



October 31, 2021

Cassandra Johnson  
Office of Community Engagement  
Mississippi Department of Environmental Quality  
PO Box 2261  
Jackson, MS 39225

**RE: COMMUNITY ENGAGEMENT PROGRESS REPORT AUGUST THROUGH OCTOBER 2021, KUHLMAN ELECTRIC CORPORATION CLEAN UP ACTIONS, CRYSTAL SPRINGS, MISSISSIPPI**

Dear Ms. Johnson:

This report provides a summary of community engagement actions for the Kuhlman Electric Corporation (KEC) environmental clean-up 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 2021 through and including October 2021. Future reports will continue to be provided quarterly.

KEC has continued to be actively engaged with the community, despite COVID-19 limitations. During this quarter, KEC with its consultants Environmental Management Services (EMS) and Caffee, Caffee and Associates (CCA) has updated and notified Crystal Springs residents of remedial activities through one-on-one dialogue and quarterly newsletters.

The following Corrective Action Plan milestone activities were initiated or continued during this reporting period:

- Soil Vapor Extraction System operation, monitoring (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
  - Installation of new supply pipeline efforts are temporarily delayed due to lack of railroad access (pending resolution of railroad availability for utility mark and install)
  - Preparations to bring new City Well CSW-WA11 online
  - Evaluation of potential additional supply well locations continued
- Groundwater monitoring continued
- Evaluation of potential additional monitoring well locations

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.

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Community relations are conducted on an as-needed basis, designed to meet the requests and needs of the public. The current status is as follows:

#### Points of Contact

The local contact is Craig Flagge, Health Safety Environment Manager for the Hitachi ABB Power Grids 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

Final reports are submitted to MDEQ for storage in the information repository, maintained by MDEQ online at <https://www.deq.state.ms.us>. Final reports are also maintained at the Crystal Springs Public Library Information Desk, 200 South Jackson Street, Crystal Springs, MS. Newsletters will be provided for public access through the Crystal Springs City Hall, as well. The following submittals were made to the Crystal Springs Library:

- Annual Certification Report for Restricted Use Agreed Order 5723-10 (October 2021)
- Semi-Annual Groundwater Assessment Report 2021 (October 2021)
- Soil Vapor Extraction System First Semiannual Report 2021 (September 2021)

#### Local Briefings and Telephone Briefings

CCA, on behalf of KEC, continues to hold individual meetings as requested, as well as telephone conversations each quarter. CCA has maintained communication and a presence in the community each month to reassure residents of KEC's community engagement efforts.

Representatives routinely hold one-on-one talks with businesses and churches in Crystal Springs while hand delivering copies of the KEC newsletter (see Direct Mail below) during normal quarters. These actions were reduced during this quarter due to COVID-19 concerns.

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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 continues to distribute copies of the quarterly newsletter, the Kuhlman Cleanup News. The most recent version was issued in October 2021. Over 1600 newsletters will be made available at City Hall and any open businesses. Businesses and churches receive copies of the newsletter to ensure a broad distribution and that interested individuals have multiple locations to obtain a copy. The October 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

Additional monitoring wells will be installed and sampled on the western edge of the groundwater plume in late 2021. KEC will provide the next quarterly update in January 2022. Please do not hesitate to contact Craig with any questions you might have at 601-892-6567.

Sincerely,

*Craig Flagge*

Craig Flagge

HSE Manager, Hitachi Energy 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"> <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. 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"> <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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<p>Capacity Plan Implementation</p> <p>Interim Treatment System Construction Complete</p>	<p>Fall 2013</p>	<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.</li> <li>- Public notice provided in The Meteor article published Nov 6, 2013.</li> <li>- Update published in quarterly newsletters October 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> <li>- Emergency Generator added July 2015.</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> <li>- If operation is required, establish City update schedule.</li> </ul>	<ul style="list-style-type: none"> <li>- None at this time.</li> </ul>
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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"> <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>- Updates via newsletters, Capacity Plan for Potable Water Supply Status Report (August 2013), verbal reports.</li> <li>- Collaboration with City.</li> <li>- Supply Wells CSW-WA9 and CSW-WA10 complete January 2016.</li> <li>- CSW-WA9, CSW-WA10 approved July 2016.</li> <li>- CSW-WA9, CSW-WA10 operating June 2017.</li> <li>- CSW-WA1 and CSW-WA2 taken out of service July 2017.</li> <li>- Water Main easements acquired, vendor selected.</li> <li>- Additional supply well location tested, well installed.</li> <li>- City approval to purchase land for third supply well granted March 2020.</li> <li>- Water Main Installation started July 2020.</li> <li>- RR crossing licenses acquired 3Q 2021.</li> </ul>	<ul style="list-style-type: none"> <li>- Complete water main, pending railroad permit.</li> <li>- Connect City Water Supply Well CSW-WA11.</li> <li>- Design/site additional Supply Well.</li> <li>- Continued collaboration with City.</li> </ul>	<ul style="list-style-type: none"> <li>- Additional well and access needed; this has delayed this task.</li> <li>- Railroad crossing boring needed below tracks to complete water main, delayed by Illinois Central Railroad (utility markout, track protection, and pipe installation).</li> <li>- CSW-WA11 connection is dependent on water main completion.</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 were 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. This milestone is complete.</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 completed 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 this milestone was included in the July 2013, October 2013, and January 2014 Newsletters.</li> </ul>	- None. This milestone is complete.	- None.



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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>- Installation of the full scale SVE system was completed December 2013 - April 2014. Optimization and start of operation occurred in May 2014.</li> </ul>	- 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"> <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 Report submitted to MDEQ.</li> <li>- Two additional monitoring wells installed December 2015.</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> <li>- MDEQ approval of additional monitoring well locations.</li> </ul>	<ul style="list-style-type: none"> <li>- KEC will respond to any comments that might be received on the Semi-Annual Groundwater Assessment Report submitted to MDEQ.</li> <li>- Installation of additional monitoring wells along the western plume edge.</li> </ul>	<ul style="list-style-type: none"> <li>- City meeting schedule not established. City satisfied with verbal updates and newsletters to date.</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>	<ul style="list-style-type: none"> <li>- Soil Vapor Extraction System Semi-Annual Report issued September 2015.</li> <li>- Monitoring, operation and maintenance of SVE is ongoing.</li> <li>- Updates are included in quarterly newsletters.</li> <li>- Performance assessment soil sampling program completed 4Q 2016. Report submitted 1Q2017.</li> </ul>	<ul style="list-style-type: none"> <li>- Operation and monitoring of full scale system.</li> </ul>	<ul style="list-style-type: none"> <li>- None at this time. Attendance at City meetings not requested.</li> </ul>
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.	Underway	<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>	<ul style="list-style-type: none"> <li>- 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.</li> </ul>	<ul style="list-style-type: none"> <li>- Continued evaluation of SVE system performance.</li> <li>-Augmentation pilot and design refinement.</li> <li>-Bench scale study for Ozone complete. Data evaluation ongoing.</li> </ul>	<ul style="list-style-type: none"> <li>- SVE System start up delayed until 2014; performance evaluation ongoing.</li> </ul>

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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.	To Be Determined	<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>	<ul style="list-style-type: none"> <li>- Groundwater trends indicate that SVE is making progress toward CAP objectives.</li> </ul>	<ul style="list-style-type: none"> <li>- Data evaluation will continue in 2021-2022.</li> </ul>	<ul style="list-style-type: none"> <li>- Delayed due to delayed implementation and ongoing effectiveness of SVE system.</li> </ul>
No Further Remedial Action Request  (Monitoring Only)	To Be Determined	<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>	<ul style="list-style-type: none"> <li>- This milestone will be completed pending the results of planned remedial actions.</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>

# KUHLMAN CLEANUP NEWS

OCTOBER 2021

*Newsletter on Kuhlman Environmental  
Cleanup in Crystal Springs*

## CURRENT PROGRESS AND UPCOMING PROJECTS

### *Soil Vapor Extraction Progress*

Soil Vapor Extraction System First Semi-Annual Report for 2021 was submitted to Mississippi Department of Environmental Quality (MDEQ) in September. The soil vapor extraction system continues to operate efficiently beneath the plant.

### *City Water Supply & Well*

The licenses have been approved for the borings beneath the railroad south of the old Gem plant so the new water main piping can be installed. This clears the way for the final installation of the remaining pipeline to move forward and connect to the existing city water system. The city supply wells are still being sampled and reported monthly. The search is underway for a potential location for one additional city water supply well.

### **GROUNDWATER MONITORING AND SAMPLING**

The Semi-Annual monitor well sampling was performed in September and the samples shipped to the lab for analysis. Once the results are received, a report will be generated for submission to MDEQ. Three new groundwater monitoring wells are scheduled to be installed within the next month to supplement the network currently being monitored. We also continue to sample City-owned water supply wells. The samples are currently being analyzed and will be submitted to MDEQ.

## 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.*

## **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**

Select documents have been made available at your local Crystal Springs Library for review or you can visit <http://www.mdeq.state.ms.us/>

