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January 13, 2009

Mr. Glenn May
Division of Environmental Remediation
New York State Department of Environmental Conservation
270 Michigan Avenue
Buffalo, New York 14203

W.O. No. 02181.086.017

Re: Progress Report – July 2008 to December 2008
3M Tonawanda, New York Facility
Order on Consent # B9-0369-91-04, Site Code #915148

Dear Mr. May:

In accordance with the referenced Order on Consent (Order) and at 3M's direction, we are submitting the progress report for the 3M Tonawanda, NY facility for the period extending from July 2008 to December 2008.

Should you have any comments or questions, please contact me at 610-701-7302.

Very truly yours,

WESTON SOLUTIONS, INC.



Thomas A. Drew, P.G.
Principal Project Manager

- c: Division of Environmental Remediation, Albany (w/o enclosure)
Director, Bureau of Environmental Exposure Investigation, Troy (w/o enclosure)
Division of Environmental Enforcement, Buffalo (w/o enclosure)
C. O'Connor - New York State Department of Health, Buffalo (w/ enclosure)
J. Pettinelli, 3M (w/ enclosure)
K. Held, 3M (w/ enclosure)





PROGRESS REPORT

Site Name and Location: 3M Facility, Tonawanda, New York

Registry Number: 915148

Order on Consent: B9-0369-91-04

3M Project Contacts: Justin Pettinelli (3M Corporate)
Keith Held (3M Tonawanda)

NYSDEC Project Lead: Glenn May

Reporting Period: July 2008 to December 2008

Background

The New York State Department of Environmental Conservation (NYSDEC) issued a Record of Decision (ROD) (Registry No. 915148) for the 3M facility in Tonawanda, New York. This ROD presents the selected remedial action for the Tonawanda facility based on the site's Administrative Record and public input. Following ROD issuance, the NYSDEC reclassified the 3M Tonawanda site from "Class 3 – Does not present a significant threat to the public health or environment – action may be deferred", to "Class 4 – Site properly closed – requires continued management."

3M is implementing the selected ROD remedy, No Further Action with Monitoring, under an Order on Consent (Index # B9-0369-91-04) (Order) according to the NYSDEC-approved Operation and Maintenance Work Plan (O&M Work Plan), which was made part of the Order. The original O&M Work Plan called for:

- Filing a Declaration of Covenants and Restrictions with the property deed at the Erie County Clerk's Office. This was completed and was reported in the initial progress report for the period ending March 31, 2001.
- Performing long-term groundwater monitoring. Involved semiannual sampling of site monitor wells MW-1, MW-2, MW-3, and MW-4 and annual sampling of the two site lysimeters, LY-1 and LY-2, with groundwater samples analyzed for carbon disulfide (CS₂).
- Inspecting the completed interim remedial measures (IRMs) (includes the CS₂ tank system, and the catch basin and associated swale) and maintaining the integrity of the IRMs.

Semiannual progress reports have been submitted by 3M to NYSDEC and these reports summarize project activities that occurred in the previous reporting periods. In August 2005,



the Five-Year Evaluation Report was submitted by 3M to NYSDEC and this report concluded that the selected remedy has been effective in meeting remediation goals outlined in the 1999 ROD and remains protective of human health and the environment. The aforementioned evaluation report also contained a recommended future course of action for the facility, including reductions in groundwater monitoring and reporting under the Order/O&M Plan.

By letter of May 18, 2006, NYSDEC provided comment on the Five-Year Evaluation Report. Based on the presence of CS₂ in the subsurface environment, NYSDEC required continued monitoring at this facility, but required only one site monitoring well (MW-4) and one site lysimeter (LY-2) be monitored for CS₂ on a semiannual basis and annual basis, respectively. According to the May 2006 NYSDEC correspondence, reporting on the maintenance of the drainage swale and associated catch basins would continue under the Order/O&M Plan; however, reporting on the continued operations, maintenance and inspection of the existing CS₂ tank system could be completed by 3M under NYSDEC's Chemical Bulk Storage Program.

This progress report reflects the O&M monitoring and reporting modifications agreed upon with NYSDEC. Sampling of the reduced monitoring network under the modified O&M Plan was completed in November 2008. The results from this sampling event are presented herein, along with a description of any maintenance activity conducted in the swale.

Summary of Activities Performed During the Reporting Period

The following is a summary of activities performed by 3M during the reporting period:

- Groundwater samples for CS₂ analysis were collected from monitoring well MW-4 (primary sample and duplicate sample) in November 2008 in accordance with the O&M Plan modifications approved by NYSDEC. Laboratory analytical results from the November 2008 sampling event are provided in this report.
- Annual inspection of the subject drainage swale was performed by facility personnel on November 18, 2008. During the inspection, the drainage swale was found to be well maintained. Vegetation and grading in the drainage swale area was in good condition. No maintenance activity was conducted in the swale during the reporting period.

Groundwater Monitoring Results

Summary of Carbon Disulfide Water Analytical Results (mg/L)

Sampling Date	Sample ID and Result	
	MW-4	MW-4 Duplicate
11/24/08	ND	ND

Notes: ND - Not detected. The reporting limit for CS₂ is 5 µg/L.

As noted above, CS₂ was not detected in the groundwater samples (primary and duplicate samples) collected from monitoring well MW-4 in November 2008. This result is consistent with previous sampling data from June 2008. A copy of the analytical data package for the November 2008 sampling event is provided in Attachment A.



ATTACHMENT A
LABORATORY ANALYTICAL PACKAGE
NOVEMBER 2008 SAMPLING EVENT

TestAmerica Laboratories, Inc.

ANALYTICAL REPORT

Job#: A08-F009

Project#: NY1A8679
Site Name: 3M Tonawanda, NY - Semi-Annual Monitoring
Task: 3M Tonawanda, NY - Semi-Annual Monitoring

Mr. Tom Drew
Roy F. Weston, Inc.
1400 Weston Way
West Chester, PA 19380

TestAmerica Laboratories Inc.


Mark A. Nemecek
Project Manager

12/10/2008



TestAmerica Buffalo Current Certifications

As of 11/3/2008

STATE	Program	Cert # / Lab ID
Arkansas	CWA, RCRA, SOIL	88-0686
California*	NELAP CWA, RCRA	01169CA
Connecticut	SDWA, CWA, RCRA, SOIL	PH-0568
Florida*	NELAP CWA, RCRA	E87672
Georgia*	SDWA, NELAP CWA, RCRA	956
Illinois*	NELAP SDWA, CWA, RCRA	200003
Iowa	SW/CS	374
Kansas*	NELAP SDWA, CWA, RCRA	E-10187
Kentucky	SDWA	90029
Kentucky UST	UST	30
Louisiana*	NELAP CWA, RCRA	2031
Maine	SDWA, CWA	NY0044
Maryland	SDWA	294
Massachusetts	SDWA, CWA	M-NY044
Michigan	SDWA	9937
Minnesota	SDWA, CWA, RCRA	036-999-337
New Hampshire*	NELAP SDWA, CWA	233701
New Jersey*	NELAP, SDWA, CWA, RCRA,	NY455
New York*	NELAP, AIR, SDWA, CWA, RCRA, CLP	10026
Oklahoma	CWA, RCRA	9421
Pennsylvania*	NELAP CWA, RCRA	68-00281
Tennessee	SDWA	02970
Texas*	NELAP CWA, RCRA	T104704412-08-TX
USDA	FOREIGN SOIL PERMIT	S-41579
USDOE	Department of Energy	DOECAP-STB
Virginia	SDWA	278
Washington*	NELAP CWA, RCRA	C1677
Wisconsin	CWA, RCRA	998310390
West Virginia	CWA, RCRA	252

*As required under the indicated accreditation, the test results in this report meet all NELAP requirements for parameters for which accreditation is required or available. Any exceptions to NELAP requirements are noted in this report.

SAMPLE SUMMARY

<u>LAB SAMPLE ID</u>	<u>CLIENT SAMPLE ID</u>	<u>MATRIX</u>	<u>SAMPLED</u>		<u>RECEIVED</u>	
			<u>DATE</u>	<u>TIME</u>	<u>DATE</u>	<u>TIME</u>
A8F00903	FB-MW-04	WATER	11/24/2008	11:25	11/24/2008	12:48
A8F00901	MW-04	GW	11/24/2008	12:20	11/24/2008	12:48
A8F00902	MW-04 DUP	GW	11/24/2008	12:20	11/24/2008	12:48
A8F00904	TRIP BLANK	WATER	11/24/2008	11:00	11/24/2008	12:48

METHODS SUMMARY

Job#: A08-F009Project#: NY1A8679Site Name: 3M Tonawanda, NY - Semi-Annual Monitoring

<u>PARAMETER</u>	<u>ANALYTICAL METHOD</u>
METHOD 8260 - Carbon Disulfide	SW8463 8260

References:

SW8463 "Test Methods for Evaluating Solid Waste Physical/Chemical Methods (SW846), Third Edition, 9/86; Update I, 7/92; Update IIA, 8/93; Update II, 9/94; Update IIB, 1/95; Update III, 12/96.

SDG NARRATIVE

Job#: A08-F009Project#: NY1A8679
Site Name: 3M Tonawanda, NY - Semi-Annual MonitoringGeneral Comments

The enclosed data may or may not have been reported utilizing data qualifiers (Q) as defined on the Data Comment Page.

Soil, sediment and sludge sample results are reported on "dry weight" basis unless otherwise noted in this data package.

According to 40CFR Part 136.3, pH, Chlorine Residual, Dissolved Oxygen, Sulfite, and Temperature analyses are to be performed immediately after aqueous sample collection. When these parameters are not indicated as field (e.g. pH-Field), they were not analyzed immediately, but as soon as possible after laboratory receipt.

Sample dilutions were performed as indicated on the attached Dilution Log. The rationale for dilution is specified by the 3-digit code and definition.

Sample Receipt Comments

A08-F009

Sample Cooler(s) were received at the following temperature(s); 15.6 °C
Samples were received at a temperature of 15.6°C. However, ice was present in the cooler and as the samples were collected the same day, it was not possible for the samples to cool to 4°C prior to receipt. There is no impact on the data.

GC/MS Volatile Data

No deviations from protocol were encountered during the analytical procedures.

The results presented in this report relate only to the analytical testing and condition of the sample at receipt. This report pertains to only those samples actually tested. All pages of this report are integral parts of the analytical data. Therefore, this report should be reproduced only in its entirety.



DATA QUALIFIER PAGE

These definitions are provided in the event the data in this report requires the use of one or more of the qualifiers. Not all qualifiers defined below are necessarily used in the accompanying data package.

ORGANIC DATA QUALIFIERS

- ND or U Indicates compound was analyzed for, but not detected.
- J Indicates an estimated value. This flag is used either when estimating a concentration for tentatively identified compounds where a 1:1 response is assumed, or when the data indicates the presence of a compound that meets the identification criteria but the result is less than the sample quantitation limit but greater than zero.
- C This flag applies to pesticide results where the identification has been confirmed by GC/MS.
- B This flag is used when the analyte is found in the associated blank, as well as in the sample.
- E This flag identifies compounds whose concentrations exceed the calibration range of the instrument for that specific analysis.
- D This flag identifies all compounds identified in an analysis at the secondary dilution factor.
- N Indicates presumptive evidence of a compound. This flag is used only for tentatively identified compounds, where the identification is based on the Mass Spectral library search. It is applied to all TIC results.
- P This flag is used for CLP methodology only. For Pesticide/Aroclor target analytes, when a difference for detected concentrations between the two GC columns is greater than 25%, the lower of the two values is reported on the data page and flagged with a "P".
- A This flag indicates that a TIC is a suspected aldol-condensation product.
- 1 Indicates coelution.
- * Indicates analysis is not within the quality control limits.

INORGANIC DATA QUALIFIERS

- ND or U Indicates element was analyzed for, but not detected. Report with the detection limit value.
- J or B Indicates a value greater than or equal to the instrument detection limit, but less than the quantitation limit.
- N Indicates spike sample recovery is not within the quality control limits.
- S Indicates value determined by the Method of Standard Addition.
- E Indicates a value estimated or not reported due to the presence of interferences.
- H Indicates analytical holding time exceedance. The value obtained should be considered an estimate.
- G Indicates a value greater than or equal to the project reporting limit but less than the laboratory quantitation limit
- * Indicates the spike or duplicate analysis is not within the quality control limits.
- + Indicates the correlation coefficient for the Method of Standard Addition is less than 0.995.

Date: 12/10/2008
Time: 11:38:59

3M Tonawanda, NY - Semi-Annual Monitoring
3M Tonawanda, NY - Semi-Annual Monitoring
METHOD 8260 - CARBON DISULFIDE

Rept: AN1246

Client ID	Lab ID	FB-MW-04 A08-F009 11/24/2008	A8F00903	MW-04 A08-F009 11/24/2008	A8F00901	MW-04 DUP A08-F009 11/24/2008	A8F00902	Reporting Limit	Sample Value	Reporting Limit
Analyte	Units	Sample Value	Reporting Limit	Sample Value	Reporting Limit	Sample Value	Reporting Limit	Sample Value	Reporting Limit	
Carbon Disulfide	UG/L	ND	5.0	ND	5.0	ND	5.0	NA		
IS/SURROGATE(S)										
Chlorobenzene-D5	%	87	50-200	87	50-200	85	50-200	NA		
1,4-Difluorobenzene	%	92	50-200	92	50-200	90	50-200	NA		
1,4-Dichlorobenzene-D4	%	86	50-200	87	50-200	88	50-200	NA		
Toluene-D8	%	101	71-126	102	71-126	99	71-126	NA		
p-Bromofluorobenzene	%	93	73-120	94	73-120	93	73-120	NA		
1,2-Dichloroethane-D4	%	96	66-137	94	66-137	96	66-137	NA		

7/14

Chronology and QC Summary Package

Client ID	Lab ID	VBLK62 A08-F009	A8B2719902	Sample Value	Reporting Limit	Sample Value	Reporting Limit	Sample Value	Reporting Limit
Analyte	Units	Sample Value	Reporting Limit	Sample Value	Reporting Limit	Sample Value	Reporting Limit	Sample Value	Reporting Limit
Carbon Disulfide	UG/L	ND	5.0	NA	NA	NA	NA	NA	NA
IS/SURROGATE(S)									
Chlorobenzene-D5	%	93	50-200	NA	NA	NA	NA	NA	NA
1,4-Difluorobenzene	%	96	50-200	NA	NA	NA	NA	NA	NA
1,4-Dichlorobenzene-D4	%	92	50-200	NA	NA	NA	NA	NA	NA
Toluene-D8	%	101	71-126	NA	NA	NA	NA	NA	NA
p-Bromofluorobenzene	%	94	73-120	NA	NA	NA	NA	NA	NA
1,2-Dichloroethane-D4	%	94	66-137	NA	NA	NA	NA	NA	NA

Date: 12/10/2008
Time: 11:39:13

3M Tonawanda, NY - Semi-Annual Monitoring
3M Tonawanda, NY - Semi-Annual Monitoring
METHOD 8260 - CARBON DISULFIDE

Rept: AN1246

Client ID Job No Sample Date	Lab ID	TRIP BLANK A08-F009 11/24/2008		A8F00904		Reporting Limit	Sample Value	Reporting Limit	Sample Value
		Analyte	Units	Sample Value	Reporting Limit				
Carbon Disulfide		IS/SURROGATE(S)	UG/L	ND	5.0		NA		NA
Chlorobenzene-D5			%	85	50-200		NA		NA
1,4-Difluorobenzene			%	88	50-200		NA		NA
1,4-Dichlorobenzene-D4			%	85	50-200		NA		NA
Toluene-D8			%	98	71-126		NA		NA
p-Bromofluorobenzene			%	93	73-120		NA		NA
1,2-Dichloroethane-D4			%	94	66-137		NA		NA

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METHOD 8260 - CARBON DISULFIDE

Client Sample ID Job No & Lab Sample ID	FB-MW-04 A08-F009 A8F00903	MW-04 A08-F009 A8F00901	MW-04 DUP A08-F009 A8F00902
Sample Date	11/24/2008 11:25	11/24/2008 12:20	11/24/2008 12:20
Received Date	11/24/2008 12:48	11/24/2008 12:48	11/24/2008 12:48
Extraction Date	12/05/2008 00:39	12/04/2008 23:44	12/05/2008 00:12
Analysis Date	-	-	-
Extraction HT Met?	YES	YES	YES
Analytical HT Met?	WATER	GW	GW
Sample Matrix	1.0	1.0	1.0
Dilution Factor	0.005	0.005	0.005
Sample wt/vol	LITERS	LITERS	LITERS
% Dry			

11/14

METHOD 8260 - CARBON DISULFIDE

Client Sample ID Job No & Lab Sample ID	TRIP BLANK A08-F009 A8F00904			
Sample Date	11/24/2008 11:00			
Received Date	11/24/2008 12:48			
Extraction Date	12/05/2008 01:07			
Analysis Date	-			
Extraction HT Met?	YES			
Analytical HT Met?	WATER			
Sample Matrix	1.0			
Dilution Factor	0.005			
Sample wt/vol	LITERS			
% Dry				

METHOD 8260 - CARBON DISULFIDE

Client Sample ID Job No & Lab Sample ID	VBLK62 A08-F009 A8B2719902				
Sample Date	12/04/2008 22:06				
Received Date	-				
Extraction Date	-				
Analysis Date	WATER				
Extraction HT Met?	1.0				
Analytical HT Met?	0.005 LITERS				
Sample Matrix					
Dilution Factor					
Sample wt/vol					
% Dry					

TestAmerica

THE LEADER IN ENVIRONMENTAL TESTING

Temperature on Receipt _____
 Drinking Water? Yes No

Chain of Custody Record

TAL-4124 (1007)

Client: Western Solutions Project Manager: Tom Drew Date: 11/24/08 Chain of Custody Number: 121907
 Address: 1400 Western Way Telephone Number (Area Code)/Fax Number: 610.701.7302 Lab Number: _____
 City: W Chester State: PA Zip Code: 19380 Site Contact: Mark Nemec Page: 1 of 1
 Project Name and Location (State): 34 Pennsylvania Carrier/Waybill Number: _____

Sample I.D. No. and Description (Containers for each sample may be combined on one line)	Date	Time	Matrix					Containers & Preservatives					Analysis (Attach list if more space is needed)	Special Instructions/ Conditions of Receipt	
			Air	Aqueous	Sed.	Soil	Unpres.	H2SO4	HNO3	HCl	NaOH	ZnAc			
MW-04	11/24/08	1220													CS2 ONLY
MW-04 Dup		1220													*5 PPB
FB-MW-04		1125													
Trip Blank		1100													ACG 909

Possible Hazard Identification
 Non-Hazard Flammable Skin Irritant Poison B Unknown Return To Client Disposal By Lab Archive For _____ Months (A fee may be assessed if samples are retained longer than 1 month)

Turn Around Time Required
 24 Hours 48 Hours 7 Days 14 Days 21 Days Other _____

QC Requirements (Specify)

1. Relinquished By: [Signature] Date: 11/24/08 Time: 12:30
 2. Relinquished By: _____ Date: _____ Time: _____
 3. Relinquished By: _____ Date: _____ Time: _____

1. Received By: [Signature] Date: 11/24/08 Time: 12:48
 2. Received By: _____ Date: _____ Time: _____
 3. Received By: _____ Date: _____ Time: _____

Comments: _____

15.6°C

DISTRIBUTION: WHITE - Returned to Client with Report; CANARY - Slays with the Sample; PINK - Field Copy