

**VIA ELECTRONIC MAIL**

April 13, 2018

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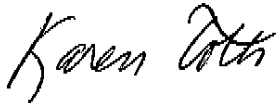
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**RE: Monthly Progress Report – March 2018  
Taconic Site (Site No. 442047)  
Petersburgh, New York**

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 is attached. Please feel free to contact me at 518.658.3202 x288 or at [karent@4taconic.com](mailto:karent@4taconic.com) if you have any questions.

Sincerely,



Karen Toth  
Environmental Manager

cc: Jason Johnson, 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  
MARCH 2018**

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

- 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. NYSDEC submitted a Request for Information to the Town of Petersburg on February 21, 2018, to determine the need for an Article 15 Protection of Waters Permit. Taconic participated on a conference call with the Town of Petersburg and the NYSDEC on March 27, 2018 to discuss the NYSDEC comments. As discussed during the conference call, further clarification is needed from the NYSDEC on the regulatory status of the proposed receiving stream to finalize the engineering report. Taconic met with a NYSDEC representative in the field on March 1, 2018 to review the receiving streams and received an email from the NYSDEC dated March 21, 2018 clarify the permitting status of the proposed receiving stream. Taconic is coordinating with the Town of Petersburg and preparing updates to the application for submittal by the Town of Petersburg. and is waiting for further direction from the NYSDEC regarding the SPDES limits for this treatment system.
- 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. The exterior recirculation line was installed on January 20, 2018, the GAC air vents were installed on February 2, 2018, and the internal piping was installed/disinfected on March 9, 2018. Taconic is coordinating with the Town of Petersburg for the installation of the remaining components 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. Taconic continues to coordinate with the Town of Petersburg to develop plans to incorporate the artesian flows into the Maintenance Water Treatment System and is waiting for further direction from the NYSDEC regarding the SPDES limits for this treatment system.
- 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 participated on a conference call with the Town of Petersburg and the NYSDEC on March 27, 2018 to discuss the NYSDEC comments. As discussed during the conference call, further clarification is needed from the NYSDEC on the regulatory status of the SPDES permit discharge limits to finalize the engineering report. Taconic met with a NYSDEC representative in the field on March 1, 2018 to review the discharge options and received an email from the NYSDEC dated March 21, 2018 clarify the permitting status of the proposed receiving stream. Taconic is coordinating with the Town of Petersburg and preparing updates to the application for submittal by the Town of Petersburg and is waiting for further direction from the NYSDEC regarding the SPDES limits for this treatment system.

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- 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 (March):**

- Taconic submitted a revised RI/FS Work Plan to the NYSDEC and NYSDOH on April 9, 2018 to address the State's comments received on March 28, 2018.
- Taconic submitted a revised Private Home GAC System O&M Plan on January 3, 2018. As requested by NYSDEC on February 15, 2018, Taconic submitted the PE stamped revised Private Home GAC System O&M Plan, complete with the appendices, on February 22, 2018.

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

- Analytical results received from Test America (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 March 2 and 19, 2018.

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

- None.

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

- As noted in the February 16, 2018 email, sampling of sludge, at three intervals, and wastewater in the active underground storage tank inside Building 6, before the necessary routine cleaning of the tank, for PFAS-21, HFPO-DA, TCL-VOCs, TCL-SVOCs, TAL-Metals, TOC, pH and field parameters. In addition to the material collected for analysis, additional material will be collected for archiving purposes (for all environmental liquid and sludge samples), to be retained at the site for future analytical and/or bench scale testing. The sampling of the underground storage tank inside Building 6 was conducted on April 12, 2018. Additional sampling will be conducted during the next scheduled clean out of this tank.
- 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 (April):**

- None planned.

**Delays Encountered or Anticipated and Mitigation Measures:**

- None.

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

- None.

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

By the end of March 2018, 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  
MARCH 2018**

**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, 11/20/2017 and 3/5/2018)
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)
1st Quarter Maintenance Monitoring of the POET Systems	71% (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.)

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**POET System Monthly Report**

<b>Raw-Only Sampling of Locations with No POET System</b>	
1) Total Raw-Only Locations	143
2) Total Raw-Only Sampled	1Q18 = 2 Completed <ul style="list-style-type: none"> <li>• Jan = 1 Completed</li> <li>• Feb = None Completed</li> <li>• Mar = 1 Completed</li> </ul>
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)
<b>POET Systems</b>	
<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.)
<b>POET System O&amp;M:</b>	
1) Total POET System Samples collected this Quarter	1Q18 = 24 Completed <ul style="list-style-type: none"> <li>• Jan = 9 Completed</li> <li>• Feb = 9 Completed</li> <li>• Mar = 6 Completed.</li> </ul>
2) GAC Tank Exchanges	1 (As noted in 2.12.2018 e-mail.)