

VIA ELECTRONIC MAIL

November 15, 2023

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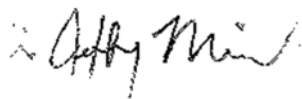
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**RE: Monthly Progress Report – October 2023
Taconic Site (Site No. 442047)
Petersburgh, New York**

Dear Mr. Harrington

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 Petersburg, New York, the Monthly Progress Report is attached. Please contact me at 518.658.3202 x328 or at jeffm@4taconic.com if you have any questions.

Sincerely,



A. Jeffrey Mirarchi, P.E.
Manager, Environmental Stewardship

cc: Barbara Firebaugh, NYSDEC
Ian Beilby, NYSDEC
Justin Deming, NYSDOH
Angela Martin, NYSDOH
Lori Mason, Esq., Taconic

**MONTHLY PROGRESS REPORT
TACONIC FACILITY (NYSDEC SITE NO. 442047)
PETERSBURGH, NEW YORK
October 2023**

Actions Taken to Comply with the Settlement Agreement During Current Month (October):

- Taconic received NYSDEC's approval of the Phase 2c RI Work Plan on September 12, 2023. Groundwater, surface soil, surface water and sediment samples collected October 24-November 2, 2023. Installation of monitoring wells planned for 4th quarter 2023-1st quarter 2024.
- To support the evaluation of Agricultural Products analytical results (Phase 2b Work Plan), surface soil and surface water samples were collected during October 24-November 2, 2023.
- To facilitate discussions with the NYSDEC and NYSDOH, work continued on the development of a scoping memorandum for the Part 2c Fish and Wildlife Impact Assessment (FWIA).
- On October 17, 2023, analytical data packages were submitted to the NYSDEC and NYSDOH for samples collected on September 29, 2023, at the Town after the GAC was exchanged in the lead tank. With concurrence of the regulatory agencies, the GAC system was returned to normal operations on October 20, 2023.

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

- To improve the understanding of the hydrogeology in the vicinity of the Site and support the evaluation of potential groundwater extractions part of a long-term remedy, a Work Plan for a Pumping Test of Taconic's production well PW-4 was submitted on October 26, 2023.
- A revised Operation, Maintenance and Sampling Manual for the Town GAC system was submitted on October 31, 2023. The manual has been revised to address revised analytical methods and actions levels consistent with NYSDOH drinking water standards and proposed regulations.

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

- Analytical results received during the month for the POET systems and annual raw only properties were submitted to NYSDEC/NYSDOH/RCDOH on November 1, 2023
- Analytical results received during the month for the Town of Petersburg treatment system were submitted to NYSDEC/NYSDOH/RCDOH on October 17, November 1, 2023.

Activities Undertaken in Support of the Citizen Participation Plan (CPP) During Current Month (October):

- None.

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

- On November 3, 2023, Taconic submitted a scoping memo for Part 2c of the FWIA-Toxic Effects Analysis. Taconic will work with NYSDEC to schedule a meeting to discuss this scope.

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- In November, Taconic will attempt to collect additional samples of eggs as Part Phase 2b Agricultural Products Sampling Work Plan.
- In November, in response to requests from local residents, Taconic plans to submit a brief amendment to the Phase 2b Agricultural Products Sampling Work Plan to include samples of venison harvested in the vicinity of the Site.
- Analytical results are scheduled to be received for the installed POET systems and raw water only locations with no POET systems.
- Sampling of the installed POET systems and raw water only locations with no POET systems will continue.
- Installation and maintenance services of POET systems will continue.
- 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.
- Operation and maintenance support services for the Town of Petersburg Treatment System will continue.

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

- Approved plans will be transmitted to the document repository as required.

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:

RI Phase 2b Tasks	Percent Complete
Sample surface soils	95%
Sample surface water and sediment (initial)	100%
Sample groundwater (existing wells)	100%
Install Wells	0%
Periodic surface water and sediment samples	0%
Periodic groundwater samples	0%
Data Validation	0%
Interim Deliverable Data Report	0%

RI Phase 2b (Ag Samling) Tasks	Percent Complete
Sample beef, eggs, milk and syrup as available	99%
Sample fruits and vegetables as available	100%
Sampling garden soils	100%
Data Validation	33%
Update QHHEA Report	0%

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POET System Monthly Report

Total Raw-Only Locations	128
Total Raw-Only Sampled	4Q23 = 0 Completed 6 Scheduled <ul style="list-style-type: none"> • October= 0 Completed; 5 Scheduled. • November=NA Completed; 1 Scheduled. • December = NA Completed; 0 Scheduled.
Locations On Hold	29 (16 vacant locations and 13 owners that requested no additional samples be collected and to be removed from the list.)
Taconic POET System Installed as a result of Raw-Only Sampling	21
Taconic POET System Cleared for Use	17
NYSDEC POET Systems installed at Owner's Request (Within AOC. Estimated)	21
POET Systems (does not include POETS operated by DEC)	
<u>Updated Exhibit C POET System Installation List:</u>	
Total POET System Locations	150 (97 Exhibit C, 11 added because of Raw data, and 32 added with new MCL)
Total POET Systems Installed	112
POET Systems Clear for Use	109
POET Systems on Hold	24 (Contacted homeowners.)
POET Installations - Exhibit C of the Settlement Agreement	82% (Will complete with homeowners' acceptance)
<u>POET System O&M:</u>	
Total POET System Properties Sampled this Quarter	4Q2023 = 14 Completed; 39 Scheduled <ul style="list-style-type: none"> • October = 14 Completed; 14 Scheduled. • November = NA Completed; 15 Scheduled. • December = NA Completed; 10 Scheduled.
GAC Tank Exchanges	47
4th Quarter Maintenance Monitoring of the POET Systems through October.	34% through October 2023