



October 31, 2012

Melissa McGee-Collier
Office of Community Engagement
PO Box 2261
Jackson, MS 39225

**RE: COMMUNITY ENGAGEMENT PROGRESS REPORT JANUARY THROUGH
OCTOBER 2012, KUHLMAN ELECTRIC CORPORATION CLEAN UP ACTIONS,
CRYSTAL SPRINGS, MISSISSIPPI**

Dear Ms. Collier:

This report provides a summary of community engagement actions taken for the Kuhlman Electric Corporation (KEC) environmental clean-up actions in Crystal Springs, Mississippi, as required by the Community Engagement Plan approved by the Mississippi Department of Environmental Quality (MDEQ) on July 17, 2012. Because this is the first report, it covers January through October 2012. Future reports will be provided quarterly.

KEC and MDEQ have been actively engaged with the community in 2012. In January, KEC held an information open house at the Crystal Springs Armory, where a proposed Corrective Action Plan (CAP) was presented to the public and elected officials. KEC, with its consultants Environmental Management Services (EMS), and Caffee, Caffee and Associates (CCA) presented technical project information, answered questions and received public comments. The Mississippi Department of Health and MDEQ also participated in the open house. A public comment period was conducted from January to February 2012, and the CAP was approved on March 1, 2012.

On June 1, 2012, Kuhlman's consultants, CCA, submitted the Community Engagement Plan on behalf of KEC. The plan was subsequently revised to address MDEQ's comments. MDEQ approved the Community Engagement Plan on July 17, 2012.

The following Corrective Action Plan milestones were completed during this reporting period:

- Capacity Plan for Potable Water Supply for the City of Crystal Springs (submitted June 8, 2012)
- Soil Vapor Extraction System Pilot Test completed at 101 Kuhlman Drive facility (May 2012)
- Monitored Natural Attenuation Ground Water Monitoring (ongoing)

The following Corrective Action Plan milestones were initiated during this reporting period:

- Final Design of Soil Vapor Extraction System (data evaluation, design, and reporting in progress)
- Capacity Plan Implementation - Interim Treatment System Final Design (pending MDOH, City of Crystal Springs, and MDEQ approval of CAP and technology selection)

Progress in implementing the Community Engagement Plan as it relates to these specific milestones, above, is detailed in Table 1 (attached). All required activities were completed. Several community relations actions are conducted on an as-needed basis, designed to meet the requests and needs of the public. The status of these actions is as follows:

Points of Contact

There have been no changes in the points of contact since the Community Engagement Plan was submitted.

Fact Sheets

Several fact sheets were developed for the January 2012 Informational Open House and are available upon request to the public. Copies of all fact sheets and presentation material from the Open House were compiled and submitted to MDEQ for the public record in February 2012. Fact sheets available are:

- Event Summary (Informational Open House)
- Soil Vapor Extraction
- Air Sparging
- Monitored Natural Attenuation
- Groundwater Corrective Action Plan

Media Releases and Briefings

KEC representatives conducted interview with the local paper in Crystal Springs, the Meteor, at the public open house and a front-page article was published the following week.

Public Notices

Public notice of the comment period for the Corrective Action Plan was provided by MDEQ at the January 19, 2012 Informational Open House. Subsequently, MDEQ provided public notice of the Corrective Action Plan and Soil Vapor Extraction Pilot Test Plan approvals in their March 2012 Community Update.

Information Repository

The information repository is maintained by MDEQ online at <https://www.deq.state.ms.us> and at the Crystal Springs Public Library Information Desk, 200 South Jackson Street, Mississippi, MS. MDEQ adds approved documents and final reports only. During this reporting period, the following documents were approved:

- Corrective Action Plan (March 15, 2011)
- Soil Vapor Extraction Test Plan (January 10, 2012)
- Community Engagement Plan (revised July 2012)
- Lake Chautauqua Soil and Sediment Sampling Work Plan (May 15, 2012)

- North Drainage Channel Remediation Report (September 2011) and Response Letter (April 12, 2012)

During this reporting period, the following final reports were also submitted to MDEQ:

- Semi-Annual Groundwater Assessment Report (January 3, 2012)
- Groundwater Monitoring Well Installation Report (February 22, 2012)
- Capacity Plan for Potable Water Supply City of Crystal Springs (June 8, 2012)
- Semi-Annual Groundwater Assessment Report (July 31, 2012)
- Bench Study Findings for Destruction of Contaminants of Concern by Purifics Photo-Cat Technology (September 6, 2012)
- 2nd Quarter Groundwater Sampling Report (October 3, 2012)
- Upgradient Shallow Subsurface Investigation Work Plan (October 3, 2012)

Local Briefings and telephone briefings

Caffee, Caffee and Associates, on behalf of KEC, has held several small group and individual meetings, as well as telephone conversations each month during the reporting period, including attendance at the Concerned Citizens Against Pollution monthly meetings through March 2012 (meetings were suspended in subsequent months due to the death of Ms. Deaton – but will resume on November 1st at a meeting with the mayor). CCA has maintained communication and a presence in the community each month to reassure residents of KEC's community engagement efforts.

Additionally, representatives held one-on-one talks with businesses and churches in Crystal Springs while hand delivering copies of the KEC newsletter (see Direct Mail below).

KEC staffed two information booths at the Crystal Springs 2012 Tomato Festival on June 30th, where community members asked questions and signed up on the site mailing list.

A meeting was held with regulatory agencies and the City of Crystal Springs' designated engineers, WKG Engineering, on June 25, 2012, to review the Capacity Plan and solicit comments on the proposed technology/implementation strategy for the potable water supply for the City of Crystal Springs.

Public Meeting, Open Houses and Small Group Meetings

Approximately 250 people attended KEC's Informational Open House in January 2012. More than 150 attendees signed up for additional information and have been added to KEC's mailing/contact list. CCA has continually offered updates through monthly small group meetings to over 75 people during the reporting period not including those who received newsletters (see Direct Mail below).

Direct Mail

KEC published the first edition of a quarterly newsletter, the Kuhlman Cleanup News on October 5, 2012. The newsletter was distributed to more than 150 individuals, 20 local businesses, and 30 churches. Businesses and churches received copies of the newsletter to ensure a broad distribution and that interested individuals had multiple locations to obtain a copy. The number of businesses receiving the

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newsletter is expected to more than double in the coming months. This issue of the newsletter provided updates on the Soil Vapor Extraction pilot test results, the drainage ditch, and the Capacity Plan. A copy is attached.

MDEQ published a Community Update newsletter in March 2012, providing public notice of the Corrective Action Plan and Soil Vapor Extraction Test Plan approval.

Comment Period and Comment Responses

MDEQ provided a 30-day public comment period prior to approving the Corrective Action Plan and Soil Vapor Extraction Test Plan.

CCA collected public comments on behalf of KEC at the January Informational Open House, and it continues to receive calls and comments by phone and email. KEC created a dedicated email address for public comments/concerns at crystalspringsinfo@us.abb.com. To date, no questions or comments have been received by email. All verbal comments have been responded to by CCA.

MDEQ has not notified KEC of any other public notice/comment periods required at this time.

Upcoming Activities

KEC will provide the next quarterly update in January 2013. Please do not hesitate to contact us with any questions you might have.

Sincerely,

Tommy Kessinger
ABB Kuhlman

KUHLMAN ELECTRIC CORPORATION
101 KUHLMAN DRIVE, CRYSTAL SPRINGS, MS

TABLE 1 - CORRECTIVE ACTION PLAN MILESTONE/COMMUNITY ENGAGEMENT TASK SUMMARY

CAP Milestone	Anticipated Date	Planned Community Engagement Activities	Task Initiated and/or Completed	Task Planned for Following Quarter	Problems and Delays
Capacity Plan for Potable Water Supply, City of Crystal Springs (submitted to MDEQ and MDOH June 8, 2012).	Summer 2012	<ul style="list-style-type: none"> - Concurrently submit to the mayor of the City of Crystal Springs for review and comment. - Have a representative at Tomato Festival June 30th 2012. - Publish in quarterly newsletter to interested parties. - Update civic leaders. - Approved document will be placed in public repository. 	<ul style="list-style-type: none"> - Capacity Plan for Potable Water Supply completed and submitted to City of Crystal Springs and MDOH. - Two information booths at the Tomato Festival on June 30, 2012. - Quarterly Newsletter completed and mailed/distributed to Crystal Spring's residents and businesses by October 10th. - Mayor and Civic leaders were updated through the Newsletter. - Documents submitted to MDEQ for placement in the public repository. Also available upon request. 	<ul style="list-style-type: none"> - Awaiting comments from City and MDOH review. - Continue to update residents and civic leaders through the quarterly Newsletter. - Continue to ensure that reports and newsletters are placed in public repository. 	<ul style="list-style-type: none"> - None at this time.

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Capacity Plan Implementation Interim Treatment System Final Design	Summer – Fall 2012	<ul style="list-style-type: none"> - Will be submitted to MDEQ, MDOH, and engineers selected by the City of Crystal Springs. - Approved design will be placed in the public repository at the Crystal Springs library and on the MDEQ website. - Public notice upon approval. - Update civic leaders. - Publish in quarterly newsletter to interested parties. 	<ul style="list-style-type: none"> - The bench study has been completed successfully and the interim treatment system final design is in progress. 	<ul style="list-style-type: none"> - Finalization and submission of Interim Treatment System Final Design. 	<ul style="list-style-type: none"> - MSDH requirements for Operator(s) being refined. Documentation of existing City system under review.
Capacity Plan Implementation Interim Treatment System Construction Complete	Fall – Winter 2012	<ul style="list-style-type: none"> - Public notice - Update civic leaders. - Publish in quarterly newsletter to interested parties - Attend regularly scheduled City meeting on an annual basis and provide update. 	<ul style="list-style-type: none"> - The bench study has been completed successfully and the interim treatment system final design is in progress. 		
Capacity Plan Implementation Long term volume replacement, as needed	Ongoing - 2015	<ul style="list-style-type: none"> - Progress will be included in Groundwater monitoring reports submitted to MDEQ. - Update civic leaders. - Publish in quarterly newsletter to interested parties. - Attend regularly scheduled City meeting on an annual basis and provide update. 	<ul style="list-style-type: none"> - Possible well site locations are being evaluated along with data gathering related to City Potable Water Supply System and demand. 	<ul style="list-style-type: none"> - Continue existing design documentation and potential well site search. Initiate permit process with MDEQ. 	<ul style="list-style-type: none"> - Lower than anticipated yield from Harmony Road well has delayed this task.

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Expected results of Soil Vapor Extraction (SVE) Pilot Test	Fall 2012	<ul style="list-style-type: none"> - Updates with individuals, as requested. - Results will be included in Final Design submitted to MDEQ. Once approved, MDEQ will place the design in a public repository at the Crystal Springs library and on the MDEQ website. - Publish in quarterly newsletter to interested parties. 	<ul style="list-style-type: none"> - The initial test of the proposed Soil Vapor Extraction (SVE) procedure was successfully completed in May 2012. - Report for submission to MDEQ in progress. - The results will be included in the final design submitted to MDEQ. - Updates on this milestone were included in the Quarterly Newsletter. 	<ul style="list-style-type: none"> - Report submitted to MDEQ. 	<ul style="list-style-type: none"> - None at this time.
Final design of SVE System	Winter 2012	<ul style="list-style-type: none"> - A final design will be submitted to MDEQ for review and approval. Once approved, MDEQ will place the design in a public repository at the Crystal Springs library and on the MDEQ website. - Publish in quarterly newsletter to interested parties. - Update civic leaders. 	<ul style="list-style-type: none"> - Detailed design work has been initiated for design, procurement, and installation of the SVE system. 	<ul style="list-style-type: none"> - Detailed design of SVE system/Quality Assurance Project Plan (QAPP). 	<ul style="list-style-type: none"> - None at this time.

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Installation of SVE System	Spring-Summer 2013	<ul style="list-style-type: none"> - Construction report will be submitted to MDEQ. - Approved report will be placed in public repository at Crystal Spring's library and on MDEQ website. - Publish in quarterly newsletter to interested parties. - Attend regularly scheduled City meeting on an annual basis and provide update. 			- None at this time.

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Monitored Natural Attenuation (MNA)/ Groundwater Monitoring	Ongoing Quarterly- to Semi-Annually	<ul style="list-style-type: none"> - Groundwater Monitoring Reports will be sent to the Mississippi Department of Environmental Quality (MDEQ) following each sampling event. - Final Monitoring Reports will be placed in a public repository at the Crystal Springs Library and the MDEQ website. - Updates with individuals, small groups as requested. - Publish in quarterly newsletter to interested parties. - Attend regularly scheduled City meeting on an annual basis and provide update. 	<ul style="list-style-type: none"> - Semi-Annual Groundwater Assessment Report submitted to MDEQ January 3, 2012. - Semi-Annual Groundwater Assessment Report submitted to MDEQ July 31, 2012. - Completed semi-annual groundwater sampling event September 27, 2012. Data pending. - Quarterly Groundwater Monitoring Report (select wells) has been submitted to MDEQ October 3, 2012. - Notice of upcoming reports/sampling included in quarterly newsletter. - Documents submitted to MDEQ for placement in the public repository. Also available upon request. 	<ul style="list-style-type: none"> - Semi-Annual Groundwater Assessment Report scheduled for submission to Semi-Annual Groundwater Assessment Report to MDEQ in December/ January 2012. - 4th Quarter sampling event will take place in December 2012. 	<ul style="list-style-type: none"> - None at this time.

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Ongoing SVE operations	Ongoing Quarterly- to Semi-Annually	<ul style="list-style-type: none"> - KEC will submit a summary of the active SVE operations within the Ground Water Assessment Reports. - Publish in quarterly newsletter to interested parties. - Attend regularly scheduled City meeting on an annual basis and provide updates. 	<ul style="list-style-type: none"> - System to be installed in Spring-Summer 2013. 		<ul style="list-style-type: none"> - None at this time.
Air sparge (AS) vs. alternative remedial method evaluation – KEC will evaluate the effectiveness of the SVE system and either proceed with the installation of Air Sparging or an alternative plume treatment scenario.	Spring 2014	<ul style="list-style-type: none"> - Recommendations will be made available to MDEQ in written format. Any changes to the CAP approved by MDEQ will be posted to the public document repository. - Publish in quarterly newsletter to interested parties. - Attend regularly scheduled City meeting on an annual basis and provide updates. 	<ul style="list-style-type: none"> - This milestone will be completed in Spring 2014. 		<ul style="list-style-type: none"> - None at this time.

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Contingencies/In Situ Treatment – Once the system has been operating for a sufficient amount of time the groundwater trends will be reexamined and KEC will determine if the treatment technologies are meeting the CAP objectives and report accordingly.	2014 – 2015	<ul style="list-style-type: none"> - Will be summarized on Groundwater Monitoring reports. - Final Monitoring Reports will be placed in a public repository at the Crystal Springs Library and the MDEQ website. - Updates with individuals, small groups as requested. - Publish in quarterly newsletter to interested parties. - Attend regularly scheduled City meeting on an annual basis and provide updates. 	<ul style="list-style-type: none"> - This milestone will be completed in 2014-2015. 		<ul style="list-style-type: none"> - None at this time.
No Further Remedial Action Request	2015	<ul style="list-style-type: none"> - Formal request will be submitted to MDEQ when data supports it. - Public notice - Publish in quarterly newsletter to interested parties. - Attend regularly scheduled City meeting on an annual basis and provide updates. 	<ul style="list-style-type: none"> - This milestone will be completed in 2015. 		<ul style="list-style-type: none"> - None at this time.

Kuhlman Cleanup News

Newsletter on Kuhlman Environmental Cleanup in Crystal Springs, MS

SOIL VAPOR EXTRACTION PILOT

TEST A SUCCESS!

The initial test of the proposed Soil Vapor Extraction (SVE) procedure has been successfully completed. During the January 2012 Informational Open House a Corrective Action Plan detailing a pilot Soil Vapor Extraction (SVE) test was presented for public comment. At the end of the public comment period, the Mississippi Department of Environmental Quality (MDEQ) reviewed comments received and approved the plan, giving KEC the permission to proceed with the test at the Kuhlman Facility in Crystal Springs.

The test was completed in May 2012 and deemed a success with the results confirming that the SVE technology will work for the shallow soils that are the target for corrective action. Careful planning and testing were conducted to address community concerns that SVE be used at the facility with no negative impacts on the facility workers or community. The results confirmed that it can be implemented without impact to the facility workers and the community. A final design for a larger scale SVE system is currently being prepared to be submitted for review and approval by MDEQ.

Once the final design and implementation plan has been approved by MDEQ, Kuhlman will purchase, install and begin operation of the equipment as described in the plan. A copy of the plan will be available for public viewing at the Crystal Springs Public Library and on the MDEQ website www.deq.state.ms.us.

NORTH DRAINAGE CHANNEL REMEDIAL WORK COMPLETED

MDEQ has completed review of the North Drainage Channel remedial work and concluded that remediation of PCBs in the drainage channel is completed and no further remedial action is required. Approximately 70,000 tons of soil were excavated, removed and replaced with clean soil stretching from Fulgham Avenue to Camp Street. The channel was reconstructed and seeded with grass to enhance soil stability and prevent erosion. MDEQ provided Mayor Evans a letter documenting completion of this milestone in March of 2011.

INFORMATIONAL OPEN HOUSE

Kuhlman appreciates the community participation in the January Informational Open House. Many of you shared questions and concerns at that meeting, and have continued to do so through calls or smaller group meetings. This input is extremely valuable in Kuhlman's endeavor to keep the citizens of Crystal Springs engaged in the cleanup process.

Kuhlman conducted the open house as part of the community relations for environmental program management it started last year. This newsletter is part of the community relations effort, providing periodic updates of the cleanup program actions.

ANNUAL TOMATO FESTIVAL

Kuhlman sponsored two booths at the annual Tomato Festival on June 30, 2012. The booths were located in different areas to provide multiple opportunities to receive free water, candy, balloons and opportunities to sign up for ongoing updates and the newsletter. Kuhlman looks forward to being a part of this great event again next year.

COMMUNITY ENGAGEMENT PLAN

Kuhlman has recently submitted a Community Engagement Plan to the MDEQ and received approval to proceed with the communication measures identified. A copy of the plan can be accessed at the Crystal Springs Public Library as well as virtually at www.deq.state.ms.us.

UPCOMING EVENTS

- Groundwater Monitoring Event and Reporting
- Final Design of Protective Groundwater Treatment System for City Wells
- Lake Chautauqua Investigation Results Evaluation and Report
- Monthly City Well Monitoring
- Community Engagement Progress Report to MDEQ

CAPACITY PLAN FOR CITY WATER SUPPLY

During the Open House in January there was a lot of concern expressed about the drinking water quality, and possible future impacts to the City drinking water. Kuhlman understands those concerns and has hired Environmental Management Services (EMS) to help address these issues. Since the Open House, Kuhlman and EMS have been having meetings and working closely with the City of Crystal Springs, the Mississippi Department of Health (MDOH), and MDEQ to come up with short-term and long-term solutions, including possible replacement of some of the City wells with new wells located away from the contamination. As these solutions are likely to take some time to implement, Kuhlman has also proposed to purchase and put in place a temporary treatment system that could be used at a moment's notice to keep the City well water suitable for drinking and other uses if it becomes necessary before the long-

term solution is ready. The details of this plan are available in Kuhlman's Capacity Plan, submitted to MDEQ, MDOH, and the City of Crystal Springs on June 8th. It is important for the community to know that there is no need to treat the City water at this time, as it meets all of the drinking water standards established. In the interim, the City supply wells are being sampled monthly and analyzed by at least two separate laboratories to keep a close watch and be sure that the water meets the criteria established for drinking water.

QUESTIONS OR COMMENTS

Please submit all questions or comments to Kuhlman at crystalspringsinfo@us.abb.com or Brenda Bell Caffee of Caffee, Caffee and Associates at 601-336-7212.