14. US EPA ID Number		15. Facility's Phone 601 962 8488	
16. Waste Shipping Name and Description		17. Allocated Waste Approval # and Exp. Date		18. Containers	
a. SOIL AND CONCRETE WITH PCB				No. Type	
b. L-38 Y9 9100		EXPIRES 12/31/2008		19. Total Quantity <i>25</i>	
c.				20. Unit Wt/Vol <i>400</i>	
d.					
21. Additional Descriptions for Materials Listed Above					
22. Special Handling Instructions and Additional Information BILL TO: KUHLMAN ELECTRIC CORP ACCT# 851105 ATTN: AL THOMAS					
23. GENERATOR'S CERTIFICATION: I certify the materials described on this manifest are not subject to federal regulatory reporting proper disposal of Hazardous Waste. <i>ALL DEF# RT 2516</i>					
Printed/Typed Name <i>ALAN THOMAS</i>		Signature <i>[Signature]</i>		Month Day Year <i>2 5 09</i>	
24. Transporter #1: Acknowledgement of Receipt of Materials Printed/Typed Name <i>Kelvin Gray</i>		Signature <i>[Signature]</i>		Month Day Year <i>8 26 08</i>	
25. Transporter #2: Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year	
26. Discrepancy Indication Space					
27. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest (except as noted in Item 18)					
Printed/Typed Name		Signature		Month Day Year	

GENERATOR'S COPY

Figure 9



NON-HAZARDOUS WASTE MANIFEST **0927239**

1. Generator's US EPA ID Number		Manifest Document Number		2. Page 1 of	
3. Generator's Name and Mailing Address KUHLMAN ELECTRIC CORP 301 KUHLMAN DR CRYSTAL SPRINGS, MS 39059				5. Generating Location (if different) KUHLMAN ELECTRIC CORP	
4. Phone ()		8. US EPA ID Number LA R0000 37408		9. Transporter #1's Phone 1-877-330-2304	
7. Transporter #1 Company Name STEVE KIAT Trucking		11. US EPA ID Number		12. Transporter #2's Phone	
10. Transporter #2 Company Name		14. US EPA ID Number		15. Facility's Phone 601 982 9488	
13. Designated Disposal Site LITTLE DUNE LANDFILL 1716 N COUNTY LINE RD RIDGELAND, MS 39157		17. Allied Waste Approval # and Exp. Date EXPIRES 12/31/2008		16. Facility's Phone	
18. Waste Shipping Name and Description a. SOIL AND CONCRETE WITH PCB b. L-38 Y8 9102 c. d.		17. Allied Waste Approval # and Exp. Date		18. Containers	
				19. Total Quantity	
				20. Unit Wt/Vol	
				No.	
				Type	
				25 yds	
21. Additional Descriptions for Materials Listed Above					
22. Special Handling Instructions and Additional Information BILL TO: KUHLMAN ELECTRIC CORP ACCT# 851108 ATTN: AL THOMAS ROLL OFF # RT-2504					
23. GENERATOR'S CERTIFICATION: I certify the materials described on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.					
Printed/Typed Name ALAN THOMAS		Signature <i>[Signature]</i>		Month Day Year 8 5 09	
24. Transporter #1: Acknowledgement of Receipt of Materials Printed/Typed Name Kevin Gray		Signature <i>[Signature]</i>		Month Day Year 8 05 09	
25. Transporter #2: Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year	
26. Discrepancy Indication Space					
27. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest (except as noted in Item 19)					
Printed/Typed Name		Signature		Month Day Year	

GENERATOR'S COPY

Figure 10



NON-HAZARDOUS WASTE MANIFEST

022724U

1. Generator's US EPA ID Number
Manifest Document Number 2. Page 1 of

3. Generator's Name and Mailing Address
KUHLMAN ELECTRIC CORP
181 KUHLMAN DR
CRYSTAL SPRINGS, MS 39058

4. Phone ()

5. Generating Location (if different)
KUHLMAN ELECTRIC CORP

6. Phone ()

7. Transporter #1 Company Name
STEVE KAUF Trucking

8. US EPA ID Number
LARGWOOD 37468

9. Transporter #1's Phone
1-877-330-2304

10. Transporter #2 Company Name

11. US EPA ID Number

12. Transporter #2's Phone

13. Designated TSD Facility Name and Address
LITTLE DUNE LANDFILL
1718 N COUNTY LINE RD
RIDGELAND, MS 39157

14. US EPA ID Number

15. Facility's Phone
601 982 9488

16. Waste Shipping Name and Description

17. Allot Waste Approval # and Exp. Date
EXPIRES 12/31/2008

18. Containers	19. Total Quantity		20. Unit Wt/Vol
	No.	Type	
a. SOIL AND CONCRETE WITH PCB			
b. L-38 Y9 9189		25	y.k
c.			
d.			

21. Additional Descriptions for Materials Listed Above

22. Special Handling Instructions and Additional Information
BILL TO: KUHLMAN ELECTRIC CORP ACCT# 951108 ATTN: AL THOMAS
ROLL OFF * RT 25K

23. Generator's Certification: I certify the materials described on this manifest are not subject to federal regulations for reporting proper disposal of hazardous waste.

Printed/Typed Name: ALAN THOMAS Signature: [Signature] Month Day Year: 1/16/09

24. Transporter #1: Acknowledgement of Receipt of Materials
Printed/Typed Name: Kelvin Gray Signature: [Signature] Month Day Year: 8/15/09

25. Transporter #2: Acknowledgement of Receipt of Materials
Printed/Typed Name: Signature: Month Day Year:

26. Discrepancy Indication Space

27. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest (except as noted in Item 16)
Printed/Typed Name: Signature: Month Day Year:

GENERATOR'S COPY

Figure 11

APPENDIX I

ENVIRONMENTAL

MANAGEMENT SERVICES, INC.



August 27, 2009

Mr. Alan Thomas
Kuhlman Electric Corporation
101 Kuhlman Drive
Crystal Springs, Mississippi 39059

Re: Concrete Cutting Soil, Water, and Air Sampling
Kuhlman Electric Corporation
Crystal Springs, Mississippi

Dear Mr. Thomas:

Environmental Management Services, Inc. (EMS) has prepared this report for a round of soil, water, and air sampling associated with three floor cutting events at the Kuhlman Electric Corporation (KEC) facility in Crystal Springs, Mississippi. Cut #1 was located in the southern portion of the Winding Department, Cut #2 was located in front of the Core Department Supervisor's Office, and Cut #3 was located in front of the Vapor Phase Unit in the Core Department. The locations of the three cuts are shown on Figure 1.

Six soil samples and one water sample were collected on July 6, 2009 and July 20, 2009 by EMS. The samples were analyzed by Micro-Methods Laboratory, Inc. for Polychlorinated Biphenyls (PCBs) by Environmental Protection Agency (EPA) Method 8082. Additionally, three air samples were collected during the excavation of the concrete slab and analyzed by EMSL Analytical by EPA Compendium TO-15. The air samples were collected using specially-prepared summa canisters. The sample locations are shown on Figure 2.

Seven of the soil samples were collected from the containers storing the soil, one soil sample was collected from the cutting solids, and the water sample was collected from water used as a cooling agent/lubricant during the cutting process. All of the soil samples and the cutting solid sample contained detectable levels of PCB-1260. Three of the soil samples (05 Cutting Solids, 11 RB-0225107, and 12 RB-0324304) exceeded the Mississippi Department of Environmental Quality's (MDEQ) Tier 1 Target Remedial Goals (TRGs) for unrestricted soils of 1.0 milligrams per kilogram (mg/kg). The water sample obtained from the cutting water did not exhibit any

concentrations of PCBs above their respective reporting limit. The analytical results are included in Table 1, and a copy of the laboratory analytical report is included as Attachment 1.

The laboratory analytical results indicated all air samples contained VOC concentration above their respective reporting limit. The samples did not exceed the Occupational Safety and Health Administration's (OSHA) or the National Institute for Occupational Safety and Health's (NIOSH) standards for the compounds analyzed. The analytical results are included in Table 2, and a copy of the laboratory analytical report is included as Attachment 2.

In addition to the previously mentioned sampling and analysis, the air in the immediate work area was monitored using a photo ionization detector (PID), a flame ionization detector (FID), and a four gas meter. The FID and PID monitors did not detect any exceedingly high readings during the cutting and excavation. The four gas meter detected a high carbon monoxide (CO) reading of 37 parts per million (ppm) at Cut #1 following the concrete cutting. This elevated reading was determined to be due to the operation of diesel equipment in the vicinity. It was noted that the levels dropped to the 0-12 ppm range shortly after the elevated reading was taken. Another elevated CO reading of 33 ppm was detected with the four gas meter at Cut #3. The elevated reading was believed to be caused by equipment exhaust. The readings from these monitors are listed in the field notes that are included as Attachment 3.

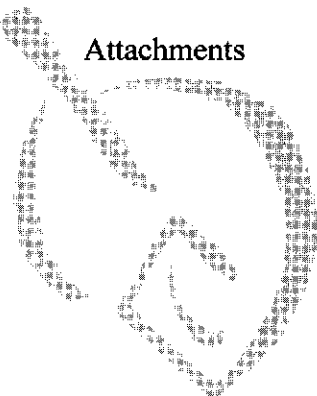
We appreciate the opportunity to provide these environmental services for you. If you have any questions regarding this report please contact me.

Sincerely,
Environmental Management Services, Inc.

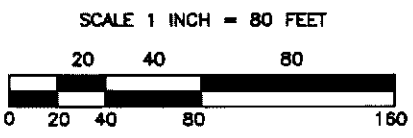
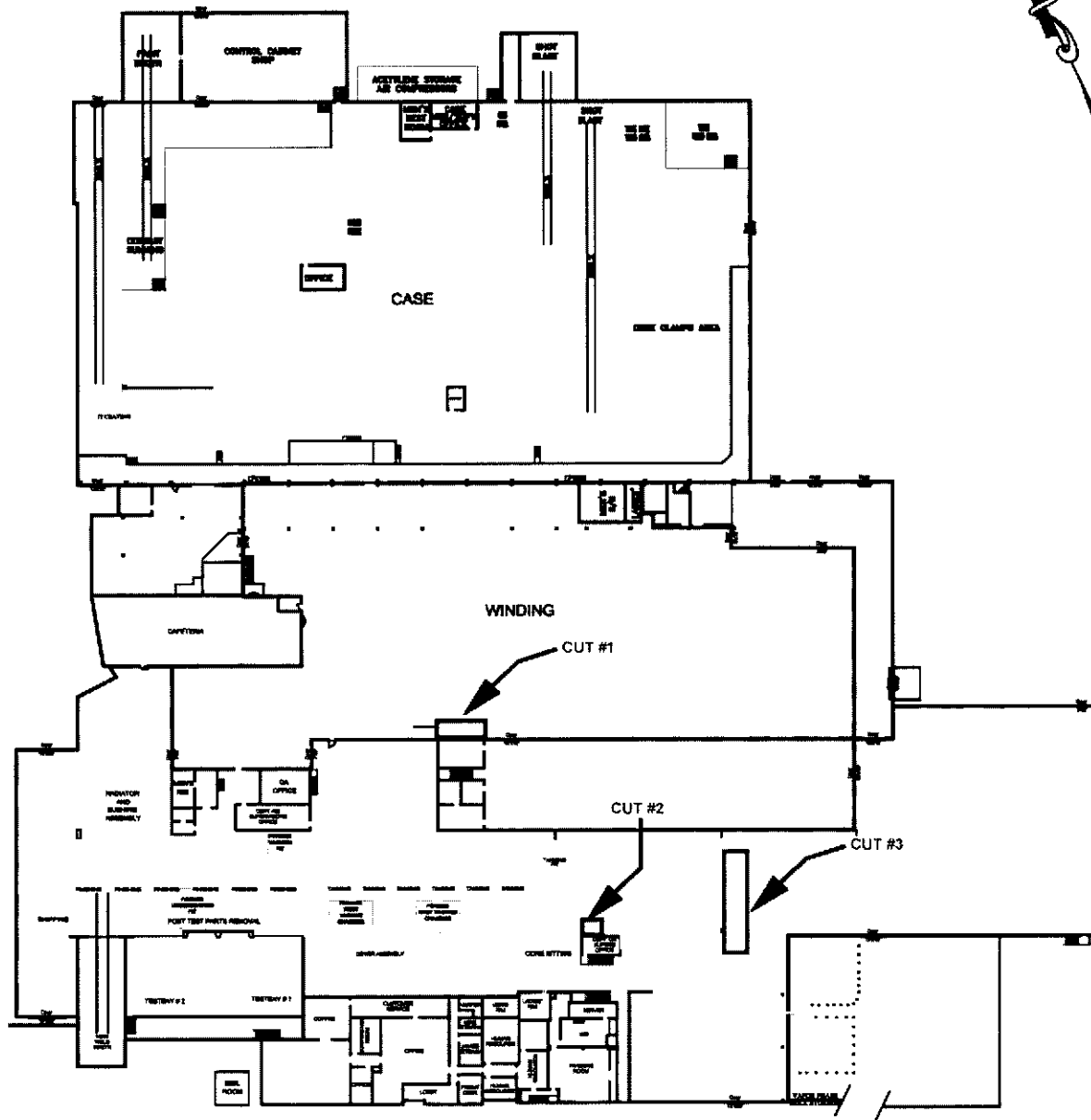


Ethan Allen, P.G.
Project Geologist

Attachments



FIGURES



PRIVILEGED AND CONFIDENTIAL
 ATTORNEY-CLIENT COMMUNICATION
 ATTORNEY WORK PRODUCT

CONCRETE CUT LOCATIONS		
CONCRETE CUTTING KUHLMAN ELECTRIC CORPORATION 101 KUHLMAN DRIVE CRYSTAL SPRINGS, MISSISSIPPI		
DATE: 8/12/09	APPROVED:	DRAWN BY: E.E.A.
SCALE: 1" = 80'	BY:	CAD NO.
	DATE:	REC. SAMPLE LOCATION

NOTE: PROPERTY BOUNDARIES AND SCALE ARE APPROXIMATE.

ENVIRONMENTAL
 MANAGEMENT SERVICES, INC.

FIGURE
 1