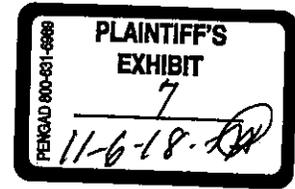


EXHIBIT S84 TO DECLARATION OF
STEPHEN G. SCHWARZ IN SUPPORT OF
PLAINTIFFS' MOTION FOR CLASS
CERTIFICATION



Overview Statement
September 12, 2016

Honeywell recognizes the New York State Senate's interest in promptly moving forward to investigate issues surrounding the presence of perfluorooctanoic acid (PFOA) in groundwater in Hoosick Falls and is committed to cooperating. In that spirit, we are providing responses to your Letter Request of September 6, 2016.

Honeywell is a global manufacturing and technology company with a history of successfully resolving complex environmental challenges. We have worked with numerous communities to effectively remediate and reuse our legacy sites. Government entities, environmental agencies, and leading non-profit organizations have consistently recognized Honeywell's efforts.

We are presently working with the Hoosick Falls' community, the New York State Department of Environmental Conservation (DEC), the New York State Department of Health (DOH), the U.S. Environmental Protection Agency (EPA), and Saint-Gobain Performance Plastics to investigate and respond to PFOA impacts in and around Hoosick Falls. We are committed to continuing this work, recognize that our initial efforts are part of a longer-term commitment, and look forward to working with the Committees.

In 1986, AlliedSignal Laminate Systems Inc., (AlliedSignal Laminate) a company affiliated with AlliedSignal, which is now known as Honeywell, acquired various facilities engaged in a coating business in Hoosick Falls. AlliedSignal Laminate operated those facilities for approximately 10 years until it divested the coating business. Almost two decades later, in late 2015, Honeywell first learned of the presence of PFOA in the Hoosick Falls' municipal water system.

Honeywell is responding to the Committees' request based on currently available, non-privileged information. We reserve the right to supplement this response in the event that we locate additional responsive, non-privileged documents or information, but we do not assume the obligation to do so.

Because of the global nature of its business, and given the nature and scope of the Committees' investigation, Honeywell has focused its responses generally on the former coating operations in Hoosick Falls, which is the only current or former

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Honeywell business in New York State that, at this date, we have determined used PFOA in its manufacturing processes.¹

Response to Question 1:

Honeywell is a large manufacturing corporation with many different lines of business. For example, we make or have made, airplane components, specialty chemicals and resins, thermostats, automobile parts, various types of electronic controls and components, and other products.

Honeywell, or its predecessors, have been in the manufacturing business for more than 100 years, including many in the State of New York. Over that period of time, Honeywell has had operations in, for example, Onondaga County (Syracuse) near Onondaga Lake, Erie County (Buffalo along the Buffalo River), Niagara Falls County (Highland Community in Niagara Falls), Queens County and Kings County (New York City), and Renasselaer County (Hoosick Falls).

Most of those operations involved manufacturing processes unrelated to the coating business operated by AlliedSignal Laminate. Honeywell's Syracuse operations, for example, included the production of various chlorine related industrial chemicals through the chloralkali process – a process that would not have used PFOA. At this time, we have not identified any information indicating that such historical businesses or manufacturing operations in New York (other than those in Hoosick Falls) ever manufactured or used PFOA or other perfluorinated compounds (PFCs).

AlliedSignal Laminate acquired and operated various facilities in Hoosick Falls, New York, from approximately 1986 to 1996. The AlliedSignal Laminate coating

¹ Honeywell provides these responses and documents subject to and without waiving any of its objections to the Letter Request, including that the Legislature does not have the authority to compel written responses to questions, or to propound document requests absent the issuance of an enforceable subpoena, that the Letter Request calls for information related to matters outside the State of New York and/or outside the scope of the Committees' investigation, seeks confidential or proprietary business information, seeks legally privileged information, seeks information and/or documents outside of Honeywell's possession, is overbroad and unduly burdensome, and does not provide a reasonable time for compliance. Nothing contained in these responses is intended as, or shall in anyway be deemed, an admission of liability or a waiver of any protections afforded by the attorney-client privilege, the attorney work product doctrine, the self-evaluative privilege, or any other applicable privilege or doctrine. By responding to these questions, Honeywell is not waiving and is expressly reserving any and all rights to object to future inquires, subpoenas or requests.

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business coated tapes, wires, fabric, and other materials with polytetrafluoroethylene (PTFE), which is commonly known as Teflon®. It is our understanding that PFOA was a raw material, or ingredient, in certain of those production processes. We discuss the AlliedSignal Laminate business in Hoosick Falls more specifically below.

The AlliedSignal Laminate business locations included:

- 14 McCaffrey Street, Hoosick Falls, NY
- 1 Liberty Street, Hoosick Falls, NY
- John Street/3 Lyman Street, Hoosick Falls, NY
- 21410-12 Route 22, Hoosick Falls, NY
- 1 Mechanic Street, Hoosick Falls, NY
- First Street, Hoosick Falls, NY

Response to Questions 2 through 5:

Based on our current understanding of AlliedSignal Laminate's operations in Hoosick Falls, it does not appear that PFOA or other PFCs were manufactured or produced by the AlliedSignal Laminate's business. Instead, it appears that PFOA and PTFE were purchased by the business and used as raw materials or ingredients in the coating process.

With respect to the AlliedSignal Laminate business in Hoosick Falls, it appears that PFOA was a constituent or raw material in certain products, wetting agents, and dispersions manufactured by others at locations other than Hoosick Falls that may have been used during coating of tape, wires or other fabrics, or materials with PTFE (trade name of Teflon®). In 1986, AlliedSignal Laminate acquired existing coating manufacturing operations historically operated by Dodge Industries or its affiliates. Thus, at this time, Honeywell cannot ascertain with certainty the date of first use of PFOA or other PFCs in these operations.

At this time, Honeywell has identified the potential use of raw PTFE compounds being applied as part of operations that involved coating, molding, extruding, etching, drying or sintering at the following locations:

- 14 McCaffrey Street: This facility appears to have engaged in manufacturing and coating operations understood to have used PFCs from approximately 1961 until at least 1996 when it was sold. Honeywell does not have sufficient information to ascertain whether such coating operations continued after the 1996 sale. Operations at this location included surface

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coating, extrusion, and other processes using PTFE as a raw material.

- 1 Liberty Street: This facility appears to have engaged in operations understood to have used PFCs from approximately 1972 until at least 1996 when it was sold. Honeywell does not have sufficient information to ascertain whether such coating operations continued after the 1996 sale. Operations at this location included surface coating, extrusion, and other processes using PTFE as a raw material.
- John Street / 3 Lyman Street: This facility appears to have engaged in operations understood to have used PFCs beginning in the mid-1950s until approximately 1996 when production was phased-out. Operations at this location included surface coating and other processes using PTFE as a raw material. Based on the documents we are providing with this response, operations at this facility involving handling of PFC appear to have ceased in the mid-1990s.
- River Road facilities: In one of the three buildings at this location, it appears that operations included the etching of previously coated PTFE products and fabrication of custom PTFE parts. It does not appear that any PTFE coating was conducted at these facilities during the AlliedSignal Laminate operating period.

Because the AlliedSignal Laminate PTFE business in Hoosick Falls was sold in 1996, Honeywell's information related to its prior operations there is limited. At this time, however, we have not located information that would suggest that C6 or other PFCs were used as substitutes for PFOA in the AlliedSignal Laminate operations in Hoosick Falls.

The documents we have identified related to AlliedSignal Laminate's production processes in Hoosick Falls indicate that PFOA and PTFE were purchased as raw materials or ingredients for the coating and manufacturing processes. Honeywell has not located detailed purchase records for AlliedSignal Laminate's operations in Hoosick Falls.

Honeywell's current, general understanding is that the facilities at 14 McCaffrey Street, 1 Liberty Street, and 3 Lyman Street manufactured pressure sensitive tape, coated fiberglass cloth and yarn and/or Teflon[®] tape, and Teflon[®] molded products.

Response to Questions 6 through 9:

Honeywell is continuing its efforts to compile information about past operating and disposal practices for PFOA or other PFCs. Because (a) AlliedSignal Laminate PTFE operations have not operated in Hoosick Falls since 1996; (b) neither PFOA

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nor PTFE were regulated hazardous substances during the time of AlliedSignal Laminate's operations; and (c) Honeywell has limited documentation in its possession with respect to historic coating operations in Hoosick Falls, at this time, Honeywell has not identified responsive information.

Honeywell understands, however, that after selling the business in 1996, standard environmental site investigations were conducted at certain facilities, including soil and groundwater sampling. For several of the facilities, Liberty Street, McCaffrey Street, and Mechanic Street, the DEC issued "No Further Action" letters based on the results of these investigations.

As discussed below, environmental testing is currently being conducted pursuant to the Orders with DEC. (See below Response to Questions 12 –14.)

Response to Questions 10 through 11:

In late 2015, Honeywell first learned of the discovery of PFOA in the Village of Hoosick Falls public water supply. At that time, Saint-Gobain was supplying bottled water to residents and working with regulators and the Village to install upgrades to the drinking water treatment system, and government officials were sampling for PFOA. Honeywell met with Saint-Gobain and opened a dialogue with the Healthy Hoosick Water group. Honeywell also contacted the DOH offering our assistance, cooperation, and support. Honeywell continued to meet with agency officials to assess environmental conditions, test private wells in the area surrounding the Village, and install treatment. Since that time, Honeywell has worked with Saint-Gobain to fund the operation of the Village's water treatment system, and has entered into two Consent Orders with the DEC to investigate five former facilities in Hoosick Falls. In July, Honeywell began its environmental investigations.

When Honeywell first learned of the discovery of PFOA in the Village of Hoosick Falls' public water supply in late 2015, we understand the EPA, the DOH, the DEC and Village officials had already received notice of (or were the source of) reports of testing detecting levels of PFOA in the water supplies of Hoosick Falls.

Response to Questions 12 through 14:

In June 2016, Honeywell voluntarily entered into two Consent Orders with the DEC related to PFOA issues in Hoosick Falls.

- Under one Consent Order, Honeywell has begun conducting environmental investigations on and around two properties located on John Street and River Road where PFOA may have been used during former manufacturing activities.

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- We have been in the field collecting soil and groundwater samples in and around these properties in recent weeks.
- Prior to beginning, we outlined the program for the Mayor and the Supervisor, and we have walked door-to-door to properties where we need to conduct sampling with a detailed letter that explains the program and an access agreement.
- We expect to get the complete initial rounds of data back this fall. We will share our results with the DEC and the community.
- Under a second Consent Order, Honeywell is cooperating with, and sharing funding for, Saint-Gobain's environmental investigations of the McCaffrey Street and the Liberty Street plants. Like the investigations at River Road and John Street, these investigations are going on right now.
- Both companies also are sharing costs for the bottled water program and for upgrading the existing water treatment system to full capacity.
- Under the Consent Orders, Honeywell and Saint-Gobain also will reimburse the state for:
 - water sampling of private wells, the Hoosick River, and the Bus Garage on River Road;
 - soil sampling conducted by the state;
 - preliminary costs to evaluate alternative water supplies; and
 - various other administrative costs.
- Together with Saint-Gobain, we have committed to conduct an evaluation of the long-term water supply options for area residents in cooperation with the state agencies. That evaluation has begun. When it is complete, we will share the results with the DEC and the community.

We understand that the DOH has concluded that the Village's water treatment system funded by Saint-Gobain and Honeywell has been effective. In addition, for those residents who obtain water from private wells rather than the Village water supply, POETs (individual treatment filters for small water systems) are effective treatment systems that remove PFOA from a water supply.

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Honeywell is committed to continuing to work with state, local, and federal officials as well as Saint-Gobain and the community to make sure that the Village water treatment system continues to treat the water effectively for PFOA and to ensure that POET systems are available and maintained for residents with impacted wells who are not on Village water.

Honeywell also is committed to conducting a thorough investigation into environmental conditions at former AlliedSignal Laminate manufacturing facilities in Hoosick Falls and to cleaning them up as appropriate. Since we learned of PFOA in the Hoosick Falls' water supply our team of experts who have extensive experience in the field of environmental investigation and remediation has been focused daily on this work.

Response to Document Requests:

Subject to the objections set forth previously in this letter, and to the extent that we have been able to locate and compile such documents on a short time frame, we are providing documents that are or may be responsive to the requests set forth in your letter.