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Bureau of Environmental Exposure Investigation

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VIA ELECTRONIC MAIL

June 15, 2017

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RE: Monthly Progress Report - May 2017

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.

Krista Anders

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NYSDOH

Sincerely,

Karen Toth

Environmental Manager

cc: Jason Johnson, NYSDEC James Moras, NYSDEC Justin Deming, NYSDOH Dawn Hettrick, NYSDOH Lori Mason, Esq., Taconic Paul Hare, OBG

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

- Repairs to the Town of Petersburgh (Town) Well #1 were completed on April 26, 2017. Water purged from the well during repairs that was pumped into the frac tank was unloaded and treated by Taconic by starting on May 1, 2017.
- Taconic had the Town distribution system flushed on March 28, 2017. Sample results were received and sent to New York State Department of Health (NYSDOH) on April 17, 2017. NYSDOH and NYSDEC cleared the Town of Petersburgh GAC system on May 3, 2017.
- Submission of NYSDEC formatted EQuISTM electronic data deliverable (EDD) on April 17, 2017 for the accelerated RI analytical results associated with the groundwater and surface water samples collected from the Taconic site on September 1 and December 9, 2016, respectively were successfully uploaded in the NYSDEC Taconic database on May 30, 2017.
- 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 (May):

- Taconic received comments from NYSDEC on February 27, 2017 and additional comments on March 22, 2017 on the RI/FS Work Plan submitted on December 20, 2016. Taconic obtained a second extension to address extensive comments by May 12, 2017. Taconic submitted a revised RI/FS Work Plan to include comments from NYSDEC on May 12, 2017.
- Taconic received comments from NYSDEC on February 27, 2017 and additional comments on March 22, 2017 on the POET O&M Plan that was included as Exhibit D of the Order CO 4-20160519-01. Taconic obtained a second extension to address extensive comments by May 12, 2017. Taconic submitted a revised POET O&M Plan to include comments from NYSDEC on May 12, 2017.
- Taconic received comments from NYSDEC, NYSDOH, and RCHD on May 16, 2017 on the updated Town GAC System O&M Plan submitted on March 29, 2017. Taconic submitted a revised Town GAC System O&M Plan to include comments from NYSDEC, NYSDOH, and RCHD on May 19, 2017.

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 TestAmerica (TA) during the month for perfluorinated compounds (PFCs) for the POET systems and annual raw only properties were submitted to NYSDEC under separate cover on May 8, 12, 22, and 24, 2017.

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

None in May 2017.

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

• Analytical results are scheduled to be received from TA for PFCs for the POET systems and annual raw water only locations with no POET systems collected in May 2017.

- Analytical results are scheduled to be received from TA for POET system(s) installed in May 2017 and cleared by the Rensselaer County Health Department (RCHD).
- WEL-DUN will continue quarterly maintenance monitoring of the POET systems in June 2017.
- WEL-DUN will continue annual sampling of the raw water only locations with no POET systems in June 2017.
- Installation of POET system(s) not yet completed at locations included in Exhibit C of the Settlement Agreement will continue in June 2017.

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

None in April 2017.

Delays Encountered or Anticipated and Mitigation Measures:

None in April 2017.

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

None in April 2017.

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

By the end of May 2017, the approximate percentage of completion for current work activities is presented in the following table.

Percentage of Completion Relating to the Progress of Work

| Item | Percent Complete |
|--|---|
| Sample the Taconic production wells for analysis of PFCs and TCL/TAL constituents (accelerated RI field task approved by NYSDEC) | 100% (Completed on 9/1/2016) |
| Sample surface water at/near the Taconic facility for analysis of PFCs and TCL/TAL constituents (accelerated RI field task approved by NYSDEC) | 100% (Completed on 12/9/2016) |
| Prepare/submit CPP | 100% (Original plan submitted on 12/9/2016) |
| Prepare/submit revised CPP | 100% (Submitted on 1/13/2017. Submitted DEC requested info on 2/3/2017 and 3/1/2017) |
| Prepare/submit RI/FS Work Plan and associated FSAP, QAPP and HASP | 100% (Original plan submitted on 12/20/2016) |
| Prepare/submit revised RI/FS Work Plan and associated FSAP, QAPP | 100% (Submitted on 5/12/2017) |
| Prepare/submit O&M Manual for the Town Public Water GAC System | 100% (Original plan submitted on 12/20/2016) |
| Prepare/submit revised O&M Manual for the Town Public Water GAC System | 100% (Submitted on 3/29/2017 and 5/19/2017) |
| Town Public Water GAC System Installation | 100% (Electrical and piping installation completed on 12/21/2016) |
| Town Public Water GAC System Start-up | 100% (Completed on 12/30/2016) |
| Town Public Water System Flushing Plan | 100% (Submitted on 1/6/2017. Completed 3/28/2017) |
| 2nd Quarter Maintenance Monitoring of the POET Systems | 60% (Waiting on homeowners to return back multiple messages.) |
| POET Installations - Exhibit C of the Settlement Agreement | 90% (Plan to complete as soon as homeowners return back multiple messages.) |

POET System Monthly Report

| Annual Raw-Only Sampling of Locations with No POET System | | |
|---|--|---|
| 1) | Total Annual Raw Locations | 141 |
| 2) | Total Annual Raw Sampled | 2Q17 = 39 (Apr = 30, May = 7, June = 2) |
| 3) | Locations On Hold | 11 (7 vacant locations and 4 current owners that requested no additional samples be collected and to be removed from the list.) |
| 4) | New POET System Installed as a result of Annual Raw Sampling | 3 installed to date in 2017. |
| 5) | New POET System Cleared for Use | 1 (2 pending) |
| POET Systems | | |
| Updated Exhibit C POET System Installation List: | | |
| 1) | Total POET System Locations | 95 |
| 2) | Total POET Systems Installed | 86 |
| 3) | POET Systems Clear for Use | 83 (3 pending) |
| 4) | POET Systems on Hold | 9 |
| POET System Quarterly O&M: | | |
| 1) | Total POET System Samples collected this Quarter | 2Q17 = 50 (Apr = 18, May = 18, June = 14) |
| 2) | GAC Tank Exchanges | None required to date. |