

**VIA ELECTRONIC MAIL**

July 13, 2019

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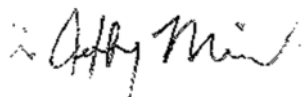
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**RE: Monthly Progress Report – July 2019  
Taconic Site (Site No. 442047)  
Petersburgh, New York**

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 x328 or at [jeffm@4taconic.com](mailto:jeffm@4taconic.com) if you have any questions.

Sincerely,



A. Jeffrey Mirarchi, P.E.  
Project Engineer

cc: Jason Johnson, NYSDEC  
Barbara Firebaugh, NYSDEC  
Ian Beilby, NYSDEC  
Justin Deming, NYSDOH  
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Lori Mason, Esq., Taconic  
Jeff Mirarchi, Taconic  
Paul Hare, OBG

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

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

- Preparation of the Interim Investigation Deliverable as described in Section 6.2 of the RI/FS Work Plan was initiated in July 2019 and is due to the NYSDEC within 60-days of receiving the final analytical data package from the Phase 1 work. This activity also involves identification of data gaps in the Phase 1 of the RI and evaluation of additional investigations in Phase 2 of the RI.
- 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 (July):**

None

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

- Analytical results were received in July 2019 for groundwater samples collected in July 2019. This data will be uploaded to the NYSDEC once validated 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 July 22, 2019. POET analytical results EDDs were submitted to NYSDEC on July 19 and 29, 2019, and successfully uploaded.

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

- None.

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

- 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.
- 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

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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.
- Installation of a new production well will likely be completed in August 2019. If completed, the borehole geophysical investigations described in Section 2.4.2 of the RI/FS Work Plan are anticipated to be performed in September 2019.
- An additional round of the periodic surface water sampling events as described in Section 2.2 of the RI/FS Work Plan is planned for late August 2019 with the final round tentatively scheduled for November 2019.
- 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.
- 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.
- Installation of POET system(s) not yet completed at locations included in Exhibit C of the Settlement Agreement will continue if accepted by the homeowners.

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

- None.

**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:**

<b>RI Phase 1a Tasks</b>	<b>Percent Complete</b>
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%

<b>RI Phase 1b Tasks</b>	<b>Percent Complete</b>
Phase 1b Overburden Well Installation	100%
Phase 1b Overburden Well Development	100%
Phase 1b Groundwater Sampling	100%
Phase 1b Hydraulic Conductivity Testing	100%
Data Validation	0%
Phase 1 Interim RI Deliverable	10%

<p align="center"><b>MONTHLY PROGRESS REPORT</b>  <b>TACONIC FACILITY (NYSDEC SITE NO. 442047)</b>  <b>PETERSBURGH, NEW YORK</b>  <b>July 2019</b></p>
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**POET System Monthly Report**

<b>Raw-Only Sampling of Locations with No POET System</b>	
Total Raw-Only Locations	144
Total Raw-Only Sampled	3Q19 =1 Completed; 3 Scheduled <ul style="list-style-type: none"> <li>• July =1 Completed; 1 Scheduled.</li> <li>• August = NA Completed; 0 Scheduled.</li> <li>• September = NA Completed; 2 Scheduled.</li> </ul>
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	5 (0 pending)
<b>POET Systems</b>	
<u>Updated Exhibit C POET System Installation List:</u>	
Total POET System Locations	97
Total POET Systems Installed	94 (0 pending)
POET Systems Clear for Use	94 (0 pending)
POET Systems on Hold	3 (Contacted homeowners.)
POET Installations - Exhibit C of the Settlement Agreement	96% (Will complete with homeowners acceptance)
<u>POET System O&amp;M:</u>	
Total POET System Properties Sampled this Quarter	3Q19 = 19 Completed; 59 Scheduled <ul style="list-style-type: none"> <li>• July = 19 Completed; 17 Scheduled.</li> <li>• August = NA Completed; 22 Scheduled.</li> <li>• September = NA Completed; 20 Scheduled.</li> </ul>
GAC Tank Exchanges	4 (0 pending)
3 <sup>rd</sup> Quarter Maintenance Monitoring of the POET Systems	112% through July 2019