

# EXHIBIT 2

September 9, 2016

Via Hand Delivery

Senator Kemp Hannon  
Chair, Senate Health Committee  
NYS Capitol Room 420  
Albany, NY 12247

Senator Thomas O'Mara  
Chair, Senate Environmental Conservation Committee  
Legislative Office Building Room 307  
Albany, NY 12247

**RE: Tonoga, Inc. d/b/a Taconic ("Taconic") 136 Coonbrook Road, Petersburg, NY (the "Site").**

Dear Chairmen Hannon and O'Mara:

It is Taconic's desire to cooperate fully with Legislative and Executive Agency requests for information. In keeping with this position, please find enclosed Taconic's responses to your questions of September 6, 2016, received by Taconic on September 7 and supplemented by 3,996 pages of enclosures. You have asked that we respond within two days of receipt of your letter, and we have sought to do this. On September 8, a document subpoena was issued requesting by September 12th much of the same information requested in the September 6 transmittal.

Rather than wait until September 12<sup>th</sup>, we thought it best to provide as much information as possible today, given the legislative hearing on Monday. Should time be required to provide additional information, we will discuss with your Counsel a production schedule. The following information is provided on information and belief. The source of the information are the files and recollection of corporate personnel. The Company reserves the right to supplement or revise its responses.

Please be aware that we have previously provided available information to the New York State Department of Environmental Conservation ("NYSDEC"); New York State Department of Health ("NYSDOH") and Federal Environmental Protection Agency ("EPA").

A brief overview may prove helpful.

Taconic operates a facility in Petersburg, New York which currently employs 231 people (the "Facility"). Most of the Facility's employees reside in the Petersburg community. The Facility manufactures PTFE coated fabrics. Taconic never manufactured PTFE, but instead Taconic purchased PTFE from other manufacturers. Historically, the PTFE purchased by Taconic from manufacturers (such as E.I. du Pont de Nemours and Company) contained approximately 1%

perfluorooctanoic acid ("PFOA"). In 2006, Taconic began purchasing PTFE with the lowest available concentration of PFOA, and since 2013, Taconic ceased purchasing PTFE containing PFOA.

Because the Facility is located in a rural area not serviced by a public sewer system, Taconic was allowed by NYSDEC to discharge industrial waste water on the Site. (NYSDEC commonly issued such authorizations to manufacturing facilities operating in rural areas throughout New York State (the "State"). The NYSDEC authorization was embodied in a NYS Pollutant Discharge Elimination permit ("SPDES Permit") issued in 1989. NYSDEC continuously renewed Taconic's SPDES Permit through 2003. The process water which Taconic discharged pursuant to the SPDES Permit contained residual material which may have included PFOA. Even though Taconic had a valid SPDES Permit to do so, Taconic elected to stop discharging process water on the Site in 1999. The SPDES Permit and related renewals are enclosed as TAC-TAC-SEN 00001 to TAC-SEN 00034.

In 2001, Taconic learned that EPA was having discussions concerning PFOA with one of the PTFE manufacturers. Despite these discussions, EPA did not notify Taconic regarding either PTFE or PFOA. At that time, EPA took no steps to regulate PFOA, and NYSDEC only regulated PFOA as an unspecified organic contaminant.

In late 2004, in the absence of regulatory guidance, Taconic decided to voluntarily test the Site's groundwater for the presence of PFOA. This decision was based upon the fact that Taconic, with State approval, had discharged its waste water on the Site. A State qualified laboratory performed a series of tests for Taconic which revealed the presence of PFOA in the Site's groundwater. Taconic submitted these test results to NYSDEC and NYSDOH (the "State Agencies") during the Pataki Administration, and at the same time, requested guidance from the State Agencies. Neither of the State Agencies responded to Taconic's data submission or request for guidance. A copy of Taconic's submittals to the State Agencies is enclosed as TAC-SEN 00035 to TAC-SEN 00036.

In the absence of any guidance from the State Agencies, Taconic chose to take voluntary precautionary measures. On September 30, 2005, Taconic submitted a well modification application to the Rensselaer County Department of Health ("RCDOH") to allow Taconic to install a carbon filter treatment system on its Site wells for the purpose of removing PFOA. RCDOH approved Taconic's application on January 4, 2006. These materials are enclosed as TAC-SEN 00037 to TAC-SEN 00056. As a further precautionary measure, Taconic began voluntarily providing bottled water to its employees and residents living near the Site.

From 2005 to the present, NYSDEC conducted twelve detailed air inspections at the Site, and RCDOH conducted at least six water inspections at the Site. On December 1, 2005, EPA also conducted a multi-media inspection at the Site. During this time period, neither the EPA nor the State Agencies raised the issue of PFOA with Taconic despite the data supplied by Taconic, as well as the obvious presence of carbon filtration and bottled water at the Site.

On January 27, 2016, NYSDEC, by regulation, added PFOA to the 6 NYCRR 597.3 list of hazardous substances. This action for the first time characterized PFOA as a hazardous substance under state law. On January 28, 2016, EPA issued a recommended exposure guidance level for PFOA which was lower than 100 parts per trillion.

On January 29, 2016, the day after EPA issued its guidance level, Taconic requested a meeting with NYSDEC personnel to remind them of Taconic's data submittals made ten years earlier. During the meeting, NYSDEC officials indicated that they were not aware of Taconic's ten year old data submittals. Sometime thereafter, NYSDEC confirmed that Taconic's data submittals, with agency time stamps, were located in the agency's files. Since January 29, Taconic has been in constant contact with NYSDEC by answering questions, providing additional information and taking voluntary actions to support the community. Taconic has also attended two in person meetings with the NYSDEC Commissioner, on February 29, 2016 and again on July 15, 2016.

On February 10, 2016, ten days after Taconic convened a meeting to alert the NYSDEC to its submitted groundwater data, Taconic held another meeting at its Facility with NYSDEC, NYSDOH and RCDOH representatives. Taconic provided the attendees with binders containing copies of its sampling results. During the meeting, the attendees discussed the potential of using the Brownfield Cleanup Program ("BCP") at the Site. On February 13, 2016, NYSDEC and NYSDOH began sampling and testing groundwater for PFOA at Taconic's three plant supply wells and five rental properties near the Site, as well as the Town of Petersburg's municipal supply wells. These tests confirmed the presence of PFOA.

On February 19, 2016, Taconic filed a BCP Application with NYSDEC. In response to NYSDEC's multiple requests, Taconic supplemented its BCP application on March 4, 2016 and March 16, 2016. Taconic understood the application to have been deemed complete as of March 16, 2016, but Taconic received no response from NYSDEC until May 19, 2016, one day after EPA announced its new Lifetime Drinking Water Health Advisory level for PFOA of 70 parts per trillion ("ppt"). NYSDEC's response to Taconic was a denial of the BCP application.

On February 24, 2016, RCDOH, in consultation with NYSDOH and NYSDEC, began sampling private water wells in the vicinity of the Site (the "Initial Well Investigation Area") for both perfluorinated chemicals (including PFOA) and perfluorooctane sulfonic acid ("PFOS"). Taconic paid for all of this sampling. RCDOH prepared map of the Initial Well Investigation Area which is enclosed as TAC-SEN 00057. Based upon the results of the sampling, Taconic agreed to install a granular activated carbon point of entry treatment system in compliance with 10 NYCRR Part 75 Appendix B ("POET") on each private water well located within the Initial Well Investigation Area that tested at or above EPA's May 2016 Lifetime Drinking Water Health Advisory level for PFOA of 70 ppt. To date, Taconic has installed 55 POETS.

Taconic also engaged an engineering firm to design a granular activated carbon treatment system to remove PFOA from the Petersburg municipal water supply (the "Treatment System"). On June 17, 2016, Taconic submitted to NYSDOH its engineering design report for the Treatment System ("EDR"). NYSDOH provided Taconic with multiple sets of comments, and Taconic provided responses to those comments on August 12, 2016 and August 17, 2016. On August 17, 2016, NYSDOH granted Taconic authority to procure the Treatment System. Taconic purchased the Treatment System on August 30, 2016 and expects delivery to Petersburg by the end of November. Before Taconic begins construction of the Treatment System, Taconic must submit a final design package with detailed fabrication plans and specifications for NYSDOH approval.

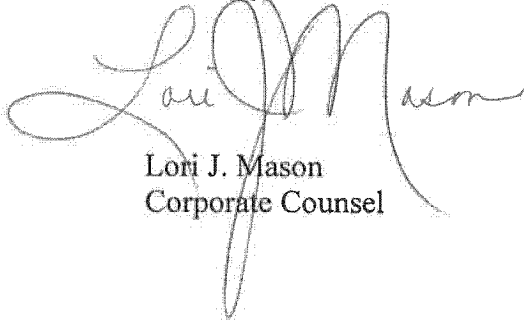
Taconic has voluntarily implemented a temporary bottled water distribution program for all Petersburg residents which includes making bottled water available at both a centralized distribution location and the Tops convenience store. The program also includes the delivery of bottled water to residents who are disabled or infirmed.

On July 9, 2016, with RCDOH written approval, Taconic installed additional granular activated carbon tanks on two supply wells on the Site. RCDOH and NYSDOH have not yet taken official clearance samples of these additional tanks. Taconic's engineering firm is currently preparing an installation design for an additional granular activated carbon tank on the Site's third well.

After notifying NYSDEC, Taconic voluntarily began early implementation of remedial investigation ("RI") at the Site. The RI began on September 1, 2016 and is being performed by Taconic's engineering firm.

Taconic welcomes your questions. Its specific responses are attached.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lori J. Mason". The signature is written in dark ink and is positioned above the printed name and title.

Lori J. Mason  
Corporate Counsel

Attachment

The following information is provided on information and belief. The source of the information are the files and recollection of corporate personnel. The Company reserves the right to supplement or revise its responses.

**Interrogatory No. 1:** Has Taconic Plastics or any subsidiary operated in New York State? State dates of operation and the addresses of any and all locations.

a. Where in Rensselaer County has Taconic Plastics or any subsidiary operated? State dates of operation and the addresses of any and all locations.

**Response:**

Tonoga, Inc. d/b/a Taconic, a Delaware corporation ("Taconic") and its predecessors have operated in Rensselaer County since approximately 1961. Taconic has not operated in other areas of New York State. A brief overview of Taconic's corporate history is set forth below:

Taconic is a successor in interest to Tonoga Limited, a Republic of Ireland corporation, which is a successor in interest to Taconic Plastics Limited, a United Kingdom corporation, which is a successor in interest to Taconic Plastics Inc., a New York corporation. Taconic's history is summarized as follows:

- 1969 - Taconic Plastics Inc. was founded (incorporated in New York)
- 1981 - Taconic Plastics Limited d/b/a Taconic Plastics was incorporated in United Kingdom ("Taconic UK"). Taconic UK purchased all of the assets and assumed all of the liabilities of Taconic Plastics Inc. Taconic Plastics Inc. was subsequently liquidated.
- 1991 - Tonoga Limited d/b/a Taconic Plastics was incorporated in the Republic of Ireland ("Taconic Ireland"). Taconic Ireland acquired all of the assets and assumed all of the liabilities of Taconic UK. Taconic UK was subsequently liquidated.
- 2002 - Tonoga, Inc. d/b/a Taconic was incorporated in Delaware. Taconic acquired all of the assets and assumed all of the liabilities of Taconic Ireland. Taconic Ireland was subsequently liquidated.

Taconic owns and operates its facilities on Coonbrook Road in Petersburg, NY. The site consists of 9 structures, 3 parking lots and a propane storage facility. The site is home to Taconic'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,

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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)

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 Taconic, 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.

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.

**Interrogatory 2:** Are, or has perfluorooctanoic acid (PFOA) or other perfluorinated compounds (PFCs) been produced at Taconic Plastics or any subsidiaries' location in New York?

- a. State dates of earliest production and latest production.

**Response:**

Taconic is not and never has been a fluoropolymer manufacturer or a manufacturer of PFOA or PTFE. Taconic purchases PTFE from fluoropolymer manufacturers and then uses PTFE as a raw material to produce articles at the Petersburg facility.

**Interrogatory 3:** Are, or have PFOA or other PFCs been used in manufacturing at Taconic Plastics or any subsidiaries' location in New York State? Describe its use.

- a. State dates of earliest use and latest use.
- b. Does Taconic Plastics or any subsidiary use any substances as an alternative to PFOA including but not limited to C6? If so, what substances and for what purpose?

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**Response:**

Taconic and its predecessors have manufactured PTFE coated fabrics since 1961. PTFE historically contained approximately 1% PFOA as a processing agent (since 2013 PTFE purchased by Taconic no longer contained PFOA). Taconic purchases PTFE manufactured with alternatives to PFOA, including, but not limited to,  $\text{CF}_3\text{CF}_2\text{CF}_2\text{OCF}(\text{CF}_3)\text{COOH.NH}_3$ . This alternative to PFOA is used by fluoropolymer manufacturers (Taconic's suppliers) to manufacture fluoropolymer resins, including PTFE (Taconic's raw materials) and is present in the raw material when Taconic receives it. Taconic does not purchase any PFOA alternatives for its own use, excepting the material arriving already incorporated in the raw material (fluoropolymer dispersions). Please see information supplied by DuPont, which among other things, indicates that  $\text{CF}_3\text{CF}_2\text{CF}_2\text{OCF}(\text{CF}_3)\text{COOH.NH}_3$  was reviewed by EPA through the Premanufacture Notification Process, enclosed as **TAC-SEN 03825 to TAC-SEN 03828**.

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. Taconic has not purchased PTFE containing PFOA since 2013.

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 Taconic ceased purchasing PTFE containing PFOA, New York State classified PFOA as a hazardous substance.

**Interrogatory 4:** If PFOA or other PFCs have been or are currently used in manufacturing at any Taconic Plastic or any subsidiaries location in New York, but are not produced at said location, how and from whom was the PFOA or other PFC obtained and shipped?

**Response:**

During the phase out of PFOA from 2006 to 2013, the following PTFE suppliers were utilized. The vast majority of product purchased during that timeframe was purchased from E.I. du Pont de Nemours & Co Inc. Taconic is reviewing its purchasing records to provide the identities of additional suppliers to confirm there were no suppliers not otherwise identified.

AGC Chemicals, Inc.  
Daikin America Inc.  
E.I. du Pont de Nemours & Co Inc.  
Solvay Solexis Inc.  
Hiking Intl  
Shamrock Technologies Inc  
Shanghai Hongshen Industry Co Ltd.



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C&F Group Limited  
Chenguang Research Institute

**Interrogatory 5:** Describe the nature of the operations at any and all Taconic Plastics or any subsidiaries' plant utilizing PFOA or PFCs in New York State.

**Response:**

Taconic produces PTFE coated fabrics. 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.

**Interrogatory 6:** Describe the past and present disposal process for PFOA or other PFCs utilized by Taconic Plastics or any subsidiary.

- a. Provide disposal locations and dates.

**Response:**

Since 2013, PTFE purchased by Taconic no longer contains PFOA. With respect to disposal records related to PTFE and other materials, we have located the following documents:

- Hazardous waste manifests, 1989 to present. (TACSEN 00058 to TAC-SEN 01533)
- Non-Hazardous waste manifests, 1996 to present. (TAC-SEN 01534 to TAC-SEN 03281)

Subsequent to discharging onsite pursuant to the NYSDEC issued SPDES Permit, Taconic implemented a wastewater recycling system.

Wastewater from the PTFE surface coating oven process is primarily generated by the rinsing of the dip pans with spray water hoses, supplied by the plant wells, after residual mixtures have been pumped into drums for offsite disposal. In addition, wastewater is generated from the rinsing of pails and pans with spray water hoses, supplied by the plant wells, done in industrial and laboratory sinks. Lastly, wastewater is also generated from the mopping of the production floors in the surface coating oven manufacturing areas.

Wastewater generated from Oven Rooms 4 and 5, and the laboratory sinks is pumped directly into the onsite Wastewater Treatment Plant (WWTP) storage tank located in Oven Room 4. Wastewater generated from Oven Room 6 is pumped into an underground storage tank inside the oven room. Wastewater generated from Oven Room 11 is pumped into an

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aboveground storage tank inside the oven room. Wastewater from Oven Rooms 6 and 11 is then pumped into a small tank truck and is transported to Building 4. Wastewater is unloaded outside of Building 4 and pumped into the WWTP storage tank located inside Oven Room 4.

Wastewater effluent from the onsite WWTP is pumped into a receiving tank located in Oven Room 4. From this tank, the wastewater is pumped directly to the air pollution control device for Oven Rooms 4 and 5, Fume Eliminator #5, where it is used as the water curtain inside the fume eliminator inlet chamber. The water is recycled inside the fume eliminator.

The fume eliminator is cleaned out on a regular basis. Liquid and solid wastes are pumped out of the fume eliminator sump by a 3<sup>rd</sup> party vacuum truck and disposed offsite as non-hazardous waste.

**Interrogatory 7:** Describe any and all methods Taconic Plastics or any subsidiary employed to minimize PFOA or other PFC contamination.

**Response:**

In 2001, Taconic learned that EPA was having discussions concerning PFOA with one of the PTFE manufacturers. Despite these discussions, EPA did not notify Taconic regarding either PTFE or PFOA. At that time, EPA took no steps to regulate PFOA, and NYSDEC only regulated PFOA as an unspecified organic contaminant.

In late 2004, in the absence of regulatory guidance, Taconic decided to voluntarily test the Site's groundwater for the presence of PFOA. This decision was based upon the fact that Taconic, with State approval, had discharged its waste water on the Site. A State qualified laboratory performed a series of tests for Taconic which revealed the presence of PFOA in the Site's groundwater. Taconic submitted these test results to NYSDEC and NYSDOH (the "State Agencies") during the Pataki Administration, and at the same time, requested guidance from the State Agencies. Neither of the State Agencies responded to Taconic's data submission or request for guidance. A copy of Taconic's submittals to the State Agencies is enclosed as **TAC-SEN 00035 to TAC- SEN 00036**.

Taconic also implemented a new worker safety training initiative to ensure proper handling of PTFE containing PFOA.

In the absence of any guidance from the State Agencies, Taconic chose to take voluntary precautionary measures. On September 30, 2005, Taconic submitted a well modification application to the Rensselaer County Department of Health ("RCDOH") to allow Taconic to install a carbon filter treatment system on its Site wells for the purpose of removing PFOA. RCDOH approved Taconic's application on January 4, 2006. These materials are enclosed as **TAC-SEN 00037 to TAC-SEC 00056**. As a further precautionary measure, Taconic began voluntarily providing bottled water to its employees and residents living near the Site.

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On January 29, 2016, the day after EPA issued its guidance level, Taconic requested a meeting with NYSDEC personnel to remind them of Taconic's data submittals made ten years earlier. During the meeting, NYSDEC officials indicated that they were not aware of Taconic's ten year old data submittals. Sometime thereafter, NYSDEC confirmed that Taconic's data submittals, with agency time stamps, were located in the Agency's files. Since January 29, Taconic has been in constant contact with NYSDEC by answering questions, providing additional information and taking voluntary actions to support the community. Taconic has also attended two in person meetings with the NYSDEC Commissioner, on February 29, 2016 and again on July 15, 2016.

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that tested at or above EPA's May 2016 Lifetime Drinking Water Health Advisory level for PFOA of 70 ppt. To date, Taconic has installed 55 POETS.

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After notifying NYSDEC, Taconic voluntarily began early implementation of remedial investigation ("RI") at the Site. The RI began on September 1, 2016 and is being performed by Taconic's engineering firm.

**Interrogatory 8:** Describe the methods employed by Taconic Plastics or any subsidiary to minimize PFOA or other PFC exposure to:

- a. Employees of Taconic Plastics or any subsidiary;
- b. The general public.

**Response:**

Please see the response to Interrogatory 7 above.

**Interrogatory 9:** Describe any testing, evaluation or monitoring performed by Taconic Plastics or any subsidiary and results of those efforts as it relates to health effects of PFOA or other PFCs.

**Response:**

It is not believed that Taconic has conducted any testing, evaluation or monitoring of the health effects of PFOA or other PFCs.

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**Interrogatory 10:** Has Taconic Plastics or any subsidiary ever detected PFOA or PFC's at any level in the soil, groundwater or drinking water near facilities in New York State?

- a. If so where, when and at what levels?
- b. State dates and subsequent actions taken upon initial detection.

**Response:**

Please see the following reports:

- January 2013 (TAC-SEN 03829 to TAC-SEN 03996);
- February 2006 (TAC-SEN 03282 to TAC-SEN 03347);
- January 2006 (TAC-SEN 03348 to TAC-SEN 03402);
- October 2005 (TAC-SEN 03403 to TAC SEN 03523);
- January 2005 (TAC-SEN 03524 to TAC-SEN 03624);
- December 2004 (TAC-SEN 03625 to TAC-SEN 03741).

An April 2001 Supplemental Environmental Investigation Report and a June 4, 2007 Annual Groundwater Monitoring Report (both prepared for non-PFOA related issues) provide site maps containing well location information. Please see documents (TAC-SEN 03742 to TAC-SEN 03791 and TAC-SEN 03792 to TAC-SEN 03824). Please see the response to Interrogatory 7 above for a description of actions taken.

**Interrogatory 11:** When did Taconic Plastics or any subsidiary first become aware of any possible or potential health risks to humans posed by PFOA or PFCs?

- a. State dates and subsequent actions taken upon becoming aware of any possible or potential health risks to humans or otherwise.

**Response:**

In 2001, Taconic learned that EPA was having discussions concerning PFOA with one of the PTFE manufacturers. Despite these discussions, EPA did not notify Taconic regarding either PTFE or PFOA. At that time, EPA took no steps to regulate PFOA, and NYSDEC only regulated PFOA as an unspecified organic contaminant. Taconic took the steps described in the response to Interrogatory 7 above.

**Interrogatory 12:** Has Taconic Plastics or any subsidiary ever reported PFOA or PFCs levels

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detected near any Taconic Plastics or any subsidiaries' facility to any governmental or other outside entity?

a. State dates of reporting or notice, parties contacted, responses to reporting or notice and all other relevant information.

**Response:**

Please see our response to Interrogatory 7 above.

**Interrogatory 13:** When did Taconic Plastics or any subsidiary first learn of PFOA contamination in drinking water and/or groundwater in Rensselaer County?

a. State steps taken to address contamination.

**Response:**

Please see the response to Interrogatory 7 above.

**Interrogatory 14:** What is Taconic Plastics or any subsidiary currently doing to address the health and safety of Rensselaer County residents?

a. State current operations and any future plans.

**Response:**

Please see the response to Interrogatory 7 above.

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**Request for copies of documents (Subpoena Demands):**

**Document Request 1:** Any correspondence and/or notices sent to and/or received by any New York State or federal governmental agency or other third party pertaining to levels of PFOA or other PFCs discovered near any Taconic Plastics or any subsidiaries' facility in New York State.

Please see response to Interrogatory 7 above including **TAC-SEN 00035 to TAC-SEN 00036**.

**Document Request 2:** Results of any water or soil testing conducted by or on behalf of Taconic Plastics or any subsidiary for PFOA or other PFCs in New York State.

Please see the response to Interrogatory 10 above, including

- January 2013 (**TAC-SEN 03829 to TAC-SEN 03996**);
- February 2006 (**TAC-SEN 03282 to TAC-SEN 03347**);
- January 2006 (**TAC-SEN 03348 to TAC-SEN 03402**);
- October 2005 (**TAC-SEN 03403 to TAC-SEN 03523**);
- January 2005 (**TAC-SEN 03524 to TAC-SEN 03624**);
- December 2004 (**TAC-SEN 03625 to TAC-SEN 03741**).

**Document Request 3:** Any environmental, health and/or scientific studies or reports written and/or issued by Taconic Plastics or any subsidiary regarding PFOA or other PFCs.

It is not believed that Taconic has written and/or issued any environmental, health and/or scientific studies or reports regarding PFOA or other PFCs.

**Document Request 4:** Any internal correspondence regarding PFOA or other PFCs.

This material is subject to further review.

**Document Request 5:** Any past and/or present written policies or guidance regarding use and/or disposal of PFOA or PFCs, or any filters, products or equipment containing PFOA or PFCs.

This material is subject to further review.

**Document Request 6:** Any past and/or present written policies or guidance regarding employee exposure to PFOA or PFCs.  
This material is subject to further review.