October 19, 2011
File No. 147-104414

Mr. Michael MacCabe, Senior Environmental Engineer
NYS Department of Environmental Conservation
Division of Environmental Remediation
625 Broadway
Albany, New York 12233-7016

Re: Progress Letter for September 2011
Former tesa tape, Inc., Middletown Facility
NYSDEC Site #3-36-56
Order of Consent (Index # W3-0906-02-07)

Dear Mr. MacCabe:

On behalf of tesa tape Inc., HDR is submitting a progress report for the above referenced site. This letter documents the removal of the loading dock sump's water treatment system and closure of the onsite monitoring wells at the former facility (Figure 1), herein referred to as the Site. HDR recommended the treatment system be closed and monitoring wells be abandoned in a letter addressed to NYSDEC dated April 19, 2011. On July 12, 2011 New York State Department of Environmental Conservation (NYSDEC) approved HDR's recommendation to remove the system and abandon the wells.

On August 11, 2011 HDR arrived at the Site and began removing the plumbing, wiring and submersible pump associated with the loading dock sump dewatering system. The current tenant that occupies this portion of the facility aided HDR by moving the 85 gallon granulated activated carbon (GAC) drum to the exterior of the building. A truck subcontracted by General Carbon Corporation of Patterson New Jersey arrived shortly afterwards and loaded the GAC drum onto the truck and removed it from the Site. The used carbon in the drum will be stripped of contaminates, and reactivated at the General Carbon Paterson, NJ facility.

At mid morning HDR met with drillers from Parratt Wolff Inc. (Parratt Wolff) at the Site. Parratt Wolff was contracted by HDR to abandon the thirteen monitoring wells located across the site (Figure 2). All of the wells on site consisted of 2 inch schedule 40 PVC with flush mount curb boxes. The wells were abandoned by either pulling the casing or grouting in place after breaking the bottom well cap (Table 1). The abandonment procedure followed guidance found in CP-43 Groundwater Monitoring Well Decommissioning Policy, NYSDEC, , August 2009.

Prior to abandoning the wells the concrete well pads and steel curb boxes were removed. The concrete and curb boxes were disposed of as solid waste. Each well was grouted in place by pumping grout into the well from the bottom up using a "tremie" pipe. The tremie pipe was lifted up as the well was filled with grout. In some cases the PVC casing was loose and was removed prior to pumping grout into the well. Grout was

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pumped into the well until it appeared at the surface. Displaced groundwater flowed into the cavity left behind by the former curb box and was allowed to percolated back into the surrounding soil. After approximately ten minutes the grout had settled approximately six to ten inches in each well (or approximately 18 inchesbelow grade). After the well was grouted and allowed to set the curb box area was filled with asphalt patch to match the area surrounding the well. The asphalt was tamped into place by hand. The only exception is MW-8 which is located in a grassy lot. The former curb box in this area was filled with a mixture of sand and native soil to match the surrounding area.

At this time tesa tape has completed all of the environmental obligations that were part of the sales agreement to the current owner. It is our understanding that the current owner will continue to submit the Periodic Review for the site.

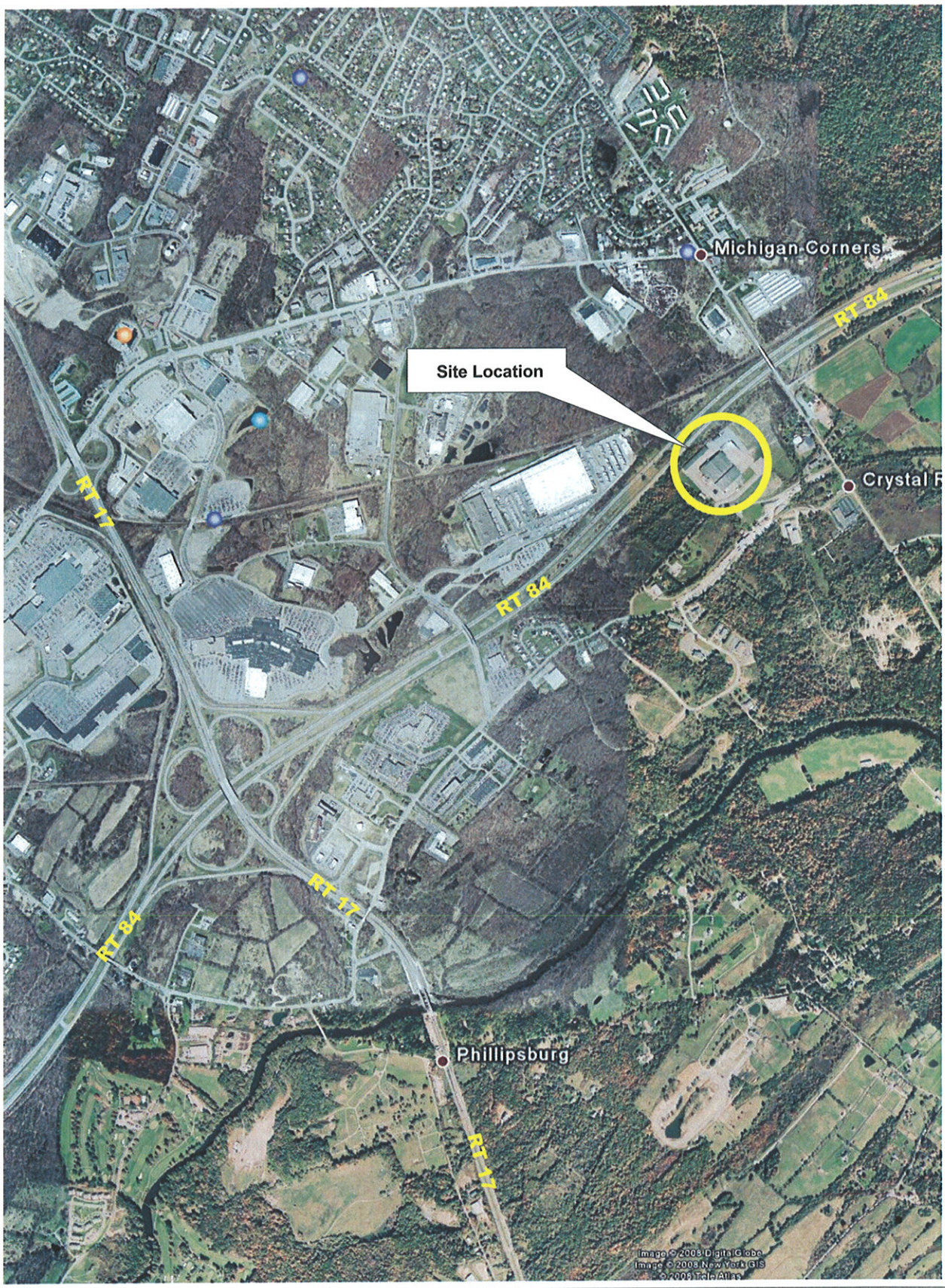
Please contact Michael Pantliano at 8450-735-8300 ext 311 if you have any questions.

Sincerely,

For MDL

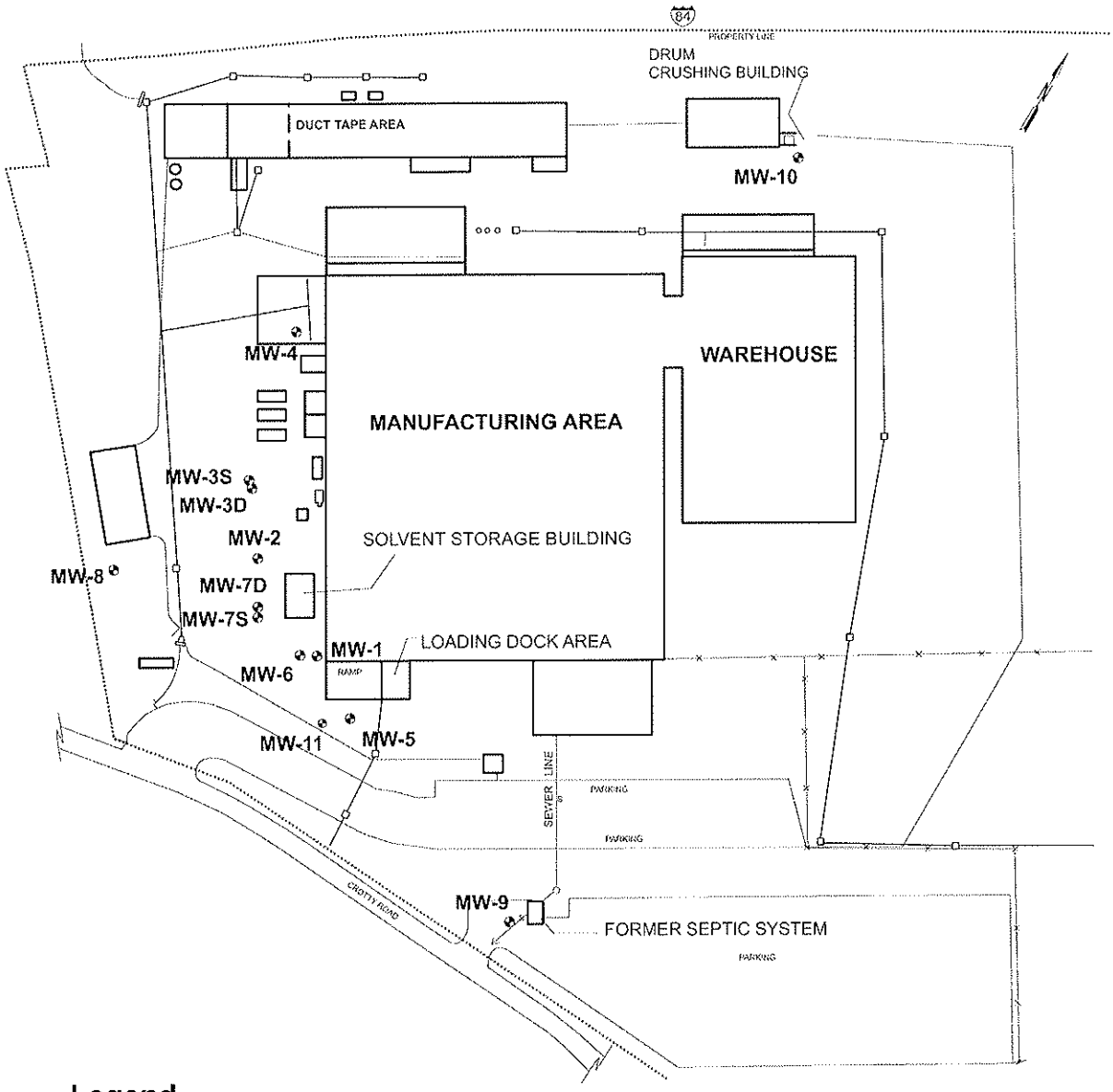
Michael D. Lehtinen
Project Manager

cc: S. Fein, Esq., Whiteman, Osterman & Hanna
C. Rigano, tesa tape
E. Grossman, Crotty Associates LLC



Source Google Earth

HDR	Henningson, Durham & Richardson Architecture and Engineering, P.C. in association with HDR Engineering, Inc. One Blue Hill Plaza Pearl River, NY 10965	**Site Location** **tesa tape Inc. • Middletown, New York**	**Figure 1**



Legend

- Monitoring well

NO SCALE

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HDR | LMS Henningson, Durham & Richardson Architecture and Engineering, P.C. in association with HDR Engineering, Inc. One Blue Hill Plaza Pearl River, NY 10965	**Monitoring Well Locations** **tesa tape Inc. • Middletown, New York**	Figure 2

Table 1
tesa tape inc.
Well Closure Details

Well ID	Closure Date	Well Depth (Feet)	Procedure	Gallons of Grout
MW-1	8/11/2011	15.3	Pulled Casing	5
MW-2	8/11/2011	13.1	Broke Bottom Cap	5
MW-3S	8/11/2011	16.8	Broke Bottom Cap	5
MW-3D	8/11/2011	34	Broke Bottom Cap	15
MW-4	8/11/2011	9	Broke Bottom Cap	5
MW-5	8/11/2011	13.6	Pulled Casing	5
MW-6	8/11/2011	13.9	Broke Bottom Cap	5
MW-7S	8/11/2011	12.9	Broke Bottom Cap	5
MW-7D	8/12/2011	34.2	Broke Bottom Cap	10
MW-8	8/12/2011	30	Broke Bottom Cap	10
MW-9	8/12/2011	8.1	Pulled Casing	5
MW-10	8/12/2011	6.4	Pulled Casing	5
MW-11	8/12/2011	21.1	Broke Bottom Cap	12.5