



April 30, 2017

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

RE: COMMUNITY ENGAGEMENT PROGRESS REPORT FEBRUARY THROUGH APRIL 2017, 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 2017 through and including April 2017. 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 –
 - Well controls integration with City water distribution system underway.
 - Survey for new supply pipeline underway.
 - Sampling program for SVE performance evaluation completed.

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 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 submittals were made:

- Soil Vapor Extraction System Second Semiannual Report 2016 (February 24, 2017)
- Soil Vapor Extraction Performance Monitoring: Soil Sampling and Air Monitoring Implementation Results (March 3, 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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April 30, 2017

Page 3

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 nineteenth edition of a quarterly newsletter, the Kuhlman Cleanup News in April 2017. 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. A copy is attached.

Comment Period and Comment Responses

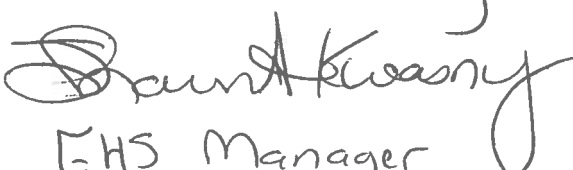
MDEQ has not notified KEC of any other public notice/comment periods required at this time.

Upcoming Activities

KEC will provide the next quarterly update in July 2017. Please do not hesitate to contact me with any questions you might have.

Sincerely,

Lorraine Stoer

Shawn Kwasy

EHS Manager

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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Capacity Plan Implementation Long term volume replacement, as needed	Ongoing	<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. - Civic leaders updated through newsletters, Capacity Plan for Potable Water Supply Status Report (August 2013), verbal reports to Mayor. - Collaboration with City regarding existing system. - Access and testing for potential wells 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. - Two Supply Wells complete Dec 2015/January 2016. - New Supply Wells approved for use July 2016. - New Supply Wells connected to existing municipal water main. 	<ul style="list-style-type: none"> - Continue design on additional water main to facilitate long-term connection to municipal treatment and distribution plant. - Pending City selection of control technology, initiate operation of new City supply wells. - Design/site additional Supply Well if necessary, pending results of initial replacement supply wells. - Continued collaboration with City. 	<ul style="list-style-type: none"> - KEC is informed that there was lower than anticipated yield from Harmony Road test well, which was installed by others; this has delayed this task. - City has not yet installed control technology for new Supply wells. - 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. - Evaluate data from performance assessment soil sampling program. 	<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 needed. However, initial indications are that SVE is making progress toward CAP objectives. 	<ul style="list-style-type: none"> - Data evaluation will continue into 2nd quarter 2017. 	<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

APRIL 2017

*Newsletter on Kuhlman Environmental
Cleanup in Crystal Springs*

CORRECTIVE ACTION PLAN UPDATE!

Environmental Management Services (EMS) is currently updating the corrective action plan to reflect the improvements made to date and the current environmental conditions. The plan will be submitted to MDEQ for approval.

CURRENT PROGRESS AND UPCOMING PROJECTS

Soil Vapor Extraction Area Construction Project

Results of the soil sampling program conducted in the area of the Soil Vapor Extraction (SVE) system during late 2016 and early 2017 have been received. A Final Soil Vapor Extraction Performance Monitoring report was submitted to MDEQ at the beginning of April. The report has been reviewed and accepted by MDEQ. The results of the sampling program indicate that soil contaminants below the plant have been significantly reduced, and some of the contaminants are no longer detected at all. This indicates that the SVE system is operating as designed in removing volatile organic compounds. The results from the monitoring period also confirmed that air quality in the plant continues to meet standards.

Questions or Comments?

*We want to hear them! Please submit questions or comments to Brenda Bell
Caffee of Caffee, Caffee and Associates at 601-336-7212*

Well Field Replacement

EMS continues to survey and develop the detailed routing drawings for the new water main. The new water main will create a loop system connecting the new supply wells installed by KEC to the existing City water supply wells and the City treatment and distribution system. Once the drawings are complete, the drawings and technical specifications will be presented to the City leadership and engineers for review and comment.

Well Controls

Dexter-Fortson, a well control contractor, is installing new control equipment at all of the individual City water supply well locations, including the two new wells installed by KEC. This new equipment will provide enhanced operation of the water wells and the water treatment plant and will lower monthly

costs to the City. Once the contractor is finished with the equipment installations, a test period for each well will be initiated. Soon afterwards, the new wells will be available for use.



GROUNDWATER MONITORING

We are continuing to monitor the groundwater both on-site and off-site on a semi-annual basis. The groundwater monitoring well network consists of 46 monitoring wells that are sampled on a semi-annual basis. Results are submitted to MDEQ in a report format that consists of a discussion of results, tables, figures, and appendices, which include the laboratory reports.

CITY WELL SAMPLING

We also continue to sample all city owned water wells south of the plant site and water exiting the treatment plant on a monthly basis to ensure the protection of the city water supply. The laboratory reports are submitted to MDEQ upon receipt by KEC from the laboratory.

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.

UPCOMING EVENTS

- Continued operation of the full-scale Soil Vapor Extraction system
- Continued monitoring of existing public supply wells
- Updating the well use survey.

PUBLIC DOCUMENTS REPOSITORY

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

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