

VIA ELECTRONIC MAIL

March 10, 2017

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**RE: Monthly Progress Report
Taconic Site (Site No. 442047)
Petersburgh, New York**


Dear Sir/Madam;

Pursuant to Section XIII of Appendix A of the Order on Consent and Administrative Settlement for the Tonoga Inc. d/b/a Taconic facility in Petersburgh, New York, the Monthly Progress Report covering February 2017 is attached.

On February 23, 2017, Taconic was notified by DEC to include a new form (POET Monthly Report) in our Monthly Progress Reports to help the Department's effort to track installation and O&M efforts related to the residential POET systems in Petersburgh. Taconic has an internal tracking system for the residential POET systems, including the sampling, based on the database previously developed by the Rensselaer County Health Department, that have been used over the past year. We have reviewed the form suggested by DEC, and, in lieu of that form, have included the key milestones in a table that will be included in our Monthly Progress Reports. Use of the form suggested by DEC is an excessive burden for Taconic and would divert resources from other aspects of the project. We believe that our alternate approach, in conjunction with the other reporting that is already occurring, will provide DEC with sufficient details on the installation, O&M, and annual raw water sampling of the residential POET systems for Petersburgh.

Please feel free to contact me at 518.658.3202 x288 or at karent@4taconic.com if you have any questions.

Sincerely,



Karen Toth
Environmental Manager



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attachment

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**MONTHLY PROGRESS REPORT
TACONIC FACILITY (NYSDEC SITE NO. 442047)
PETERSBURGH, NEW YORK
FEBRUARY 2017**

Actions Taken to Comply with the Settlement Agreement During Previous Month (February):

- The status of the point-of-entry treatment (POET) system and non-POET location monitoring is provided in the attached table.
- Taconic obtained approval of the Town of Petersburg (Town) distribution system flush plan from the New York State Department of Environmental Conservation (NYSDEC) on February 7, 2017.
- Taconic received a letter from NYSDEC on February 15, 2017 requesting maintenance of the Town public supply wells before the New York State Department of Health (NYSDOH) can authorize the operation of the Town Public Water Granular Activated Carbon (GAC) System. Taconic responded to NYSDEC on February 21, 2017.
- The Town completed repairs to public supply Well #2 on February 24, 2017. Water purged from Well #2 during repairs was pumped into a frac tank for subsequent treatment. Based on positive coliform results, the Town disinfected Well #2 with NYSDOH oversight until coliform test results are reported as negative.

Plans, Reports, and Other Deliverables Required by the Settlement Agreement Completed and Submitted in the Previous Month (February):

- Taconic received comments from NYSDEC on February 27, 2017 on the Remedial Investigation Feasibility Study (RI/FS) Work Plan submitted on December 20, 2016. Taconic requested an extension to address extensive comments on February 28, 2017.

Results of Sampling, Tests and Any Other Data Received or Generated by or on behalf of Respondent During the Previous Month (February):

- Analytical results were received from TA during the month for PFCs for the mid-carbon and post-carbon quarterly samples collected from the POET systems and were submitted to NYSDEC under separate cover on February 1, 8, 15, and 17, 2017.

Activities Undertaken in Support of the Citizen Participation Plan (CPP) During Previous Month (February):

- Taconic received comments from NYSDEC on the CPP on December 22, 2016. The revised CPP was submitted to NYSDEC and NYSDOH on January 13, 2017, in advance of the January 21, 2017 due date, as per 6 NYCRR Part 375-1.6(d)(3). Taconic received additional comments from NYSDEC on January 27, 2017 and responded back on February 3, 2017.

Actions, Plans and Data Scheduled for the Next Month (March):

- Pending total coliform results and NYSDEC/NYSDOH approval, distribution flushing is scheduled to be conducted on March 20, 2017.
- Analytical results are scheduled to be received from TA for PFCs for the mid-carbon and post-carbon quarterly samples collected from POET systems in February and March 2017.

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- Analytical results are scheduled to be received from TA for the pre- and post-carbon samples collected from POET system(s) installed in March 2017 and cleared by the RCDOH.
- Analytical results are scheduled to be received from TA for annual raw water samples collected in February 2017 as part of the POET system maintenance monitoring.
- WEL-DUN will continue quarterly maintenance monitoring of the POET systems in February 2017.
- WEL-DUN will continue annual sampling of the raw water as part of the POET system maintenance monitoring in March 2017.
- Installation of POET system(s) not yet completed at locations included in Exhibit C of the Settlement Agreement will continue in March 2017.

Activities in Support of the Citizen Participation Plan Anticipated for the Next Month (March):

- None in March 2017.

Delays Encountered or Anticipated and Mitigation Measures:

- None in February 2017.

Proposed or Approved Modifications (Work Scope and/or Schedule):

- None in February 2017.

Percentage of Completion and Additional Information Relating to the Progress of Work:

By the end of February 2017, the approximate percentage of completion for current work activities is presented in the following table.

**MONTHLY PROGRESS REPORT
TACONIC FACILITY (NYSDEC SITE NO. 442047)
PETERSBURGH, NEW YORK
FEBRUARY 2017**

Percentage of Completion Relating to the Progress of Work

Item	Percent Complete
Sample the Taconic production wells for analysis of PFCs and TCL/TAL constituents (accelerated RI field task approved by NYSDEC)	100% (Completed on 9/1/2016)
Sample surface water at/near the Taconic facility for analysis of PFCs and TCL/TAL constituents (accelerated RI field task approved by NYSDEC)	100% (Completed on 12/9/2016)
Prepare/submit CPP	100% (Original plan submitted on 12/9/2016)
Prepare/submit revised CPP	100% (Submitted on 1/13/2017)
Prepare/submit revised CPP	100% (Submitted DEC requested info on 2/3/2017 and 3/1/2017)
Prepare/submit RI/FS Work Plan and associated FSAP, QAPP and HASP	100% (Submitted on 12/20/2016)
Prepare/submit O&M Manual for the Town Public Water GAC System	100% (Submitted on 12/20/2016)
Prepare/submit revised O&M Manual for the Town Public Water GAC System	95% (After the Town's distribution system is flushed and cleared for use.)
Town Public Water GAC System Installation	100% (Electrical and piping installation completed on 12/21/2016)
Town Public Water GAC System Start-up	100% (Completed on 12/30/2016)
Town Public Water System Flushing Plan	100% (Submitted on 1/6/2017)
First Quarter Maintenance Monitoring of the POET Systems	90% (Plan to complete by March 31 or until homeowners return back multiple messages)
POET Installations - Exhibit C of the Settlement Agreement	90% (Plan to complete as soon as homeowners return back multiple messages.)

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POET System Monthly Report

Annual Raw-Only Sampling of Locations with No POET System	
1) Total Annual Raw Locations	137
2) Total Annual Raw Sampled	1Q17 = 40 (Jan = 10, Feb = 0, March = 30 scheduled)
3) Locations On Hold	3 (vacant locations)
4) New POET System Installed as a result of Annual Raw Sampling	1 installed in February 2017. 1 installed to date in 2017.
5) New POET System Cleared for Use	0 (1 pending)
POET Systems	
<u>Updated Exhibit C POET System Installation List:</u>	
1) Total POET System Locations	92
2) Total POET Systems Installed	82 (+ 2 in progress)
3) POET Systems Clear for Use	82 (1 pending)
4) POET Systems on Hold	8
<u>POET System Quarterly O&M:</u>	
1) Total POET System Samples collected this Quarter	1Q17 = 64 (Jan = 37, Feb = 20, March = 7 scheduled)
2) GAC Tank Exchanges	None required in 1Q17. None required to date.