GM/BS

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January 11, 2007

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

W.O. No. 02181.086.017

Re: Progress Report – June 2006 to December 2006
3M Tonawanda, New York Facility
Order on Consent # B9-0369-91-04, Site Code #915148

Dear Mr. May:

In accordance with the referenced Order on Consent (Order) and at 3M's direction, I am submitting the progress report for the 3M Tonawanda, NY facility for the period extending from June 2006 to December 2006. As you know, 3M has been conducting ongoing groundwater monitoring and reporting to fulfill the operations and maintenance (O&M) plan requirement specified in the Order for the 3M Tonawanda, NY facility. In August 2005, the Five-Year Evaluation Report was submitted to the New York State Department of Environmental Conservation (NYSDEC) and this report concluded that the selected remedy has been effective in meeting remediation goals outlined in the 1999 Record of Decision (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, the NYSDEC provided comment on the Five-Year Evaluation Report. Based on the presence of carbon disulfide (CS_2) in the subsurface environment, the 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 CS_2 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 CS_2 tank system could be completed by 3M under NYSDEC's Chemical Bulk Storage Program.

The attached progress report reflects the monitoring and reporting modifications agreed upon with the NYSDEC for this facility. In June 2006, the semiannual groundwater sample was collected from site monitoring well MW-4 and the annual soil pore water sample was collected from lysimeter LY-2. These samples were submitted to the laboratory for CS_2 analysis. The June 2006 event represents the first sampling of the reduced monitoring network. Per the modified O&M Plan, additional monitoring and

inspection activities were performed in the period from June 2006 to December 2006 and they are described in the attached progress report.

If you have any comments or questions, please call me at 610-701-7302.

Very truly yours,

WESTON SOLUTIONS, INC.

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

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

PROGRESS REPORT

Site Name and Location:	3M Facility, Tonawanda, New York
Registry Number:	915148
Order on Consent:	B9-0369-91-04
3M Project Contacts:	Mark Gaetz (3M Corporate) Keith Held (3M Tonawanda)
NYSDEC Project Lead:	Glenn May
Reporting Period:	June 2006 to December 2006

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. Involves 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 CS_2.
- Inspecting the completed interim remedial measures (IRMs) (includes the CS_2 tank system, and the catch basin and associated swale) and maintaining the integrity of the IRMs.

Semiannual progress reports have been submitted by 3M to the 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 the 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, the NYSDEC provided comment on the Five-Year Evaluation Report. Based on the presence of carbon disulfide (CS_2) 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 CS_2 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 CS_2 tank system could be completed by 3M under NYSDEC's Chemical Bulk Storage Program.

This progress report reflects the O&M monitoring and reporting modifications agreed upon with the NYSDEC. In June 2006, the semiannual groundwater sample was collected from site monitoring well MW-4 and the annual soil pore water sample was collected from lysimeter LY-2. These samples were submitted to the laboratory for CS_2 analysis. The June 2006 event represents the first sampling of the reduced monitoring network under the modified O&M Plan. Additional monitoring and inspection activities were performed in the period from June 2006 to December 2006 and they are described below.

1.0 Summary of Activities Performed During the Reporting Period

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

- Annual inspection of the catch basins and associated drainage swale was performed on November 16, 2006. Some ruts were observed in the drainage swale area due to the current tank project. 3M intends to properly grade and reseed this disturbed area in Year 2007 once the tank project is complete.

- Site monitoring was conducted on June 23, 2006 and December 1, 2006 in accordance with the O&M Plan modifications approved by the NYSDEC. Water samples for CS_2 analysis were collected from monitoring well MW-4 and lysimeter LY-02 in June 2006; well MW-4 was sampled in December 2006. Laboratory analytical results from the latter sampling event are pending, and therefore, they are not included in this progress report.

2.0 Water Monitoring Results

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

Sampling Date	Sample ID and Result	
	MW-4	LY-02
6/23/06	ND	380

Notes: ND - Not detected. The reporting limit for CS_2 is 5 µg/L.

As noted above, CS_2 was not detected in the groundwater sample collected from monitor well MW-4 in June 2006. Site lysimeter LY-2 was also sampled in June 2006. CS_2 was found at a concentration of 380 mg/L in the LY-2 pore water sample and this result is comparable to previous sampling data.

A copy of the analytical data package for the June 2006 sampling event is provided in Attachment A.

ATTACHMENT A
LABORATORY ANALYTICAL PACKAGE
JUNE 2006 SAMPLING EVENT

STL Buffalo
10 Hazelwood Drive, Suite 106
Amherst, NY 14228

Tel: 716 691 2600 Fax: 716 691 7991
www stl-inc com

ANALYTICAL REPORT

Job#: A06-7214

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

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

STL Buffalo

Mark A. Nemec
Project Manager

07/10/2006

STL Buffalo
Current Certifications

As of 4/10//2006

STATE	Program	Cert # / Lab ID
AFCEE	AFCEE	
Arkansas	SDWA, CWA, RCRA, SOIL	03-054-D/88-0686
California	NELAP CWA, RCRA	01169CA
Connecticut	SDWA, CWA, RCRA, SOIL	PH-0568
Florida	NELAP CWA, RCRA	E87672
Georgia	SDWA	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	NY044
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	SDWA, CWA, RCRA, CLP	NY455
New York	NELAP, AIR, SDWA, CWA, RCRA,ASP	10026
Oklahoma	CWA, RCRA	9421
Pennsylvania	Env. Lab Reg.	68-281
South Carolina	RCRA	91013
Tennessee	SDWA	02970
USACE	USACE	
USDA	FOREIGN SOIL PERMIT	S-41579
USDOE	Department of Energy	DOECAP-STB
Virginia	SDWA	278
Washington	CWA,RCRA	C1677
West Virginia	CWA,RCRA	252
Wisconsin	CWA	998310390

SAMPLE SUMMARY

LAB SAMPLE ID	CLIENT SAMPLE ID	MATRIX	SAMPLED DATE	SAMPLED TIME	RECEIVED DATE	RECEIVED TIME
A6721404	FB-MW-04	WATER	06/23/2006	12:50	06/23/2006	14:35
A6721401	LY-02	WATER	06/23/2006	13:50	06/23/2006	14:35
A6721402	MW-04	GW	06/23/2006	13:40	06/23/2006	14:35
A6721403	MW-04 DUP	GW	06/23/2006	13:40	06/23/2006	14:35
A6721405	TRIP BLANK	WATER	06/23/2006	11:00	06/23/2006	14:35

METHODS SUMMARY

Job#: A06-7214

STL Project#: NY1A8679
Site Name: 3M Tonawanda, NY - Semi-Anual Monitoring

PARAMETER	ANALYTICAL METHOD
METHOD 8260 - Carbon Disulfide	SW8463 8260

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

NON-CONFORMANCE SUMMARY

Job#: A06-7214

STL Project#: NY1A8679
Site Name: 3M Tonawanda, NY - Semi-Anual Monitoring

General Comments

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

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

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

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

Sample Receipt Comments

A06-7214
Sample Cooler(s) were received at the following temperature(s); 4.8 °C
All samples were received in good condition.

GC/MS Volatile Data

No deviations from protocol were encountered during the analytical procedures.

****

Client Sample ID	Lab Sample ID	Parameter (Inorganic)/Method (Organic)	Dilution	Code
LY-02	A6721401	8260	5.00	008
LY-02	A6721401DL	8260	4000.00	008
MW-04	A6721402	8260	5.00	003
MW-04 DUP	A6721403	8260	5.00	003

Dilution Code Definition:

002 - sample matrix effects
003 - excessive foaming
004 - high levels of non-target compounds
005 - sample matrix resulted in method non-compliance for an Internal Standard
006 - sample matrix resulted in method non-compliance for Surrogate
007 - nature of the TCLP matrix
008 - high concentration of target analyte(s)
009 - sample turbidity
010 - sample color
011 - insufficient volume for lower dilution
012 - sample viscosity
013 - other

SEVERN

DATA QUALIFIER PAGE

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

ORGANIC DATA QUALIFIERS

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

INORGANIC DATA QUALIFIERS

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

Client ID		FB-MW-04		LY-02		LY-02		MW-04	
Job No	Lab ID	A06-7214	A6721404	A06-7214	A6721401	A06-7214	A6721401DL	A06-7214	A6721402
Sample Date		06/23/2006		06/23/2006		06/23/2006		06/23/2006	

Analyte	Units	Sample Value	Reporting Limit	Sample Value	Reporting Limit	Sample Value	Reporting Limit	Sample Value	Reporting Limit
Carbon Disulfide	UG/L	ND	5.0	32000 E	5.0	380000 D	1900	ND	5.0
IS/SURROGATE(S)									
Chlorobenzene-D5	%	89	50-200	94	50-200	85	50-200	91	50-200
1,4-Difluorobenzene	%	94	50-200	98	50-200	86	50-200	98	50-200
1,4-Dichlorobenzene-D4	%	75	50-200	84	50-200	73	50-200	77	50-200
Toluene-D8	%	102	76-122	101	76-122	92	76-122	103	76-122
p-Bromofluorobenzene	%	90	73-120	92	73-120	101	73-120	89	73-120
1,2-Dichloroethane-D4	%	105	72-143	112	72-143	133	72-143	105	72-143

Client ID		MW-04 DUP							
Job No	Lab ID	A06-7214	A6721403						
Sample Date		06/23/2006							

Analyte	Units	Sample Value	Reporting Limit	Sample Value	Reporting Limit	Sample Value	Reporting Limit	Sample Value	Reporting Limit
Carbon Disulfide	UG/L	ND	5.0	NA		NA		NA	
IS/SURROGATE(S)									
Chlorobenzene-D5	%	89	50-200	NA		NA		NA	
1,4-Difluorobenzene	%	94	50-200	NA		NA		NA	
1,4-Dichlorobenzene-D4	%	75	50-200	NA		NA		NA	
Toluene-D8	%	103	76-122	NA		NA		NA	
p-Bromofluorobenzene	%	92	73-120	NA		NA		NA	
1,2-Dichloroethane-D4	%	104	72-143	NA		NA		NA	

8/15

NA = Not Applicable ND = Not Detected

Chronology and QC Summary Package

Client ID		VBLK11		VBLK58					
Job No	Lab ID	A06-7214	A6B2210702	A06-7214	A6B2195302				
Sample Date									
Analyte	Units	Sample Value	Reporting Limit	Sample Value	Reporting Limit	Sample Value	Reporting Limit	Sample Value	Reporting Limit
Carbon Disulfide	UG/L	ND	5.0	ND	5.0	NA		NA	
IS/SURROGATE(S)									
Chlorobenzene-D5	%	93	50-200	84	50-200	NA		NA	
1,4-Difluorobenzene	%	97	50-200	90	50-200	NA		NA	
1,4-Dichlorobenzene-D4	%	79	50-200	72	50-200	NA		NA	
Toluene-D8	%	97	76-122	104	76-122	NA		NA	
p-Bromofluorobenzene	%	104	73-120	90	73-120	NA		NA	
1,2-Dichloroethane-D4	%	131	72-143	98	72-143	NA		NA	

10/15

NA = Not Applicable ND = Not Detected

Client ID		TRIP BLANK							
Job No	Lab ID	A06-7214	A6721405						
Sample Date		06/23/2006							
Analyte	Units	Sample Value	Reporting Limit	Sample Value	Reporting Limit	Sample Value	Reporting Limit	Sample Value	Reporting Limit
Carbon Disulfide	UG/L	ND	5.0	NA		NA		NA	
IS/SURROGATE(S)									
Chlorobenzene-D5	%	91	50-200	NA		NA		NA	
1,4-Difluorobenzene	%	95	50-200	NA		NA		NA	
1,4-Dichlorobenzene-D4	%	76	50-200	NA		NA		NA	
Toluene-D8	%	103	76-122	NA		NA		NA	
p-Bromofluorobenzene	%	92	73-120	NA		NA		NA	
1,2-Dichloroethane-D4	%	105	72-143	NA		NA		NA	

11/15

NA = Not Applicable ND = Not Detected

METHOD 8260 - CARBON DISULFIDE

Client Sample ID Job No & Lab Sample ID	FB-MW-04 A06-7214 A6721404	LY-02 A06-7214 A6721401	LY-02 A06-7214 A6721401DL	MW-04 A06-7214 A6721402	MW-04 DUP A06-7214 A6721403
Sample Date	06/23/2006 12:50	06/23/2006 13:50	06/23/2006 13:50	06/23/2006 13:40	06/23/2006 13:40
Received Date	06/23/2006 14:35	06/23/2006 14:35	06/23/2006 14:35	06/23/2006 14:35	06/23/2006 14:35
Extraction Date					
Analysis Date	06/28/2006 13:36	06/28/2006 14:48	06/30/2006 09:53	06/28/2006 14:24	06/28/2006 14:00
Extraction HT Met?	-	-	-	-	-
Analytical HT Met?	YES	YES	YES	YES	YES
Sample Matrix	WATER	WATER	WATER	GW	GW
Dilution Factor	1.0	5.0	4000.0	5.0	5.0
Sample wt/vol	0.005 LITERS	0.005 LITERS	0.005 LITERS	0.005 LITERS	0.005 LITERS
% Dry					

12/15

NA = Not Applicable

METHOD 8260 - CARBON DISULFIDE

Client Sample ID	TRIP BLANK				
Job No & Lab Sample ID	A06-7214 A6721405				
Sample Date	06/23/2006 11:00				
Received Date	06/23/2006 14:35				
Extraction Date					
Analysis Date	06/28/2006 13:12				
Extraction HT Met?	-				
Analytical HT Met?	YES				
Sample Matrix	WATER				
Dilution Factor	1.0				
Sample wt/vol	0.005 LITERS				
% Dry					

13/15

NA = Not Applicable

METHOD 8260 - CARBON DISULFIDE

Client Sample ID ob No & Lab Sample ID	VBLK11 A06-7214 A6B2210702	VBLK58 A06-7214 A6B2195302			
Sample Date					
Received Date					
Extraction Date					
Analysis Date	06/30/2006 01 21	06/28/2006 08:55			
Extraction HT Met?	-	-			
Analytical HT Met?	-	-			
Sample Matrix	WATER	WATER			
Dilution Factor	1.0	1.0			
Sample wt/vol	0.005 LITERS	0.005 LITERS			
% Dry					

NA = Not Applicable

Chain of Custody Record

Carbon Disulfide
* ONLY * 5 PPB

SEVERN TRENT STL®
Severn Trent Laboratories, Inc.

STL-4124 (0901)

Client	Project Manager	Date	Chain of Custody Number
Western	Tom Drew	6/23/06	296270
Address	**Telephone Number (Area Code)/Fax Number**	**Lab Number**	**Page 1 of 1**
1400 Western Way	610.701.7302		
City / State / Zip Code	**Site Contact**	**Lab Contact**	
W Chester PA 19380	Greg Flasinski	Mark Nemec	
Project Name and Location (State)	**Carrier/Waybill Number**		
3M Tonawanda			
Contract/Purchase Order/Quote No.			

Sample I.D. No. and Description (Containers for each sample may be combined on one line)	Date	Time	Matrix: Air	Aqueous	Sed.	Soil	Containers & Preservatives: Unpres.	H2SO4	HNO3	HCl	NaOH	ZnAc/NaOH	Analysis (Attach list if more space is needed): CS2	Special Instructions/ Conditions of Receipt
FB-MW-04	6/23/06	1250		↓						4				
MW-04		1340								4				
MW-04 Dup		1340								4				
L4-02		1350								4				
Trip Blank	↓	1100		↓						2				

Possible Hazard Identification
☐ Non-Hazard ☐ Flammable ☐ Skin Irritant ☐ Poison B ☐ Unknown

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

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

QC Requirements (Specify)

	Date	Time		Date	Time
1. Relinquished By	6/23/06	1425	1. Received By	6-23-06	14:35
2. Relinquished By	Date	Time	2. Received By	Date	Time
3. Relinquished By	Date	Time	3. Received By 4.6° C	Date	Time

Comments

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

15/15