

VIA ELECTRONIC MAIL

October 12, 2018

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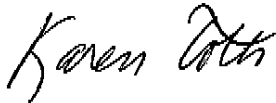
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**RE: Monthly Progress Report – September 2018
Taconic Site (Site No. 442047)
Petersburgh, New York**

Dear 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
SEPTEMBER 2018**

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

- On September 7, 2018, Taconic collected additional surface soil samples, in accordance with the NYSDEC-approved Surface Soil Sampling Review, and also additional samples of the wastewater and sludge in the Building 5 UST.
- On September 19 through October 5, 2018, Taconic performed the direct push investigations consisting of direct sensing Waterloo hydraulic profiling, subsurface soil sampling, and discrete interval groundwater profiling.
- On September 25 through October 5, 2018 Taconic installed two exploratory boreholes and completed the boreholes as shallow bedrock monitoring wells.
- 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 (September):

- None.

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

- Analytical results were received in September for the additional surface soil samples and the Building 5 UST wastewater and sludge samples. As requested by NYSDEC, these results will be submitted after validation by the third-party data validator.
- Partial analytical results were received in September for the subsurface soil and discrete-interval groundwater samples collected by direct push technology. As requested by NYSDEC, these results will be submitted after validation by the third-party data validator.
- 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 September 6, 14, 18 and 27, 2018.

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

- None.

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

- 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 held a teleconference with Taconic, NYSDEC and NYSDOH on August 7 and 28, and September 13 and 28, 2018 regarding the draft SPDES limits for this treatment system.

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TACONIC FACILITY (NYSDEC SITE NO. 442047)
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- 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 address the artesian flows from Town Wells #5 and #6.
- 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 held a teleconference with Taconic, NYSDEC and NYSDOH on August 7 and 28, and September 13 and 28, 2018 regarding the draft SPDES limits for this treatment system.
- The final data package for the Waterloo hydraulic profiling for the direct sensing portion of the direct-push investigation was received on October 3, 2018.
- Analytical results are scheduled to be received from Eurofins for the subsurface soil and discrete interval groundwater samples that were collected in September and October 2018.
- The borehole geophysical and hydraulic conductivity profiling work is anticipated to be completed in October.
- Depending on hydrologic conditions, a round of periodic surface water sampling may be conducted in October.
- 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.

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

- None.

Delays Encountered or Anticipated and Mitigation Measures:

- None.

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

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

- During the installation of the direct push borings in the alleyway between Building 2 and 5, subsurface electrical utilities, large cobbles, and shallow groundwater were encountered preventing the safe installation of direct push borings in this area. With NYSDEC concurrence, the shallow surface soils were sampled. However, the deeper subsurface soil and groundwater samples were abandoned.
- As requested by the NYSDEC, an additional direct-push boring location with subsurface soil and discrete-interval groundwater sampling was completed near the location of the waste sludge roll-off pad located at the rear of Building 2.
- With NYSDEC concurrence, the discrete-interval groundwater sampling at the campground sonic boring location was collected using direct-push technology rather than sonic-push-ahead techniques. Discrete-interval groundwater sampling near PW-1 was not conducted as no productive water-bearing zones were observed in the overburden during the sonic drilling of the exploratory borehole in this area.

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

RI Phase 1a Tasks	Percent Complete
Miscellaneous Sampling (USTs, Bldg 6 pipe)	100%
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	100%
Subsurface Soil Sampling-DPT	100%
Discrete Interval Groundwater Sampling-DPT	100%
Borehole Geophysical Investigations	67%
Discrete Interval Groundwater Sampling-Geophysical	67%
Shallow Bedrock Borehole Installation	100%
Discrete Interval Groundwater Sampling-Boreholes	100%
Data Validation	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	3Q18 = 30 Completed; 48 Scheduled <ul style="list-style-type: none"> • July = 6 Completed; 29 Scheduled. • Aug = 13 Completed; 7 Scheduled. • Sept = 10 Completed; 12 Scheduled.
Locations On Hold	11 (6 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 (1 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	90 (1 pending)
POET Systems Clear for Use	89 (1 pending)
POET Systems on Hold	5 (Contacted homeowners.)
POET Installations - Exhibit C of the Settlement Agreement	95% (Plan to complete as soon as homeowners return back multiple messages.)
<u>POET System O&M:</u>	
Total POET System Samples collected this Quarter	3Q18 = 43 Completed; 36 Scheduled <ul style="list-style-type: none"> • July = 13 Completed; 13 Scheduled. • Aug = 11 Completed; 12 Scheduled. • Sept = 19 Completed; 11 Scheduled.
GAC Tank Exchanges	2 (0 pending)
3 rd Quarter Maintenance Monitoring of the POET Systems	120% (Waiting on homeowners to return back multiple messages.)