RESPONSE TO EPA REQUEST FOR INFORMATION

A Bates number is included on each page of this production as designated by "TAC EPA" in the lower right corner. The Company previously responded to a New York State Department of Environmental Conservation ("NYSDEC") information request on April 15, 2016. In an effort to ensure that all regulatory authorities possess the same information, the Company is providing EPA its entire April 15 response to NYSDEC. Original Bates numbers from the NYSDEC production are included below the "TAC EPA" numbers. Cross references to the NYSDEC Bates numbers are provided within the written responses below following the TAC EPA numbers. The Company's entire April 15, 2016 response to NYSDEC is produced to EPA as TAC EPA 00001-TAC EPA 04603; 000001 - 004598.

1.a. Tonoga, Inc. (the "Company") owns and operates its facility on Coonbrook Road in Petersburgh, NY. The site consists of 9 structures, 3 parking lots and a propane storage facility. The site is home to the Company's offices, warehouse and manufacturing operations.

123 Coonbrook Road consists of a propane storage facility; 125 Coonbrook Road (referred to as "Building 3") consists of a wood shop; 127 Coonbrook Road (referred to as "Building 1") consists of offices, manufacturing and warehousing. Property transfer dates related to these parcels are as follows:

- July 15, 1969 from Lester & Virginia Russell (Former officers of Taconic Properties, now deceased) to Taconic Properties;
- November 7, 1979 from Taconic Properties to Taconic Plastics, Inc.;
- June 30, 1981 from Taconic Plastics, Inc. to Taconic Plastics Limited.;
- March 19, 1991 from Taconic Plastics Limited. to Tonoga Limited;
- February 12, 2002 from Tonoga Limited to Tonoga, Inc. (current owner).

Each of the foregoing business entities are inactive predecessors of Tonoga, Inc.

136 Coonbrook Road (referred to as "Buildings 2, 4 & 5") consists of offices, manufacturing and warehousing; 98 Coonbrook Road (referred to as "Buildings 6, 9, 10 & 11") consists of offices, manufacturing and warehousing. Property transfer dates related to these parcels are as follows:

- November 7, 1979 from Henry & Hilda Allen (no relationship to the Company, now deceased) to Taconic Plastics, Inc.;
- June 30, 1981 from Taconic Plastics Inc. to Taconic Plastics Limited.;
- March 19, 1991 from Taconic Plastics Limited. to Tonoga Limited;
- February 12, 2002 from Tonoga Limited to Tonoga, Inc.

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Each of the foregoing business entities are inactive predecessors of Tonoga, Inc.

46 Coonbrook Road (referred to as "Barn & Maintenance Warehouse") consists of warehousing. Property transfer dates related to this parcel are as follows:

- November 8, 1993 from Thomas J and Patricia A Singleton to Tonoga Limited;
- February 12, 2002 from Tonoga Limited to Tonoga, Inc.

Tonoga Limited is an inactive predecessor of Tonoga, Inc.

Please see also the corresponding documents at TAC EPA 04580 - TAC EPA 04603; 004575 - 004598.

1.b. Please see the materials provided in response to Item 1.a. above. Note also that Tonoga, Inc. is a Delaware Corporation. It appears that "Tonoga of Delaware," referenced in the definition section of the request for information, is a fictitious name previously used to refer to the Company in New York. "Taconic International Ltd." is a wholly owned foreign subsidiary of Tonoga, Inc.

1.c. Please see the materials provided in response to Item 1.a. above.

1.d The Company, and its predecessors have manufactured PTFE coated fabrics since 1961. PTFE historically contained approximately 1% PFOA as a processing agent (since 2013 PTFE used by the Company no longer contained PFOA). At the facility, PTFE is mixed with water supplied by the plant wells, and additives, such as ammonia, formic acid, surfactants, and pigments. The PTFE mixture is then pumped into long shallow dip pans at the base of each surface coating oven. Raw fiberglass fabric is unrolled and pulled into the dip pan. As the PTFE mixture coats the fiberglass, the fiberglass is pulled vertically up through the surface coating oven, where it is dried, baked, and then sintered. The coated fiberglass is re-rolled back from the top of the oven and the process is repeated multiple times to place multiple coats of the PTFE mixture on the fiberglass.

PFOA was historically used by fluoropolymer manufacturers as a dispersion agent in the manufacture of fluoropolymers, such as PTFE. Since 2006, fluoropolymer manufacturers have participated in EPA's PFOA Stewardship Program, where manufacturers phased-out PFOA in PTFE, and eventually eliminated PFOA in PTFE in 2013. The Company has not used PTFE containing PFOA since 2013.

The Company is not and never has been a fluoropolymer manufacturer or a manufacturer of PFOA or PTFE. The Company purchases PTFE from fluoropolymer manufacturers and then uses PTFE as a raw material to produce articles at the Petersburgh facility. Based on the information provided by the manufacturer, the Company believes that PFOA is destroyed during the manufacturing process and is not present in the articles it produces.

It bears note that at all times during which PTFE containing PFOA was used at the facility or may have been present in discharges at the facility, PFOA and PTFE were not classified as hazardous substances or hazardous wastes under State or Federal Law. Neither PFOA nor PTFE are classified as hazardous substances or hazardous wastes under Federal Law today. In January 2016, approximately three years after the Company ceased using PTFE containing PFOA, New York State classified PFOA as a hazardous substance.

With respect to potential releases, from at least 1989 through 2003 the Company held a DEC issued SPDES Permit which authorized process wastewater discharges to Outfall 001, as described in and depicted on the maps contained in the SPDES Permit referenced below. By 1999, the Company ceased discharging process water. In 2001, the Company transitioned to General Permit coverage for its sanitary discharges. The process water came into contact with PTFE during the manufacturing process. The SPDES permit authorizing the discharge of process water is referenced below.

The SPDES Permit, as amended and extended is provided as TAC EPA 00107-TAC EPA 00140; 000098 – 000131, broken out as follows:

- NYSDEC SPDES Permit No. NY-0223107, valid May 15, 1989 through May 15, 1994. (TAC EPA 00131-TAC EPA 00140; 000122 - 000131);

- NYSDEC SPDES Permit No. NY-0223107, renewed for a term commencing May 15, 1994 and ending May 15, 1999 (TAC EPA 00126-TAC EPA 00130; 000117 - 000121) as modified on December 15, 1997 to include an additional sanitary wastewater outfall. (TAC EPA 00109-TAC EPA 00125; 000100 - 000116); and

- NYSDEC SPDES Permit No. NY-0223107, renewed for a term commencing November 1, 1998 and ending November 1, 2003. (TAC EPA 00107-TAC EPA 00108; 000098 - 000099).

Also note that Company and NYSDEC spill records evidence other releases which may have contained PFOA.

- NYSDEC Spills Report Database; 1989 to present. (TAC EPA 04562-TAC EPA 04579; 004557 - 004574);

- Taconic Spill reports and supporting documents 1996 to present (TAC EPA 03993-TAC EPA 04561; 003988 - 004556). The majority of the releases were not reportable because they were released indoors, were below the reportable quantity, or did not otherwise enter the environment.

1.e Please see the materials provided in response to Item 1.d. above.

1.f. Please see the following reports:

- January 2013 (TAC EPA 00141-TAC EPA 00308; 00132-000299);

- February 2006 (TAC EPA 00309-TAC EPA 00374; 00300-000365);
- January 2006 (TAC EPA 00375-TAC EPA 00429; 00366-000420);
- October 2005; (TAC EPA 00430-TAC EPA 00550; 00421-000541);
- January 2005 (TAC EPA 00551-TAC EPA 00651; 000542-000642); and
- December 2004 (TAC EPA 00652-TAC EPA 00768; 000643-000759).

Please see documents (TAC EPA 00024-TAC EPA 00026; 000015-000017) and (TAC EPA 00066; 000057) for site maps containing well location information.

Water Supply Wells

The Rensselaer County Department of Health ("RCDOH") began to conduct sampling of the private water supply wells on February 13, 2016. The first round of sampling included all private water supply wells within a 1/2 mile radius of the Taconic facility and the Town of Petersburgh's municipal water supply wells. Subsequent rounds now extend to a two mile radius from the facility. The RCDOH continues to conduct sampling of the private water supply wells. We would respectfully refer you to the RCDOH for the results of their sampling. NYSDOH conducted sampling of facility potable wells and company owned residential wells in February and March 2016. We would respectfully refer you to NYSDOH for the results of its sampling.

Industrial Hygiene Study

Adirondack Environmental Services performed personal and area exposure air monitoring of certain facility personnel in June 2003. Two bulk waste samples were also analyzed. The study concluded that PFOA was not present above detectable limits in the samples. Please see TAC EPA 04604-TAC EPA 04624.

Study for the Presence of Ammonium Perfluorooctanoate in Air

Barr Engineering Company performed a study in 2006 to determine the presence and concentration of ammonium perfluoroctanoate (APFO) in indoor air at the facility. Because there were no applicable OSHA exposure levels or NIOSH recommended exposure levels, the American Conference of Governmental Industrial Hygienists Threshold Limit Value guideline for APFO of .01 mg/m^3 was used. All samples were below this guideline. Please see *Results of a Confidential Study for the Presence of Ammonium Perfluorooctanoatein Air at a Manufacturing Facility*, April 2006 (TAC EPA 04625-TAC EPA 04729).

In 2016, following installation of carbon filters at Company owned residences and new carbon filters at facility potable wells, sampling was performed. Please see TestAmerica analytical reports dated April 12, 2016 and April 15, 2016 (TAC EPA 04730-TAC EPA 04751; TAC EPA 04752-TAC EPA 04773).

1.g. Following the Company's August 3, 2005 letters to NYSDEC, NYSDOH, and RCDOH and in the absence of a regulatory guidance following the Company's previous testing, the Company voluntarily made bottled water available to employees and Company owned homes adjacent to the facility and requested RCDOH's approval to install carbon filters on facility water supply wells. On September 30, 2005 the Company sent RCDOH an Application for Approval of Plans for Public Water Supply Improvement to address the presence of PFOA (TAC EPA 04776-TAC EPA 04791). On December 27, 2005, the Company sent follow up correspondence to RCDOH (EPA 04792-TAC EPA 04794). RCDOH provided its approval of the carbon filtration design and specifications on January 4, 2006 (TAC EPA 04795). On February 21, 2006, CHA provided RCDOH with a certification of completion of installation (TAC EPA 4796).

In response to recent testing conducted by NYSDOH, the Company is installing Granular Activated Carbon (GAC) filters in series for those private wells that tested at or above 70 ppt. The GAC systems are being installed pursuant to the standards contained in 10 NYCRR Part 75 Appendix B. Per NYSDOH request, Calgon Filtrasorb® carbon was utilized. The Company has also agreed to design and install a treatment system for the municipal water supply.

2.a. The Company provided sampling results to NYSDOH (with a copy to RCDOH) and to NYSDEC, along with a request for a meeting and for guidance from the agencies. We are providing the cover letters to the transmittals. (TAC EPA 04774 and TAC EPA 04775). We recently confirmed NYSDEC and NYSDOH possess in their files the sampling reports and data supplied to the Company in 2005 as well as the Company's request for guidance.

2.b. Please see the materials provided in response to Item 1.f. above.

2.c. When the Company discovered the existence of PFOA in the groundwater, the only governmental entity that appeared to regulate PFOA was the NYSDOH, which had established an MCL for unspecified organic contaminants. EPA had no regulatory limit. Accordingly, the Company notified NYSDOH, the regulatory agency with the only applicable limit. The Company also notified NYSDEC (which was delegated enforcement of the Clean Water Act and RCRA in 1984) and the RCDOH which was involved in local water quality. Therefore, the Company thought that NYSDOH and RCDOH, together with NYSDEC were the appropriate agencies to be alerted.

2.d. Please see the materials provided in response to Item 2.a. above. Although the letters requested the agencies to provide guidance, there is no record of a written or verbal response from any of the agencies.

2.e. Sampling results obtained from residential drinking water wells were markedly below NYSDOH's default limit for all unspecified organic contaminants of 50,000 ppt. Sampling results obtained from the facility's potable wells (which results were reported to NYSDEC, NYSDOH and RCDOH) were above the MCL (152,000 ppt at the Building #2 well also known as Well #1 and 117,000 ppt at the Building #4 dispersion well also known as Well #2). As noted above, in response to previous testing, the Company installed carbon filters at the facility and made bottled water available to employees and Company owned homes adjacent to the facility. Neither the provision of bottled water nor installation of filters was required by regulation. From

at least 1989 through 2003, the Company held a NYSDEC issued SPDES permit, which authorized the discharge of process wastewater. By 1999, the Company ceased discharging process water and transported process water off-site to a treatment facility.

2.f. Please see the materials provided in response to Items 2.a. and 2.c. above.

2.g. The sampling results were provided to the State and County agencies referenced in Item 2.a. and 2.c. above. The Company did not notify the National Response Center nor did it believe there was a requirement to do so. At all times during which PFOA containing materials were used at the facility, it was not classified as a hazardous substance or hazardous waste pursuant to State or Federal law. PFOA is not classified as a hazardous substance under Federal Law today. In January 2016, approximately three years after Taconic ceased using PTFE containing PFOA, New York State classified PFOA as a hazardous substance. Two days later, the Company again notified NYSDEC of the earlier sampling and suggested that the involved agencies meet at the facility.

2.h. In 2001, the Company learned there were discussions between industry associations and EPA concerning PFOA. At the time, the PTFE purchased by the Company contained approximately 1% PFOA[1]. Absent guidance from EPA, the Company decided in 2004 as a precaution to test groundwater for the presence of PFOA. The Company thought it best to send the analytical results to NYSDEC and the New York State Department of Health ("NYSDOH") (with a copy to the Rensselaer County Department of Health ("RCDOH") along with a request for a meeting and guidance).

2.i. At the time of the 2004 and 2005 sampling, the Company was aware of some media articles and regulatory discussions concerning PFOA.

2.j. Throughout the years, Company personnel have read media articles, trade articles, government press releases, and assorted documents concerning PFCs. This information was presumably available on the internet or otherwise available to the public. It is not believed that the Company conducted its own research on PFC, PFC-containing or PFC-producing materials

2.k. Please see the responses to 1.f., 1.g., 2.a., 2.c., 2.d., and 2.e. above. Also note that in response to sampling conducted in 2016 following NYSDEC's classification of PFOA as a hazardous substance, the Company, in close consultation with NYSDEC, NYSDOH and the RCDOH has installed carbon filtration systems on more than 40 drinking water wells (and continues to install additional systems as sampling progresses); provides bottled water to residents, and is working to further address water supply issues in the town, including agreeing to design and install a treatment system for the municipal water supply. Please see enclosed correspondence with NYSDOH and RCDOH in connection with the 2016 remedial actions (TAC EPA 04796-TAC EPA 04913).

2.l. The Company has never "manufactured, processed or distributed PFOA in commerce" within the meaning of TSCA. Accordingly, notification under Section 8(e) of TSCA was not

[1] Beginning in 2006, the Company began purchasing PTFE containing the lowest available concentration of PFOA. Since 2013, the Company no longer used PTFE containing PFOA.

required. When the Company discovered the existence of PFOA in the groundwater, the only governmental entity that appeared to regulate PFOA was the NYSDOH, which had established a standard for unspecified organic contaminants. EPA had no regulatory limit. Accordingly, the Company notified NYSDOH, the regulatory agency with the only applicable limit. The Company also notified NYSDEC (which was delegated enforcement of the Clean Water Act and RCRA in 1984) and the RCDOH which was involved in local water quality. This appeared to be the common sense and proper legal approach.

3.a. The facility was aware of media accounts of the provisional health advisory.

3.b. The Company did not re-notify NYSDEC, NYSDOH and RCDOH regarding the presence of PFOA in groundwater in 2009. It bears note that when these entities were first notified and their guidance sought in 2005, the agencies did not respond.

3.c. The Company did not notify the NRC nor did it believe was there an obligation to do so.

3.d. Please see the response to Item 1.g. above which discusses the installation of carbon filtration at the facility and provision of bottled water to virtually all of the residents of company owned properties in 2005. More recently, bottled water and filtration units have been provided to the public more broadly.

3.e. Please see response to Item 2.e. above.

3.f. Please see response to Item 2.l. above.

4. Please see the response to Item 2.a. above as well as documents TAC EPA 04796-TAC EPA 04913.

5. Please see the response to Item 2.a. above.

6. Throughout the years, Company personnel have read media articles, trade articles, government press releases, and assorted documents concerning PFCs. This information was presumably available on the internet or otherwise available to the public. This material is subject to further review.

7. Throughout the years, Company personnel have read media articles, trade articles, government press releases, and assorted documents concerning PFCs. This information was presumably available on the internet or otherwise available to the public. This material is subject to further review.

8. This material is subject to further review.

9. This material is subject to further review.

10. The Company has never "manufactured, processed or distributed PFOA in commerce" within the meaning of TSCA. Thus, the Company does not have a specific policy addressing 8.e. reporting requirements. The facility does have detailed policies on reporting spills and releases.

11. Responses to this information request and materials provided in the attached Information Request submitted to the NYSDEC on April 15, 2016 were compiled by outside legal counsel in reliance on Company records.

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