

VIA ELECTRONIC MAIL

June 14, 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

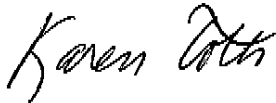
Caryn Bower, Esq.
Office of General Counsel
NYSDEC
625 Broadway
Albany, New York 12233
caryn.bower@dec.ny.gov

**RE: Monthly Progress Report – May 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
Ian Beilby, 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
MAY 2018**

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

- 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 was 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. The Town of Petersburg received draft SPDES limits on June 11, 2018. The Town of Petersburg is coordinating with Taconic and NYSDEC regarding the draft 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. Start-up and testing of the system has been completed. On May 15, 2018, the Town submitted the Engineer's Certification of Public Water Improvement Project Completion.
- 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. The Town of Petersburg received draft SPDES limits on June 11, 2018. The Town of Petersburg is coordinating with Taconic and NYSDEC regarding the draft 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. The Town of Petersburg received draft SPDES limits on June 11, 2018. The Town of Petersburg is coordinating with Taconic and NYSDEC regarding the draft SPDES limits for this treatment system.

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

- The status of the point-of-entry treatment (POET) system and non-POET location monitoring is provided in the attached tables.
- During May 2018, Taconic undertook the following actions as described in the RI/FS Work Plan:
 - On May 1 and 2, 2018, Taconic collected samples of surface soils for laboratory analysis.
 - On May 2, 3, and 7, 2018 Taconic collected samples of surface water and sediment for laboratory analysis.
 - On May 17, 2018, Taconic collected samples of wastewater in the Building 5 UST. An attempt was made to sample the capped plastic pipe protruding from the slope to the north of Building 6. However, no liquid was present when the pipe was opened.
 - On May 17 and 18, 2018, Taconic collected samples of sludge from the Building 6 UST for laboratory analysis.
 - On May 17 and 18, 2018, Taconic completed the surveying for base mapping and performed an initial survey of sample locations.

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

- 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. A paper copy of the approved POET O&M Plan was hand-delivered to the Petersburg Town Clerk for the local repository on May 21, 2018.

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

- Analytical results received from Eurofins Lancaster Labs Environmental (ELLE) during the month for per- and polyfluoroalkyl substances (PFAS) for the POET systems and annual raw only properties were submitted to NYSDEC under separate cover on May 2, 21 and 25, 2018.
- For the RI, partial analytical data packages were received during May for surface soils, surface water, and sediment. As requested by the NYSDEC, these results will be submitted once validated by the third-party data validator.

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

- None.

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

- Taconic has changed analytical laboratory services to Eurofins, effective May 2, 2018. Analytical results are scheduled to be received from Eurofins for PFAS 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.
- The following actions, plans, and data related to the remedial investigation are planned for June 2018:
 - Borehole geophysical testing and discrete interval groundwater sampling of existing water supply wells are planned for the week of June 18th.
 - Pending further discussions with the NYSDEC, sampling of the Building 5 UST wastewater and sludge will be completed.

<p align="center">MONTHLY PROGRESS REPORT TACONIC FACILITY (NYSDEC SITE NO. 442047) PETERSBURGH, NEW YORK MAY 2018</p>

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

- None planned.

Delays Encountered or Anticipated and Mitigation Measures:

- By email dated May 24, 2018, the NYSDEC requested subsurface soil sampling be postponed until Taconic and the NYSDEC resolve issues related to field observations of the NYSDEC oversight staff. On May 30, 2018, Taconic met with the NYSDEC and discussed the field observations. Taconic was sent the meeting summary prepared by the NYSDEC. After review of the NYSDEC meeting summary, Taconic will submit proposed mitigation measures as necessary to address NYSDEC concerns.
- On May 18, 2018, NYSDEC directed Taconic not to perform the planned sampling of the Building 5 UST sludge unless Taconic agreed to an expanded list of required analyses. As requested, Taconic postponed the sampling of the Building 5 UST until the required list of analyses and any other issues raised by the NYSDEC were resolved.

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

- NYSDEC has requested TCL PCBs/Pesticides be added to the analytical suite for the Building 6 and Building 5 USTs. Taconic is awaiting further clarifications from the NYSDEC on the analyses required for the wastewater and sludge in these tanks.

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

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

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)	75%
Underground Utility Location	100%
Surface Soil Sampling	100%
Surface Water Sampling-Initial	100%
Surface Water Sampling-Periodic (3 events)	0%
Sediment Sampling	100%
Direct Sensing-DPT	0%
Subsurface Soil Sampling-DPT	0%
Borehole Geophysical Investigations	0%
Discrete Interval Groundwater Sampling	0%
Shallow Bedrock Borehole Installation	0%
Data Validation	0%

<p align="center">MONTHLY PROGRESS REPORT TACONIC FACILITY (NYSDEC SITE NO. 442047) PETERSBURGH, NEW YORK MAY 2018</p>

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 = 24 Completed; 53 Scheduled <ul style="list-style-type: none"> • Apr = 7 Completed; 14 Scheduled. • May = 12 Completed; 28 Scheduled • June = 5 Completed; 11 Scheduled.
GAC Tank Exchanges	1 (0 pending)
2 nd Quarter Maintenance Monitoring of the POET Systems	45% (Waiting on homeowners to return back multiple messages.)