

VIA ELECTRONIC MAIL

April 10, 2019

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

Christine Vooris
NYSDOH
Bureau of Environmental Exposure Investigation
Empire State Plaza
Corning Tower Room 1787
Albany, NY 12237
christine.vooris@health.ny.gov

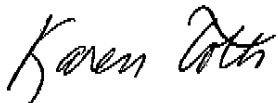
Caryn Bower, Esq.
Office of General Counsel
NYSDEC
625 Broadway
Albany, New York 12233
caryn.bower@dec.ny.gov

**RE: Monthly Progress Report – March 2019
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
Paul Hare, OBG

**MONTHLY PROGRESS REPORT
TACONIC FACILITY (NYSDEC SITE NO. 442047)
PETERSBURGH, NEW YORK
MARCH 2019**

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

- A round of periodic surface water sampling was conducted on March 1, 2019.
- On March 29, 2019, Taconic conducted a site walkthrough to familiarize NYSDEC personnel with site operations and to review locations for the planned Phase 1b overburden 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 (March):

- On March 1, 2019, under the provisions of Section 2.4.7 of the RIFS Work Plan, Taconic submitted a proposed scope for the installation of the Phase 1b overburden monitoring wells. Included with the proposed scope for Phase 1b, Taconic submitted preliminary summary tables and figures of the analytical data for the Phase 1a investigations.
- On March 25, 2019 Taconic submitted Change In Use Notifications for paving repairs, installation of a water supply well, closure of the Building 6 Underground Storage Tank, and the closure of the sump related to the Building 5 former underground storage tank.

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

- Analytical results were received in March for the periodic surface water sampling conducted on March 1, 2019. 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 March 29 and April 2, 2019. POET analytical results EDDs were submitted to NYSDEC on March 29 and April 2, 2019, and successfully uploaded.

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):

- 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. On October 16, 2018, Taconic received a letter from the Town of Petersburg addressing various issues related to the management of maintenance water and artesian well flows. Taconic responded to the Town by letter dated October 31, 2018. On December 31, 2018, the NYSDEC requested the Town schedule a meeting to discuss the letters.

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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. On October 16, 2018, Taconic received a letter from the Town of Petersburg addressing various issues related to the management of maintenance water and artesian well flows. Taconic responded to the Town by letter dated October 31, 2018. On December 31, 2018, the NYSDEC requested the Town schedule a meeting to discuss the letters.
- 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. On October 16, 2018, Taconic received a letter from the Town of Petersburg addressing various issues related to the management of maintenance water and artesian well flows. Taconic responded to the Town by letter dated October 31, 2018. On December 31, 2018, the NYSDEC requested the Town schedule a meeting to discuss the letters.
- In early April 2019, Taconic will submit the revised proposed scope for the Phase 1b overburden monitoring wells to incorporate NYSDEC comments discussed during the conference call of March 22, 2019 and the site visit conducted with the NYSDEC on March 29, 2019.
- In April 2019, Taconic will initiate the installation of the Phase 1b overburden monitoring wells and, depending on the drilling progress, may also conduct sampling and hydraulic conductivity testing of the wells.
- 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.
- Taconic has contracted with another sampling company for the Petersburg private homes and Town, effective March 1, 2019. The new sampling company is Alpha Analytical (www.alphalab.com). Alpha will continue sampling of the installed POET systems and raw water only locations with no POET systems.
- WEL-DUN will continue to provide installation and maintenance services of POET systems.
- POET termination letters approved by NYSDEC were mailed out to homeowners on December 26, 2018. No responses were received. Second notice POET termination letters were mailed out to homeowners on March 1, 2019. One owner elected to keep the POET system, that was transferred to NYSDEC effective March 13, 2019. The second owner elected to have the POET system removed, that was removed on April 2, 2019.
- 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.

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Delays Encountered or Anticipated and Mitigation Measures:

- Related to availability and coordination of the schedules for the drilling contractor and the oversight consultant, the field work related to Phase 1 of the RI may not be completed by April 2019 as estimated in Section 8 of the RI/FS Workplan. To mitigate overall schedule impacts, the installation of the Phase 1b monitoring wells will be conducted in April 2019 during extended work hours and weekend work. No impacts to the overall RI/FS project schedule are anticipated.
- Related to the availability of suitable bedrock wells, the borehole geophysical testing and depth discrete groundwater profiling program described in Section 2.4.2 of the RI/FS Work Plan will not be completed by April 2019 as estimated in Section 8 of the RI/FS Workplan. To mitigate overall schedule impacts, Taconic may perform the borehole geophysical testing in the third and final well using a new production well, scheduled to be installed around June-July 2019. No impacts to the overall RI/FS project schedule are anticipated.

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

- By email dated March 4, 2019, the NYSDEC confirmed MS/MSD and Duplicate samples are not required for the surface water sampling of March 1, 2019, since MS/MSD and Duplicate samples of surface water were collected during previous events at greater than the 1 per 20 requirements. During the remaining surface water sampling events, the NYSDEC may request additional MS/MSD and Duplicate samples at greater than the 1 per 20 requirements if different conditions are encountered.
- By email dated March 29, 2019, the NYSDEC approved Taconic's request to treat Investigation Derived Wastewater in the on-site wastewater treatment facility.

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)	33%
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	100%

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POET System Monthly Report

Raw-Only Sampling of Locations with No POET System	
Total Raw-Only Locations	144
Total Raw-Only Sampled	1Q19 = 3 Completed; 2 Scheduled <ul style="list-style-type: none"> • Jan = 1 Completed; 1 Scheduled. • Feb = 0 Completed; 1 Scheduled. • Mar = 2 Completed; 0 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	5 (0 pending)
New POET System Cleared for Use	4 (1 pending)
POET Systems	
<u>Updated Exhibit C POET System Installation List:</u>	
Total POET System Locations	97
Total POET Systems Installed	93 (0 pending)
POET Systems Clear for Use	92 (1 pending)
POET Systems on Hold	4 (Contacted homeowners.)
POET Installations - Exhibit C of the Settlement Agreement	96% (Plan to complete as soon as homeowners return multiple messages.)
<u>POET System O&M:</u>	
Total POET System Samples collected this Quarter	1Q19 = 46 Completed; 39 Scheduled <ul style="list-style-type: none"> • Jan = 12 Completed; 14 Scheduled. • Feb = 6 Completed; 11 Scheduled. • Mar = 28 Completed; 14 Scheduled.
GAC Tank Exchanges	4 (0 pending)
1 st Quarter Maintenance Monitoring of the POET Systems	118 % (Waiting on homeowners to return multiple messages.)