

VIA ELECTRONIC MAIL

January 12, 2018

Susan Edwards
NYSDEC
Division of Environmental Remediation
625 Broadway
Albany, NY 12233
susan.edwards@dec.ny.gov

Krista Anders
NYSDOH
Bureau of Environmental Exposure Investigation
Empire State Plaza
Corning Tower Room 1787
Albany, NY 12237
krista.anders@health.ny.gov

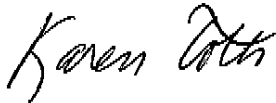
Caryn Bower, Esq.
Office of General Counsel
NYSDEC
625 Broadway
Albany, New York 12233
caryn.bower@dec.ny.gov

**RE: Monthly Progress Report – December 2017
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 Petersburg, New York, the Monthly Progress Report is attached. 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

cc: Jason Johnson, NYSDEC
James Moras, NYSDEC
Justin Deming, NYSDOH
Dawn Hettrick, NYSDOH
Lori Mason, Esq., Taconic
Jeff Mirarchi, Taconic
Paul Hare, OBG

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

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

- Application of Approval of Plans for PWS Improvement, engineering report, and specifications for the Town of Petersburg Well #2 pitless adaptor were submitted to NYSDOH and RCDOH on June 29 and September 20, 2017. The application was approved by NYSDOH on October 4, 2017.
- Application of Approval of Plans for PWS Improvement, engineering report, and specifications for the Town of Petersburg storage and GAC treatment system for maintenance well water were submitted to NYSDOH and RCDOH on July 20, 2017. Comments on the design report were received from the NYSDEC on November 24, 2017. Taconic is coordinating with the Town and preparing updates to the application for submittal by the Town of Petersburg.
- Application of Approval of Plans for PWS Improvement, engineering report, and specifications for the Town of Petersburg recirculation loop system were submitted to NYSDOH and RCDOH on August 4, 2017. Comments were received from NYSDOH on October 16 and November 13, 2017. Revised applications were prepared by Taconic that included NYSDOH and additional Town comments, and submitted to the Town of Petersburg on October 17 and 30, 2017, and on November 9 and 14, 2017. The application was approved by NYSDOH on November 15, 2017. Taconic is coordinating with the Town for the installation of the recirculation loop.
- Application of Approval of Plans for PWS Improvement, engineering report, and specifications for the Town of Petersburg Wells #5 and #6 artesian drains, based on recommendations by the certified well driller inspection report, were submitted to NYSDOH and RCDOH on August 28 and September 20, 2017. On October 17, 2017, NYSDOH commented that the artesian well overflows for Town Wells #5 and #6 will be subject to a SPDES permit and prefer to eliminate the artesian discharge.
- As requested by NYSDEC on October 25, 2017, a SPDES Industrial Application to Discharge Industrial Wastewater, map of the facility and discharge location, flow diagram and the associated sampling results for the discharge of maintenance waters and artesian well overflows for the Town of Petersburg public water supply, were prepared by Taconic and submitted to the Town of Petersburg on November 8, 2017. The Town of Petersburg submitted the application to NYSDEC on November 10, 2017. Comments were received from NYSDEC on the submitted application on November 24, 2017. Taconic is coordinating with the town and preparing updates to the application for submittal by the Town of Petersburg.
- The status of the point-of-entry treatment (POET) system and non-POET location monitoring is provided in the attached tables.

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

- Taconic submitted a revised RI/FS Work Plan to the NYSDEC and NYSDOH on November 20, 2017 to address the State's comments received on September 20, 2017.
- Taconic received comments from NYSDEC, NYSDOH, and RCHD on September 15, 2017 on the updated Town GAC System O&M Plan submitted on August 17, 2017. Taconic submitted a revised Town GAC System O&M Plan to include comments from NYSDEC, NYSDOH, and RCHD on September 18, 2017. NYSDEC and NYSDOH approved the plan as final on September 29, 2017.

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

- Taconic received comments from NYSDEC, NYSDOH, and RCHD on August 17 and 31, 2017 on the updated Private Home POET O&M Plan submitted on May 12, 2017. Taconic submitted a revised Private Home POET O&M Plan to include comments from NYSDEC, NYSDOH, and RCHD on September 18, 2017. Taconic submitted a proposal to extend the POET sampling frequency on September 28, 2017. NYSDEC granted the extension on September 29, 2017. Taconic submitted a revised Private Home GAC System O&M Plan to include the sample frequency extension on October 31, 2017. Taconic received comments from NYSDEC on December 27, 2017. Taconic submitted a revised Private Home GAC System O&M Plan on January 3, 2018.

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

- Analytical results received from TestAmerica (TA) during the month for perfluorinated compounds (PFCs) for the POET systems and annual raw only properties were submitted to NYSDEC under separate cover on December 4 and 6, 2017.

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

- None.

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

- Analytical results are scheduled to be received from TA for PFCs for the installed POET systems and raw water only locations with no POET systems.
- WEL-DUN will continue maintenance monitoring of the installed POET systems.
- WEL-DUN will continue sampling of the raw water only locations with no POET systems.
- Installation of POET system(s) not yet completed at locations included in Exhibit C of the Settlement Agreement will continue.

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

- None planned.

Delays Encountered or Anticipated and Mitigation Measures:

- None.

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

- None.

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

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

<p align="center">MONTHLY PROGRESS REPORT TACONIC FACILITY (NYSDEC SITE NO. 442047) PETERSBURGH, NEW YORK DECEMBER 2017</p>
--

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. 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% (Original plan submitted on 12/20/2016)
Prepare/submit revised RI/FS Work Plan and associated FSAP, QAPP	100% (Submitted on 5/12/2017 and 11/20/2017)
Prepare/submit O&M Manual for the Town Public Water GAC System	100% (Original plan submitted on 12/20/2016)
Prepare/submit revised O&M Manual for the Town Public Water GAC System	100% (Submitted on 3/29/2017, 5/19/2017, 6/16/2017, 8/17/2017 and 9/18/2017. Plan finalized on 9/29/2017.)
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. Completed 3/28/2017)
4th Quarter Maintenance Monitoring of the POET Systems	97% (Waiting on homeowners to return back multiple messages.)
POET Installations - Exhibit C of the Settlement Agreement	94% (Plan to complete as soon as homeowners return back multiple messages.)

<p align="center">MONTHLY PROGRESS REPORT TACONIC FACILITY (NYSDEC SITE NO. 442047) PETERSBURGH, NEW YORK DECEMBER 2017</p>
--

POET System Monthly Report

Raw-Only Sampling of Locations with No POET System	
1) Total Raw-Only Locations	143
2) Total Raw-Only Sampled	4Q17 = 4 Completed <ul style="list-style-type: none"> • Oct = 1 Completed • Nov = 3 Completed • Dec = None Scheduled
3) Locations On Hold	13 (8 vacant locations and 5 current owners that requested no additional samples be collected and to be removed from the list.)
4) New POET System Installed as a result of Raw-Only Sampling	3 installed to date in 2017.
5) New POET System Cleared for Use	3 (0 pending)
POET Systems	
<u>Updated Exhibit C POET System Installation List:</u>	
1) Total POET System Locations	95
2) Total POET Systems Installed	89 (0 pending)
3) POET Systems Clear for Use	89 (0 pending)
4) POET Systems on Hold	6 (Contacted homeowners.)
<u>POET System O&M:</u>	
1) Total POET System Samples collected this Quarter	4Q17 = 63 Completed <ul style="list-style-type: none"> • Oct = 22 Completed • Nov = 33 Completed • Dec = 8 Completed
2) GAC Tank Exchanges	None required to date.