



April 30, 2013

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

**RE: COMMUNITY ENGAGEMENT PROGRESS REPORT JANUARY 2013 THROUGH  
APRIL 2013, 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 2013 to April 2013. 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 and Concerned Citizens Against Pollution (CCAP) meetings, one-on-one dialogue and the quarterly newsletters.

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

- Purifics Interim Groundwater Treatment System approved by the City of Crystal Springs (January 2013)
- Upgradient Subsurface Investigation completed and approved (January, April 2013)
- Soil Vapor Extraction Pilot Study Report submitted to MDEQ (February 2013)
- Monitored Natural Attenuation Ground Water Monitoring (ongoing)

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

- Capacity Plan Implementation - Interim Treatment System Construction continued and Final Design details for the Interim Treatment System for the City supply wells were completed.
- Capacity Plan Implementation – Research into replacement supply well locations continued.
- Detailed design work has been ongoing for design, procurement, and installation of the final SVE system. A Conceptual Design was included in the Soil Vapor Extraction Pilot Study Report submitted to MDEQ in February 2013.

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. 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 and upon request 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 have been no public notices this period.

#### 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 document was approved:

- Upgradient Shallow Subsurface Investigation Report (April 2013)

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

- Soil Vapor Extraction Pilot Study Report (February 27, 2013)
- Upgradient Shallow Subsurface Investigation Report (April 10, 2013)

As previously mentioned, the Soil Vapor Extraction Pilot Study Report also included the Conceptual Design for the full scale SVE system to be installed at the plant site.

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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 CCAP 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).

Direct Mail

KEC continued to distribute copies of the second edition of the quarterly newsletter. KEC also published the third edition of a quarterly newsletter, the Kuhlman Cleanup News in April 2013. The newsletters will be distributed 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 Interim Treatment System for the City supply wells, SVE Pilot Study and Design of the full scale SVE system, and the Upgradient Subsurface Investigation. The newsletter also included several frequently asked questions and answers relative to the SVE system. A copy is attached.

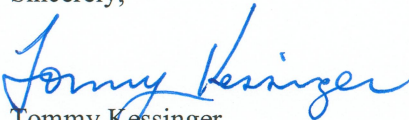
Comment Period and Comment Responses

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 2013. Please do not hesitate to contact me with any questions you might have.

Sincerely,



Tommy Kessinger  
Kuhlman Electric Corporation

KUHLMAN ELECTRIC CORPORATION  
101 KUHLMAN DRIVE, CRYSTAL SPRINGS, MS  
CORRECTIVE ACTION PLAN MILESTONE/COMMUNITY ENGAGEMENT TASK SUMMARY

<b>CAP Milestone</b>	<b>Anticipated Date</b>	<b>Planned Community Engagement Activities</b>	<b>Task Initiated and/or Completed</b>	<b>Task Planned for Following Quarter</b>	<b>Problems and Delays</b>
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"> <li>- Concurrently submit to the mayor of the City of Crystal Springs for review and comment.</li> <li>- Publish in quarterly newsletter to interested parties.</li> <li>- Update civic leaders.</li> <li>- Approved document will be placed in public repository.</li> </ul>	<ul style="list-style-type: none"> <li>- Capacity Plan for Potable Water Supply approved by MDEQ in December 2012.</li> <li>- Quarterly Newsletter distributed to Crystal Spring's residents and businesses in January 2013.</li> <li>- Mayor and Civic leaders were updated through the Newsletter.</li> <li>- Documents placed in the public repository. Also available upon request.</li> </ul>	- None at this time.	- None at this time.
Capacity Plan Implementation  Interim Treatment System Final Design	Summer – Fall 2012	<ul style="list-style-type: none"> <li>- Will be submitted to MDEQ, MSDH, and engineers selected by the City of Crystal Springs.</li> <li>- Approved design will be placed in the public repository at the Crystal Springs library and on the MDEQ website.</li> <li>- Public notice upon approval.</li> <li>- Update civic leaders.</li> <li>- Publish in quarterly newsletter to interested parties.</li> </ul>	<ul style="list-style-type: none"> <li>- The bench study and final design was successfully completed.</li> <li>- The MDSH issued a letter of concurrence with the proposed interim treatment system design in November 2012.</li> <li>- The final design was approved by MDEQ in December 2012.</li> <li>- Public notice and updates to civic leaders were provided via quarterly newsletter in January 2013.</li> </ul>	- 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"> <li>- Public notice</li> <li>- Update civic leaders.</li> <li>- Publish in quarterly newsletter to interested parties</li> <li>- Attend regularly scheduled City meeting on an annual basis and provide update.</li> </ul>	<ul style="list-style-type: none"> <li>- Treatment system site preparation and manufacture has begun.</li> <li>- Update published in quarterly newsletter April 2013.</li> <li>- City of Crystal Springs passed a resolution approving the Purifics Interim Groundwater Treatment System in January 2013.</li> </ul>	<ul style="list-style-type: none"> <li>- Continue site preparation and continued construction of interim treatment system.</li> <li>- Building, installing and testing the system to be in place by Fall 2013.</li> </ul>	<ul style="list-style-type: none"> <li>- Manufacture dependent on State/City approvals.</li> <li>- Long lead time for system components and custom welding required.</li> <li>- City update schedule not yet established.</li> </ul>
Capacity Plan Implementation  Long term volume replacement, as needed	Ongoing - 2015	<ul style="list-style-type: none"> <li>- Progress will be included in Groundwater monitoring reports submitted to MDEQ.</li> <li>- Update civic leaders.</li> <li>- Publish in quarterly newsletter to interested parties.</li> <li>- Attend regularly scheduled City meeting on an annual basis and provide update.</li> </ul>	<ul style="list-style-type: none"> <li>- Possible well site locations are being evaluated. Data gathering related to City Potable Water Supply System and demand has been ongoing.</li> <li>- Civic leaders updated through newsletter.</li> <li>- Initiated collaboration with City regarding existing data.</li> </ul>	<ul style="list-style-type: none"> <li>- Continue existing design documentation and potential well site search. Initiate permit process with MDEQ.</li> <li>- Collaboration with City engineering firm WGK.</li> </ul>	<ul style="list-style-type: none"> <li>- KEC is informed that there is lower than anticipated yield from Harmony Road well, which was installed by others; this has delayed this task.</li> </ul>

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Expected results of Soil Vapor Extraction (SVE) Pilot Test	Fall 2012	<ul style="list-style-type: none"> <li>- Updates with individuals, as requested.</li> <li>- 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.</li> <li>- Publish in quarterly newsletter to interested parties.</li> </ul>	<ul style="list-style-type: none"> <li>- The initial test of the proposed Soil Vapor Extraction (SVE) procedure was successfully completed in May 2012.</li> <li>- The results will be included in the final design submitted to MDEQ.</li> <li>- Updates on this milestone were included in the October 2012 Quarterly Newsletter.</li> <li>- Pilot Test Report and SVE Conceptual Design submitted to MDEQ in February 2013 (approval pending).</li> </ul>	- None at this time.	- None at this time.
Final design of SVE System	Winter 2012-Spring 2013	<ul style="list-style-type: none"> <li>- 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.</li> <li>- Publish in quarterly newsletter to interested parties.</li> <li>- Update civic leaders.</li> </ul>	<ul style="list-style-type: none"> <li>- Detailed design work has been initiated for design, procurement, and installation of the SVE system.</li> <li>- Conceptual Design submitted to MDEQ in February 2013, pending approval.</li> </ul>	- Detailed design of SVE system and Quality Assurance Project Plan (QAPP).	- Pending MDEQ Approval of Conceptual Design.

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Installation of SVE System	Spring-Summer 2013	<ul style="list-style-type: none"> <li>- Construction report will be submitted to MDEQ.</li> <li>- Approved report will be placed in public repository at Crystal Spring's library and on MDEQ website.</li> <li>- Publish in quarterly newsletter to interested parties.</li> <li>- Attend regularly scheduled City meeting on an annual basis and provide update.</li> </ul>	<ul style="list-style-type: none"> <li>- Extraction well installed as part of the SVE pilot test in 2012.</li> </ul>	<ul style="list-style-type: none"> <li>- Installation pending MDEQ approval of Conceptual and Final Design for SVE system.</li> </ul>	<ul style="list-style-type: none"> <li>- None at this time.</li> </ul>
Monitored Natural Attenuation (MNA)/ Groundwater Monitoring	Ongoing Semi-Annually	<ul style="list-style-type: none"> <li>- Groundwater Monitoring Reports will be sent to the MDEQ following each sampling event.</li> <li>- Final Monitoring Reports will be placed in a public repository at the Crystal Springs Library and the MDEQ website.</li> <li>- Updates with individuals, small groups as requested.</li> <li>- Publish in quarterly newsletter to interested parties.</li> <li>- Attend regularly scheduled City meeting on an annual basis and provide update.</li> </ul>	<ul style="list-style-type: none"> <li>- Semi-Annual Groundwater Assessment conducted March 2013.</li> <li>- Notice of upcoming reports/sampling included in quarterly newsletter.</li> <li>- Documents submitted to MDEQ for placement in the public repository. Also available upon request.</li> </ul>	<ul style="list-style-type: none"> <li>- Semi-Annual Groundwater Assessment Report to be submitted to MDEQ in May 2013.</li> <li>- Semi-Annual Groundwater Assessment sampling scheduled for September 2013.</li> </ul>	<ul style="list-style-type: none"> <li>- None at this time.</li> </ul>

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Ongoing SVE operations	Ongoing Quarterly-to Semi-Annually	<ul style="list-style-type: none"> <li>- KEC will submit a summary of the active SVE operations within the Ground Water Assessment Reports.</li> <li>- Publish in quarterly newsletter to interested parties.</li> <li>- Attend regularly scheduled City meeting on an annual basis and provide updates.</li> </ul>	- System to be installed in Summer 2013, pending MDEQ approval of System Design.	- None at this time.	- 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"> <li>- 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.</li> <li>- Publish in quarterly newsletter to interested parties.</li> <li>- Attend regularly scheduled City meeting on an annual basis and provide updates.</li> </ul>	- This milestone will be completed in Spring 2014.	- 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"> <li>- Will be summarized on Groundwater Monitoring reports.</li> <li>- Final Monitoring Reports will be placed in a public repository at the Crystal Springs Library and the MDEQ website.</li> <li>- Updates with individuals, small groups as requested.</li> <li>- Publish in quarterly newsletter to interested parties.</li> <li>- Attend regularly scheduled City meeting on an annual basis and provide updates.</li> </ul>	- This milestone will be completed in 2014-2015.	- None at this time.	- None at this time.
No Further Remedial Action Request	2015	<ul style="list-style-type: none"> <li>- Formal request will be submitted to MDEQ when data supports it.</li> <li>- Public notice.</li> <li>- Publish in quarterly newsletter to interested parties.</li> <li>- Attend regularly scheduled City meeting on an annual basis and provide updates.</li> </ul>	- This milestone will be completed in 2015.	- None at this time.	- None at this time.

# Kuhlman Cleanup News

*Newsletter on Kuhlman Environmental Cleanup in Crystal Springs, MS*

## **UPGRADIENT SHALLOW SUBSURFACE INVESTIGATION COMPLETE!**

Investigation of potential historical source area(s) for contamination in the groundwater has been completed at the plant. KEC collected samples at seven additional locations, including two in the plant.

The sampling was completed in late January 2013. The Mississippi Department of Environmental Quality (MDEQ) was involved with the work, and routine safety precautions were taken. At the conclusion of the investigation, a detailed report was submitted to MDEQ confirming that no second source area was identified for groundwater contamination. After reviewing the report, MDEQ issued a letter of agreement with the findings of the report.

## **SOIL VAPOR EXTRACTION (SVE) PILOT TEST REPORT AND CONCEPTUAL DESIGN SUBMITTED TO MDEQ**

The SVE Pilot Test results and the Conceptual Design for the full scale system have been submitted to MDEQ and are under review. Upon receiving approval, KEC will begin preparation of the final design and planning for installation of the system. Full scale operations will begin shortly thereafter.

## **GROUNDWATER AND CITY WELL MONITORING**

We continue to monitor groundwater and city wells. Monitoring reports are submitted to MDEQ and made available on their website. All city well data for the 1<sup>st</sup> quarter of 2013 indicates City water continues to meet drinking water standards.

## **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](http://www.mdeq.state.ms.us).

## **IN CELEBRATION OF MEMORIAL DAY**

On behalf of Kuhlman Electric Company (KEC) we would like to remember and honor the men and women of the United States Military who fought valiantly and sacrificed their lives to ensure our freedoms in this great country.

## **MANUFACTURING OF TREATMENT SYSTEM FOR CITY WELLS UNDERWAY!**

City water continues to meet drinking water standards. However, as part of KEC's plan to address community water supply concerns, KEC will be installing a system that could be used to treat water from the existing City wells if it becomes necessary in the future. We are excited to announce that the manufacturing of the treatment system for the city wells is underway. At this stage of the process, much of the work is being done in the background and is not really visible to the community. However, the parts have been ordered and the large amount of custom welding required has begun at the manufacturing plant. Planning is underway for construction locally as well.

## **2013 ANNUAL TOMATO FESTIVAL**

We are looking forward to another tremendous year at the annual Tomato Festival. As last year, we will be having an informational booth where individuals may sign-up to receive quarterly updates and current information. We will be offering water, candy and other giveaways again as well.

## **UPCOMING EVENTS**

- Tomato Festival
- Groundwater Monitoring Event and Reporting
- Monthly City Well Monitoring
- Community Engagement Progress Report to MDEQ

## **FREQUENTLY ASKED QUESTIONS**

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

**Question: What will be done to remove the chemicals from the soil?**

**Answer:** The chemicals present in the soil at the plant above established clean-up levels prefer to be in vapor form. Over time, these chemicals will change from the soil to the vapor form, similar to the way rubbing alcohol evaporates when spilled on a countertop.

These chemicals will therefore be removed over time as vapors are removed by the SVE system. This process will be repeated until levels of chemicals in the soil and vapor are below clean-up standards approved by the Mississippi Department of Environmental Quality.

**Question: Can vapors come up through any cracks in the floor or the [SVE] suction pipes?**

**Answer:** The SVE system that will be installed at the plant is designed to prevent vapors from entering the building. The SVE system pulls vapors into the suction pipes and vents them after treatment outside of the building. All piping joints will be sealed.

Air monitoring was conducted as part of the routine safety measures taken during the SVE pilot test. The results confirmed that the air quality remains in compliance with OSHA requirements when the SVE is operating.

**Question: How will SVE and Air Sparging affect me as an employee or a community member?**

**Answer:** Employees may see drilling equipment or construction contractors working in the plant during the installation of remedial systems. Precautions will be taken for safety and to avoid interfering with operations. As before, Kuhlman will also monitor carefully to ensure that the air quality remains in compliance with OSHA requirements while penetrating the plant floor or operating the systems.

As a community member, there is little to see or hear as corrective actions will be focused inside the plant. This is a long-term, project with the goal to reduce groundwater contaminant levels on and off-site.

## **QUESTIONS OR COMMENTS**

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