

VIA ELECTRONIC MAIL

August 13, 2018

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

Krista Anders
NYSDOH
Bureau of Environmental Exposure Investigation
Empire State Plaza
Corning Tower Room 1787
Albany, NY 12237
krista.anders@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 – July 2018
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.

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
JULY 2018**

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

- On May 18, 2018, NYSDEC requested TCL Pesticides/PCBs also be analyzed for the Building 5 and Building 6 underground storage tanks. Taconic proposed a plan on June 14, 2018 to NYSDEC. NYSDEC approved the plan on July 9, 2018.
- On May 24, 2018, NYSDEC requested subsurface soil sampling be postponed until Taconic and NYSDEC resolve issues related to field observations of NYSDEC oversight staff. On May 30, 2018, Taconic met with NYSDEC and discussed the field observations. NYSDEC sent the meeting summary to Taconic on June 16, 2018. On June 27, 2018, Taconic submitted a draft Surface Soil Sampling Review to address NYSDEC concerns and propose corrective actions. On July 27, 2018, Taconic submitted the Surface Soil Sampling Review that was revised as discussed during the July 20, 2018 conference call with NYSDEC. NYSDEC approved the Surface Soil Sampling Review on August 2, 2018. NYSDEC requested Taconic to submit a revised FASP and QAPP.
- On June 19, 2018, NYSDEC requested Taconic prepare and submit to NYSDEC a revised field calibration log to be used during the Remedial Investigation moving forward. Taconic acknowledged this request on June 28, 2018.
- On June 21, 2018, NYSDEC directed Taconic to follow the field calibration protocols of Section 7.2 of the Field Sampling and Analysis Plan (Low Flow Groundwater Sampling) for all water samples. Taconic acknowledged this request on June 28, 2018.
- 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 for the Building 6 UST and the discrete-interval groundwater samples for PW-1 and 159 Coonbrook Road. As requested by NYSDEC, these results will be submitted after validation by the third-party data validator.
- Taconic's consultant inadvertently requested some surface soil, surface water, and sediment samples be analyzed for Gen-X (HFPO-DA), although not required to do so under the RI/FS Work Plan approved by DEC. Nevertheless, we have attached to this report the analytical results for samples of surface soil, surface water, and sediment that contain results for Gen-X. (HFPO-DA) Although Taconic is providing these results with the monthly report to apprise DEC of the findings, it does not plan to have these results validated since such validation is not required as it relates to the sampling for Gen-X.
- 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 9, 10, 13 and 27, 2018.

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

- None.

**MONTHLY PROGRESS REPORT
TACONIC FACILITY (NYSDEC SITE NO. 442047)
PETERSBURGH, NEW YORK
JULY 2018**

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, 2018 regarding the draft SPDES limits for this treatment system.
- 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, 2018 regarding the draft SPDES limits for this treatment system.
- Taconic is planning to conduct sampling of the Building 5 UST wastewater and sludge, and re-sampling of the surface soil. Depending on hydrologic conditions, a round of periodic surface water sampling may be conducted.
- Taconic is planning to submit a revised FASP and QAPP to include the approved Surface Soil Sampling Review.
- 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 (August):

- None.

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

Delays Encountered or Anticipated and Mitigation Measures:

- None.

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

- None.

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

RI Phase 1a Tasks	Percent Complete
Miscellaneous Sampling (USTs, Bldg 6 pipe)	75%
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	0%
Subsurface Soil Sampling-DPT	0%
Discrete Interval Groundwater Sampling-DPT	0%
Borehole Geophysical Investigations	67%
Discrete Interval Groundwater Sampling-Geophysical	67%
Shallow Bedrock Borehole Installation	0%
Data Validation	0%

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

POET System Monthly Report

Raw-Only Sampling of Locations with No POET System	
Total Raw-Only Locations	143
Total Raw-Only Sampled	3Q18 = 14 Completed; 36 Scheduled <ul style="list-style-type: none"> • July = 6 Completed; 29 Scheduled. • Aug = 8 Completed; 7 Scheduled.
Locations On Hold	12 (7 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 (0 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	89 (1 pending)
POET Systems Clear for Use	89 (0 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 = 17 Completed; 25 Scheduled <ul style="list-style-type: none"> • July = 13 Completed; 13 Scheduled. • Aug = 4 Completed; 12 Scheduled.
GAC Tank Exchanges	1 (0 pending)
3 rd Quarter Maintenance Monitoring of the POET Systems	68% (Waiting on homeowners to return back multiple messages.)