February 24, 2023

Mr. Glenn May New York State Department of Environmental Conservation 270 Michigan Avenue Buffalo, New York 14203-2915

Re: Annual Periodic Review Report (February 14, 2022 to February 14, 2023) and IC/EC Certification
3M O-Cel-O Sponge Site, Tonawanda, New York
Order on Consent # B9-0369-91-04, Registry # 915148

Dear Mr. May:

In accordance with the referenced Order on Consent and at the direction of 3M Company, we are submitting the Annual Periodic Review Report for the 3M O-Cel-O Sponge Site in Tonawanda, New York for the period extending from February 14, 2022 to February 14, 2023. 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

Thomas A. Drew, P.G.

Project Manager

c: B. Chambers, 3M (w/ enclosure)

K. Held, 3M (w/ enclosure)

R. Montalto, Weston (w/ enclosure)



PERIODIC REVIEW REPORT

Site Name and Location: 3M O-Cel-O Sponge Site, Tonawanda, New York

Registry Number: 915148

Order on Consent: B9-0369-91-04

3M Project Contacts: Britta Chambers (3M Corporate)

Keith Held (3M Tonawanda)

NYSDEC Project Lead: Glenn May

Reporting Period: February 14, 2022, to February 14, 2023

Background

The New York State Department of Environmental Conservation (NYSDEC) issued a Record of Decision (ROD) (Registry No. 915148) for the 3M Company (3M) O-Cel-O Sponge Site in Tonawanda, New York (the "Site") in March 1999. This ROD presents the selected remedial action for the Site based on the Site's Administrative Record and public input. Following ROD issuance, the NYSDEC reclassified the 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 summarizing project activities that occurred in the previous reporting periods. In August 2005, the Five-Year Evaluation Report was submitted by 3M to NYSDEC. The 2005 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 2005 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 Work 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 the Site, 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 Work 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.

The aforementioned monitoring and reporting modifications approved by the NYSDEC were implemented starting in June 2006. Continued monitoring and semiannual reporting in accordance with the O&M Work Plan modifications approved by NYSDEC were performed by 3M from June 2006 to March 2022.

The PRR submitted to NYSDEC in March 2022 contained a description of activities performed by 3M in the period from February 14, 2021 to February 14, 2022, and the results of Site sampling conducted in May and November 2021. This PRR also contained a proposed modification to the sampling frequency of groundwater monitoring well MW-4 from semiannually to annually, consistent with the sampling frequency of lysimeter LY-2. This proposal was based on CS₂ not being detected above the laboratory reporting limit in bedrock monitoring well MW-4 during the previous 16 years of semiannual sampling. NYSDEC approved the request to change the sampling frequency of well MW-4 from semiannually to annually, via e-mail correspondence from Mr. Glenn May (NYSDEC) on April 14, 2022. Mr. Glenn May also approved the submission of an annual PRR via e-mail correspondence on April 21, 2022. Accordingly, a revised O&M Work Plan, dated April 2022, was submitted to NYSDEC on April 26, 2022. This revised O&M Work Plan includes the approved annual sampling of well MW-4 (along with lysimeter LY-2) and the submission of one PRR (i.e., an Annual PRR) to NYSDEC to summarize annual project activities and sampling results.

This Annual PRR reflects the O&M monitoring and reporting activities specified in the April 2022 O&M Work Plan. Annual sampling of bedrock monitoring well MW-4 and lysimeter LY-2 was completed on May 25, 2022. The results from this sampling event are presented herein, along with a description of any maintenance activity conducted in the swale. All analytical results presented in this PRR will be uploaded into NYSDEC's EQuIS system in March 2023.



Summary of Activities Performed During the Reporting Period

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

- The annual groundwater samples for CS₂ analysis were collected from monitoring well MW-4 (primary sample and duplicate sample) and lysimeter LY-2 on May 25, 2022, in accordance with the April 2022 O&M Work Plan. Photographs of the site groundwater monitoring well and lysimeter are provided in Attachment A. The May 2022 well purging/sampling forms and laboratory analytical results are provided in this report as Attachments B and C, respectively.
- No maintenance activity was conducted in the subject drainage swale during the reporting period. Vegetation and grading in this swale are in good condition. Photographs showing the condition of the monitoring well, lysimeter, drainage swale, catch basin and fencing at the time of the site inspection in November 2022 are provided in Attachment A.
- The annual compliance inspection/evaluation was completed on November 10, 2022. No deficiencies were noted during the inspection. The Institutional and Engineering Controls Certification Form is provided as Attachment D.

Annual Groundwater Monitoring Results

Summary of Carbon Disulfide Water Analytical Results

	Sample ID and Result								
Sampling Date	MW-4 (μg/L)	MW-4 Duplicate (µg/L)	LY-2 (mg/L)						
5/25/2022	< 5	< 5	160						

Notes:

 μ g/L: micrograms per liter mg/L: milligrams per liter

<5 : Not detected above the laboratory reporting limit of 5 μ g/L

As noted above, CS₂ was not detected in the groundwater samples collected from monitoring well MW-4 in May 2022. CS₂ was detected at a concentration of 160 milligrams per liter in the pore water sample collected from lysimeter LY-2 in May 2022. This finding is consistent with previous sample results. A copy of the completed well purging/sampling forms and the laboratory data package for the May 2022 sampling event is provided in Attachments B and C, respectively.



ATTACHMENT A SITE PHOTOGRAPHS – NOVEMBER 10, 2022



Groundwater Monitoring Well MW-4



Catch Basin, Swale and Fencing





Lysimeter, LY-2



Drainage Collection





ATTACHMENT B WELL PURGING/SAMPLING FORMS



Figure 4-2 Well Purging/Sampling Form

SITE INFORMATION Co	nfidenti	al Ton	awanda, l	NY	ITE INFORMATION Confidential Tonawanda, NY 5/25/22										
Well No.: MW-4				Weather	r: Sunny Cloudy Rain Temp:										
Sampling Team: Green Fla	isus	KI		Sampler	's Signature:										
WELL INFORMATION	Market Carpative Hull Wellington				U										
Protective Casing: Intact /	Damaged	***************		Concrete	e Base: Intact / Damaged										
Locked: Yes /	No			Well Diameter: 2-inch 4-inch 6-inch											
WELL EVACUATION INF	ORMAT	ION													
A. Total Well Depth from Top of Ca	asing (TOC)	: "	72.90	Well Evacuation Method											
B. Depth to Water (ft below TOC):		-	31,63) Bailer) 2-Inch Grundfos										
C. Column of Standing Water (ft) (C	C=A - B):	â	11.27	() Peristaltic Pump () Other (Specify)											
D. Purge Factor:		X	0.16	() Omer (specny)											
E. One Well Volume (gallons):			ا، ا												
F. Three Well Volumes (gallo		19.8	Total Volume Purged (gallons): 2 (
INDICATOR PARAMETEI	RS														
Time:															
	921	933	943	1000											
Purge Rate (gal. per minute):	Ø	7	14	21											
			_												
Temperature (degrees C):	10.9	10,5	10,1	10.1											
Specific Cond (mS/cm):	743	2148	3536	361											
рН:	9.18	10.20	P8.8	8.77	7										
Turbidity (NTU):	68.3	247,	1 104.3	50,4											
Depth to Water (ft below TOC):	31.63	320	8 32.40	319	3										
NAPL Observed: Yes / No				Well Pumped Dry: Yes / (No)											
ODOR: Yes / (No)				Other:											
SAMPLE COLLECTION I	NFORM	ATION			SAMPLE DATE: 5/25/22										
Sample No.			Time		Sample No. Time										
Media Sample ID: Oco - Cw- Mu	004-0-	22052	5 1000	Rinse Bl	lank: Yes/No O CO-W-EBOI-EB-220525 905										
Duplicate: Yes/No oco 60 MW					nk: (Yes/NO OCO-W-TBOI-TB-220525 90										
Parameters: Only CS ₂	0100		70 1000												
900 - OCO-W-TBOI.	-TB-	220	525												
1010 OCO-00-1402-0	-2203	525		445-0	9 ₹-										
			COMM	ENTS											
MW-1 30.93					Well Requires Maintenance? Yes / No										
MW-231.90					Access Requires Maintenance? Yes (No)										
MW-3 32.33															
MW-431.63															



ATTACHMENT C LABORATORY ANALYTICAL PACKAGE



Environment Testing America

ANALYTICAL REPORT

Eurofins Buffalo 10 Hazelwood Drive Amherst, NY 14228-2298 Tel: (716)691-2600

Laboratory Job ID: 480-198305-1 Client Project/Site: 3M Tonawanda

For:

Weston Solutions, Inc. 1400 Weston Way PO BOX 2653 West Chester, Pennsylvania 19380

Attn: Rachel Montalto

Wystl Bloton

Authorized for release by: 6/8/2022 2:17:20 PM

Wyatt Watson, Project Management Assistant I

Wyatt.Watson@et.eurofinsus.com

Designee for

Steve Hartmann, Project Manager (413)572-4000

Steve.Hartmann@et.eurofinsus.com

..... Links



Have a Question?



Visit us at: www.eurofinsus.com/Env The test results in this report meet all 2003 NELAC, 2009 TNI, and 2016 TNI requirements for accredited parameters, exceptions are noted in this report. 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.

Results relate only to the items tested and the sample(s) as received by the laboratory.

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Definitions/Glossary

Client: Weston Solutions, Inc.

Job ID: 480-198305-1

Project/Site: 3M Tonawanda

Qualifiers

GC/MS VOA

Qualifier Qualifier Description

F2 MS/MSD RPD exceeds control limits

Glossary

Abbreviation	These commonly used abbreviations may or may not be present in this report.
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Eisted under the "D" column to designate that the result is reported on a dry weight basis

%R Percent Recovery
CFL Contains Free Liquid
CFU Colony Forming Unit
CNF Contains No Free Liquid

DER Duplicate Error Ratio (normalized absolute difference)

Dil Fac Dilution Factor

DL Detection Limit (DoD/DOE)

DL, RA, RE, IN Indicates a Dilution, Re-analysis, Re-extraction, or additional Initial metals/anion analysis of the sample

DLC Decision Level Concentration (Radiochemistry)

EDL Estimated Detection Limit (Dioxin)

LOD Limit of Detection (DoD/DOE)

LOQ Limit of Quantitation (DoD/DOE)

MCL EPA recommended "Maximum Contaminant Level"

MDA Minimum Detectable Activity (Radiochemistry)

MDC Minimum Detectable Concentration (Radiochemistry)

MDL Method Detection Limit
ML Minimum Level (Dioxin)
MPN Most Probable Number
MQL Method Quantitation Limit

NC Not Calculated

ND Not Detected at the reporting limit (or MDL or EDL if shown)

NEG Negative / Absent
POS Positive / Present

PQL Practical Quantitation Limit

PRES Presumptive
QC Quality Control

RER Relative Error Ratio (Radiochemistry)

RL Reporting Limit or Requested Limit (Radiochemistry)

RPD Relative Percent Difference, a measure of the relative difference between two points

TEF Toxicity Equivalent Factor (Dioxin)
TEQ Toxicity Equivalent Quotient (Dioxin)

TNTC Too Numerous To Count

Eurofins Buffalo

Page 3 of 18 6/8/2022

Case Narrative

Client: Weston Solutions, Inc.

Job ID: 480-198305-1

Project/Site: 3M Tonawanda

Job ID: 480-198305-1

Laboratory: Eurofins Buffalo

Narrative

Job Narrative 480-198305-1

Comments

No additional comments.

Receipt

The samples were received on 5/25/2022 10:30 AM. Unless otherwise noted below, the samples arrived in good condition, and where required, properly preserved and on ice. The temperature of the cooler at receipt was 3.5° C.

GC/MS VOA

Method 8260C: The following sample was diluted to bring the concentration of target analytes within the calibration range: OCO-GW-LY02-0-220525 (480-198305-4). Elevated reporting limits (RLs) are provided.

Method 8260C: The continuing calibration verification (CCV) analyzed in batch 480-628755 was outside the method criteria for the following analyte: Carbon disulfide. A CCV standard at or below the reporting limit (RL) was analyzed with the affected samples and found to be acceptable. As indicated in the reference method, sample analysis may proceed; however, any detection for the affected analyte is considered estimated. The associated sample is impacted: OCO-GW-LY02-0-220525 (480-198305-4).

No additional analytical or quality issues were noted, other than those described above or in the Definitions/Glossary page.

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Detection Summary

Project/Site: 3M Tonawanda Client Sample ID: OCO-GW-MW04-0-220525 Lab Sample ID: 480-198305-1 No Detections. Client Sample ID: OCO-GW-MW04-DB-220525 Lab Sample ID: 480-198305-2 No Detections. Client Sample ID: OCO-W-MW04-EB-220525 Lab Sample ID: 480-198305-3 No Detections. Client Sample ID: OCO-GW-LY02-0-220525 Lab Sample ID: 480-198305-4 Analyte Result Qualifier RL **MDL** Unit Dil Fac D Method **Prep Type** Carbon disulfide 160000 10000 380 ug/L 2000 8260C Total/NA Client Sample ID: OCO-W-TB01-TB-220525 Lab Sample ID: 480-198305-5

No Detections.

Client: Weston Solutions, Inc.

This Detection Summary does not include radiochemical test results.

Job ID: 480-198305-1

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Job ID: 480-198305-1

Client: Weston Solutions, Inc.

Project/Site: 3M Tonawanda

Client Sample ID: OCO-GW-MW04-0-220525

Date Collected: 05/25/22 10:00 Date Received: 05/25/22 10:30

Lab Sample ID: 480-198305-1

Matrix: Water

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Carbon disulfide	ND		5.0	0.19	ug/L			06/01/22 17:10	1
Surrogate	%Recovery	Qualifier	Limits				Prepared	Analyzed	Dil Fac
1,2-Dichloroethane-d4 (Surr)	90		77 - 120					06/01/22 17:10	1
Toluene-d8 (Surr)	97		80 - 120					06/01/22 17:10	1
4-Bromofluorobenzene (Surr)	109		73 - 120					06/01/22 17:10	1
Dibromofluoromethane (Surr)	94		75 - 123					06/01/22 17:10	1

Client Sample ID: OCO-GW-MW04-DB-220525

Date Collected: 05/25/22 10:05 Date Received: 05/25/22 10:30

Lab Sample ID: 480-198305-2

Matrix: Water

Method: 8260C - Volatile Organic Compounds by GC/MS Analyte Result Qualifier RL **MDL** Unit Prepared Analyzed Dil Fac Carbon disulfide ND 5.0 0.19 ug/L 06/01/22 17:33 Surrogate %Recovery Qualifier Limits Prepared Analyzed Dil Fac 1,2-Dichloroethane-d4 (Surr) 77 - 120 06/01/22 17:33 92 Toluene-d8 (Surr) 92 80 - 120 06/01/22 17:33 4-Bromofluorobenzene (Surr) 102 73 - 120 06/01/22 17:33 Dibromofluoromethane (Surr) 06/01/22 17:33 95 75 - 123

Client Sample ID: OCO-W-MW04-EB-220525

Date Collected: 05/25/22 09:05 Date Received: 05/25/22 10:30

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Carbon disulfide	ND		5.0	0.19	ug/L			06/03/22 02:50	1
Surrogate	%Recovery	Qualifier	Limits				Prepared	Analyzed	Dil Fac
1,2-Dichloroethane-d4 (Surr)	102		77 - 120			•		06/03/22 02:50	1
Toluene-d8 (Surr)	96		80 - 120					06/03/22 02:50	1
4-Bromofluorobenzene (Surr)	101		73 - 120					06/03/22 02:50	1
Dibromofluoromethane (Surr)	100		75 - 123					06/03/22 02:50	1

Client Sample ID: OCO-GW-LY02-0-220525

Date Collected: 05/25/22 10:10

Date Received: 05/25/22 10:30

Lab	Sample	ID:	480-198305-4

Lab Sample ID: 480-198305-3

Matrix: Water

Matrix: Water

Analyte Corbon disculfide		Qualifier	RL		Unit ug/L	D	Prepared	Analyzed 06/04/22 06:11	2000
Carbon disulfide	160000		10000	360	ug/L			00/04/22 00.11	2000
Surrogate	%Recovery	Qualifier	Limits				Prepared	Analyzed	Dil Fac
1,2-Dichloroethane-d4 (Surr)	107		77 - 120					06/04/22 06:11	2000
Toluene-d8 (Surr)	95		80 - 120					06/04/22 06:11	2000
4-Bromofluorobenzene (Surr)	104		73 - 120					06/04/22 06:11	2000
Dibromofluoromethane (Surr)	100		75 - 123					06/04/22 06:11	2000

Client Sample Results

Client: Weston Solutions, Inc. Job ID: 480-198305-1

Project/Site: 3M Tonawanda

Client Sample ID: OCO-W-TB01-TB-220525

Date Collected: 05/25/22 09:00 Date Received: 05/25/22 10:30

Lab Sample ID: 480-198305-5

Matrix: Water

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Carbon disulfide	ND		5.0	0.19	ug/L			06/03/22 03:37	1
Surrogate	%Recovery	Qualifier	Limits				Prepared	Analyzed	Dil Fac
1,2-Dichloroethane-d4 (Surr)	107		77 - 120					06/03/22 03:37	1
Toluene-d8 (Surr)	93		80 - 120					06/03/22 03:37	1
4-Bromofluorobenzene (Surr)	100		73 - 120					06/03/22 03:37	1
Dibromofluoromethane (Surr)	100		75 - 123					06/03/22 03:37	1

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Surrogate Summary

Client: Weston Solutions, Inc.

Project/Site: 3M Tonawanda

Job ID: 480-198305-1

Method: 8260C - Volatile Organic Compounds by GC/MS

Matrix: Water Prep Type: Total/NA

			Pe	rcent Surro	ogate Recove	ery (Acce
		DCA	TOL	BFB	DBFM	
Lab Sample ID	Client Sample ID	(77-120)	(80-120)	(73-120)	(75-123)	
480-198305-1	OCO-GW-MW04-0-220525	90	97	109	94	
480-198305-1 MS	OCO-GW-MW04-0-220525	82	92	101	87	
480-198305-1 MSD	OCO-GW-MW04-0-220525	86	91	105	93	
480-198305-2	OCO-GW-MW04-DB-220525	92	92	102	95	
480-198305-3	OCO-W-MW04-EB-220525	102	96	101	100	
480-198305-4	OCO-GW-LY02-0-220525	107	95	104	100	
480-198305-5	OCO-W-TB01-TB-220525	107	93	100	100	
LCS 480-628289/5	Lab Control Sample	99	94	107	101	
LCS 480-628475/10	Lab Control Sample	87	91	101	90	
LCS 480-628596/6	Lab Control Sample	102	101	108	100	
LCS 480-628755/6	Lab Control Sample	99	103	106	95	
LCSD 480-628596/7	Lab Control Sample Dup	98	104	109	98	
MB 480-628289/7	Method Blank	92	92	100	95	
MB 480-628475/9	Method Blank	85	89	104	88	
MB 480-628596/9	Method Blank	101	96	102	95	
MB 480-628755/8	Method Blank	100	95	105	96	

Surrogate Legend

DCA = 1,2-Dichloroethane-d4 (Surr)

TOL = Toluene-d8 (Surr)

BFB = 4-Bromofluorobenzene (Surr)

DBFM = Dibromofluoromethane (Surr)

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Client: Weston Solutions, Inc. Job ID: 480-198305-1

Project/Site: 3M Tonawanda

Method: 8260C - Volatile Organic Compounds by GC/MS

MD MD

Lab Sample ID: MB 480-628289/7 **Client Sample ID: Method Blank** Prep Type: Total/NA

Matrix: Water

Analysis Batch: 628289

	IVID	IAID							
Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Carbon disulfide	ND		5.0	0.19	ug/L			06/01/22 12:31	1

MB MB Surrogate %Recovery Qualifier Limits Prepared Analyzed Dil Fac 77 - 120 06/01/22 12:31 1,2-Dichloroethane-d4 (Surr) 92 Toluene-d8 (Surr) 92 80 - 120 06/01/22 12:31 4-Bromofluorobenzene (Surr) 100 73 - 120 06/01/22 12:31 75 - 123 Dibromofluoromethane (Surr) 95 06/01/22 12:31

Lab Sample ID: LCS 480-628289/5 **Client Sample ID: Lab Control Sample Matrix: Water** Prep Type: Total/NA

Analysis Batch: 628289

	Spike	LCS	LCS				%Rec	
Analyte	Added	Result	Qualifier	Unit	D	%Rec	Limits	
Carbon disulfide	25.0	21.7		ug/L		87	59 - 134	

LCS LCS Surrogate %Recovery Qualifier Limits 1,2-Dichloroethane-d4 (Surr) 77 - 120 99 Toluene-d8 (Surr) 94 80 - 120 4-Bromofluorobenzene (Surr) 107 73 - 120 Dibromofluoromethane (Surr) 101 75 - 123

Lab Sample ID: MB 480-628475/9 **Client Sample ID: Method Blank** Prep Type: Total/NA

Matrix: Water

Analysis Batch: 628475

_	MB	MB							
Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Carbon disulfide	ND		5.0	0.19	ug/L			06/02/22 13:45	1
	MB	MB							
Surrogate	%Recovery	Qualifier	Limits				Prepared	Analyzed	Dil Fac
1,2-Dichloroethane-d4 (Surr)	85		77 - 120			•		06/02/22 13:45	1
Toluene-d8 (Surr)	89		80 - 120					06/02/22 13:45	1
4-Bromofluorobenzene (Surr)	104		73 - 120					06/02/22 13:45	1

Lab Sample ID: LCS 480-628475/10 **Client Sample ID: Lab Control Sample** Prep Type: Total/NA

75 - 123

Matrix: Water

Analysis Batch: 628475

Dibromofluoromethane (Surr)

, , , , , , , , , , , , , , , , , , , ,	Spike	LCS	LCS				%Rec	
Analyte	Added	Result	Qualifier	Unit	D	%Rec	Limits	
Carbon disulfide	25.0	22.1		ug/L		88	59 - 134	

	LCS	LCS	
Surrogate	%Recovery	Qualifier	Limits
1,2-Dichloroethane-d4 (Surr)	87		77 - 120
Toluene-d8 (Surr)	91		80 - 120
4-Bromofluorobenzene (Surr)	101		73 - 120
Dibromofluoromethane (Surr)	90		75 - 123

Eurofins Buffalo

6/8/2022

06/02/22 13:45

Client: Weston Solutions, Inc. Job ID: 480-198305-1 Project/Site: 3M Tonawanda

Method: 8260C - Volatile Organic Compounds by GC/MS (Continued)

Lab Sample ID: 480-198305-1 MS Client Sample ID: OCO-GW-MW04-0-220525 Prep Type: Total/NA

Matrix: Water

Analysis Batch: 628475

Analysis Buton, 020410										
	Sample	Sample	Spike	MS	MS				%Rec	
Analyte	Result	Qualifier	Added	Result	Qualifier	Unit	D	%Rec	Limits	
Carbon disulfide	ND		25.0	17.2		ua/L	_	69	59 - 134	

MS MS Surrogate %Recovery Qualifier Limits 77 - 120 1,2-Dichloroethane-d4 (Surr) 82 Toluene-d8 (Surr) 92 80 - 120 4-Bromofluorobenzene (Surr) 101 73 - 120 75 - 123 Dibromofluoromethane (Surr) 87

Lab Sample ID: 480-198305-1 MSD Client Sample ID: OCO-GW-MW04-0-220525 **Matrix: Water** Prep Type: Total/NA

Analysis Batch: 628475

	Sample	Sample	Spike	MSD	MSD				%Rec		RPD
Analyte	Result	Qualifier	Added	Result	Qualifier	Unit	D	%Rec	Limits	RPD	Limit
Carbon disulfide	ND		25.0	20.8	F2	ug/L		83	59 - 134	19	15

MSD MSD Surrogate %Recovery Qualifier Limits 1,2-Dichloroethane-d4 (Surr) 77 - 120 86 Toluene-d8 (Surr) 91 80 - 120 4-Bromofluorobenzene (Surr) 105 73 - 120 Dibromofluoromethane (Surr) 93 75 - 123

Lab Sample ID: MB 480-628596/9 **Client Sample ID: Method Blank Matrix: Water** Prep Type: Total/NA

Analysis Batch: 628596

	MB	MB							
Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Carbon disulfide	ND		5.0	0.19	ug/L			06/03/22 02:27	1
	МВ	MB							
Surrogate	%Recovery	Qualifier	Limits				Prepared	Analyzed	Dil Fac
1,2-Dichloroethane-d4 (Surr)	101		77 - 120			•		06/03/22 02:27	1
Toluene-d8 (Surr)	96		80 120					06/03/22 02:27	1

4-Bromofluorobenzene (Surr) 102 73 - 120 06/03/22 02:27 Dibromofluoromethane (Surr) 95 75 - 123 06/03/22 02:27

Lab Sample ID: LCS 480-628596/6 **Client Sample ID: Lab Control Sample** Prep Type: Total/NA

Matrix: Water

Analysis Batch: 628596

	Spike	LCS	LCS				%Rec		
Analyte	Added	Result	Qualifier	Unit	D	%Rec	Limits		
Carbon disulfide	25.0	22.2		ug/L		89	59 - 134		

	LCS	LCS	
Surrogate	%Recovery	Qualifier	Limits
1,2-Dichloroethane-d4 (Surr)	102		77 - 120
Toluene-d8 (Surr)	101		80 - 120
4-Bromofluorobenzene (Surr)	108		73 - 120
Dibromofluoromethane (Surr)	100		75 - 123

Eurofins Buffalo

QC Sample Results

Client: Weston Solutions, Inc. Job ID: 480-198305-1 Project/Site: 3M Tonawanda

Method: 8260C - Volatile Organic Compounds by GC/MS (Continued)

Client Sample ID: Lab Control Sample Dup

Lab Sample ID: LCSD 480-628596/7 **Matrix: Water**

Prep Type: Total/NA

LCSD LCSD RPD Spike %Rec Analyte Added Result Qualifier Unit D %Rec Limits RPD Limit Carbon disulfide 25.0 19.8 ug/L 79 59 - 134 11 15

	LCSD	LCSD		
Surrogate	%Recovery	Qualifier	Limits	
1,2-Dichloroethane-d4 (Surr)	98		77 - 120	
Toluene-d8 (Surr)	104		80 - 120	
4-Bromofluorobenzene (Surr)	109		73 - 120	
Dibromofluoromethane (Surr)	98		75 - 123	

Lab Sample ID: MB 480-628755/8 **Client Sample ID: Method Blank Matrix: Water** Prep Type: Total/NA

Analysis Batch: 628755

Analysis Batch: 628596

MB MB Analyte RL **MDL** Unit Dil Fac Result Qualifier **Prepared** Analyzed Carbon disulfide 5.0 0.19 ug/L 06/04/22 05:48 ND

MB MB Surrogate %Recovery Qualifier Limits Prepared Analyzed Dil Fac 1,2-Dichloroethane-d4 (Surr) 77 - 120 06/04/22 05:48 100 Toluene-d8 (Surr) 95 80 - 120 06/04/22 05:48 4-Bromofluorobenzene (Surr) 105 73 - 120 06/04/22 05:48 Dibromofluoromethane (Surr) 96 75 - 123 06/04/22 05:48

Lab Sample ID: LCS 480-628755/6 **Client Sample ID: Lab Control Sample** Prep Type: Total/NA

Matrix: Water

Analysis Batch: 628755

•	Spike	LCS	LCS				%Rec	
Analyte	Added	Result	Qualifier	Unit	D	%Rec	Limits	
Carbon disulfide	25.0	16.0		ug/L		64	59 - 134	

	LCS LCS	
Surrogate	%Recovery Quar	lifier Limits
1,2-Dichloroethane-d4 (Surr)	99	77 - 120
Toluene-d8 (Surr)	103	80 - 120
4-Bromofluorobenzene (Surr)	106	73 - 120
Dibromofluoromethane (Surr)	95	75 - 123

QC Association Summary

Client: Weston Solutions, Inc. Job ID: 480-198305-1 Project/Site: 3M Tonawanda

GC/MS VOA

Analysis Batch: 628289

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
480-198305-1	OCO-GW-MW04-0-220525	Total/NA	Water	8260C	
480-198305-2	OCO-GW-MW04-DB-220525	Total/NA	Water	8260C	
MB 480-628289/7	Method Blank	Total/NA	Water	8260C	
LCS 480-628289/5	Lab Control Sample	Total/NA	Water	8260C	

Analysis Batch: 628475

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
MB 480-628475/9	Method Blank	Total/NA	Water	8260C	
LCS 480-628475/10	Lab Control Sample	Total/NA	Water	8260C	
480-198305-1 MS	OCO-GW-MW04-0-220525	Total/NA	Water	8260C	
480-198305-1 MSD	OCO-GW-MW04-0-220525	Total/NA	Water	8260C	

Analysis Batch: 628596

Lab Sample ID 480-198305-3	Client Sample ID OCO-W-MW04-EB-220525	Prep Type Total/NA	Matrix Water	Method 8260C	Prep Batch
480-198305-5	OCO-W-TB01-TB-220525	Total/NA	Water	8260C	
MB 480-628596/9	Method Blank	Total/NA	Water	8260C	
LCS 480-628596/6	Lab Control Sample	Total/NA	Water	8260C	
LCSD 480-628596/7	Lab Control Sample Dup	Total/NA	Water	8260C	

Analysis Batch: 628755

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
480-198305-4	OCO-GW-LY02-0-220525	Total/NA	Water	8260C	
MB 480-628755/8	Method Blank	Total/NA	Water	8260C	
LCS 480-628755/6	Lab Control Sample	Total/NA	Water	8260C	

Job ID: 480-198305-1

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

Client Sample ID: OCO-GW-MW04-0-220525

Lab Sample ID: 480-198305-1 Date Collected: 05/25/22 10:00

Matrix: Water

10

Date Received: 05/25/22 10:30

Batch Dilution Batch Batch Prepared Method or Analyzed **Prep Type** Type Run **Factor** Number Analyst Lab Total/NA Analysis 8260C 06/01/22 17:10 CRL TAL BUF 628289

Client Sample ID: OCO-GW-MW04-DB-220525

Lab Sample ID: 480-198305-2 **Matrix: Water**

Date Collected: 05/25/22 10:05 Date Received: 05/25/22 10:30

Batch Batch Dilution Batch **Prepared Prep Type** Type Method Run Factor Number or Analyzed Analyst Lab Total/NA Analysis 8260C 628289 06/01/22 17:33 CRL TAL BUF

Client Sample ID: OCO-W-MW04-EB-220525

Lab Sample ID: 480-198305-3

Date Collected: 05/25/22 09:05 **Matrix: Water**

Date Received: 05/25/22 10:30

Batch Batch Dilution Batch **Prepared Prep Type** Method **Factor** Number or Analyzed Type Run Analyst Lab TAL BUF Total/NA Analysis 8260C 628596 06/03/22 02:50 CR

Client Sample ID: OCO-GW-LY02-0-220525 Lab Sample ID: 480-198305-4

Date Collected: 05/25/22 10:10 **Matrix: Water**

Date Received: 05/25/22 10:30

Batch Batch Dilution Batch **Prepared Prep Type** Method Factor Number or Analyzed Analyst Type Run Lab Analysis 8260C 2000 628755 06/04/22 06:11 ATG TAL BUF Total/NA

Client Sample ID: OCO-W-TB01-TB-220525 Lab Sample ID: 480-198305-5

Date Collected: 05/25/22 09:00 **Matrix: Water**

Date Received: 05/25/22 10:30

Batch Batch Dilution Batch Prepared Method Factor Number or Analyzed **Prep Type** Type Run Analyst Lab TAL BUF Total/NA Analysis 8260C 628596 06/03/22 03:37 CR

Laboratory References:

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

6/8/2022

Accreditation/Certification Summary

Client: Weston Solutions, Inc.

Job ID: 480-198305-1

Project/Site: 3M Tonawanda

Laboratory: Eurofins Buffalo

The accreditations/certifications listed below are applicable to this report.

Authority	Program	Identification Number	Expiration Date
New York	NELAP	10026	03-31-23

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Method Summary

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

Job ID: 480-198305-1

Method	Method Description	Protocol	Laboratory
8260C	Volatile Organic Compounds by GC/MS	SW846	TAL BUF
5030C	Purge and Trap	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 = Eurofins Buffalo, 10 Hazelwood Drive, Amherst, NY 14228-2298, TEL (716)691-2600

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Sample Summary

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

Job ID: 480-198305-1

Lab Sample ID	Client Sample ID	Matrix	Collected	Received
480-198305-1	OCO-GW-MW04-0-220525	Water	05/25/22 10:00	05/25/22 10:30
480-198305-2	OCO-GW-MW04-DB-220525	Water	05/25/22 10:05	05/25/22 10:30
480-198305-3	OCO-W-MW04-EB-220525	Water	05/25/22 09:05	05/25/22 10:30
480-198305-4	OCO-GW-LY02-0-220525	Water	05/25/22 10:10	05/25/22 10:30
480-198305-5	OCO-W-TB01-TB-220525	Water	05/25/22 09:00	05/25/22 10:30

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Amherst. NY 14228-2298

Phone: 716-691-2600 Fax: 716-691-7991

10 Hazelwood Drive

Chain of Custody Record

eurofins :

Environment Testing

Carrier Tracking No(s): Greg Flashski Phone: 610-721-0583 Hartmann, Steve 480-173592-35365.1 Client Information State of Origin: Page: Client Contact: Greg Flasinski Steve.Hartmann@et.eurofinsus.com Page 1 of 1 Company **Analysis Requested** Weston Solutions, Inc. Due Date Requested: Preservation Codes: 1400 Weston Way PO BOX 2653 M - Hexane A - HCL N - None TAT Requested (days): B - NaOH O - AsNaO2 West Chester C - Zn Acetate P - Na2O4S D - Nitric Acid State, Zip Q - Na2SO3 Compliance Project: A Yes A No PA, 19380 R - Na2S2O3 504 Dodecahydrate 610-701-3428(Tel) 0100619 (change order 4 1/21) one A 02181.086.027.0001 greg.flasinski@westonsolutions.com 4-5 8260C - 8260 Carbon Disulfide Project #: ma 48003524 ir (specify) 3M Tonawanda SSOW# Matrix Sample (Wewater Type S=solid. O=waste/oil. (C=comp, Sample Sample Date Time G=grab) BT=Tissue, A=Air Special Instructions/Note: Sample Identification Preservation Code 3 Water OCO-GW-MW04-0-220525 1000 3 Water OCO-GW-MW04-DB-220525 3 905 Water OCO-W-MW04-EB-220525 3 Water OCO-GW-MW04-0-220525 MS 1000 6 3 OCO-GW-MW04-0-220525 MSD Water 1000 3 OCO-GW-LY02-0-220525 1010 Water Water 5/25/22 900 OCO-W-TB01-TB-220525 Water 2 Water Sample Disposal (A fee may be assessed if samples are retained longer than 1 month) Possible Hazard Identification Non-Hazard Flammable Skin Irritant Poison B Unknown Radiological Disposal By Lab Archive For Return To Client Months Deliverable Requested: I, II, III, IV, Other (specify) Special Instructions/QC Requirements: Empty Kit Relinquished by: Method of Shipment Time: westuu Relinquished by Company Received by Date/Time Relinquished by: Date/Time Company Received by Date/Time Company Custody Seal No.: Custody Seals Intact: Cooler Temperature(s) °C and Other Remarks

Δ Yes Δ No

Page 17 of 18











Client: Weston Solutions, Inc.

Job Number: 480-198305-1

Login Number: 198305 List Source: Eurofins Buffalo

List Number: 1

Creator: Wallace, Cameron

Creator. Wanace, Cameron		
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 (Excluding tests with immediate HTs)	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.	True	
Chlorine Residual checked.	N/A	



ATTACHMENT D INSTITUTIONAL AND ENGINEERING CONTROLS CERTIFICATION FORM



Enclosure 2 NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION Site Management Periodic Review Report Notice Institutional and Engineering Controls Certification Form



Sit	e No.	915148	Site Details		Box 1	
Sit	e Name 3N	l O-Cel-O Sponge Plan	t			
Cit Co	e Address: y/Town: To unty:Erie e Acreage:		Zip Code: 14150			
Re	porting Perio	od: February 14, 2022 to	o February 14, 2023			
					YES	NO
1.	Is the infor	mation above correct?			X	
	If NO, inclu	ide handwritten above o	r on a separate sheet.			
2.		or all of the site property nendment during this Re	been sold, subdivided, merged, or porting Period?	r undergone a		X
3.		peen any change of use RR 375-1.11(d))?	at the site during this Reporting Pe	eriod		X
4.	•	ederal, state, and/or loca e property during this Re	al permits (e.g., building, discharge porting Period?	e) been issued		X
	-	-	s 2 thru 4, include documentation			
5.	Is the site of	currently undergoing dev	relopment?			X
					Box 2	
					YES	NO
6.	Is the curre	ent site use consistent w	ith the use(s) listed below?		X	
7.	Are all ICs	in place and functioning	as designed?	X		
	IF TI		R QUESTION 6 OR 7 IS NO, sign ar HE REST OF THIS FORM. Otherwi		and	
Α (Corrective M	easures Work Plan mus	et be submitted along with this for	m to address ti	hese iss	ues.
Sig	gnature of Ow	ner, Remedial Party or D	esignated Representative	Date		

SITE NO. 915148 Box 3

Description of Institutional Controls

Parcel Owner Institutional Control

65.09-6-5 Minnesota Mining & Manufacturing Company

Landuse Restriction

Monitoring Plan

A No Further Action Record of Decision (ROD) was issued for this site in March 1999. A Declaration of Convenants 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.

Box 4

Description of Engineering Controls

<u>Parcel</u> <u>Engineering Control</u>

65.09-6-5

Fencing/Access Control Monitoring Wells

Box	5
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	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 reviewed by, the party making the Engineering Control certification; 	ection of	, and
	b) to the best of my knowledge and belief, the work and conclusions described are in accordance with the requirements of the site remedial program, and generalized in accordance with the information processes and compare		
	engineering practices; and the information presented is accurate and compete.	YES	NO
		X	
2.	For each Engineering control listed in Box 4, I certify by checking "YES" below that al following statements are true:	l of the	
	(a) The 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 De	epartmer	nt;
	(b) nothing has occurred that would impair the ability of such Control, to protect the environment;	t public h	nealth and
	(c) access to the site will continue to be provided to the Department, to evaluate remedy, including access to evaluate the continued maintenance of this Control		
	(d) nothing has occurred that would constitute a violation or failure to comply w Site Management Plan for this Control; and	vith the	
	(e) if a financial assurance mechanism is required by the oversight document f mechanism remains valid and sufficient for its intended purpose established in		
		YES	NO
		X	
	IF THE ANSWER TO QUESTION 2 IS NO, sign and date below and DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue) .	
	A Corrective Measures Work Plan must be submitted along with this form to address	these is:	sues.
	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 1,2, and 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.

1 Anthony Somuels at print name	305 Sawyer Ave Tenawanda, NY, 14150 print business address
am certifying as	(Owner or Remedial Party)
for the Site named in the Site Details Section Signature of Owner-Remedial Party, or Des Rendering Certification	2/22/27

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. Homas A. Drew at 1400 WESTON WAY, WEST CHESTER, PA
print name print business address 19380 am certifying as a Qualified Environmental Professional for the ______OWNER (Owner or Remedial Party) Signature of Qualified Environmental Professional, for Stamp the Owner or Remedial Party, Rendering Certification (Required for PE)