

VIA ELECTRONIC MAIL

May 14, 2018

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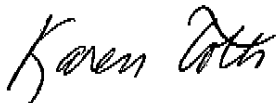
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**RE: Monthly Progress Report – April 2018
Taconic Site (Site No. 442047)
Petersburgh, New York**

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 if you have any questions.

Sincerely,



Karen Toth
Environmental Manager

cc: Jason Johnson, NYSDEC
Barbara Firebaugh, NYSDEC
Justin Deming, NYSDOH
Dawn Hettrick, NYSDOH
Lori Mason, Esq., Taconic
Jeff Mirarchi, Taconic

**MONTHLY PROGRESS REPORT
TACONIC FACILITY (NYSDEC SITE NO. 442047)
PETERSBURGH, NEW YORK
APRIL 2018**

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

- 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. The electrical service and control wiring was installed on April 24 - 27, 2018. Taconic is coordinating with the Town of Petersburg for the start-up and testing of the system.
- 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.
- During April 2018, Taconic undertook the following actions as described in the RI/FS Work Plan:
 - On April 12, 2018 collected samples of wastewater and sludge from the underground storage tank in Building 6 for laboratory analysis;
 - On April 24, 2018 located and marked underground utilities using ground penetrating radar, electromagnetic sensing, and traceable rod. Located utilities were marked with paint and flags to facilitate survey at a later date; and
 - On April 30, 2018 collected samples of surface soil for laboratory analysis.

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

- 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. The revised RI/FS Work Plan was approved by NYSDEC on April 16, 2018.
- Taconic submitted a revised Private Home GAC System O&M Plan on February 22, 2018. As requested by NYSDEC on April 25, 2018, Taconic submitted the PE stamped revised Private Home GAC System O&M Plan, complete with the appendices, on April 26, 2018. The revised Private Home GAC System O&M Plan was approved by NYSDEC on May 11, 2018.

Results of Sampling, Tests and Any Other Data Received or Generated by or on behalf of Respondent During the Previous 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 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 April 10, 13 and 27, 2018.

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

- None.

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

- Taconic has changed analytical laboratory services to Eurofins, effective May 2, 2018. Analytical results are scheduled to be received from Eurofins 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.
- Installation of the recirculation system on the Town GAC system will be completed and start-up/testing operation will be conducted with the Town;
- The following actions, plans, and data related to the remedial investigation are planned for May 2018:

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- The location and marking of underground utilities will be completed;
- Surveying of base map features and sample locations will be conducted;
- Samples of surface soil, surface water, and sediment will be collected for laboratory analysis;
- Additional samples of the sludge in the Building 6 tank will be collected for laboratory analysis in coordination with the cleaning of the tank;
- Samples of the wastewater and sludge in the Building 5 tank will be collected for laboratory analysis;
- The white PVC pipe outlet adjacent to Building 6 will be inspected for wastewater and sampled;
- Direct sensing, subsurface soil sampling and discrete interval groundwater sampling will be conducted using direct-push technologies;
- Laboratory data for the wastewater and sludge samples from the Building 6 tank will be received and transmitted to the NYSDEC; and
- Laboratory data for surface soil, surface water, and sediment samples will be received and transmitted to the NYSDEC.

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

- None planned.

Delays Encountered or Anticipated and Mitigation Measures:

- None.

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

- Based on field requests by the NYSDEC, Taconic collected 2 additional surface soil samples along the roof-drip edges of Buildings 2 and 4.

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

By the end of April 2018, the approximate percentage of completion for current work activities is presented in the following table.

**Percentage of Completion Relating to the Progress of Work
for the Remedial Investigation**

Phase 1a RI Items	Percent Complete
Miscellaneous Sampling (USTs, Bldg 6 pipe)	30%
Underground Utility Location	50%
Surface Soil Sampling	90%
Surface Water Sampling-Initial	0%
Surface Water Sampling-Periodic (3 events)	0%
Sediment Sampling	0%
Direct Sensing-DPT	0%
Subsurface Soil Sampling-DPT	0%
Borehole Geophysical Investigations	0%
Discrete Interval Groundwater Sampling	0%
Shallow Bedrock Borehole Installation	0%

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POET System Monthly Report

Raw-Only Sampling of Locations with No POET System	
Total Raw-Only Locations	143
Total Raw-Only Sampled	2Q18 = 2 Completed; 30 Scheduled <ul style="list-style-type: none"> • Apr = 0 Completed; 9 Scheduled. • May = 2 Completed; 1 Scheduled. • June = 20 Scheduled.
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.)
New POET System Installed as a result of Raw-Only Sampling	3 (0 pending)
New POET System Cleared for Use	3 (0 pending)
POET Systems	
<u>Updated Exhibit C POET System Installation List:</u>	
Total POET System Locations	95
Total POET Systems Installed	89 (0 pending)
POET Systems Clear for Use	89 (0 pending)
POET Systems on Hold	6 (Contacted homeowners.)
POET Installations - Exhibit C of the Settlement Agreement	94% (Plan to complete as soon as homeowners return back multiple messages.)
<u>POET System O&M:</u>	
Total POET System Samples collected this Quarter	2Q18 = 13 Completed; 52 Scheduled <ul style="list-style-type: none"> • Apr = 7 Completed; 14 Scheduled. • May = 6 Completed; 28 Scheduled • June = 10 Scheduled.
GAC Tank Exchanges	1 (0 pending)
2 nd Quarter Maintenance Monitoring of the POET Systems	20% (Waiting on homeowners to return back multiple messages.)