



Weston Solutions, Inc.
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The Trusted Integrator for Sustainable Solutions

July 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: Periodic Review Report – January 2009 to June 2009
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 periodic review report for the 3M Tonawanda, NY facility for the period extending from January 2009 to June 2009.

Should you have any comments or questions, please contact me at 610-701-3677.

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)





PERIODIC REVIEW 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: January 2009 to June 2009

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 periodic review 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 periodic review 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 June 2009. 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) and lysimeter LY-2 on June 11, 2009 in accordance with the O&M Plan modifications approved by NYSDEC. Laboratory analytical results from the June 11, 2009 sampling event are provided in this report.
- No maintenance activity was conducted in the subject drainage swale during the reporting period. Vegetation and grading in this swale are in good condition.

Groundwater Monitoring Results

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

Sampling Date	Sample ID and Result		
	MW-4	MW-4 Duplicate	LY-2
6/11/09	ND	ND	440

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 June 2009. Consistent with previous sampling data, CS₂ was found in the pore water sample collected from lysimeter LY-2. A copy of the analytical data package for the June 2009 sampling event is provided in Attachment A.



**ATTACHMENT A
LABORATORY ANALYTICAL PACKAGE
JUNE 2009 SAMPLING EVENT**

Analytical Report

Work Order: RSF0552

Project Description

3M Tonawanda, NY - Semi-Annual Monitoring

For:

Tom Drew

Weston Solutions, Inc. - West Chester, PA

1400 Weston Way

West Chester, PA 19380



Mark Nemec

Customer Service Manager

mark.nemec@testamericainc.com

Wednesday, July 1, 2009

The test results in this report meet all NELAP requirements for analytes for which accreditation is required or available. Any exception to NELAP requirements are noted in this report. Pursuant to NELAP, this report may not be reproduced, except in full, without the written approval of the laboratory. All questions regarding this test report should be directed to the TestAmerica Project manager who has signed this report.

Weston Solutions, Inc. - West Chester, PA
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Work Order: RSF0552

Project: 3M Tonawanda, NY - Semi-Annual Monitoring
 Project Number: RFW

Received: 06/11/09
 Reported: 07/01/09 17:30

TestAmerica Buffalo Current Certifications

As of 1/27/2009

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.

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Case Narrative

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. field-pH), they were not analyzed immediately, but as soon as possible after laboratory receipt.

A pertinent document is appended to this report, 1 page, is included and is an integral part of this report.

Reproduction of this analytical report is permitted only in its entirety. This report shall not be reproduced except in full without the written approval of the laboratory.

TestAmerica Laboratories, Inc. certifies that the analytical results contained herein apply only to the samples tested as received by our Laboratory.

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DATA QUALIFIERS AND DEFINITIONS

- B** Analyte was detected in the associated Method Blank.
- D08** Dilution required due to high concentration of target analyte(s)
- J** Analyte detected at a level less than the Reporting Limit (RL) and greater than or equal to the Method Detection Limit (MDL). Concentrations within this range are estimated.
- L5** Analyte recovery outside of specified criteria. Individual analyte criteria exceedences allowed for multi-component analyses without disqualification of data per NELAC Standard, DOD QSM and/or AFCEE QAPP.
- NR** Any inclusion of NR indicates that the project specific requirements do not require reporting estimated values below the laboratory reporting limit.

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Executive Summary - Detections

Analyte	Sample Result	Data Qualifiers	RL	MDL	Units	Dil Fac	Date Analyzed	Lab Tech	Batch	Method
Sample ID: RSF0552-03RE1 (LY-02 - Water)					Sampled: 06/11/09 12:20			Recvd: 06/11/09 13:15		
<u>Volatile Organic Compounds by EPA 8260B</u>										
Carbon disulfide	440000	D08	8000	1600	ug/L	8000	06/25/09 12:40	LH	9F25035	8260B
Sample ID: RSF0552-04 (FB MW-04 - Water)					Sampled: 06/11/09 12:35			Recvd: 06/11/09 13:15		
<u>Volatile Organic Compounds by EPA 8260B</u>										
Carbon disulfide	0.61	J, B	5.0	0.19	ug/L	1.00	06/24/09 18:29	TRB	9F24023	8260B

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Sample Summary

Sample Identification	Lab Number	Client Matrix	Date/Time Sampled	Date/Time Received	Sample Qualifiers
MW-04	RSF0552-01	Water	06/11/09 12:45	06/11/09 13:15	
MW-04 DUP	RSF0552-02	Water	06/11/09 12:45	06/11/09 13:15	
LY-02	RSF0552-03	Water	06/11/09 12:20	06/11/09 13:15	
FB MW-04	RSF0552-04	Water	06/11/09 12:35	06/11/09 13:15	
TRIP BLANK	RSF0552-05	Water	06/11/09 11:00	06/11/09 13:15	

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Analytical Report

Analyte	Sample Result	Data Qualifiers	RL	MDL	Units	Dil Fac	Date Analyzed	Lab Tech	Batch	Method
Sample ID: RSF0552-01 (MW-04 - Water)						Sampled: 06/11/09 12:45		Recvd: 06/11/09 13:15		
<u>Volatile Organic Compounds by EPA 8260B</u>										
Carbon disulfide	ND		5.0	0.19	ug/L	1.00	06/24/09 05:59	MF	9F23026	8260B
1,2-Dichloroethane-d4	103 %		Surr Limits: (66-137%)				06/24/09 05:59	MF	9F23026	8260B
4-Bromofluorobenzene	101 %		Surr Limits: (73-120%)				06/24/09 05:59	MF	9F23026	8260B
Toluene-d8	101 %		Surr Limits: (71-126%)				06/24/09 05:59	MF	9F23026	8260B

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Analytical Report

Analyte	Sample Result	Data Qualifiers	RL	MDL	Units	Dil Fac	Date Analyzed	Lab Tech	Batch	Method
Sample ID: RSF0552-02 (MW-04 DUP - Water)						Sampled: 06/11/09 12:45		Recvd: 06/11/09 13:15		
<u>Volatile Organic Compounds by EPA 8260B</u>										
Carbon disulfide	ND		5.0	0.19	ug/L	1.00	06/24/09 06:23	MF	9F23026	8260B
1,2-Dichloroethane-d4	102 %		<i>Surr Limits: (66-137%)</i>				06/24/09 06:23	MF	9F23026	8260B
4-Bromofluorobenzene	102 %		<i>Surr Limits: (73-120%)</i>				06/24/09 06:23	MF	9F23026	8260B
Toluene-d8	101 %		<i>Surr Limits: (71-126%)</i>				06/24/09 06:23	MF	9F23026	8260B

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Analyte	Sample Result	Data Qualifiers	RL	MDL	Units	Dil Fac	Date Analyzed	Lab Tech	Batch	Method
Sample ID: RSF0552-04 (FB MW-04 - Water)						Sampled: 06/11/09 12:35		Recvd: 06/11/09 13:15		
<u>Volatile Organic Compounds by EPA 8260B</u>										
Carbon disulfide	0.61	J, B	5.0	0.19	ug/L	1.00	06/24/09 18:29	TRB	9F24023	8260B
1,2-Dichloroethane-d4	105 %		Surr Limits: (66-137%)				06/24/09 18:29	TRB	9F24023	8260B
4-Bromofluorobenzene	106 %		Surr Limits: (73-120%)				06/24/09 18:29	TRB	9F24023	8260B
Toluene-d8	102 %		Surr Limits: (71-126%)				06/24/09 18:29	TRB	9F24023	8260B

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Analyte	Sample Result	Data Qualifiers	RL	MDL	Units	Dil Fac	Date Analyzed	Lab Tech	Batch	Method
Sample ID: RSF0552-03RE1 (LY-02 - Water)						Sampled: 06/11/09 12:20		Recvd: 06/11/09 13:15		
<u>Volatile Organic Compounds by EPA 8260B</u>										
Carbon disulfide	440000	D08	8000	1600	ug/L	8000	06/25/09 12:40	LH	9F25035	8260B
1,2-Dichloroethane-d4	106 %	D08	Surr Limits: (66-137%)				06/25/09 12:40	LH	9F25035	8260B
4-Bromofluorobenzene	105 %	D08	Surr Limits: (73-120%)				06/25/09 12:40	LH	9F25035	8260B
Toluene-d8	101 %	D08	Surr Limits: (71-126%)				06/25/09 12:40	LH	9F25035	8260B

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Analytical Report

Analyte	Sample Result	Data Qualifiers	RL	MDL	Units	Dil Fac	Date Analyzed	Lab Tech	Batch	Method
Sample ID: RSF0552-05 (TRIP BLANK - Water)						Sampled: 06/11/09 11:00		Recvd: 06/11/09 13:15		
<u>Volatile Organic Compounds by EPA 8260B</u>										
Carbon disulfide	ND		5.0	0.19	ug/L	1.00	06/24/09 18:53	TRB	9F24023	8260B
1,2-Dichloroethane-d4	101 %		Surr Limits: (66-137%)				06/24/09 18:53	TRB	9F24023	8260B
4-Bromofluorobenzene	101 %		Surr Limits: (73-120%)				06/24/09 18:53	TRB	9F24023	8260B
Toluene-d8	99 %		Surr Limits: (71-126%)				06/24/09 18:53	TRB	9F24023	8260B

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SAMPLE EXTRACTION DATA

Parameter	Batch	Lab Number	Wt/Vol Extracte	Units	Extract Volume	Units	Date Prepared	Lab Tech	Extraction Method
Volatile Organic Compounds by EPA 8260B									
8260B	9F23026	RSF0552-01	5.00	mL	5.00	mL	06/23/09 09:37	LCH	5030B MS
8260B	9F23026	RSF0552-02	5.00	mL	5.00	mL	06/23/09 09:37	LCH	5030B MS
8260B	9F25035	RSF0552-03RE	5.00	mL	5.00	mL	06/25/09 10:30	LCH	5030B MS
8260B	9F24023	RSF0552-04	5.00	mL	5.00	mL	06/24/09 10:00	TWS	5030B MS
8260B	9F24023	RSF0552-05	5.00	mL	5.00	mL	06/24/09 10:00	TWS	5030B MS

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LABORATORY QC DATA

Analyte	Source Result	Spike Level	RL	MDL	Units	Result	% REC	% REC Limits	% RPD	RPD Limit	Data Qualifiers
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Volatil Organic Compounds by EPA 8260B

Blank Analyzed: 06/23/09 (Lab Number:9F23026-BLK1, Batch: 9F23026)

Carbon disulfide			1.0	0.19	ug/L	ND					
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<i>Surrogate:</i>					ug/L		99	66-137			
<i>1,2-Dichloroethane-d4</i>					ug/L		100	73-120			
<i>Surrogate:</i>					ug/L		102	71-126			
<i>4-Bromofluorobenzene</i>					ug/L						
<i>Surrogate: Toluene-d8</i>					ug/L						

LCS Analyzed: 06/23/09 (Lab Number:9F23026-BS1, Batch: 9F23026)

1,1,1,2-Tetrachloroethane	25	1.0	0.35	ug/L	28.2	113	76-122			
1,1,1-Trichloroethane	25	1.0	0.26	ug/L	27.9	112	73-126			
1,1,2,2-Tetrachloroethane	25	1.0	0.21	ug/L	26.6	106	70-126			
1,1,2-Trichloroethane	25	1.0	0.23	ug/L	25.8	103	76-122			
1,1,2-Trichlorotrifluoroethane	25	1.0	0.31	ug/L	23.5	94	60-140			
1,1-Dichloroethane	25	1.0	0.75	ug/L	26.1	105	71-129			
1,1-Dichloroethene	25	1.0	0.29	ug/L	28.6	114	65-138			
1,1-Dichloropropene	25	1.0	0.18	ug/L	26.4	105	72-122			
1,2,3-Trichlorobenzene	25	1.0	0.39	ug/L	27.3	109	64-121			
1,2,3-Trichloropropane	25	1.0	0.16	ug/L	24.2	97	68-131			
1,2,4-Trichlorobenzene	25	1.0	0.41	ug/L	27.2	109	70-122			
1,2,4-Trimethylbenzene	25	1.0	0.33	ug/L	26.5	106	76-121			
1,2-Dibromo-3-chloropropane	25	1.0	1.0	ug/L	26.7	107	56-134			
1,2-Dibromoethane (EDB)	25	1.0	0.17	ug/L	26.3	105	77-120			
1,2-Dichlorobenzene	25	1.0	0.20	ug/L	26.6	106	77-120			
1,2-Dichloroethane	25	1.0	0.21	ug/L	26.5	106	75-127			
1,2-Dichloroethene, Total	50	2.0	0.70	ug/L	52.2	104	72-124			
1,2-Dichloropropane	25	1.0	0.14	ug/L	24.9	100	76-120			
1,3,5-Trimethylbenzene	25	1.0	0.22	ug/L	26.8	107	77-121			
1,3-Dichlorobenzene	25	1.0	0.16	ug/L	26.2	105	77-120			
1,3-Dichloropropane	25	1.0	0.21	ug/L	25.0	100	75-120			
1,4-Dichlorobenzene	25	1.0	0.16	ug/L	26.6	106	75-120			
2,2-Dichloropropane	25	1.0	0.75	ug/L	26.0	104	63-136			
2-Butanone (MEK)	120	5.0	1.3	ug/L	120	96	57-140			
2-Chlorotoluene	25	1.0	0.20	ug/L	26.2	105	76-121			
2-Hexanone	120	5.0	1.2	ug/L	121	97	65-127			
4-Chlorotoluene	25	1.0	0.37	ug/L	25.5	102	77-121			
4-Isopropyltoluene	25	1.0	0.31	ug/L	26.6	106	73-120			
4-Methyl-2-pentanone (MIBK)	120	5.0	0.91	ug/L	125	100	71-125			

TestAmerica Buffalo

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LABORATORY QC DATA

Analyte	Source Result	Spike Level	RL	MDL	Units	Result	% REC	% REC Limits	% RPD	RPD Limit	Data Qualifiers
Volatile Organic Compounds by EPA 8260B											
LCS Analyzed: 06/23/09 (Lab Number:9F23026-BS1, Batch: 9F23026)											
Acetone		120	5.0	1.3	ug/L	132	105	56-142			
Acetonitrile		1000	40	6.5	ug/L	1100	110	60-140			
Acrolein		500	20	5.5	ug/L	259	52	60-140			L5
Acrylonitrile		120	5.0	0.83	ug/L	126	101	63-138			
Allyl chloride			1.0	0.17	ug/L	ND		60-140			
Benzene		25	1.0	0.16	ug/L	25.6	102	71-124			
Bromobenzene		25	1.0	0.17	ug/L	26.2	105	78-120			
Bromochloromethane		25	1.0	0.12	ug/L	26.5	106	72-130			
Bromodichloromethane		25	1.0	0.39	ug/L	26.2	105	80-122			
Bromoform		25	1.0	0.26	ug/L	24.3	97	66-128			
Bromomethane		25	1.0	0.28	ug/L	27.6	111	36-150			
Carbon disulfide		25	1.0	0.19	ug/L	24.3	97	59-134			
Carbon Tetrachloride		25	1.0	0.27	ug/L	28.6	114	72-134			
Chlorobenzene		25	1.0	0.32	ug/L	25.8	103	72-120			
Chlorodibromomethane		25	1.0	0.32	ug/L	25.1	101	75-125			
Chloroethane		25	1.0	0.32	ug/L	27.3	109	69-136			
Chloroform		25	1.0	0.34	ug/L	26.7	107	73-127			
Chloromethane		25	1.0	0.35	ug/L	26.2	105	49-142			
Chloroprene			1.0	0.18	ug/L	ND		60-140			
cis-1,2-Dichloroethene		25	1.0	0.16	ug/L	26.1	104	74-124			
cis-1,3-Dichloropropene		25	1.0	0.36	ug/L	24.0	96	74-124			
Cyclohexane		25	1.0	0.53	ug/L	23.5	94	70-130			
Dibromomethane		25	1.0	0.41	ug/L	26.5	106	76-127			
Dichlorodifluoromethane		25	1.0	0.29	ug/L	26.5	106	33-157			
Ethyl Methacrylate		25	1.0	0.26	ug/L	23.9	96	60-140			
Ethyl tert-Butyl Ether			1.0	0.60	ug/L	ND		75-125			
Ethylbenzene		25	1.0	0.18	ug/L	26.3	105	77-123			
Hexachlorobutadiene		25	1.0	0.28	ug/L	28.2	113	62-124			
Iodomethane		25	1.0	0.75	ug/L	22.0	88	52-151			
Isobutanol			40	4.4	ug/L	ND		60-140			
Isopropyl ether			1.0	0.17	ug/L	ND		75-125			
Isopropylbenzene		25	1.0	0.19	ug/L	27.7	111	77-122			
Methacrylonitrile			5.0	0.12	ug/L	ND		60-140			
Methyl Acetate		25	1.0	0.17	ug/L	27.8	111	60-140			
Methyl Methacrylate			1.0	0.14	ug/L	ND		60-140			
Methyl tert-Butyl Ether		25	1.0	0.16	ug/L	26.1	104	64-127			
Methylcyclohexane		25	1.0	0.50	ug/L	23.9	95	60-140			
Methylene Chloride		25	1.0	0.44	ug/L	26.0	104	57-132			

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Weston Solutions, Inc. - West Chester, PA
 1400 Weston Way
 West Chester, PA 19380

Work Order: RSF0552

Received: 06/11/09
 Reported: 07/01/09 17:30

Project: 3M Tonawanda, NY - Semi-Annual Monitoring
 Project Number: RFW

LABORATORY QC DATA

Analyte	Source Result	Spike Level	RL	MDL	Units	Result	% REC	% REC Limits	% RPD	RPD Limit	Data Qualifiers
Volatil Organic Compounds by EPA 8260B											
LCS Analyzed: 06/23/09 (Lab Number:9F23026-BS1, Batch: 9F23026)											
m-Xylene & p-Xylene		50	2.0	0.66	ug/L	52.9	106	76-122			
Naphthalene		25	1.0	0.43	ug/L	27.7	111	54-140			
n-Butylbenzene		25	1.0	0.28	ug/L	26.1	104	71-128			
n-Propylbenzene		25	1.0	0.18	ug/L	25.8	103	77-120			
o-Xylene		25	1.0	0.14	ug/L	26.9	108	76-122			
Propionitrile			10	1.9	ug/L	ND		60-140			
sec-Butylbenzene		25	1.0	0.30	ug/L	26.9	108	74-127			
Styrene		25	1.0	0.18	ug/L	26.5	106	70-130			
t-Amyl alcohol			1.0	1.0	ug/L	ND		75-125			
t-Butanol			20	3.6	ug/L	ND		75-125			
Tert-Amyl Methyl Ether			1.0	0.53	ug/L	ND		75-125			
tert-Butylbenzene		25	1.0	0.30	ug/L	27.4	109	75-123			
Tetrachloroethene		25	1.0	0.36	ug/L	27.1	109	74-122			
Toluene		25	1.0	0.51	ug/L	25.9	104	70-122			
trans-1,2-Dichloroethene		25	1.0	0.13	ug/L	26.1	104	73-127			
trans-1,3-Dichloropropene		25	1.0	0.37	ug/L	24.2	97	72-123			
trans-1,4-Dichloro-2-butene		120	5.0	2.1	ug/L	82.2	66	38-155			
Trichloroethene		25	1.0	0.18	ug/L	26.6	107	74-123			
Trichlorofluoromethane		25	1.0	0.15	ug/L	27.3	109	62-152			
Vinyl acetate		120	5.0	0.85	ug/L	116	93	50-144			
Vinyl chloride		25	1.0	0.24	ug/L	28.0	112	65-133			
Xylenes, total		75	3.0	0.66	ug/L	79.8	106	76-122			
Surrogate: 1,2-Dichloroethane-d4					ug/L		101	66-137			
Surrogate: 4-Bromofluorobenzene					ug/L		101	73-120			
Surrogate: Toluene-d8					ug/L		103	71-126			

Volatil Organic Compounds by EPA 8260B

Blank Analyzed: 06/24/09 (Lab Number:9F24023-BLK1, Batch: 9F24023)

Carbon disulfide			1.0	0.19	ug/L	0.88					J
Surrogate: 1,2-Dichloroethane-d4					ug/L		101	66-137			
Surrogate: 4-Bromofluorobenzene					ug/L		103	73-120			
Surrogate: Toluene-d8					ug/L		100	71-126			

LCS Analyzed: 06/24/09 (Lab Number:9F24023-BS1, Batch: 9F24023)

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Project: 3M Tonawanda, NY - Semi-Annual Monitoring
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LABORATORY QC DATA

Analyte	Source Result	Spike Level	RL	MDL	Units	Result	% REC	% REC Limits	% RPD Limit	RPD Limit	Data Qualifiers
<u>Volatile Organic Compounds by EPA 8260B</u>											
LCS Analyzed: 06/24/09 (Lab Number:9F24023-BS1, Batch: 9F24023)											
1,1,1,2-Tetrachloroethane		25	1.0	0.35	ug/L	28.2	113	76-122			
1,1,1-Trichloroethane		25	1.0	0.26	ug/L	27.0	108	73-126			
1,1,2,2-Tetrachloroethane		25	1.0	0.21	ug/L	25.9	104	70-126			
1,1,2-Trichloroethane		25	1.0	0.23	ug/L	26.5	106	76-122			
1,1,2-Trichlorotrifluoroethane		25	1.0	0.31	ug/L	21.6	87	60-140			
1,1-Dichloroethane		25	1.0	0.75	ug/L	25.5	102	71-129			
1,1-Dichloroethene		25	1.0	0.29	ug/L	25.6	102	65-138			
1,1-Dichloropropene		25	1.0	0.18	ug/L	24.5	98	72-122			
1,2,3-Trichlorobenzene		25	1.0	0.39	ug/L	26.6	106	64-121			
1,2,3-Trichloropropane		25	1.0	0.16	ug/L	24.6	98	68-131			
1,2,4-Trichlorobenzene		25	1.0	0.41	ug/L	27.3	109	70-122			
1,2,4-Trimethylbenzene		25	1.0	0.33	ug/L	26.0	104	76-121			
1,2-Dibromo-3-chloropropane		25	1.0	1.0	ug/L	24.4	98	56-134			
1,2-Dibromoethane (EDB)		25	1.0	0.17	ug/L	27.4	110	77-120			
1,2-Dichlorobenzene		25	1.0	0.20	ug/L	26.9	107	77-120			
1,2-Dichloroethane		25	1.0	0.21	ug/L	27.8	111	75-127			
1,2-Dichloroethene, Total		50	2.0	0.70	ug/L	51.1	102	72-124			
1,2-Dichloropropane		25	1.0	0.14	ug/L	24.9	99	76-120			
1,3,5-Trimethylbenzene		25	1.0	0.22	ug/L	26.1	104	77-121			
1,3-Dichlorobenzene		25	1.0	0.16	ug/L	26.7	107	77-120			
1,3-Dichloropropane		25	1.0	0.21	ug/L	25.7	103	75-120			
1,4-Dichlorobenzene		25	1.0	0.16	ug/L	27.1	109	75-120			
2,2-Dichloropropane		25	1.0	0.75	ug/L	25.6	102	63-136			
2-Butanone (MEK)		120	5.0	1.3	ug/L	126	100	57-140			
2-Chlorotoluene		25	1.0	0.20	ug/L	26.3	105	76-121			
2-Hexanone		120	5.0	1.2	ug/L	129	103	65-127			
4-Chlorotoluene		25	1.0	0.37	ug/L	25.7	103	77-121			
4-Isopropyltoluene		25	1.0	0.31	ug/L	25.2	101	73-120			
4-Methyl-2-pentanone (MIBK)		120	5.0	0.91	ug/L	128	103	71-125			
Acetone		120	5.0	1.3	ug/L	141	113	56-142			
Acetonitrile		1000	40	6.5	ug/L	1070	107	60-140			
Acrolein		500	20	5.5	ug/L	281	56	60-140			L5
Acrylonitrile		120	5.0	0.83	ug/L	128	102	63-138			
Allyl chloride			1.0	0.17	ug/L	ND		60-140			
Benzene		25	1.0	0.16	ug/L	25.3	101	71-124			

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Work Order: RSF0552

Received: 06/11/09
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Project: 3M Tonawanda, NY - Semi-Annual Monitoring
 Project Number: RFW

LABORATORY QC DATA

Analyte	Source Result	Spike Level	RL	MDL	Units	Result	% REC	% REC Limits	% RPD	RPD Limit	Data Qualifiers
Volatile Organic Compounds by EPA 8260B											
LCS Analyzed: 06/24/09 (Lab Number:9F24023-BS1, Batch: 9F24023)											
Bromobenzene		25	1.0	0.17	ug/L	26.3	105	78-120			
Bromochloromethane		25	1.0	0.12	ug/L	27.2	109	72-130			
Bromodichloromethane		25	1.0	0.39	ug/L	26.7	107	80-122			
Bromoform		25	1.0	0.26	ug/L	23.9	95	66-128			
Bromomethane		25	1.0	0.28	ug/L	29.4	118	36-150			
Carbon disulfide		25	1.0	0.19	ug/L	24.9	100	59-134			B
Carbon Tetrachloride		25	1.0	0.27	ug/L	25.9	104	72-134			
Chlorobenzene		25	1.0	0.32	ug/L	26.4	106	72-120			
Chlorodibromomethane		25	1.0	0.32	ug/L	25.2	101	75-125			
Chloroethane		25	1.0	0.32	ug/L	25.9	104	69-136			
Chloroform		25	1.0	0.34	ug/L	27.4	109	73-127			
Chloromethane		25	1.0	0.35	ug/L	23.8	95	49-142			
Chloroprene			1.0	0.18	ug/L	ND		60-140			
cis-1,2-Dichloroethene		25	1.0	0.16	ug/L	25.6	102	74-124			
cis-1,3-Dichloropropene		25	1.0	0.36	ug/L	24.4	98	74-124			
Cyclohexane		25	1.0	0.53	ug/L	21.6	86	70-130			
Dibromomethane		25	1.0	0.41	ug/L	27.4	110	76-127			
Dichlorodifluoromethane		25	1.0	0.29	ug/L	22.8	91	33-157			
Ethyl Methacrylate		25	1.0	0.26	ug/L	25.5	102	60-140			
Ethyl tert-Butyl Ether			1.0	0.60	ug/L	ND		75-125			
Ethylbenzene		25	1.0	0.18	ug/L	26.4	106	77-123			
Hexachlorobutadiene		25	1.0	0.28	ug/L	25.2	101	62-124			
Iodomethane		25	1.0	0.75	ug/L	22.3	89	52-151			
Isobutanol			40	4.4	ug/L	ND		60-140			
Isopropyl ether			1.0	0.17	ug/L	ND		75-125			
Isopropylbenzene		25	1.0	0.19	ug/L	26.6	106	77-122			
Methacrylonitrile			5.0	0.12	ug/L	ND		60-140			
Methyl Acetate		25	1.0	0.17	ug/L	28.7	115	60-140			
Methyl Methacrylate			1.0	0.14	ug/L	ND		60-140			
Methyl tert-Butyl Ether		25	1.0	0.16	ug/L	27.1	109	64-127			
Methylcyclohexane		25	1.0	0.50	ug/L	22.2	89	60-140			
Methylene Chloride		25	1.0	0.44	ug/L	24.5	98	57-132			
m-Xylene & p-Xylene		50	2.0	0.66	ug/L	53.1	106	76-122			
Naphthalene		25	1.0	0.43	ug/L	25.7	103	54-140			
n-Butylbenzene		25	1.0	0.28	ug/L	24.4	98	71-128			
n-Propylbenzene		25	1.0	0.18	ug/L	24.4	98	77-120			
o-Xylene		25	1.0	0.14	ug/L	26.9	107	76-122			
Propionitrile			10	1.9	ug/L	ND		60-140			

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1400 Weston Way
West Chester, PA 19380

Work Order: RSF0552

Received: 06/11/09
Reported: 07/01/09 17:30

Project: 3M Tonawanda, NY - Semi-Annual Monitoring
Project Number: RFW

LABORATORY QC DATA

Analyte	Source Result	Spike Level	RL	MDL	Units	Result	% REC	% REC Limits	% RPD	RPD Limit	Data Qualifiers
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Volatil Organic Compounds by EPA 8260B

LCS Analyzed: 06/24/09 (Lab Number:9F24023-BS1, Batch: 9F24023)

sec-Butylbenzene		25	1.0	0.30	ug/L	25.1	101	74-127			
Styrene		25	1.0	0.18	ug/L	26.9	108	70-130			
t-Amyl alcohol			1.0	1.0	ug/L	ND		75-125			
t-Butanol			20	3.6	ug/L	ND		75-125			
Tert-Amyl Methyl Ether			1.0	0.53	ug/L	ND		75-125			
tert-Butylbenzene		25	1.0	0.30	ug/L	25.8	103	75-123			
Tetrachloroethene		25	1.0	0.36	ug/L	25.9	103	74-122			
Toluene		25	1.0	0.51	ug/L	26.0	104	70-122			
trans-1,2-Dichloroethene		25	1.0	0.13	ug/L	25.5	102	73-127			
trans-1,3-Dichloropropene		25	1.0	0.37	ug/L	24.5	98	72-123			
trans-1,4-Dichloro-2-butene		120	5.0	2.1	ug/L	52.3	42	38-155			
Trichloroethene		25	1.0	0.18	ug/L	26.4	106	74-123			
Trichlorofluoromethane		25	1.0	0.15	ug/L	23.4	93	62-152			
Vinyl acetate		120	5.0	0.85	ug/L	124	100	50-144			
Vinyl chloride		25	1.0	0.24	ug/L	24.7	99	65-133			
Xylenes, total		75	3.0	0.66	ug/L	80.0	107	76-122			
<i>Surrogate:</i>					<i>ug/L</i>		<i>113</i>	<i>66-137</i>			
<i>1,2-Dichloroethane-d4</i>											
<i>Surrogate:</i>					<i>ug/L</i>		<i>114</i>	<i>73-120</i>			
<i>4-Bromofluorobenzene</i>											
<i>Surrogate: Toluene-d8</i>					<i>ug/L</i>		<i>111</i>	<i>71-126</i>			

Volatil Organic Compounds by EPA 8260B

Blank Analyzed: 06/25/09 (Lab Number:9F25035-BLK1, Batch: 9F25035)

Carbon disulfide			1.0	0.19	ug/L	ND					
<i>Surrogate:</i>					<i>ug/L</i>		<i>105</i>	<i>66-137</i>			
<i>1,2-Dichloroethane-d4</i>											
<i>Surrogate:</i>					<i>ug/L</i>		<i>105</i>	<i>73-120</i>			
<i>4-Bromofluorobenzene</i>											
<i>Surrogate: Toluene-d8</i>					<i>ug/L</i>		<i>101</i>	<i>71-126</i>			

LCS Analyzed: 06/25/09 (Lab Number:9F25035-BS1, Batch: 9F25035)

1,1,1,2-Tetrachloroethane		25	1.0	0.35	ug/L	25.6	102	76-122			
1,1,1-Trichloroethane		25	1.0	0.26	ug/L	26.2	105	73-126			
1,1,2,2-Tetrachloroethane		25	1.0	0.21	ug/L	22.9	92	70-126			
1,1,2-Trichloroethane		25	1.0	0.23	ug/L	24.0	96	76-122			
1,1,2-Trichlorotrifluoroethane		25	1.0	0.31	ug/L	22.6	90	60-140			
1,1-Dichloroethane		25	1.0	0.75	ug/L	23.3	93	71-129			

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LABORATORY QC DATA

Analyte	Source Result	Spike Level	RL	MDL	Units	Result	% REC	% REC Limits	% RPD	RPD Limit	Data Qualifiers
Volatile Organic Compounds by EPA 8260B											
LCS Analyzed: 06/25/09 (Lab Number:9F25035-BS1, Batch: 9F25035)											
1,1-Dichloroethene		25	1.0	0.29	ug/L	25.4	101	65-138			
1,1-Dichloropropene		25	1.0	0.18	ug/L	24.9	100	72-122			
1,2,3-Trichlorobenzene		25	1.0	0.39	ug/L	24.7	99	64-121			
1,2,3-Trichloropropane		25	1.0	0.16	ug/L	22.3	89	68-131			
1,2,4-Trichlorobenzene		25	1.0	0.41	ug/L	24.9	99	70-122			
1,2,4-Trimethylbenzene		25	1.0	0.33	ug/L	23.8	95	76-121			
1,2-Dibromo-3-chloropropane		25	1.0	1.0	ug/L	21.4	86	56-134			
1,2-Dibromoethane (EDB)		25	1.0	0.17	ug/L	24.6	99	77-120			
1,2-Dichlorobenzene		25	1.0	0.20	ug/L	24.3	97	77-120			
1,2-Dichloroethane		25	1.0	0.21	ug/L	25.7	103	75-127			
1,2-Dichloroethene, Total		50	2.0	0.70	ug/L	47.6	95	72-124			
1,2-Dichloropropane		25	1.0	0.14	ug/L	22.3	89	76-120			
1,3,5-Trimethylbenzene		25	1.0	0.22	ug/L	24.0	96	77-121			
1,3-Dichlorobenzene		25	1.0	0.16	ug/L	24.5	98	77-120			
1,3-Dichloropropane		25	1.0	0.21	ug/L	23.8	95	75-120			
1,4-Dichlorobenzene		25	1.0	0.16	ug/L	24.6	99	75-120			
2,2-Dichloropropane		25	1.0	0.75	ug/L	23.7	95	63-136			
2-Butanone (MEK)		120	5.0	1.3	ug/L	111	89	57-140			
2-Chlorotoluene		25	1.0	0.20	ug/L	24.1	96	76-121			
2-Hexanone		120	5.0	1.2	ug/L	114	91	65-127			
4-Chlorotoluene		25	1.0	0.37	ug/L	23.8	95	77-121			
4-Isopropyltoluene		25	1.0	0.31	ug/L	24.1	97	73-120			
4-Methyl-2-pentanone (MIBK)		120	5.0	0.91	ug/L	113	90	71-125			
Acetone		120	5.0	1.3	ug/L	122	97	56-142			
Acetonitrile		1000	40	6.5	ug/L	920	92	60-140			
Acrolein		500	20	5.5	ug/L	226	45	60-140			L5
Acrylonitrile		120	5.0	0.83	ug/L	110	88	63-138			
Allyl chloride			1.0	0.17	ug/L	ND		60-140			
Benzene		25	1.0	0.16	ug/L	23.5	94	71-124			
Bromobenzene		25	1.0	0.17	ug/L	24.1	96	78-120			
Bromochloromethane		25	1.0	0.12	ug/L	24.5	98	72-130			
Bromodichloromethane		25	1.0	0.39	ug/L	24.4	98	80-122			
Bromoform		25	1.0	0.26	ug/L	21.6	87	66-128			
Bromomethane		25	1.0	0.28	ug/L	27.3	109	36-150			
Carbon disulfide		25	1.0	0.19	ug/L	21.0	84	59-134			
Carbon Tetrachloride		25	1.0	0.27	ug/L	26.7	107	72-134			

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Work Order: RSF0552

Project: 3M Tonawanda, NY - Semi-Annual Monitoring
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LABORATORY QC DATA

Analyte	Source Result	Spike Level	RL	MDL	Units	Result	% REC	% REC Limits	% RPD	RPD Limit	Data Qualifiers
Volatile Organic Compounds by EPA 8260B											
LCS Analyzed: 06/25/09 (Lab Number:9F25035-BS1, Batch: 9F25035)											
Chlorobenzene		25	1.0	0.32	ug/L	24.9	100	72-120			
Chlorodibromomethane		25	1.0	0.32	ug/L	23.2	93	75-125			
Chloroethane		25	1.0	0.32	ug/L	23.4	94	69-136			
Chloroform		25	1.0	0.34	ug/L	25.0	100	73-127			
Chloromethane		25	1.0	0.35	ug/L	21.5	86	49-142			
Chloroprene			1.0	0.18	ug/L	ND		60-140			
cis-1,2-Dichloroethene		25	1.0	0.16	ug/L	23.6	94	74-124			
cis-1,3-Dichloropropene		25	1.0	0.36	ug/L	21.9	88	74-124			
Cyclohexane		25	1.0	0.53	ug/L	21.7	87	70-130			
Dibromomethane		25	1.0	0.41	ug/L	24.7	99	76-127			
Dichlorodifluoromethane		25	1.0	0.29	ug/L	23.7	95	33-157			
Ethyl Methacrylate		25	1.0	0.26	ug/L	22.2	89	60-140			
Ethyl tert-Butyl Ether			1.0	0.60	ug/L	ND		75-125			
Ethylbenzene		25	1.0	0.18	ug/L	25.0	100	77-123			
Hexachlorobutadiene		25	1.0	0.28	ug/L	25.9	104	62-124			
Iodomethane		25	1.0	0.75	ug/L	20.0	80	52-151			
Isobutanol			40	4.4	ug/L	ND		60-140			
Isopropyl ether			1.0	0.17	ug/L	ND		75-125			
Isopropylbenzene		25	1.0	0.19	ug/L	25.0	100	77-122			
Methacrylonitrile			5.0	0.12	ug/L	ND		60-140			
Methyl Acetate		25	1.0	0.17	ug/L	24.7	99	60-140			
Methyl Methacrylate			1.0	0.14	ug/L	ND		60-140			
Methyl tert-Butyl Ether		25	1.0	0.16	ug/L	23.7	95	64-127			
Methylcyclohexane		25	1.0	0.50	ug/L	22.5	90	60-140			
Methylene Chloride		25	1.0	0.44	ug/L	21.8	87	57-132			
m-Xylene & p-Xylene		50	2.0	0.66	ug/L	50.4	101	76-122			
Naphthalene		25	1.0	0.43	ug/L	23.2	93	54-140			
n-Butylbenzene		25	1.0	0.28	ug/L	23.4	93	71-128			
n-Propylbenzene		25	1.0	0.18	ug/L	23.1	92	77-120			
o-Xylene		25	1.0	0.14	ug/L	24.9	100	76-122			
Propionitrile			10	1.9	ug/L	ND		60-140			
sec-Butylbenzene		25	1.0	0.30	ug/L	24.1	96	74-127			
Styrene		25	1.0	0.18	ug/L	24.7	99	70-130			
t-Amyl alcohol			1.0	1.0	ug/L	ND		75-125			
t-Butanol			20	3.6	ug/L	ND		75-125			
Tert-Amyl Methyl Ether			1.0	0.53	ug/L	ND		75-125			
tert-Butylbenzene		25	1.0	0.30	ug/L	25.8	103	75-123			
Tetrachloroethene		25	1.0	0.36	ug/L	27.1	108	74-122			

TestAmerica Buffalo

10 Hazelwood Drive Amherst, NY 14228 tel 716-691-2600 fax 716-691-7991

www.testamericainc.com

Weston Solutions, Inc. - West Chester, PA
 1400 Weston Way
 West Chester, PA 19380

Work Order: RSF0552

Received: 06/11/09
 Reported: 07/01/09 17:30

Project: 3M Tonawanda, NY - Semi-Annual Monitoring
 Project Number: RFW

LABORATORY QC DATA

Analyte	Source Result	Spike Level	RL	MDL	Units	Result	% REC	% REC Limits	% RPD	RPD Limit	Data Qualifiers
<u>Volatile Organic Compounds by EPA 8260B</u>											
LCS Analyzed: 06/25/09 (Lab Number:9F25035-BS1, Batch: 9F25035)											
Toluene		25	1.0	0.51	ug/L	24.7	99	70-122			
trans-1,2-Dichloroethene		25	1.0	0.13	ug/L	24.0	96	73-127			
trans-1,3-Dichloropropene		25	1.0	0.37	ug/L	22.1	88	72-123			
trans-1,4-Dichloro-2-butene		120	5.0	2.1	ug/L	60.7	49	38-155			
Trichloroethene		25	1.0	0.18	ug/L	25.0	100	74-123			
Trichlorofluoromethane		25	1.0	0.15	ug/L	26.1	104	62-152			
Vinyl acetate		120	5.0	0.85	ug/L	108	86	50-144			
Vinyl chloride		25	1.0	0.24	ug/L	20.9	84	65-133			
Xylenes, total		75	3.0	0.66	ug/L	75.3	100	76-122			
<i>Surrogate:</i>					<i>ug/L</i>		<i>105</i>	<i>66-137</i>			
<i>1,2-Dichloroethane-d4</i>					<i>ug/L</i>		<i>107</i>	<i>73-120</i>			
<i>Surrogate: 4-Bromofluorobenzene</i>					<i>ug/L</i>		<i>101</i>	<i>71-126</i>			
<i>Surrogate: Toluene-d8</i>					<i>ug/L</i>						

TestAmerica

THE LEADER IN ENVIRONMENTAL TESTING

Temperature on Receipt _____
 Drinking Water? Yes No

Chain of Custody Record

Client: **Western Solutions** Chain of Custody Number: **161159**
 Address: **1400 Weston Way** City: **W Chester** State: **PA** Zip Code: **19380**
 Project Manager: **Tom Drew** Date: **6/11/09**
 Telephone Number (Area Code/Fax Number): **610-701-7302** Lab Number: _____
 Site Contact: **Mark Neme** Analysis (Attach list if more space is needed): _____
 Contract/Purchase Order/Quote No.: **3R TOM PA, PA, PA** Carrier/Vendor Number: _____

Sample I.D. No. and Description (Containers for each sample may be combined on one line)	Date	Time	Matrix					Containers & Preservatives					Special Instructions/ Conditions of Receipt	
			MS	DS	MS	DS	MS	DS	MS	DS	MS	DS		
MW-04	6/11/09	1245												OSZ ONLY
MW-04 NP		1245												* 5 ppb
LY-02		1220												DETECTION
TRIP BLANK		1100												LIMIT
FB MW-04		1235												

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)

Sample Disposal:
 Return to Client Disposal By Lab Archive For _____ Months (A fee may be assessed if samples are retained longer than 1 month)

CC Requirements (Specify): _____

1. Relinquished By: *[Signature]* Date: **6/11/09** Time: **1315**
 2. Relinquished By: _____ Date: _____ Time: _____
 3. Relinquished By: _____ Date: _____ Time: _____

Comments: **20**