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July 8, 2011

Mr. Brian Sadowski
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 – February 15, 2011 to June 30, 2011
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 February 15, 2011 to June 30, 2011.

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)
- G. May, NYSDEC (w/ enclosure)
- J. Pettinelli, 3M (w/ enclosure)
- K. Held, 3M (w/ enclosure)

an employee-owned company



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: February 15, 2011 to June 30, 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 2011. 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 6, 2011 in accordance with the O&M Plan modifications approved by NYSDEC. Laboratory analytical results from the June 2011 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
6/6/11	ND	ND	560

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 2011. 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 2011 sampling event is provided in Attachment A.

ATTACHMENT A
LABORATORY ANALYTICAL PACKAGE
JUNE 2011 SAMPLING EVENT

TestAmerica

THE LEADER IN ENVIRONMENTAL TESTING

ANALYTICAL REPORT

TestAmerica Laboratories, Inc.

TestAmerica Buffalo

10 Hazelwood Drive

Amherst, NY 14228-2298

Tel: (716)691-2600

TestAmerica Job ID: 480-5745-1

Client Project/Site: 3M Tonawanda

Sampling Event: 3M Tonawanda, NY - Semi-Annual Monit.

For:

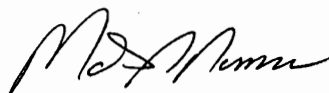
Weston Solutions, Inc.

1400 Weston Way

PO BOX 2653

West Chester, Pennsylvania 19380

Attn: Mr. Tom Drew



Authorized for release by:

06/20/2011 03:54:20 PM

Mark Nemec

Customer Service Manager

mark.nemec@testamericainc.com

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Results relate only to the items tested and the sample(s) as received by the laboratory. The test results in this report meet all 2003 NELAC requirements for accredited parameters, exceptions are noted in this report. Pursuant to NELAC, this report may not be reproduced except in full, and with written approval from the laboratory. For questions please contact the Project Manager at the e-mail address or telephone number listed on this page.

This report has been electronically signed and authorized by the signatory. Electronic signature is intended to be the legally binding equivalent of a traditionally handwritten signature.

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Definitions/Glossary

Client: Weston Solutions, Inc.
Project/Site: 3M Tonawanda

TestAmerica Job ID: 480-5745-1

Glossary

Abbreviation	These commonly used abbreviations may or may not be present in this report.
☼	Listed under the "D" column to designate that the result is reported on a dry weight basis.
EPA	United States Environmental Protection Agency
ND	Not Detected above the reporting level.
MDL	Method Detection Limit
RL	Reporting Limit
RE, RE1 (etc.)	Indicates a Re-extraction or Reanalysis of the sample.
%R	Percent Recovery
RPD	Relative Percent Difference, a measure of the relative difference between two points.

Case Narrative

Client: Weston Solutions, Inc.
Project/Site: 3M Tonawanda

TestAmerica Job ID: 480-5745-1

Job ID: 480-5745-1

Laboratory: TestAmerica Buffalo

Narrative

Job Narrative 480-5745-1

Comments

No additional comments.

Receipt

All samples were received in good condition within temperature requirements.

GC/MS VOA

Method(s) 8260B: The following sample was diluted due to the abundance of target analytes: LY-02 (480-5745-4). Elevated reporting limits (RLs) are provided.

No other analytical or quality issues were noted.

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Detection Summary

Client: Weston Solutions, Inc.
Project/Site: 3M Tonawanda

TestAmerica Job ID: 480-5745-1

Client Sample ID: FB-MW-04

Lab Sample ID: 480-5745-1

No Detections.

Client Sample ID: MW-04

Lab Sample ID: 480-5745-2

No Detections.

Client Sample ID: MW-04 DUP

Lab Sample ID: 480-5745-3

No Detections.

Client Sample ID: LY-02

Lab Sample ID: 480-5745-4

Analyte	Result	Qualifier	RL	MDL	Unit	Dil Fac	D	Method	Prep Type
Carbon disulfide	560000		40000	1500	ug/L	8000		8260B	Total/NA

Client Sample ID: Trip Blank

Lab Sample ID: 480-5745-5

No Detections.

Client Sample Results

Client: Weston Solutions, Inc.
Project/Site: 3M Tonawanda

TestAmerica Job ID: 480-5745-1

Client Sample ID: FB-MW-04

Lab Sample ID: 480-5745-1

Date Collected: 06/06/11 08:50

Matrix: Monitor Well

Date Received: 06/06/11 10:20

Method: 8260B - Volatile Organic Compounds (GC/MS)

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Carbon disulfide	ND		5.0	0.19	ug/L			06/11/11 10:58	1
Surrogate	% Recovery	Qualifier	Limits				Prepared	Analyzed	Dil Fac
1,2-Dichloroethane-d4 (Surr)	125		66 - 137					06/11/11 10:58	1
Toluene-d8 (Surr)	100		71 - 126					06/11/11 10:58	1
4-Bromofluorobenzene (Surr)	99		73 - 120					06/11/11 10:58	1

Client Sample ID: MW-04

Lab Sample ID: 480-5745-2

Date Collected: 06/06/11 09:45

Matrix: Monitor Well

Date Received: 06/06/11 10:20

Method: 8260B - Volatile Organic Compounds (GC/MS)

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Carbon disulfide	ND		5.0	0.19	ug/L			06/11/11 11:20	1
Surrogate	% Recovery	Qualifier	Limits				Prepared	Analyzed	Dil Fac
1,2-Dichloroethane-d4 (Surr)	125		66 - 137					06/11/11 11:20	1
Toluene-d8 (Surr)	100		71 - 126					06/11/11 11:20	1
4-Bromofluorobenzene (Surr)	97		73 - 120					06/11/11 11:20	1

Client Sample ID: MW-04 DUP

Lab Sample ID: 480-5745-3

Date Collected: 06/06/11 09:45

Matrix: Monitor Well

Date Received: 06/06/11 10:20

Method: 8260B - Volatile Organic Compounds (GC/MS)

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Carbon disulfide	ND		5.0	0.19	ug/L			06/11/11 11:42	1
Surrogate	% Recovery	Qualifier	Limits				Prepared	Analyzed	Dil Fac
1,2-Dichloroethane-d4 (Surr)	126		66 - 137					06/11/11 11:42	1
Toluene-d8 (Surr)	100		71 - 126					06/11/11 11:42	1
4-Bromofluorobenzene (Surr)	98		73 - 120					06/11/11 11:42	1

Client Sample ID: LY-02

Lab Sample ID: 480-5745-4

Date Collected: 06/06/11 10:00

Matrix: Monitor Well

Date Received: 06/06/11 10:20

Method: 8260B - Volatile Organic Compounds (GC/MS)

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Carbon disulfide	560000		40000	1500	ug/L			06/11/11 12:05	8000
Surrogate	% Recovery	Qualifier	Limits				Prepared	Analyzed	Dil Fac
1,2-Dichloroethane-d4 (Surr)	126		66 - 137					06/11/11 12:05	8000
Toluene-d8 (Surr)	102		71 - 126					06/11/11 12:05	8000
4-Bromofluorobenzene (Surr)	98		73 - 120					06/11/11 12:05	8000

TestAmerica Buffalo

Client Sample Results

Client: Weston Solutions, Inc.
Project/Site: 3M Tonawanda

TestAmerica Job ID: 480-5745-1

Client Sample ID: Trip Blank

Lab Sample ID: 480-5745-5

Date Collected: 06/06/11 08:00

Matrix: Water

Date Received: 06/06/11 10:20

Method: 8260B - Volatile Organic Compounds (GC/MS)

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Carbon disulfide	ND		5.0	0.19	ug/L			06/11/11 12:27	1

Surrogate	% Recovery	Qualifier	Limits	Prepared	Analyzed	Dil Fac
1,2-Dichloroethane-d4 (Surr)	128		66 - 137		06/11/11 12:27	1
Toluene-d8 (Surr)	102		71 - 126		06/11/11 12:27	1
4-Bromofluorobenzene (Surr)	98		73 - 120		06/11/11 12:27	1

Surrogate Summary

Client: Weston Solutions, Inc.
Project/Site: 3M Tonawanda

TestAmerica Job ID: 480-5745-1

Method: 8260B - Volatile Organic Compounds (GC/MS)

Matrix: Monitor Well

Prep Type: Total/NA

Lab Sample ID	Client Sample ID	Percent Surrogate Recovery (Acceptance Limits)		
		12DCE (66-137)	TOL (71-126)	BFB (73-120)
480-5745-1	FB-MW-04	125	100	99
480-5745-2	MW-04	125	100	97
480-5745-3	MW-04 DUP	126	100	98
480-5745-4	LY-02	126	102	98

Surrogate Legend

12DCE = 1,2-Dichloroethane-d4 (Surr)

TOL = Toluene-d8 (Surr)

BFB = 4-Bromofluorobenzene (Surr)

Method: 8260B - Volatile Organic Compounds (GC/MS)

Matrix: Water

Prep Type: Total/NA

Lab Sample ID	Client Sample ID	Percent Surrogate Recovery (Acceptance Limits)		
		12DCE (66-137)	TOL (71-126)	BFB (73-120)
480-5745-5	Trip Blank	128	102	98
LCS 480-19614/3	Lab Control Sample	124	101	100
MB 480-19614/4	Method Blank	124	102	97

Surrogate Legend

12DCE = 1,2-Dichloroethane-d4 (Surr)

TOL = Toluene-d8 (Surr)

BFB = 4-Bromofluorobenzene (Surr)

QC Sample Results

Client: Weston Solutions, Inc.
Project/Site: 3M Tonawanda

TestAmerica Job ID: 480-5745-1

Method: 8260B - Volatile Organic Compounds (GC/MS)

Lab Sample ID: MB 480-19614/4

Matrix: Water

Analysis Batch: 19614

Client Sample ID: Method Blank

Prep Type: Total/NA

Analyte	MB Result	MB Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Carbon disulfide	ND		5.0	0.19	ug/L			06/11/11 10:35	1

Surrogate	MB % Recovery	MB Qualifier	Limits	Prepared	Analyzed	Dil Fac
1,2-Dichloroethane-d4 (Surr)	124		66 - 137		06/11/11 10:35	1
Toluene-d8 (Surr)	102		71 - 126		06/11/11 10:35	1
4-Bromofluorobenzene (Surr)	97		73 - 120		06/11/11 10:35	1

Lab Sample ID: LCS 480-19614/3

Matrix: Water

Analysis Batch: 19614

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Surrogate	LCS % Recovery	LCS Qualifier	Limits
1,2-Dichloroethane-d4 (Surr)	124		66 - 137
Toluene-d8 (Surr)	101		71 - 126
4-Bromofluorobenzene (Surr)	100		73 - 120

QC Association Summary

Client: Weston Solutions, Inc.
Project/Site: 3M Tonawanda

TestAmerica Job ID: 480-5745-1

GC/MS VOA

Analysis Batch: 19614

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
LCS 480-19614/3	Lab Control Sample	Total/NA	Water	8260B	
MB 480-19614/4	Method Blank	Total/NA	Water	8260B	
480-5745-1	FB-MW-04	Total/NA	Monitor Well	8260B	
480-5745-2	MW-04	Total/NA	Monitor Well	8260B	
480-5745-3	MW-04 DUP	Total/NA	Monitor Well	8260B	
480-5745-4	LY-02	Total/NA	Monitor Well	8260B	
480-5745-5	Trip Blank	Total/NA	Water	8260B	

Lab Chronicle

Client: Weston Solutions, Inc.
Project/Site: 3M Tonawanda

TestAmerica Job ID: 480-5745-1

Client Sample ID: FB-MW-04

Date Collected: 06/06/11 08:50

Date Received: 06/06/11 10:20

Lab Sample ID: 480-5745-1

Matrix: Monitor Well

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared Or Analyzed	Analyst	Lab
Total/NA	Analysis	8260B		1	19614	06/11/11 10:58	TRB	TAL BUF

Client Sample ID: MW-04

Date Collected: 06/06/11 09:45

Date Received: 06/06/11 10:20

Lab Sample ID: 480-5745-2

Matrix: Monitor Well

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared Or Analyzed	Analyst	Lab
Total/NA	Analysis	8260B		1	19614	06/11/11 11:20	TRB	TAL BUF

Client Sample ID: MW-04 DUP

Date Collected: 06/06/11 09:45

Date Received: 06/06/11 10:20

Lab Sample ID: 480-5745-3

Matrix: Monitor Well

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared Or Analyzed	Analyst	Lab
Total/NA	Analysis	8260B		1	19614	06/11/11 11:42	TRB	TAL BUF

Client Sample ID: LY-02

Date Collected: 06/06/11 10:00

Date Received: 06/06/11 10:20

Lab Sample ID: 480-5745-4

Matrix: Monitor Well

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared Or Analyzed	Analyst	Lab
Total/NA	Analysis	8260B		8000	19614	06/11/11 12:05	TRB	TAL BUF

Client Sample ID: Trip Blank

Date Collected: 06/06/11 08:00

Date Received: 06/06/11 10:20

Lab Sample ID: 480-5745-5

Matrix: Water

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared Or Analyzed	Analyst	Lab
Total/NA	Analysis	8260B		1	19614	06/11/11 12:27	TRB	TAL BUF

Laboratory References:

TAL BUF = TestAmerica Buffalo, 10 Hazelwood Drive, Amherst, NY 14228-2298, TEL (716)691-2600

Certification Summary

Client: Weston Solutions, Inc.
Project/Site: 3M Tonawanda

TestAmerica Job ID: 480-5745-1

Laboratory	Authority	Program	EPA Region	Certification ID
TestAmerica Buffalo	Arkansas	State Program	6	88-0686
TestAmerica Buffalo	California	NELAC	9	1169CA
TestAmerica Buffalo	Connecticut	State Program	1	PH-0568
TestAmerica Buffalo	Florida	NELAC	4	E87672
TestAmerica Buffalo	Georgia	Georgia EPD	4	N/A
TestAmerica Buffalo	Georgia	State Program	4	956
TestAmerica Buffalo	Illinois	NELAC	5	100325 / 200003
TestAmerica Buffalo	Iowa	State Program	7	374
TestAmerica Buffalo	Kansas	NELAC	7	E-10187
TestAmerica Buffalo	Kentucky	Kentucky UST	4	30
TestAmerica Buffalo	Kentucky	State Program	4	90029
TestAmerica Buffalo	Louisiana	NELAC	6	02031
TestAmerica Buffalo	Maine	State Program	1	NY0044
TestAmerica Buffalo	Maryland	State Program	3	294
TestAmerica Buffalo	Massachusetts	State Program	1	M-NY044
TestAmerica Buffalo	Michigan	State Program	5	9937
TestAmerica Buffalo	Minnesota	NELAC	5	036-999-337
TestAmerica Buffalo	New Hampshire	NELAC	1	68-00281
TestAmerica Buffalo	New Hampshire	NELAC	1	2337
TestAmerica Buffalo	New Jersey	NELAC	2	NY455
TestAmerica Buffalo	New York	NELAC	2	10026
TestAmerica Buffalo	North Dakota	State Program	8	R-176
TestAmerica Buffalo	Oklahoma	State Program	6	9421
TestAmerica Buffalo	Oregon	NELAC	10	NY200003
TestAmerica Buffalo	Pennsylvania	NELAC	3	68-00281
TestAmerica Buffalo	Tennessee	State Program	4	TN02970
TestAmerica Buffalo	Texas	NELAC	6	T104704412-08-TX
TestAmerica Buffalo	USDA	USDA		P330-08-00242
TestAmerica Buffalo	Virginia	State Program	3	278
TestAmerica Buffalo	Washington	State Program	10	C1677
TestAmerica Buffalo	West Virginia	West Virginia DEP	3	252
TestAmerica Buffalo	Wisconsin	State Program	5	998310390

Accreditation may not be offered or required for all methods and analytes reported in this package. Please contact your project manager for the laboratory's current list of certified methods and analytes.

Method Summary

Client: Weston Solutions, Inc.
Project/Site: 3M Tonawanda

TestAmerica Job ID: 480-5745-1

Method	Method Description	Protocol	Laboratory
8260B	Volatile Organic Compounds (GC/MS)	SW846	TAL BUF

Protocol References:

SW846 = "Test Methods For Evaluating Solid Waste, Physical/Chemical Methods", Third Edition, November 1986 And Its Updates.

Laboratory References:

TAL BUF = TestAmerica Buffalo, 10 Hazelwood Drive, Amherst, NY 14228-2298, TEL (716)691-2600

Sample Summary

Client: Weston Solutions, Inc.
Project/Site: 3M Tonawanda

TestAmerica Job ID: 480-5745-1

Lab Sample ID	Client Sample ID	Matrix	Collected	Received
480-5745-1	FB-MW-04	Monitor Well	06/06/11 08:50	06/06/11 10:20
480-5745-2	MW-04	Monitor Well	06/06/11 09:45	06/06/11 10:20
480-5745-3	MW-04 DUP	Monitor Well	06/06/11 09:45	06/06/11 10:20
480-5745-4	LY-02	Monitor Well	06/06/11 10:00	06/06/11 10:20
480-5745-5	Trip Blank	Water	06/06/11 08:00	06/06/11 10:20

Login Sample Receipt Checklist

Client: Weston Solutions, Inc.

Job Number: 480-5745-1

Login Number: 5745

List Source: TestAmerica Buffalo

List Number: 1

Creator: Rabb, Mike

Question	Answer	Comment
Radioactivity either was not measured or, if measured, is at or below background	True	
The cooler's custody seal, if present, is intact.	True	
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	True	
Cooler Temperature is acceptable.	True	
Cooler Temperature is recorded.	True	
COC is present.	True	
COC is filled out in ink and legible.	True	
COC is filled out with all pertinent information.	True	
Is the Field Sampler's name present on COC?	True	
There are no discrepancies between the sample IDs on the containers and the COC.	True	
Samples are received within Holding Time.	True	
Sample containers have legible labels.	True	
Containers are not broken or leaking.	True	
Sample collection date/times are provided.	True	
Appropriate sample containers are used.	True	
Sample bottles are completely filled.	True	
Sample Preservation Verified	True	
There is sufficient vol. for all requested analyses, incl. any requested MS/MSDs	True	
VOA sample vials do not have headspace or bubble is <6mm (1/4") in diameter.	True	
If necessary, staff have been informed of any short hold time or quick TAT needs	True	
Multiphasic samples are not present.	True	
Samples do not require splitting or compositing.	True	
Sampling Company provided.	True	weston
Samples received within 48 hours of sampling.	True	
Samples requiring field filtration have been filtered in the field.	N/A	
Chlorine Residual checked.	N/A	