

136 Coonbrook Road • P.O. Box 69 Petersburgh, New York 12138 Telephone: 518.658.3202

Fax: 518.658.3204

VIA ELECTRONIC MAIL

April 14, 2023

Dave Harrington
NYSDEC
Division of Environmental Remediation
625 Broadway
Albany, NY 12233
david.harrington@dec.ny.gov

Mike Murphy, Esq.
Office of General Counsel
NYSDEC
625 Broadway
Albany, New York 12233
michael.murphy1@dec.ny.gov

Christine Vooris
NYSDOH
Bureau of Environmental Exposure Investigation
Empire State Plaza
Corning Tower Room 1787
Albany, NY 12237
christine.vooris@health.ny.gov

RE: Monthly Progress Report – March 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 Petersburgh, New York, the Monthly Progress Report is attached. Please contact me at 518.658.3202 x328 or at ieffm@4taconic.com if you have any questions.

Sincerely,

A. Jeffrey Mirarchi, P.E.

in Coffy Min

Manager, Environmental Stewardship

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

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

- As part of the Qualitative Human Health Exposure Assessment, the survey of agricultural products produced on local properties was concluded in March. A table and figure summarizing the results was submitted to the NYSDEC on March 3, 2023. Also submitted for NYSDEC review were the properties and agricultural products identified for sampling.
- On March 8, 2023, Taconic submitted the confidential SOPs from the Laboratory (Eurofins) for the revised analytical methods required for the RI.
- On March 20, 2023, Taconic submitted to the NYSDEC a revised Phase 2b Work Plan for the sampling of Agricultural Products. This Plan was revised to address the NYSDEC comments included with the conditional approval of the Work Plan received by Taconic on December 6, 2023.
- Work on the Interim Remedial Measures (IRM) Work Plan for the Building 1 Area continued during March 2023.
- Work on the Phase 2c Work Plan for supplemental RI activities continued during March 2023
- The status of the point-of-entry treatment (POET) system and non-POET locations monitoring is provided in the attached tables.

<u>Plans, Reports, and Other Deliverables Required by the Settlement Agreement Completed and Submitted in the Current Month (March):</u>

- A table and figure summarizing the results of the agricultural products survey was submitted to the NYSDEC on March 3, 2023. Also submitted for NYSDEC review were the properties and agricultural products identified for sampling.
- The confidential laboratory SOPs for the new requirements for the use of EPA Method 1633 for PFAS analysis and for FDA Methods for PFAS analysis were submitted to the NYSDEC on March 8, 2023.
- On March 20, 2023, Taconic submitted to the NYSDEC a revised Phase 2b Work Plan for the sampling of Agricultural Products. This Plan was revised to address the NYSDEC comments included with the conditional approval of the Work Plan received by Taconic on December 6, 2023

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

- Analytical results received during the month for the POET systems and annual raw only properties were submitted to NYSDEC/NYSDOH/RCDOH on March 17 and 22, 2023.
- Analytical results received during the month for the Town of Petersburgh treatment system were submitted to NYSDEC/NYSDOH/RCDOH on March 17, 2023.

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

• As requested by the Town of Petersburgh, on March 27, 2023, Taconic delivered a replacement copy of the original 2017 CPP to assist the Town respond to a FOIL request.

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

- The Work Plan for the Building 1 Interim Remedial Measures will be submitted if completed.
- Work on the Phase 2c RI Work Plan will continue.
- 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 Petersburgh Treatment System will continue.

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

None

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 2a Tasks	Percent Complete
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%

Building 1 Area Tasks	Percent Complete
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%

POET System Monthly Report

	100	
Total Raw-Only Locations	128	
Total Raw-Only Sampled	1Q23 = 16 Completed; 15 Scheduled	
	• January = 6 Completed; 6 Scheduled.	
	• February = 3 Completed; 0 Scheduled.	
	• March = 7 Completed; 9 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	21	
Raw-Only Sampling		
Taconic POET System Cleared for Use	17	
NYSDEC POET Systems installed at Owner's	21	
Request (Within AOC. Estimated)		
POET Systems (does not include POETS operated by DEC)		
Updated Exhibit C POET System Installation List:		
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	82% (Will complete with homeowners'	
Agreement	acceptance)	
POET System O&M:		
Total POET System Properties Sampled this	1Q2023 = 40 Completed; 43 Scheduled	
Quarter	• January = 9 Completed; 25 Scheduled.	
	• February = 16 Completed; 10 Scheduled.	
	March= 15 Completed; 8 Scheduled.	
GAC Tank Exchanges	35	
1st Quarter Maintenance Monitoring of the POET	93% through March 2023	
Systems through March.		