



July 31, 2014

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

**RE: COMMUNITY ENGAGEMENT PROGRESS REPORT APRIL 2014 THROUGH JULY 2014, 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 April 2014 through and including July 2014. 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)
- Soil Vapor Extraction System Start Up and Operation (April/May 2014, ongoing).

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

- Capacity Plan Implementation – Research into potential replacement supply well locations and access 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.

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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 were no public notices provided this quarter.

#### 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:

- Semi-Annual Groundwater Assessment Report (July 1, 2014)

#### 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).

#### 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). In June 2014, CCA/KEC staffed multiple booths at the 2014 Crystal Springs Tomato Festival. Individuals had the opportunity to ask

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questions about the remediation and sign up for the quarterly newsletter. Over 300 attendees visited the booths.

#### Direct Mail

KEC continued to distribute copies of the quarterly newsletter. KEC also published the eighth edition of a quarterly newsletter, the Kuhlman Cleanup News in July 2014. Over 1500 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 full scale SVE system and answered Frequently Asked Questions. 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 October 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. 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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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.</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> </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>- Routine City update schedule not yet established. City officials updated during Operational Demonstration Oct 30, 2013.</li> </ul>

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Capacity Plan Implementation  Long term volume replacement, as needed	Ongoing - 2015	<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 newsletters and Capacity Plan for Potable Water Supply Status Report (August 2013).</li> <li>- Collaboration with City regarding existing data and access to potential replacement well sites.</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>

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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 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. 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 conducted March 2014.</li> <li>- Semi-Annual Groundwater Assessment Report submitted to MDEQ in July 2014.</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>- KEC will respond to any comments that might be received on the Semi-Annual Groundwater Assessment Report submitted to MDEQ.</li> </ul>	<ul style="list-style-type: none"> <li>- City update schedule not yet established.</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 installed December 2013 - 2014. Optimization and operation initiated in May 2014.</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.</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 monitoring results from 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.

# Kuhlman Cleanup News

*Newsletter on Kuhlman Environmental Cleanup in Crystal Springs, MS*

## **SOIL VAPOR EXTRACTION SYSTEM IS NOW IN FULL OPERATION!**

The Soil Vapor Extraction system, approved by the Mississippi Department of Environmental Quality, is now operating full time to cleanup soils at the Kuhlman Electric plant. The engineering contractor for Kuhlman continues to operate the equipment and ensure that all safety standards are adhered to.

KEC chose the Soil Vapor Extraction system because of the many advantages that it offers in removing chemical vapors from the soil, including a proven track record of performance. The system is designed to remove chemicals from the soil and groundwater under the plant in their vapor state by applying a vacuum under the plant floor. This process will continue until levels of chemicals in the soil and vapor are below clean-up standards approved by the Mississippi Department of Environmental Quality.



## **QUESTIONS OR COMMENTS**

Please submit all questions or comments to Kuhlman at [crystalspringsinfo@us.abb.com](mailto:crystalspringsinfo@us.abb.com) or Brenda Bell Caffee of Caffee, Caffee and Associates at 601-336-7212.

## **CRYSTAL SPRINGS 2014 ANNUAL TOMATO FESTIVAL!**

KEC participated in the 2014 Annual Tomato Festival with booths placed at varying locations. During the festival, KEC representatives talked with over 300 area residents providing updates on the SVE system, remedial plans and work underway at the plant. Visitors had an opportunity to sign-up to receive the newsletters during each quarter's distribution. Through these endeavors, KEC is able to keep the residents of Crystal Springs abreast of the remedial activities.

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

We continue to sample the monitor wells and city wells. Monitoring reports are submitted to the Mississippi Department of Environmental Quality and are available on their website. All city well data for the current quarter indicates City water continues to meet drinking water standards.

## **UPCOMING EVENTS**

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

## **PUBLIC DOCUMENTS REPOSITORY**

Public documents referenced in the Newsletter are available at:

- 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.*

**Question: I am concerned that this method (of vapor extraction) does not actually remove all the chemicals from the soil.**

**Answer:** The goal of the vapor extraction remedy is to reduce the chemicals now trapped underground to the point that any remaining concentrations are below cleanup levels established by the state. Not all the chemicals will be completely removed, but the remaining concentrations will continue to degrade naturally.

**Question: Will the activated carbon being used to filter the vaporized air before being released into the atmosphere be able to remove all chemicals and gases before being released?**

**Answer:** The carbon binds with the chemicals upon contact. As a conservative measure, the system is designed with two carbon filters, so that if any chemicals pass through the first filter they can be captured by the second filter. We will continue to monitor vapors going in and out of the carbon units to ensure that the system is working as designed.

**Question: Does the Soil Vapor Extraction method consider the many other chemicals trapped in the soil and the effect of their combining when a vacuum is started?**

**Answer:** The chemical compounds in the soil are, or have been, in contact with each other for many years already. The chemical compatibility is already established.

**Question: Does the Soil Vapor Extraction method consider the different water levels?**

**Answer:** The Soil Vapor Extraction system has been designed to operate in the soils above the water table.

**Questions: Does the Soil Vapor Extraction method consider varying temperatures and how temperature will affect the chemicals combining or being released?**

**Answer:** Temperature does affect removal of certain chemicals. However, the outside temperatures here and the relatively stable underground temperatures make this method appropriate for this site.