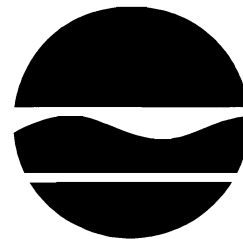


**New York State Department of Environmental Conservation
Division of Environmental Remediation, Region 9**

270 Michigan Avenue, Buffalo, New York, 14203-2915

Phone: (716) 851-7220 • FAX: (716) 851-7226

Website: www.dec.state.gov



Joe Martens
Commissioner

March 16, 2011

Mr. Keith Held
3M Tonawanda
305 Sawyer Avenue
Tonawanda, New York 14150

Dear Mr. Held:

2010 Periodic Review Report
3M O-Cel-O Sponge Site; Site No. 915148
Tonawanda, Erie County, New York

The New York State Department of Environmental Conservation (NYSDEC) is in receipt of the 2010 Periodic Review Report submitted by Weston Solutions, Inc. (Weston) on March 7, 2011 on behalf of the 3M Corporation. This report was submitted in accordance with Order on Consent No. B9-0369-91-04, and describes the groundwater monitoring and maintenance activities that were completed at the Site during 2010. The Periodic Review Report indicates that the remedy for this site remains protective of human health and the environment. This letter, therefore, transmits formal NYSDEC approval of the 2010 Periodic Review Report for the 3M O-Cel-O Sponge Site.

For future Periodic Review Reports, please provide photos of items discussed in the report (e.g., monitoring wells, lysimeters, catch basins, the swale). In addition, please remove the Division of Environmental Remediation, Albany; Director, Bureau of Environmental Exposure Investigation, Troy; Division of Environmental Enforcement, Buffalo; and Mr. O'Connor, New York State Department of Health, Buffalo, from the cc list. As part of the Division's effort to reduce the use of paper in its programs, one hard copy of future Periodic Review Reports will be required.

Lastly, please notify Mr. Brian Sadowski or myself at least ten (10) days prior to the next semiannual sampling event to give us the opportunity to provide oversight. Should you have any questions, please feel free to contact me at (716) 851-7220.

Sincerely yours,



Weston Solutions, Inc.
1400 Weston Way
P.O. Box 2653
West Chester, Pennsylvania 19380
610-701-3000 • Fax 610-701-3186
www.westonsolutions.com

The Trusted Integrator for Sustainable Solutions

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NYSDEC - REGION 9
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March 7, 2011 REL FOIL UNREL

Mr. Brian Sadowski
Division of Environmental Remediation
New York State Department of Environmental Conservation
270 Michigan Avenue
Buffalo, New York 14203-2999

W.O. No. 02181.086.017

Re: Periodic Review Report (January 15, 2010 to February 14, 2011)
and IC/EC Certification
3M Tonawanda, New York Facility
Order on Consent # B9-0369-91-04, Site Code #915148

Dear Mr. Sadowski:

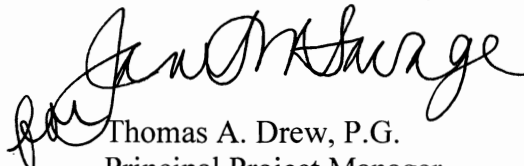
In accordance with the referenced Order on Consent (Order) and at 3M's direction, we are submitting the periodic review report for the 3M Tonawanda, NY facility for the period extending from January 15, 2010 to February 14, 2011.

We also have enclosed the completed Institutional and Engineering Controls Certification Form for this site.

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)
- G. May, NYSDEC (w/enclosure)





Enclosure 1
NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
Site Management Periodic Review Report Notice
Institutional and Engineering Controls Certification Form



	Site Details	Box 1
Site No. 915148		
Site Name 3M O-Cel-O Sponge Plant		
Site Address: 305 SAWYER AVENUE	Zip Code: 14150	
City/Town: Tonawanda		
County: Erie		
Site Acreage: 1.0		
Reporting Period: January 15, 2010 to February 14, 2011		
		YES NO
1. Is the information above correct?		<input checked="" type="checkbox"/> <input type="checkbox"/>
If NO, include handwritten above or on a separate sheet.		
2. Has some or all of the site property been sold, subdivided, merged, or undergone a tax map amendment during this Reporting Period?		<input type="checkbox"/> <input checked="" type="checkbox"/>
3. Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))?		<input type="checkbox"/> <input checked="" type="checkbox"/>
4. Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period?		<input type="checkbox"/> <input checked="" type="checkbox"/>
If you answered YES to questions 2 thru 4, include documentation or evidence that documentation has been previously submitted with this certification form.		
5. Is the site currently undergoing development?		<input type="checkbox"/> <input checked="" type="checkbox"/>
		Box 2
		YES NO
6. Is the current site use consistent with the use(s) listed below? Industrial		<input checked="" type="checkbox"/> <input type="checkbox"/>
7. Are all ICs/ECs in place and functioning as designed?		<input checked="" type="checkbox"/> <input type="checkbox"/>
IF THE ANSWER TO EITHER QUESTION 6 OR 7 IS NO, sign and date below and DO NOT COMPLETE THE REST OF THIS FORM.		
A Corrective Measures Work Plan must be submitted along with this form to address these issues.		
_____ Signature of Owner, Remedial Party or Designated Representative		_____ Date

SITE NO. 915148

Box 3

Description of Institutional Controls

<u>Parcel</u>	<u>Owner</u>	<u>Institutional Control</u>
65.09-6-5	Minnesota Mining & Manufacturing Company	Landuse Restriction Monitoring Plan

Box 4

Description of Engineering Controls

<u>Parcel</u>	<u>Engineering Control</u>
65.09-6-5	Fencing/Access Control

Control Description for Site No. 915148

Parcel: 65.09-6-5

A No Further Action Record of Decision (ROD) was issued for this site in March 1999. A Declaration of Covenants and Restrictions was placed on the property on March 21, 2001 prohibiting the residential use of the site. The graded area surrounding the catch basins are maintained and inspected annually. Groundwater monitoring is also conducted to confirm that site conditions remain unchanged and to detect any future migration of CS2, should it occur. The site is fenced.

Periodic Review Report (PRR) Certification Statements

1. I certify by checking "YES" below that:

a) the Periodic Review report and all attachments were prepared under the direction of, and reviewed by, the party making the certification;

b) to the best of my knowledge and belief, the work and conclusions described in this certification are in accordance with the requirements of the site remedial program, and generally accepted engineering practices; and the information presented is accurate and complete.

YES NO

2. If this site has an IC/EC Plan (or equivalent as required in the Decision Document), for each Institutional or Engineering control listed in Boxes 3 and/or 4, I certify by checking "YES" below that all of the following statements are true:

(a) the Institutional Control and/or Engineering Control(s) employed at this site is unchanged since the date that the Control was put in-place, or was last approved by the Department;

(b) nothing has occurred that would impair the ability of such Control, to protect public health and the environment;

(c) access to the site will continue to be provided to the Department, to evaluate the remedy, including access to evaluate the continued maintenance of this Control;

(d) nothing has occurred that would constitute a violation or failure to comply with the Site Management Plan for this Control; and

(e) if a financial assurance mechanism is required by the oversight document for the site, the mechanism remains valid and sufficient for its intended purpose established in the document.

YES NO

IF THE ANSWER TO QUESTION 2 IS NO, sign and date below and DO NOT COMPLETE THE REST OF THIS FORM.

A Corrective Measures Work Plan must be submitted along with this form to address these issues.

 Signature of Owner, Remedial Party or Designated Representative

 Date

IC CERTIFICATIONS
SITE NO. 915148

Box 6

SITE OWNER OR DESIGNATED REPRESENTATIVE SIGNATURE

I certify that all information and statements in Boxes 2 and/or 3 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

I DOUGLAS E. LANE at 305 SAWYER AVE TONAWANDA NY 14150
print name print business address

am certifying as PLANT MANAGER (Owner or Remedial Party)

for the Site named in the Site Details Section of this form.


Signature of Owner or Remedial Party Rendering Certification

3/2/11
Date

IC/EC CERTIFICATIONS

Box 7

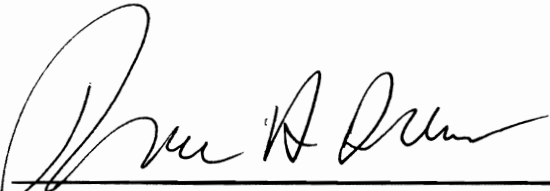
Qualified Environmental Professional Signature

I certify that all information in Boxes 4 and 5 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

Weston Solutions, Inc.

I Thomas A. Drew at 1400 Weston Way, West Chester, PA 19380
print name print business address

am certifying as a Qualified Environmental Professional for the Owner
(Owner or Remedial Party)


Signature of Qualified Environmental Professional, for
the Owner or Remedial Party, Rendering Certification

Stamp
(Required for PE)

3/4/11
Date



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 15, 2010 to February 14, 2011

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 2010 and December 2010. 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-02 on June 14, 2010 in accordance with the O&M Plan modifications approved by NYSDEC. Laboratory analytical results from the June 14, 2010 sampling event are provided in this report.
- Groundwater samples for CS₂ analysis were collected from monitoring well MW-4 (primary sample and duplicate sample) on December 13, 2010 pursuant to the O&M Plan modifications. The sampling results from the December 13, 2010 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.
- The annual compliance inspection/evaluation was completed on November 4, 2010. No deficiencies were noted during the inspection.

Groundwater Monitoring Results

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

Sampling Date	Sample ID and Result		
	MW-4	MW-4 Duplicate	LY-02
6/14/2010	ND	ND	290
12/13/2010	ND	ND	NS

Notes: ND - Not detected. The reporting limit for CS₂ is 5 µg/L for MW-4, and 8 mg/L for LY-02 due to sample dilution at lab.

NS: Not sampled per approved plan.

As noted above, CS₂ was not detected in the groundwater samples (primary and duplicate samples) collected from monitoring well MW-4 in June and December 2010. CS₂ was detected at a concentration of 290 mg/L in the pore water sample collected from lysimeter LY-02. This finding is consistent with previous sample results. A copy of the analytical data packages for the June and December 2010 sampling events is provided in Attachment A.



ATTACHMENT A
LABORATORY ANALYTICAL PACKAGE
JUNE AND DECEMBER 2010 SAMPLING EVENTS

Analytical Report

Work Order: RTF0906

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

Thursday, June 24, 2010

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
 1400 Weston Way
 West Chester, PA 19380

Work Order: RTF0906

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

Received: 06/14/10
 Reported: 06/24/10 11:34

TestAmerica Buffalo Current Certifications

As of 04/16/2010

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
North Dakota	CWA, RCRA	R-176
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
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.

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

Work Order: RTF0906

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

Received: 06/14/10
Reported: 06/24/10 11:34

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.

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

Work Order: RTF0906

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

Received: 06/14/10

Reported: 06/24/10 11:34

DATA QUALIFIERS AND DEFINITIONS

D08 Dilution required due to high concentration of target analyte(s)

NR Any inclusion of NR indicates that the project specific requirements do not require reporting estimated values below the laboratory reporting limit.

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

Work Order: RTF0906

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

Received: 06/14/10
Reported: 06/24/10 11:34

Executive Summary - Detections

Analyte	Sample Result	Data Qualifiers	RL	MDL	Units	Dil Fac	Date Analyzed	Lab Tech	Batch	Method
Sample ID: RTF0906-04 (LY-02 - Monitoring Well)					Sampled: 06/14/10 10:45			Recvd: 06/14/10 11:30		
<u>Volatile Organic Compounds by EPA 8260B</u>										
Carbon disulfide	290000	D08	8000	1600	ug/L	8000	06/22/10 17:52	LH	10F1869	8260B

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

Work Order: RTF0906

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

Received: 06/14/10

Reported: 06/24/10 11:34

Sample Summary

Sample Identification	Lab Number	Client Matrix	Date/Time Sampled	Date/Time Received	Sample Qualifiers
MW-04	RTF0906-01	Monitoring Well	06/14/10 11:00	06/14/10 11:30	
MW-04 DUP	RTF0906-02	Monitoring Well	06/14/10 11:00	06/14/10 11:30	
FB-MW-04	RTF0906-03	Monitoring Well	06/14/10 10:30	06/14/10 11:30	
LY-02	RTF0906-04	Monitoring Well	06/14/10 10:45	06/14/10 11:30	
Trip Blank	RTF0906-05	Water	06/14/10 08:00	06/14/10 11:30	

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

Work Order: RTF0906

Received: 06/14/10
 Reported: 06/24/10 11:34

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

Analytical Report

Analyte	Sample Result	Data Qualifiers	RL	MDL	Units	Dil Fac	Date Analyzed	Lab Tech	Batch	Method
Sample ID: RTF0906-01 (MW-04 - Monitoring Well)			Sampled: 06/14/10 11:00				Recvd: 06/14/10 11:30			
<u>Volatile Organic Compounds by EPA 8260B</u>										
Carbon disulfide	ND		5.0	0.19	ug/L	1.00	06/22/10 16:44	LH	10F1869	8260B
1,2-Dichloroethane-d4	108 %		Surr Limits: (66-137%)				06/22/10 16:44	LH	10F1869	8260B
4-Bromofluorobenzene	94 %		Surr Limits: (73-120%)				06/22/10 16:44	LH	10F1869	8260B
Toluene-d8	121 %		Surr Limits: (71-126%)				06/22/10 16:44	LH	10F1869	8260B

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

Work Order: RTF0906

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

Project Number: RFW

Received: 06/14/10

Reported: 06/24/10 11:34

Analytical Report

Analyte	Sample Result	Data Qualifiers	RL	MDL	Units	Dil Fac	Date Analyzed	Lab Tech	Batch	Method
Sample ID: RTF0906-02 (MW-04 DUP - Monitoring Well)					Sampled: 06/14/10 11:00			Recvd: 06/14/10 11:30		

Volatile Organic Compounds by EPA 8260B

Carbon disulfide	ND		5.0	0.19	ug/L	1.00	06/22/10 17:06	LH	10F1869	8260B
1,2-Dichloroethane-d4	109 %		<i>Surr Limits: (66-137%)</i>				06/22/10 17:06	LH	10F1869	8260B
4-Bromofluorobenzene	95 %		<i>Surr Limits: (73-120%)</i>				06/22/10 17:06	LH	10F1869	8260B
Toluene-d8	122 %		<i>Surr Limits: (71-126%)</i>				06/22/10 17:06	LH	10F1869	8260B

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

Work Order: RTF0906

Received: 06/14/10
 Reported: 06/24/10 11:34

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

Analytical Report

Analyte	Sample Result	Data Qualifiers	RL	MDL	Units	Dil Fac	Date Analyzed	Lab Tech	Batch	Method
Sample ID: RTF0906-03 (FB-MW-04 - Monitoring Well)			Sampled: 06/14/10 10:30				Recvd: 06/14/10 11:30			
<u>Volatile Organic Compounds by EPA 8260B</u>										
Carbon disulfide	ND		5.0	0.19	ug/L	1.00	06/22/10 17:29	LH	10F1869	8260B
1,2-Dichloroethane-d4	107 %		<i>Surr Limits: (66-137%)</i>				06/22/10 17:29	LH	10F1869	8260B
4-Bromofluorobenzene	95 %		<i>Surr Limits: (73-120%)</i>				06/22/10 17:29	LH	10F1869	8260B
Toluene-d8	122 %		<i>Surr Limits: (71-126%)</i>				06/22/10 17:29	LH	10F1869	8260B

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

Work Order: RTF0906

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

Received: 06/14/10

Reported: 06/24/10 11:34

Analytical Report

Analyte	Sample Result	Data Qualifiers	RL	MDL	Units	Dil Fac	Date Analyzed	Lab Tech	Batch	Method
Sample ID: RTF0906-04 (LY-02 - Monitoring Well)			Sampled: 06/14/10 10:45				Recvd: 06/14/10 11:30			
<u>Volatile Organic Compounds by EPA 8260B</u>										
Carbon disulfide	290000	D08	8000	1600	ug/L	8000	06/22/10 17:52	LH	10F1869	8260B
1,2-Dichloroethane-d4	106 %	D08	Surr Limits: (66-137%)				06/22/10 17:52	LH	10F1869	8260B
4-Bromofluorobenzene	93 %	D08	Surr Limits: (73-120%)				06/22/10 17:52	LH	10F1869	8260B
Toluene-d8	120 %	D08	Surr Limits: (71-126%)				06/22/10 17:52	LH	10F1869	8260B

Weston Solutions, Inc. - West Chester, PA
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Work Order: RTF0906

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

Analytical Report

Analyte	Sample Result	Data Qualifiers	RL	MDL	Units	Dil Fac	Date Analyzed	Lab Tech	Batch	Method
Sample ID: RTF0906-05 (Trip Blank - Water)							Sampled: 06/14/10 08:00	Recvd: 06/14/10 11:30		
<u>Volatile Organic Compounds by EPA 8260B</u>										
Carbon disulfide	ND		5.0	0.19	ug/L	1.00	06/22/10 18:15	LH	10F1869	8260B
1,2-Dichloroethane-d4	108 %		<i>Surr Limits: (66-137%)</i>				06/22/10 18:15	LH	10F1869	8260B
4-Bromofluorobenzene	95 %		<i>Surr Limits: (73-120%)</i>				06/22/10 18:15	LH	10F1869	8260B
Toluene-d8	121 %		<i>Surr Limits: (71-126%)</i>				06/22/10 18:15	LH	10F1869	8260B

Weston Solutions, Inc. - West Chester, PA
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Work Order: RTF0906

Project: 3M Tonawanda, NY - Semi-Annual Monitoring
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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	10F1869	RTF0906-01	5.00	mL	5.00	mL	06/22/10 10:18	LCH	5030B MS
8260B	10F1869	RTF0906-02	5.00	mL	5.00	mL	06/22/10 10:18	LCH	5030B MS
8260B	10F1869	RTF0906-03	5.00	mL	5.00	mL	06/22/10 10:18	LCH	5030B MS
8260B	10F1869	RTF0906-04	5.00	mL	5.00	mL	06/22/10 10:18	LCH	5030B MS
8260B	10F1869	RTF0906-05	5.00	mL	5.00	mL	06/22/10 10:18	LCH	5030B MS

Weston Solutions, Inc. - West Chester, PA
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 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											
Blank Analyzed: 06/22/10 (Lab Number:10F1869-BLK1, Batch: 10F1869)											
Carbon disulfide			5.0	0.19	ug/L	ND					
<i>Surrogate:</i>					ug/L		107	66-137			
<i>1,2-Dichloroethane-d4</i>					ug/L		95	73-120			
<i>Surrogate:</i>					ug/L		124	71-126			
<i>4-Bromofluorobenzene</i>					ug/L						
<i>Surrogate: Toluene-d8</i>					ug/L						
LCS Analyzed: 06/22/10 (Lab Number:10F1869-BS1, Batch: 10F1869)											
Carbon disulfide			1.0	0.19	ug/L	ND		59-134			
<i>Surrogate:</i>					ug/L		105	66-137			
<i>1,2-Dichloroethane-d4</i>					ug/L		97	73-120			
<i>Surrogate:</i>					ug/L		118	71-126			
<i>4-Bromofluorobenzene</i>					ug/L						
<i>Surrogate: Toluene-d8</i>					ug/L						

Chain of Custody Record

Client Information
 Client Contact: Greg Flasiński
 Name: 610.721.0583
 Lab P.M.: Mark Nemeec
 E-Mail: mark_nemeec@testamerica.com

Company: Weston Solutions, Inc. - West Chester, PA
 Address: 1400 Weston Way
 City: West Chester
 State: PA Zip: 19380
 Phone: (610) 701-7302
 Email: T.Drew@WestonSolutions.com
 Project Name: 3M Tonawanda, NY - Semi-Annual Monitoring - NY1A86
 Site: 3M Tonawanda, NY - Semi-Annual Monitoring - NY1A867

Due Date Requested: TAT Requested (Business Days) 15

Sample Identification	Sample Date	Sample Time	Sample Type (Ck Comp, G-grab)	Matrix (Water, Soil, Other)	Preserv-Cont Code	Field Filtered Sample (Yes or No)	Perform MS/MSD (Yes or No)	Notes	Total Number of Containers	Special Instructions/Notes
MW-04	6/14/10	1100	G	W					3	
MW-04 DUP	6/14/10	1100	G	W					3	
FB-MW-04	6/14/10	1030	G	W					3	
LY-02	6/14/10	1045	G	W					3	
Trip Blank	6/14/10	800	G	W					3	

Parameter(s) Requested: CS ONLY (5 ppb)

Preservation Codes: A-HCl, B-NaOH, C-Zn Acetate, D-Misc Acid, E-ice, H-Nitric, S-H2SO4, V-NACAA, Container Codes: T-Tadjar, G-Glass, P-PolyPlastic, B-Sunbina, Z-Z

Sample Disposal: Return To Client Disposal By Lab Archive For _____ Months

Special Instructions/QC Requirements: CS ONLY (5 ppb) Detection Limit

Possible Hazard Identification: Non-Hazard Flammable Skin Irritant Poison B Unknown Radiological

Deliverable Requested: I, II, III, IV, Other (specify)

Empty Kit Requisitioned by: [Signature] Date: 6/14/10 Time: 1130

Received by: [Signature] Date/Time: 6/24/10 1130 Company: TAT

Received by: [Signature] Date/Time: _____ Company: _____

Custody Seal No.: 110

Analytical Report

Work Order: RTL0904

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

Monday, December 20, 2010

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
 1400 Weston Way
 West Chester, PA 19380

Work Order: RTL0904

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

Received: 12/13/10
 Reported: 12/20/10 09:38

TestAmerica Buffalo Current Certifications

As of 08/16/2010

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	10026
North Dakota	CWA, RCRA	R-176
Oklahoma	CWA, RCRA	9421
Oregon*	CWA, RCRA	NY200003
Pennsylvania*	NELAP CWA, RCRA	68-00281
Tennessee	SDWA	02970
Texas*	NELAP CWA, RCRA	T104704412-08-TX
USDA	FOREIGN SOIL PERMIT	S-41579
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.

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

Work Order: RTL0904

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

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Reported: 12/20/10 09:38

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.

Weston Solutions, Inc. - West Chester, PA
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Work Order: RTL0904

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

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DATA QUALIFIERS AND DEFINITIONS

NR Any inclusion of NR indicates that the project specific requirements do not require reporting estimated values below the laboratory reporting limit.

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

Work Order: RTL0904

Received: 12/13/10
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Project: 3M Tonawanda, NY - Semi-Annual Monitoring
Project Number: RFW

Executive Summary - Detections

Analyte	Sample Result	Data Qualifiers	Units	Dil Fac	Date Analyzed	Lab Tech	Batch	Method
				Sampled:			Recvd:	

Weston Solutions, Inc. - West Chester, PA
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Work Order: RTL0904

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

Received: 12/13/10
Reported: 12/20/10 09:38

Sample Summary

Sample Identification	Lab Number	Client Matrix	Date/Time Sampled	Date/Time Received	Sample Qualifiers
MW-04	RTL0904-01	Monitoring Well	12/13/10 11:45	12/13/10 12:55	
MW-04 DUP	RTL0904-02	Monitoring Well	12/13/10 11:45	12/13/10 12:55	
FB-MW-04	RTL0904-03	Monitoring Well	12/13/10 10:45	12/13/10 12:55	
Trip Blank	RTL0904-04	Water	12/13/10 10:00	12/13/10 12:55	

Weston Solutions, Inc. - West Chester, PA
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Work Order: RTL0904

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

Received: 12/13/10
 Reported: 12/20/10 09:38

Analytical Report

Analyte	Sample Result	Data Qualifiers	RL	MDL	Units	Dil Fac	Date Analyzed	Lab Tech	Batch	Method
Sample ID: RTL0904-01 (MW-04 - Monitoring Well)						Sampled: 12/13/10 11:45		Recvd: 12/13/10 12:55		
<u>Volatile Organic Compounds by EPA 8260B</u>										
Carbon disulfide	ND		5.0	0.19	ug/L	1.00	12/15/10 21:22	DHC	10L1254	8260B
1,2-Dichloroethane-d4	92 %		<i>Surr Limits: (66-137%)</i>				12/15/10 21:22	DHC	10L1254	8260B
4-Bromofluorobenzene	91 %		<i>Surr Limits: (73-120%)</i>				12/15/10 21:22	DHC	10L1254	8260B
Toluene-d8	89 %		<i>Surr Limits: (71-126%)</i>				12/15/10 21:22	DHC	10L1254	8260B

Weston Solutions, Inc. - West Chester, PA
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Work Order: RTL0904

Received: 12/13/10
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Project: 3M Tonawanda, NY - Semi-Annual Monitoring
 Project Number: RFW

Analytical Report

Analyte	Sample Result	Data Qualifiers	RL	MDL	Units	Dil Fac	Date Analyzed	Lab Tech	Batch	Method
Sample ID: RTL0904-02 (MW-04 DUP - Monitoring Well)							Sampled: 12/13/10 11:45		Recvd: 12/13/10 12:55	
<u>Volatile Organic Compounds by EPA 8260B</u>										
Carbon disulfide	ND		5.0	0.19	ug/L	1.00	12/15/10 21:44	DHC	10L1254	8260B
1,2-Dichloroethane-d4	89 %		<i>Surr Limits: (66-137%)</i>				12/15/10 21:44	DHC	10L1254	8260B
4-Bromofluorobenzene	89 %		<i>Surr Limits: (73-120%)</i>				12/15/10 21:44	DHC	10L1254	8260B
Toluene-d8	88 %		<i>Surr Limits: (71-126%)</i>				12/15/10 21:44	DHC	10L1254	8260B

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

Work Order: RTL0904

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

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 Reported: 12/20/10 09:38

Analytical Report

Analyte	Sample Result	Data Qualifiers	RL	MDL	Units	Dil Fac	Date Analyzed	Lab Tech	Batch	Method
Sample ID: RTL0904-03 (FB-MW-04 - Monitoring Well)			Sampled: 12/13/10 10:45				Recvd: 12/13/10 12:55			
<u>Volatile Organic Compounds by EPA 8260B</u>										
Carbon disulfide	ND		5.0	0.19	ug/L	1.00	12/16/10 14:42	DHC	10L1367	8260B
1,2-Dichloroethane-d4	88 %		<i>Surr Limits: (66-137%)</i>				12/16/10 14:42	DHC	10L1367	8260B
4-Bromofluorobenzene	89 %		<i>Surr Limits: (73-120%)</i>				12/16/10 14:42	DHC	10L1367	8260B
Toluene-d8	87 %		<i>Surr Limits: (71-126%)</i>				12/16/10 14:42	DHC	10L1367	8260B

Weston Solutions, Inc. - West Chester, PA
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Project: 3M Tonawanda, NY - Semi-Annual Monitoring
 Project Number: RFW

Analytical Report

Analyte	Sample Result	Data Qualifiers	RL	MDL	Units	Dil Fac	Date Analyzed	Lab Tech	Batch	Method
Sample ID: RTL0904-04 (Trip Blank - Water)							Sampled: 12/13/10 10:00		Recvd: 12/13/10 12:55	
<u>Volatile Organic Compounds by EPA 8260B</u>										
Carbon disulfide	ND		5.0	0.19	ug/L	1.00	12/16/10 15:04	DHC	10L1367	8260B
1,2-Dichloroethane-d4	88 %		<i>Surr Limits: (66-137%)</i>				12/16/10 15:04	DHC	10L1367	8260B
4-Bromofluorobenzene	89 %		<i>Surr Limits: (73-120%)</i>				12/16/10 15:04	DHC	10L1367	8260B
Toluene-d8	88 %		<i>Surr Limits: (71-126%)</i>				12/16/10 15:04	DHC	10L1367	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	10L1254	RTL0904-01	5.00	mL	5.00	mL	12/15/10 10:12	DHC	5030B MS
8260B	10L1254	RTL0904-02	5.00	mL	5.00	mL	12/15/10 10:12	DHC	5030B MS
8260B	10L1367	RTL0904-03	5.00	mL	5.00	mL	12/16/10 10:36	DHC	5030B MS
8260B	10L1367	RTL0904-04	5.00	mL	5.00	mL	12/16/10 10:36	DHC	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
<u>Volatile Organic Compounds by EPA 8260B</u>											
Blank Analyzed: 12/15/10 (Lab Number:10L1254-BLK1, Batch: 10L1254)											
Carbon disulfide			5.0	0.19	ug/L	ND					
<i>Surrogate:</i>					ug/L		87	66-137			
<i>1,2-Dichloroethane-d4</i>					ug/L		94	73-120			
<i>4-Bromofluorobenzene</i>					ug/L		89	71-126			
<i>Surrogate: Toluene-d8</i>					ug/L						
LCS Analyzed: 12/15/10 (Lab Number:10L1254-BS1, Batch: 10L1254)											
Carbon disulfide			1.0	0.19	ug/L	ND		59-134			
<i>Surrogate:</i>					ug/L		89	66-137			
<i>1,2-Dichloroethane-d4</i>					ug/L		93	73-120			
<i>4-Bromofluorobenzene</i>					ug/L		90	71-126			
<i>Surrogate: Toluene-d8</i>					ug/L						
<u>Volatile Organic Compounds by EPA 8260B</u>											
Blank Analyzed: 12/16/10 (Lab Number:10L1367-BLK1, Batch: 10L1367)											
Carbon disulfide			5.0	0.19	ug/L	ND					
<i>Surrogate:</i>					ug/L		88	66-137			
<i>1,2-Dichloroethane-d4</i>					ug/L		90	73-120			
<i>4-Bromofluorobenzene</i>					ug/L		89	71-126			
<i>Surrogate: Toluene-d8</i>					ug/L						
LCS Analyzed: 12/16/10 (Lab Number:10L1367-BS1, Batch: 10L1367)											
Carbon disulfide			1.0	0.19	ug/L	ND		59-134			
<i>Surrogate:</i>					ug/L		88	66-137			
<i>1,2-Dichloroethane-d4</i>					ug/L		93	73-120			
<i>4-Bromofluorobenzene</i>					ug/L		89	71-126			
<i>Surrogate: Toluene-d8</i>					ug/L						

Chain of Custody Record

Client Information Client Contact: Tom Drew Company: Weston Solutions, Inc. - West Chester, PA Address: 1400 Weston Way City: West Chester State, Zip: PA, 19380 Phone: (610) 701-7302 Email: T.Drew@WestonSolutions.com Project Name: 3M Tonawanda, NY - Semi-Annual Monitoring - NY1A88 Site: 3M Tonawanda, NY - Semi-Annual Monitoring - NY1A867		Lab P/N: 11082010_10:25_1 Mark Name: mark.nemac@testamericainc.com Phone:		Carrier Tracking Note:	
Due Date Requested: TAT Requested (Business Days): 16 PO #: 21027 W/O #: RTL0085 Project #: 3M Tonawanda, NY - Semi-Annual Monitoring SSOW#:		Parameter(s) Requested:			
Preservation Codes: A-HCL B-H2O2 C-Zn Acetate D-Nitric Acid J-None K-None L-H2SO4 M-None N-None O-None P-None Q-None R-None S-None T-None U-None V-None W-None X-None Y-None Z-None		Total Number of Containers:			
Sample Identification: MW-04 MW-04 DUP -BY-01 FB-MW-04 -BY-01 Trip Blank		Sample Date: 12/13/10 Sample Time: 1145 Sample Date: 12/13/10 Sample Time: 1145 Sample Date: 12/13/10 Sample Time: 1045 Sample Date: 12/13/10 Sample Time: 1000		Matrix: G, W Sample Type: G, W, W Matrix (C-Comp, G-Grab): G, W, W Priority-Cont. Code: A-V Field Filtered Sample (Yes or No): Yes (Carbon Disulfide @ 5.0 ug/L): Special Instructions/Note: CS2 Spbk X	
Possible Hazard Identification <input type="checkbox"/> Non-hazard <input type="checkbox"/> Flammable <input type="checkbox"/> Skin Irritant <input type="checkbox"/> Unknown <input type="checkbox"/> Radiological Deliverable Requested I, II, III, IV, Other (specify):					
Empty Kit Requisitioned by:					
Sample Disposal (A fee may be assessed if samples are retained longer than 7 months) <input type="checkbox"/> Return To Client <input type="checkbox"/> Dispose By Lab <input type="checkbox"/> Archive For _____ Months					
Special Instructions/OC Requirements:					
Date: 12/13/10 1255 Received by: [Signature] Company: [Signature]		Date: 12/13/10 1255 Received by: [Signature] Company: [Signature]		Date: 12/13/10 1255 Received by: [Signature] Company: [Signature]	
Custody Seal No.: A Yes A No Custody Seal No.: 60.C					