



January 31, 2018

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

RE: COMMUNITY ENGAGEMENT PROGRESS REPORT NOVEMBER 2017 THROUGH JANUARY 2018, 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 November 2017 through and including January 2018. 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 CAP milestone activities were initiated or continued during this reporting period.

- Soil Vapor Extraction System Operation and evaluation (ongoing).
- Capacity Plan Implementation –
 - Operation of new City wells CSW-WA9 and CSW-WA10 continued.
 - City wells CSW-WA1 and CSW-WA2 remain out of service.
 - Easement acquisition for new supply pipeline efforts continued.
 - SVE performance monitoring data evaluation continued.

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

The local contact is Shawn Kwasny, Health Safety and Environment Manager, or Allen Gearhart, Environmental Engineer, 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 submittals were made:

- Semi-annual Groundwater Assessment Report (December 19, 2017)

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).

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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 quarterly newsletter. KEC also published the twenty first edition of a quarterly newsletter, the Kuhlman Cleanup News in January 2018. Over 1500 newsletters will be distributed. Newsletters are delivered to more than 300 individuals, local businesses, and 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 soil vapor extraction system, water quality monitoring, and new municipal supply well progress. It also answered questions received during the quarter. A copy is attached.

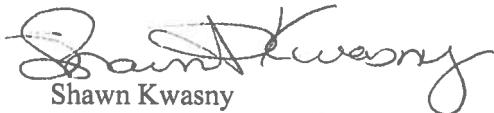
Comment Period and Comment Responses

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 April 2018. Please do not hesitate to contact me with any questions you might have.

Sincerely,


Shawn Kwasny

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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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. - Emergency Generator added July 2015. 	<ul style="list-style-type: none"> - System will remain on standby and water quality will continue to be monitored on a regular basis. - If operation is required, establish City update schedule. 	<ul style="list-style-type: none"> - None at this time.

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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 locations selected. - Updates through newsletters, Capacity Plan for Potable Water Supply Status Report (August 2013), verbal reports to Mayor. - Collaboration with City. - Access and testing approved by Board of Aldermen October 7, 2014. - Public Notice of Intent to install public supply wells October 8-18, 2014. - Well Permits October 21, 2014. - Test Wells initiated January 2015. - Design for Two Supply Wells Approved by MDOH 2015. - Supply Wells CSW-WA9 and CSW-WA10 complete January 2016. - CSW-WA9 and CSW-WA10 approved for use July 2016. - CSW-WA9 and CSW-WA10 in operation June 2017. - CSW-WA1 and CSW-WA2 taken out of service July 2017. 	<ul style="list-style-type: none"> - Continue design on additional water main to facilitate long-term connection to municipal treatment and distribution plant. - Design/site additional Supply Well if necessary. - Continued collaboration with City. 	<ul style="list-style-type: none"> - Additional test well needed along Harmony Road based upon poor yield from initial test well (installed by others); this has delayed this task. Access must be obtained again and alternate technology employed. - Access and City approval for new water main route is pending.
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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 were 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. 	- None at this time. This milestone is complete.	- 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 Report submitted to MDEQ. - Two additional monitoring wells installed December 2015. - 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 meeting schedule not established. City satisfied with verbal updates and newsletters to date.

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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"> - Soil Vapor Extraction System Semi-Annual Report issued September 2015. - Monitoring, operation and maintenance of SVE is ongoing. - Updates are included in quarterly newsletters. - Performance assessment soil sampling program completed 4Q 2016. Report submitted 1Q2017. 	<ul style="list-style-type: none"> - Operation and monitoring of full scale system. 	<ul style="list-style-type: none"> - None at this time. Attendance at City meetings not requested.
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. To date, the system continues to remove contamination from beneath the building slab. 	<ul style="list-style-type: none"> - Continued evaluation of SVE system performance. 	<ul style="list-style-type: none"> - SVE System start up delayed until 2014; performance evaluation also delayed.

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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. 	<ul style="list-style-type: none"> - Groundwater trends were evaluated 2016. Additional data is being collected. However, initial indications are that SVE is making progress toward CAP objectives. 	<ul style="list-style-type: none"> - Data evaluation will continue in 2018. 	<ul style="list-style-type: none"> - Delayed due to delayed implementation of SVE system.
No Further Remedial Action Request (Monitoring Only)	To Be Determined	<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 pending the results of planned remedial actions. 	<ul style="list-style-type: none"> - None at this time. 	<ul style="list-style-type: none"> - None at this time.

KUHLMAN CLEANUP NEWS

*Newsletter on Kuhlman Environmental
Cleanup in Crystal Springs*

JANUARY 2018

CURRENT PROGRESS AND UPCOMING PROJECTS

Soil Vapor Extraction Progress

The SVE system continues to perform well. Recent sampling indicates continued reduction of the concentrations of the chemicals below the plant. The system was recently shut down temporarily for routine maintenance and provisions made for the cold temperatures this winter. The system has been restarted. We will continue to operate the system and optimize its performance so that we can clean up the remaining chemicals below the plant.

QUESTIONS OR COMMENTS?

If you have any questions or concerns, we want to hear them! Please submit all questions or comments to Brenda Bell Caffee of Caffee, Caffee and Associates at 601-336-7212.

City Water Supply

Locations are being evaluated for the installation of a third water supply well for the City. Landowners will be contacted soon in areas desirable for the installation. Once a site is chosen and arrangements are made with the landowner and the Department of Health, the installation of a test will occur to determine if the well can produce the desired volume and quality to meet the needs of the City. The installation of the planned water supply line from east of town to the City treatment plant is still going through the planning stages. We are in the process of attaining the necessary easements and access agreements. A permit has also been requested from the railroad company for the water line to cross beneath the tracks to reach the water treatment plant.

GROUNDWATER MONITORING AND SAMPLING

Recent sampling of the (46) monitor wells was completed and the resultant report submitted to MDEQ. Fortunately, many of the wells tested continue to show declining concentrations of the target chemicals and have concentrations that meet the MDEQ water quality standards. We continue to sample City owned water supply wells south of the plant to ensure the protection of the city water supply. Regular sampling will continue for City supply wells CSW-WA1, CSW-WA3, and CSW-WA8. Regular sampling will also continue at the treatment plant. The results are submitted to MDEQ.

FACT SHEETS AVAILABLE

We understand that the terms sometimes used in the newsletters and reports can be a little confusing. For this reason, fact sheets are always available, upon request, to describe the processes and procedures being used. Any of these fact sheets can be requested by contacting Caffee, Caffee and Associates.

QUESTIONS & ANSWERS:

- *Why did the City recently shut down some of the City Wells?*
Chemical contamination has not been found in public drinking water, but has been detected in groundwater. Ground water has been monitored continually since 2000. City Well CSW-WA7 was shut down in 2005. City Wells CSW-WA1 and CSW-WA2 were shut down in 2017. These were precautionary measures taken because sampling identified the chemicals 1,1-dichloroethene and 1,4-dioxane at low levels in groundwater from these wells. It is important to note that the water supplied to the public is taken from multiple wells, and is processed, treated, and tested yet again before being distributed to the public. The water supply is monitored and routinely sampled. The chemicals which were detected in the groundwater have never been detected in the drinking water. Additionally, PCBs have never been detected in either the groundwater or the drinking water.
- *Where is my water coming from now?*
KEC has installed two new supply wells, CSW-WA9 and CSW-WA10. Both new wells are uncontaminated and currently operating.
- *Why is a new water main being installed, as reported in The Meteor?*
A new water supply main pipeline is being installed to support long-term use of the new supply wells installed by KEC, CSW-WA9 and CSW-WA10.
- *What about the lake? Has testing been done on it? Why is it being lowered?*
Sampling at the lake has been conducted. Tests were conducted on sediments, surface water, and fish. Test results are summarized in the Human Health and Ecological Risk Assessment report, submitted by Arcadis in September 2010 and Lake Chautauqua Sampling Report, submitted by Environmental Management Services in November 2012. PCBs were detected in some sediment and fish samples. No PCBs were detected in the water samples. The risk of exposure to the PCBs present was determined to be low and remediation was not required based on foreseeable future land uses. EPA also reviewed the data in 2011 and concluded that it was likely no significant ecological impacts were occurring due to the presence of PCBs in the lake. The water level in the lake has recently been voluntarily lowered by the City of Crystal Springs, as part of their proposed park and downtown improvement plans. Any questions regarding the current or future work being done at the lake should be directed to the City of Crystal Springs.

UPCOMING EVENTS

- Continued operation of the full-scale Soil Vapor Extraction system
- Continued monitoring of existing public supply wells

PUBLIC DOCUMENTS REPOSITORY

All Public documents referenced in the January 2018 Newsletter are available at your local Crystal Springs Library for review or you can also visit <http://www.deq.state.ms.us/>