

1.0 EXECUTIVE SUMMARY

Kuhlman Electric Corporation (KEC) owns and operates a transformer manufacturing plant in Crystal Springs, Mississippi (Figure 1). Environmental assessments conducted at the KEC plant site indicated that soil contaminated with the polychlorinated biphenyl (PCB) Aroclor 1260, and various chlorinated benzenes was present on-site. During the course of performing grading work on the KEC and adjacent properties, soil, brick, and other construction/demolition debris containing PCBs were reportedly transported and deposited by L. M. & R. Service, Inc. on property located at 112 and 114 Brent Street in Crystal Springs, Mississippi, which was formerly owned by Mr. David Rodgers, President of L. M. & R. Service, Inc. Mid South Leasing (MSL) of Crystal Springs, Mississippi, currently owns the 112 and 114 Brent Street properties. For purposes of this report, the two properties will be referred to as the MSL Property.

An initial environmental assessment of the fill material on the MSL property was conducted from June 6, 2002 to June 29, 2002. Analysis of soil samples of the fill material indicated that PCB concentrations exceeded the MDEQ regulatory limit of 1.0 mg/Kg at multiple locations on the property.

Based on the results of the initial investigation, MDEQ issued an order (Mississippi Commission on Environmental Quality Order No. 487-03) to Mr. David Rodgers and KEC on May 22, 2003 to further assess and remediate the resultant PCB contamination. MDEQ also ordered that an Interim Corrective Action Plan be prepared and implemented. The Interim Corrective Action Plan involved the placement of a temporary protective liner over the impacted soil. The protective liner consisted of a 12-mil scrim cushion fabric underlayer, and an impervious 40 mil, low density, polyethylene liner over the scrim fabric. The liner prevents both direct contact with the impacted soil by humans or animals and off-site transport of impacted soil by stormwater runoff or wind. The installation of the protective liner was completed in August 2003.

A scope of work was developed utilizing a phased approach of site assessment activities to delineate the horizontal and vertical impact of PCB contamination on the MSL property and surrounding properties. This detailed site characterization was conducted in accordance with the *Site Characterization Work Plan, Mid South Leasing Property dated December 2003* and approved by the MDEQ in February 2004.

Based on the information gathered during previous investigations and this site characterization assessment, it was determined that:

1. Significant quantities of metallic and non-metallic debris are present at varying depths in the fill material that has been placed on the MSL Property and the Raymond Lamar, Sr. property, which is located immediately south and downgradient of the MSL Property. The maximum depth of fill material encountered is 23 feet below ground surface (bgs) and was located at 114 Brent Street.
2. Multiple locations in the fill material on the MSL property have been impacted with PCB levels above the MDEQ regulatory limit of 1.0 mg/Kg. A few areas having PCB concentrations exceeding 50 mg/Kg are present in the fill material area to a maximum observed depth of 8.5 feet.
3. Fill material containing PCBs having concentrations greater than the MDEQ regulatory limit of 1.0 mg/Kg was placed in the northeast corner of the Raymond Lamar, Sr. property adjacent to and south of the MSL property at 114 Brent Street.
4. Pockets of shallow soil and sediments in the drainage ditch on the property immediately adjacent to the MSL 114 Brent Street property have PCB levels exceeding the MDEQ regulatory limit of 1.0 mg/Kg. The contamination is confined to shallow surface soils or sediment deposits (0-6 inches bgs) extending

south from the MSL property to approximately 350 feet down the drainage ditch on the Raymond Lamar Sr. property.

5. None of the soil and/or sediment samples collected in the drainage channel or overbank within approximately 450 feet of Turkey Creek or in Turkey Creek itself had PCB levels exceeding the MDEQ regulatory limit of 1.0 mg/Kg.