



October 31, 2013

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

**RE: COMMUNITY ENGAGEMENT PROGRESS REPORT AUGUST 2013 THROUGH  
OCTOBER 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 August 2013 through and including October 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 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)
- Capacity Plan Implementation - Interim Treatment System Construction Complete (September 2013).
- Final Design of the Soil Vapor Extraction (SVE) System (September 13, 2013). The design was approved by MDEQ October 2, 2013.

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

- Capacity Plan Implementation – Research into potential replacement supply well locations continued.
- Installation of SVE system - Planning and procurement for full scale SVE system has begun.

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 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 have been no public notices this period. Public notice is pending for the Interim Treatment System Construction Complete.

#### 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 document was approved:

- Soil Vapor Extraction Final Design and Quality Assurance Project Plan (September 13, 2013)

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

- Capacity Plan for Potable Water Supply Status Report (August 13, 2013)
- Soil Vapor Extraction Final Design and Quality Assurance Project Plan (September 13, 2013)

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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). KEC also sponsored a "Family Day" on October 12<sup>th</sup>, where individuals had the opportunity to tour the manufacturing facility and ask questions about the plant and see the improvements that have been made recently. Approximately 800 individuals attended.

#### Direct Mail

KEC continued to distribute copies of the fourth edition of the quarterly newsletter. KEC also published the fifth edition of a quarterly newsletter, the Kuhlman Cleanup News in October 2013. Approximately 1000 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 Interim Treatment System for the City supply wells and full scale 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 January 2014. 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

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"> <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>	<p>- None at this time.</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"> <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>	<p>- None at this time. Design is complete.</p>	<p>- None at this time.</p>

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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 construction complete. Public notice pending.</li> <li>- Update published in quarterly newsletters April and July 2013.</li> <li>- Capacity Plan for Potable Water Supply Status Report submitted to MDEQ and City in August 2013.</li> <li>- Tests conducted in Sept/Oct 2013 confirmed the system will perform as designed.</li> <li>- Operations Demonstration conducted for City, MDOH, and MDEQ Oct 30, 2013.</li> <li>- Ready to be activated if treatment of the City wells becomes necessary.</li> </ul>	<ul style="list-style-type: none"> <li>- System will remain on standby and water quality will continue to be monitored on a regular basis.</li> </ul>	<ul style="list-style-type: none"> <li>- City update schedule not yet established.</li> </ul>

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<p>Capacity Plan Implementation</p> <p>Long term volume replacement, as needed</p>	<p>Ongoing - 2015</p>	<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 has been ongoing.</li> <li>- Civic leaders updated through newsletter and Capacity Plan for Potable Water Supply Status Report (August 2013).</li> <li>- Collaboration with City regarding existing data.</li> </ul>	<ul style="list-style-type: none"> <li>- Continue potential well site search.</li> <li>- Negotiate Access and Install Test well(s).</li> <li>- Initiate permit process with MDEQ.</li> <li>- Continued collaboration with City.</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>
<p>Expected results of Soil Vapor Extraction (SVE) Pilot Test</p>	<p>Fall 2012</p>	<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; approved in July 2013.</li> </ul>	<ul style="list-style-type: none"> <li>- None at this time.</li> </ul>	<ul style="list-style-type: none"> <li>- None at this time.</li> </ul>

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Final design of SVE System	Fall 2013	<ul style="list-style-type: none"> <li>- 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.</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 was submitted to MDEQ in February 2013, revised May 2013, and approved July 2013.</li> <li>- Soil Vapor Extraction Final Design and Quality Assurance Project Plan submitted to MDEQ September 2013, approved by MDEQ October 2013.</li> <li>- Update on these milestones were included in the July and October 2013 Newsletters.</li> </ul>	- None.	- None.
Installation of SVE System	Winter 2013-2014	<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> <li>- Soil Vapor Extraction Final Design and Quality Assurance Project Plan approved by MDEQ October 2013.</li> <li>- Planning and procurement for full scale SVE system has begun.</li> </ul>	- Initiate installation of full scale SVE system.	- Installation has been delayed pending MDEQ approval of Conceptual and Final Designs.

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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 September 2013.</li> <li>- Semi-Annual Groundwater Assessment Report submitted to MDEQ in June 2013.</li> <li>- Notice of upcoming reports/sampling included in quarterly newsletters.</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 will be submitted to MDEQ.</li> </ul>	<ul style="list-style-type: none"> <li>- None at this time.</li> </ul>
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>	<ul style="list-style-type: none"> <li>- System to be installed Winter 2013-2014.</li> </ul>	<ul style="list-style-type: none"> <li>- None at this time.</li> </ul>	<ul style="list-style-type: none"> <li>- None at this time.</li> </ul>



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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"> <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>	- Timing for this milestone is pending start up and operation of the SVE system.	- None at this time.	- None at this time.
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.

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No Further Remedial Action Request  (Monitoring Only)	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 pending the results of planned remedial actions.	- None at this time.	- None at this time.

## **MAJOR MILESTONE COMPLETED: INTERIM WATER TREATMENT UNIT INSTALLED, TESTED AND READY FOR OPERATION IF NEEDED**

The Interim Water Treatment Unit has been installed, tested and is approved for operation on the City supply wells if needed in the future. It is designed to be used in the event that the city supply wells ever fail to meet drinking water standards. To date, all public water samples have met drinking water standards and no treatment has been necessary. Two operators have received extensive onsite training to operate the system. Employing state of the art technology, the unit can also be activated and monitored remotely if necessary. We celebrate this accomplishment as a part of our ongoing remedial commitments to the residents of Crystal Springs.

## **SOIL VAPOR EXTRACTION PLAN APPROVED**

The Final Design for the full scale Soil Vapor Extraction (SVE) system under the Kuhlman plant building has been approved by the Mississippi Department of Environmental Quality. We are currently working with vendors to solidify the necessary equipment and supplies for installation of the system. It is our expectation that the full scale system will be installed and placed into operation in the very near future.

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

We continue to sample the monitor wells and city wells monthly and semi-annually to ensure that the water meets regulatory guidelines. Monitoring reports are submitted to MDEQ and are available on their website. All city well data for the 4<sup>th</sup> quarter of 2013 indicate 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).

## **FREQUENTLY ASKED QUESTIONS**

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

### **WHAT IS THE BACKUP PLAN IF THE SVE EQUIPMENT FAILS? IS THERE ALTERNATE EQUIPMENT ON SITE IF THIS HAPPENS?**

If the SVE equipment stops working, conditions will return to their current state. There will be no increase in chemical levels or changes in worker safety.

### **HOW WILL THE CHEMICALS TRAPPED IN THE SOIL ACT WITH THE CHEMICALS BEING PULLED UP?**

The chemicals in the soil are the same as the chemicals that have been present in the groundwater and vapor for a long time. The only change that will occur as a result of removing them with the SVE system is that their concentrations will be reduced.

## **PLANT NEWS**

We extend our commendations and appreciation for Mr. Philip James' years of service at the Crystal Springs Kuhlman Electric Corporation. It is with both sadness and celebration that we announce his transfer to another plant. His hard work and tenacious spirit have been a driving force in making KEC a safe and enjoyable workplace. We will miss him, but also wish him the best on his new endeavors!

## **UPCOMING EVENTS**

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

## 2013 KEC FAMILY DAY

Kuhlman Electric Corporation's Employee Family Day declared a huge success! The event was held on Saturday, October 12, 2013 and was attended by over 800 guests. Visitors enjoyed a tour of the plant and the opportunity to learn about the products the plant builds and the services that it provides. They were able to see firsthand the procedures and protocols that are in place to ensure employee safety and wellbeing. Guests were able to meet managers, administrators, operators and other plant staff that their family members work with on a daily basis.

The event included food, games and activities for everyone. Children enjoyed various inflatable jumpers and the opportunity to explore two of the voluntary fire department's fire trucks. Adults participated in fire safety training and each household received a fire extinguisher. We wish to thank Mayor Sally Garland and all the businesses that participated as well as the employees and community members that came out to enjoy the festivities!

