

**VIA ELECTRONIC MAIL**

December 13, 2022

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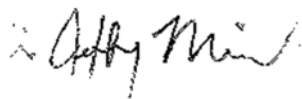
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**RE: Monthly Progress Report – November 2022  
Taconic Site (Site No. 442047)  
Petersburgh, New York**

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](mailto: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  
November 2022**

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

- Work on the Qualitative Human Health Exposure Assessment (QHHEA) continued in November 2022. On November 16, 2022, Taconic submitted a revised Phase 2b RI Work Plan to the NYSDEC for sampling agricultural products to address the NYSDEC's comments of November 10, 2022.
- On November 16, 2022, Taconic submitted a revised Field Sampling and Analysis Plan to the NYSDEC to include provisions for the sampling described in the Phase 2b Work Plan.
- On November 16, 2022, Taconic submitted a revised Citizen Participation Plan (CPP) to the NYSDEC to include updates to the Site contact lists. Taconic revised the CPP to address NYSDEC comments and submitted the revision to the NYSDEC on November 30, 2022.
- The Quality Assurance Project Plan is currently being revised to include the NYSDEC's new requirement for the use of EPA Method 1633 for PFAS analysis.
- Work on the Interim Remedial Measures Work Plan for the Building 1 Area continued during November 2022.
- The status of the point-of-entry treatment (POET) system and non-POET locations monitoring is provided in the attached tables.

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

- On November 16, 2022, Taconic submitted a revised Phase 2b RI Work Plan to the NYSDEC for sampling agricultural products to address the NYSDEC's comments of November 10, 2022.
- On November 16, 2022, Taconic submitted a revised Field Sampling and Analysis Plan to the NYSDEC to include provisions for the sampling described in the Phase 2b Work Plan.
- On November 16, 2022, Taconic submitted a revised Citizen Participation Plan (CPP) to the NYSDEC to include updates to the Site contact lists. Taconic revised the CPP to address NYSDEC comments and submitted the revision to the NYSDEC on November 30, 2022.

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

- Analytical results received during the month for the POET systems and annual raw only properties were submitted to NYSDEC/NYSDOH/RCDOH on November 2 & 30, 2022
- Analytical results received during the month for the Town of Petersburg treatment system were submitted to NYSDEC/NYSDOH/RCDOH on November 30, 2022

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

- On November 16, 2022, Taconic submitted a revised Citizen Participation Plan (CPP) to the NYSDEC to include updates to the Site contact lists. Taconic revised the CPP to address NYSDEC comments and submitted the revision to the

**MONTHLY PROGRESS REPORT  
TACONIC FACILITY (NYSDEC SITE NO. 442047)  
PETERSBURGH, NEW YORK  
November 2022**

NYSDEC on November 30, 2022. Once approved by the NYSDEC, the revised CPP will be transmitted to the Town Document Repository.

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

- Revised Quality Assurance Project Plan will be submitted to the NYSDEC to include the new analytical methods proposed for the Phase 2b RI sampling of agricultural products.
- Revised OM&M Plans for Town and Taconic plant POET systems will be submitted to update the plans for consistency with the MCLs for PFAS promulgated and proposed by the NYSDOH.
- 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 (December):**

- A copy of the revised CPP will be provided to the document repository once approved by the NYSDEC.

**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 2a Tasks</b>	<b>Percent Complete</b>
Surface Geophysics	100%
Surface Soil Sampling	100%
Surface Water Sampling (base flow)	100%
Surface Water Sampling (storm flow)	100%
Sediment Sampling	100%
Overburden Well Installation	100%
Bedrock Well Installation	100%
Borehole Geophysical Investigations	100%
Groundwater Sampling	100%
Data Validation	100%
Phase 2a Interim RI Deliverable	100%

<b>Building 1 Area Tasks</b>	<b>Percent Complete</b>
Stormwater Sampling	100%
DPT Soil Borings/Sampling	100%
Temporary Monitoring Wells Installation	100%
Groundwater Sampling	100%
Data Validation	100%
Building 1 Area Interim RI Deliverable	100%

<p align="center"><b>MONTHLY PROGRESS REPORT</b>  <b>TACONIC FACILITY (NYSDEC SITE NO. 442047)</b>  <b>PETERSBURGH, NEW YORK</b>  <b>November 2022</b></p>
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**POET System Monthly Report**

Total Raw-Only Locations	128
Total Raw-Only Sampled	4Q22 = 11 Completed; 21 Scheduled <ul style="list-style-type: none"> <li>• October = 7 Completed; 18 Scheduled.</li> <li>• November = 4 Completed; 3 Scheduled.</li> <li>• December = NA Completed; 0 Scheduled.</li> </ul>
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
<b>POET Systems (does not include POETS operated by DEC)</b>	
<u>Updated Exhibit C POET System Installation List:</u>	
Total POET System Locations	135 (97 Exhibit C, 11 added because of Raw data, and 27 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&amp;M:</u>	
Total POET System Properties Sampled this Quarter	4Q22 = 43 Completed; 41 Scheduled <ul style="list-style-type: none"> <li>• October = 24 Completed; 16 Scheduled.</li> <li>• November = 19 Completed; 14 Scheduled.</li> <li>• December = NA Completed; 12 Scheduled.</li> </ul>
GAC Tank Exchanges	30
4th Quarter Maintenance Monitoring of the POET Systems through November.	105% through November 2022