



April 30, 2014

Melissa McGee-Collier
Office of Community Engagement
Mississippi Department of Environmental Quality
PO Box 2261
Jackson, MS 39225

**RE: COMMUNITY ENGAGEMENT PROGRESS REPORT JANUARY 2014 THROUGH
APRIL 2014, 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. This report will cover the period from January 2014 through and including April 2014. Future reports will continue to be provided quarterly.

KEC has continued to be actively engaged with the community. During this quarter, KEC with its consultants Environmental Management Services (EMS) and Caffee, Caffee and Associates (CCA) has updated and notified Crystal Spring's residents of remedial activities through community meetings, one-on-one dialogue, and the quarterly newsletters.

The following Corrective Action Plan milestones were achieved during this reporting period.

- Monitored Natural Attenuation Ground Water Monitoring (ongoing)
- Soil Vapor Extraction System Installation Complete (April 2014).

The following CAP milestone activities were initiated or continued during this reporting period.

- Capacity Plan Implementation – Research into potential replacement supply well locations and access continued.
- Startup and Optimization of SVE system - Installation of the full scale SVE system was completed and startup testing initiated. Optimization and operation will begin pending test results.

Progress in implementing the Community Engagement Plan as it relates to these specific milestones, above, is detailed in Table 1 (attached). There were no required activities that were not completed.

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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 CEP was submitted.

Fact Sheets

Distribution of fact sheets continues on an ongoing basis as requested from the public. Fact sheets available are:

- Soil Vapor Extraction
- Air Sparging
- Monitored Natural Attenuation
- Groundwater Corrective Action Plan

Media Releases and Briefings

There were no media releases or briefings.

Public Notices

There were no public notices provided this quarter.

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, Crystal Springs, MS. MDEQ adds approved documents and final reports only. During this reporting period, no documents were submitted requiring approval.

Local Briefings and telephone briefings

Caffee, Caffee and Associates, on behalf of KEC, has continued to hold several small group and individual meetings, as well as telephone conversations each month during the reporting period, including attendance at the Chamber of Commerce meetings. 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).

Public Meeting, Open Houses and Small Group Meetings

CCA has continually offered updates through monthly small group meetings during the reporting period not including those who received newsletters (see Direct Mail below).

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Direct Mail

KEC continued to distribute copies of the quarterly newsletter. KEC also published the seventh edition of a quarterly newsletter, the Kuhlman Cleanup News in April 2014. Over 1500 newsletters will be distributed. Newsletters are delivered to more than 160 individuals, 60 local businesses, and 30 churches. Businesses and churches receive copies of the newsletter to ensure a broad distribution and that interested individuals have multiple locations to obtain a copy. This issue of the newsletter provided updates on the full scale SVE system and answered Frequently Asked Questions. A copy is attached.

Comment Period and Comment Responses

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 July 2014. Please do not hesitate to contact me with any questions you might have.

Sincerely,

A handwritten signature in blue ink that reads "Tommy Kessinger". The signature is written in a cursive style with a large, stylized 'T' and 'K'.

Tommy Kessinger
Kuhlman Electric Corporation

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. - 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 approved by MDEQ in December 2012. - Quarterly Newsletter distributed to Crystal Spring's residents and businesses in January 2013. - Mayor and Civic leaders were updated through the Newsletter. - Documents placed in the public repository. Also available upon request. 	- None at this time. This milestone is complete.	- None at this time.
Capacity Plan Implementation Interim Treatment System Final Design	Summer – Fall 2012	<ul style="list-style-type: none"> - Will be submitted to MDEQ, MSDH, 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 and final design was successfully completed. - The MDSH issued a letter of concurrence with the proposed interim treatment system design in November 2012. - The final design was approved by MDEQ in December 2012. - Public notice and updates to civic leaders were provided via quarterly newsletter in January 2013. 	- None at this time. Design is complete.	- None at this time.

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Capacity Plan Implementation Interim Treatment System Construction Complete	Fall 2013	<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"> - Treatment system site preparation and construction complete. - Public notice provided in The Meteor article published Nov 6, 2013. - Update published in quarterly newsletters October 2013. - Capacity Plan for Potable Water Supply Status Report submitted to MDEQ and City in August 2013. - Tests conducted in Sept/Oct 2013 confirmed the system will perform as designed. - Operations Demonstration conducted for City, MDOH, and MDEQ Oct 30, 2013. - Ready to be activated if treatment of the City wells becomes necessary. 	<ul style="list-style-type: none"> - System will remain on standby and water quality will continue to be monitored on a regular basis. 	<ul style="list-style-type: none"> - Routine City update schedule not yet established. City officials updated during Operational Demonstration on Oct 30, 2013.

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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. Data gathering has been ongoing. - Civic leaders updated through newsletters and Capacity Plan for Potable Water Supply Status Report (August 2013). - Collaboration with City regarding existing data and access to potential replacement well sites. 	<ul style="list-style-type: none"> - Continue potential well site search. - Negotiate Access and Install Test well(s). - Initiate permit process with MDEQ. - Continued collaboration with City. 	<ul style="list-style-type: none"> - KEC is informed that there is lower than anticipated yield from Harmony Road well, which was installed by others; this 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. - The results will be included in the final design submitted to MDEQ. - Updates on this milestone were included in the October 2012 Quarterly Newsletter. - Pilot Test Report and SVE Conceptual Design submitted to MDEQ in February 2013; approved in July 2013. 	<ul style="list-style-type: none"> - None at this time. This milestone is complete. 	<ul style="list-style-type: none"> - None at this time.

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Final design of SVE System	Fall 2013	<ul style="list-style-type: none"> - A final design will be 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. - Update civic leaders. 	<ul style="list-style-type: none"> - Detailed design work has been completed for design, procurement, and installation of the SVE system. - Conceptual Design was submitted to MDEQ in February 2013, revised May 2013, and approved July 2013. - Soil Vapor Extraction Final Design and Quality Assurance Project Plan submitted to MDEQ September 2013, approved by MDEQ October 2013. - Update on this milestone was included in the July 2013, October 2013, and January 2014 Newsletters. 	- None. This milestone is complete.	- None.

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Installation of SVE System	Winter 2013-2014	<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. 	<ul style="list-style-type: none"> - Extraction well installed as part of the SVE pilot test in 2012. - Soil Vapor Extraction Final Design and Quality Assurance Project Plan approved by MDEQ October 2013. - Installation of the full scale SVE system was completed December 2013 - April 2014. Startup testing is underway. 	<ul style="list-style-type: none"> - None at this time. This milestone is complete. 	<ul style="list-style-type: none"> - None at this time.
Monitored Natural Attenuation (MNA)/ Groundwater Monitoring	Ongoing Semi-Annually	<ul style="list-style-type: none"> - Groundwater Monitoring Reports will be sent to the 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 conducted September 2013. - Semi-Annual Groundwater Assessment Report submitted to MDEQ in December 2013. - Notice of upcoming reports/sampling included in quarterly newsletters. - Documents submitted to MDEQ for placement in the public repository. Also available upon request. 	<ul style="list-style-type: none"> - KEC will respond to any comments that might be received on the Semi-Annual Groundwater Assessment Report submitted to MDEQ. 	<ul style="list-style-type: none"> - City update schedule not yet established.

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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. 	- System installed December 2013 - 2014. Startup testing initiated.	- Optimization of full scale system is pending startup testing.	- 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.	Fall - Winter 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. 	- Timing for this milestone is pending start up and operation of the SVE system.	- None at this time.	- None at this time.

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Contingencies/In Situ Treatment – Groundwater trends will be reexamined and KEC will determine if the treatment technologies are meeting the CAP objectives.	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. 	- This milestone will be completed in 2014-2015.	- None at this time.	- None at this time.
No Further Remedial Action Request (Monitoring Only)	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. 	- This milestone will be completed pending the results of planned remedial actions.	- None at this time.	- None at this time.

Kuhlman Cleanup News

Newsletter on Kuhlman Environmental Cleanup in Crystal Springs, MS

SOIL VAPOR EXTRACTION SYSTEM START UP TESTING!

The Final Design for the full scale Soil Vapor Extraction system was approved by the Mississippi Department of Environmental Quality and installation has been completed. Environmental Management Services, the engineering contractor for Kuhlman, has begun start up testing of the equipment.

The system is designed to remove chemicals from the soil and groundwater beneath the plant. These chemicals naturally change from a solid to vapor form, similar to the way rubbing alcohol evaporates when spilled on a countertop. This allows these chemicals to be removed in their vapor state by applying a vacuum beneath the plant floor. This is what the Soil Vapor Extraction system will do. It will prevent vapors from entering the building by pulling them into suction pipes beneath the floor and venting them to a treatment system outside of the building. This process will be ongoing until levels of chemicals in the soil and vapor are below clean-up standards approved by the Mississippi Department of Environmental Quality.

We have done extensive testing to ensure the system's safety. Air monitoring was conducted during the pilot test and installation of the system. These tests confirmed that the air quality meets federal Occupational Safety and Health Administration requirements. If the equipment stops working, conditions will simply return to their current state. There will be no changes in worker safety.

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.

PLANT NEWS

Kuhlman Electric Corporation is excited to announce the new Managing Director, Ms. Lorrie Stoer. Ms. Stoer's managerial expertise and experience will be a tremendous asset to the plant's operations. We are excited that she is a part of our team here in Crystal Springs!

SEMI-ANNUAL MONITOR WELL SAMPLING AND CITY WELL SAMPLING COMPLETED FOR THIS QUARTER

We continue to sample the monitor wells and city wells monthly to ensure that the water meets regulatory guidelines. Monitoring reports are submitted to the Mississippi Department of Environmental Quality and are available on their website. All city well data for the current quarter indicates City water continues to meet drinking water standards.

UPCOMING EVENTS

- Groundwater Monitoring Event and Reporting.
- Operation of the full scale Soil Vapor Extraction system.

PUBLIC DOCUMENTS REPOSITORY

All public documents referenced in the Newsletter may be accessed at the following physical and virtual repositories: Crystal Springs Library and www.mdeq.state.ms.us.

FREQUENTLY ASKED QUESTIONS

Each quarter we will include one or more questions that were presented over the past year.

Question: Are VOCs the same as PCBs? If not, what's the difference?

Answer: No. PCBs are chemicals that were used decades ago as an insulator/coolant in power transformers, capacitors and other electrical components. The chlorinated solvents we refer to as VOCs are different, and are related to chemicals used as cleaning products that are no longer in use at the plant.

Question: Crystal Springs uses groundwater as a source for public drinking water. How can we be sure our drinking water is safe?

Answer: The Department of Health monitors the quality of the public water. The water is regularly tested before it leaves the City Treatment plant and is delivered to Crystal Springs households and businesses. These tests show that the public water meets drinking water standards. Kuhlman is also working to reduce chemical levels below the plant, so that they will not continue to impact underground water as it flows away from the plant.

Question: Are there PCBs in the groundwater?

Answer: No. PCBs have never been detected in the groundwater.

Question: Do we know how VOCs made it into the ground?

Answer: Based on the contamination identified beneath the plant, we believe chemicals may have been spilled or accidentally released many years ago when certain types of solvents were used at the plant to clean or degrease the machinery. These are no longer used at the plant.

Question: How do the Contaminants of Concern addressed in the Corrective Action Plan differ from previous efforts?

Answer: Previous efforts focused on PCB soil contamination. Kuhlman's remediation of the impact to groundwater is not related to PCBs, but is due to the use of solvents at the facility many years ago.