



April 29, 2015

Melissa McGee-Collier
Office of Community Engagement
Mississippi Department of Environmental Quality
PO Box 2261
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**RE: COMMUNITY ENGAGEMENT PROGRESS REPORT FEBRUARY 2015 THROUGH
APRIL 2015, 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 February 2015 through and including April 2015. 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)

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

- Soil Vapor Extraction System Operation (ongoing).
- Capacity Plan Implementation –Potential replacement supply well locations selected, access secured and test well installation initiated.
 - Drilling initiated January 20, 2015
 - Testing commenced and ongoing.

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

Tommy Kessinger has retired. The interim local contact is Lorraine Stoer, Managing Director for the ABB Crystal Springs facility.

Fact Sheets

Fact sheets are available 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 required or completed.

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, the following report was submitted:

- Soil Vapor Extraction System Semi-Annual Report (March 10, 2015)

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 eleventh edition of a quarterly newsletter, the Kuhlman Cleanup News in April 2015. 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 water quality monitoring, potential long-term water supply solutions (new well site testing), 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 2015. Please do not hesitate to contact me with any questions you might have.

Sincerely,



Lorraine Stoer

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
<p>Capacity Plan for Potable Water Supply, City of Crystal Springs</p> <p>(submitted to MDEQ, and MDOH June 8, 2012).</p>	<p>Summer 2012</p>	<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. 	<p>- None at this time. This milestone is complete.</p>	<p>- None at this time.</p>
<p>Capacity Plan Implementation</p> <p>Interim Treatment System Final Design</p>	<p>Summer – Fall 2012</p>	<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. 	<p>- None at this time. Design is complete.</p>	<p>- None at this time.</p>

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<p>Capacity Plan Implementation</p> <p>Interim Treatment System Construction Complete</p>	<p>Fall 2013</p>	<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 Oct 30, 2013.

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<p>Capacity Plan Implementation</p> <p>Long term volume replacement, as needed</p>	<p>Ongoing</p>	<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 selected. - Civic leaders updated through newsletters and Capacity Plan for Potable Water Supply Status Report (August 2013). - Collaboration with City regarding existing system ongoing. - Agreement for access and testing of potential well locations approved by Board of Aldermen October 7, 2014. - Permit process initiated with MDEQ. - Public Notice of Intent to install public supply wells published in the Meteor October 8, 2014. - Public Comment period closed October 18, 2014. - Well Permits issued October 21, 2014. - Test Wells initiated January 2015. 	<ul style="list-style-type: none"> - Installation Additional Test Wells, if needed. - Evaluate potential well capacity and quality. - Begin well design, pending test results. - 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. Optimization and start of operation occurred in May 2014. 	<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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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 March 2014. - Semi-Annual Groundwater Assessment Report submitted to MDEQ in July 2014. - 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.
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 installed December 2013 - 2014. Optimization and operation initiated in May 2014. 	<ul style="list-style-type: none"> - Operation and monitoring of full scale system. 	<ul style="list-style-type: none"> - None at this time.

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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. 	<ul style="list-style-type: none"> - Timing for this milestone is pending monitoring results from operation of the SVE system. 	<ul style="list-style-type: none"> - None at this time. 	<ul style="list-style-type: none"> - SVE System start up delayed until 2014; performance evaluation also delayed.
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. 	<ul style="list-style-type: none"> - This milestone will be completed in 2015. 	<ul style="list-style-type: none"> - None at this time. 	<ul style="list-style-type: none"> - Delayed due to delayed implementation of SVE system.

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No Further Remedial Action Request (Monitoring Only)	2016	<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

MOVING CLOSER TO APPROVING A LOCATION FOR THE POTENTIAL NEW PUBLIC WATER SUPPLY WELL

KEC has identified various locations for a potential new public water supply well site, if one should be needed in the future. Drilling and testing began at the locations earlier this year to examine critical factors in choosing the best site. These factors include if there is water at the locations and whether it meets the water quality standards of the Mississippi Department of Environmental Quality (MDEQ) standards for drinking water. Other factors that affect the decision include how much water could be pumped and how fast it could be pumped.

Two locations are currently undergoing tests and evaluations by MDEQ and the Mississippi State Department of Health. After these tests are complete, KEC will use this information to make the final decision on which site best suits the needs of a potential new public water supply well.

We are continuing our routine monitoring of the existing City wells during this process. All city well data for the current quarter confirms that City water continues to meet drinking water standards.

SOIL VAPOR EXTRACTION SYSTEM CONTINUES TO OPERATE SUCCESSFULLY

The Soil Vapor Extraction (SVE) system continues to operate successfully at the KEC plant. Monitoring and testing data show that chemicals are being removed safely and efficiently from beneath the plant. Indoor air monitoring reports also continue to show that indoor air quality meets regulatory standards.

UPCOMING EVENTS

- Groundwater Monitoring Event and Reporting.
- Continued operation of the full scale Soil Vapor Extraction system.
- Continued monitoring of existing public supply wells.
- Continued testing of potential new public water supply sites.

PUBLIC DOCUMENTS REPOSITORY

Public documents referenced in the Newsletter are available at:

- Crystal Springs Library; and
- www.mdeq.state.ms.us.

QUESTIONS OR COMMENTS

Please submit all questions or comments to Brenda Bell Caffee of Caffee, Caffee and Associates at 601-336-7212.

FREQUENTLY ASKED QUESTIONS

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

Question: Once the new public water supply well is complete, will it be put into use?

Answer: Decisions regarding when to use the new public supply well will ultimately be made by the City of Crystal Springs, and will depend on the amount of water the City needs at that time.

Question: Will the community be notified if the new water supply well has to be put into use?

Answer: City wells are routinely cycled on and off to avoid drawing too much water from any one location and depleting the supply. For this reason, the schedule for operating any given well may change frequently, possibly even on a daily basis. It is not normal practice to give notice each time operation rotates from one well to another. We expect this current practice to continue once the new well is installed.

Question: How long will the Soil Vapor Extraction System continue to operate at KEC?

Answer: We will continue to operate the soil vapor extraction system until any chemicals remaining in the soils meet state approved cleanup levels, or the system is no longer capable of removing them.

Question: How will KEC know that all the chemicals are removed from the soil?

Answer: Once it has been determined that the soil vapor extraction system is no longer removing chemicals from the soil, new soil samples will be collected from beneath the building. These samples will be sent to a state-certified laboratory for appropriate testing.