

January 31, 2019

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

**RE: COMMUNITY ENGAGEMENT PROGRESS REPORT NOVEMBER 2018 THROUGH
JANUARY 2019, 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 2018 through and including January 2019. 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.
 - Evaluation of potential additional supply well locations continued.
 - SVE performance monitoring data evaluation continued.
- Groundwater monitoring 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 Craig Flagge, HSE Manager for the 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, no submittals were made. The next submittal is scheduled during 1Q 2019:

- Semi-Annual Groundwater Assessment Report.

Local Briefings and telephone briefings

Caffee, Caffee and Associates (CCA), on behalf of KEC, continues to hold individual meetings as requested, as well as telephone conversations each month during the reporting period. CCA attends the Chamber of Commerce meetings when held. 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 during the reporting period, as requested, not including those who received newsletters (see Direct Mail below).

Direct Mail

KEC continued to distribute copies of the quarterly newsletter. KEC also updated its distribution lists and published the twenty-fifth edition of a quarterly newsletter, the Kuhlman Cleanup News, in January 2019. Over 1800 newsletters will be distributed. Newsletters are delivered to 125 individuals, various local businesses, the local library, City Hall, Chamber of Commerce, and 42 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 municipal supply augmentation 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 April 2019. Please do not hesitate to contact me with any questions you might have at 601-892-6567.

Sincerely,



Craig Flagge
HSE Manager, ABB Crystal Springs, MS

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"> - Updates via newsletters, Capacity Plan for Potable Water Supply Status Report (August 2013), verbal reports. - Collaboration with City. - Access and testing approved by Board of Aldermen October 7, 2014. - Public Notice for public supply wells October 8-18, 2014. - Well Permits October 21, 2014. - Test Wells January 2015. - Design for Two Supply Wells approved by MDOH 2015. - Supply Wells CSW-WA9 and CSW-WA10 complete January 2016. - CSW-WA9, CSW-WA10 approved July 2016. - CSW-WA9, CSW-WA10 operating June 2017. - CSW-WA1 and CSW-WA2 taken out of service July 2017. - Water Main easements acquired 2018. - Possible additional supply well location being negotiated. 	<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. - Additional Easements for new water main route being pursued.
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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. 	<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 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 2019

CURRENT PROGRESS AND UPCOMING PROJECTS

Soil Vapor Extraction Progress

The Soil Vapor Extraction system continues to function well in removing vapors from beneath the facility. Studies are underway for methods to augment this system with additional measures to achieve the corrective action goals for this area in a shorter time frame.

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.*

Plant Construction Update

The new winder installation excavation has been completed and all air monitoring results were within the regulatory limits. Resurfacing of a portion of the area where the excavated soil was handled will be completed soon.

City Water Supply Improvements

The acquisition of easements from private landowners for the installation of the planned additional underground water supply pipeline is nearly complete and plans are underway for obtaining the necessary easements for the installation beneath the railroad tracks.

Additionally, another supply well may be installed to increase the amount of water available to the City. The first step will be to install an additional test well east of the city. The decision on whether or not to follow up with a permanent City Supply Well will depend on water quality and yield testing results, as well as regulatory approvals. Sampling of existing City Supply Wells continues on a monthly basis.

GROUNDWATER MONITORING AND SAMPLING

Groundwater monitoring well sampling continues on a semi-annual basis. The recent groundwater sampling event included all 46 monitor wells. The report of findings will be finalized and forwarded to Mississippi Department of Environmental Quality for review. The report will be available for public review once MDEQ completes their review.

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

PUBLIC DOCUMENTS REPOSITORY

All Public documents referenced in the January 2019 Newsletter are available at your local Crystal Springs Library for review or you can also visit <http://www.deq.state.ms.us/>