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RECEIVED

JUL 0 8 2008 NYSDEC REG 9 POIL REL_UNREL

July 7, 2008

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 – January 2008 to June 2008 3M Tonawanda, New York Facility Order on Consent # B9-0369-91-04, Site Code #915148

Dear Mr. May:

In accordance with the referenced Order on Consent (Order) and at 3M's direction, we are submitting the progress report for the 3M Tonawanda, NY facility for the period extending from January 2008 to June 2008.

Should you have any comments or questions, please contact me at 610-701-7302.

Very truly yours,

WESTON SOLUTIONS, INC.

Alla

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)



PROGRESS REPORT

Site Name and Location:	3M Facility, Tonawanda, New York					
Registry Number:	915148					
Order on Consent:	B9-0369-91-04	RECEIVED				
3M Project Contacts:	Justin Pettinelli (3M Corporate) Keith Held (3M Tonawanda)	JUL 0 8 2008 Nysdec, reg 9				
NYSDEC Project Lead:	Glenn May					
Reporting Period:	January 2008 to June 2008					

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 progress 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 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 NYSDEC. Sampling of the reduced monitoring network under the modified O&M Plan was completed in June 2008. 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:

- Water samples for CS_2 analysis were collected from monitoring well MW-4 and lysimeter LY-02 in June 2008 in accordance with the O&M Plan modifications approved by NYSDEC. Laboratory analytical results from the June 2008 sampling event are provided in this report.
- No maintenance activity was conducted in the swale during the reporting period.

Groundwater Monitoring Results

	Sample ID and Result					
Sampling Date	LY-02	MW-4	MW-4 Duplicate			
6/10/08	590	ND	ND			

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

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

As noted above, CS_2 was not detected in the groundwater samples (primary and duplicate samples) collected from monitoring well MW-4 in June 2008. Consistent with previous sampling data, CS_2 was found in the pore water sample collected from lysimeter LY-02. A copy of the analytical data package for the June 2008 sampling event is provided in Attachment A.



ATTACHMENT A LABORATORY ANALYTICAL PACKAGE JUNE 2008 SAMPLING EVENT



ANALYTICAL REPORT

Job#: <u>A08-6612</u>

Project#: NY1A8679 Site Name: <u>3M Tonawanda, NY - Semi-Anual Monitoring</u> Task: 3M Tonawanda, NY - Semi-Annual Monitoring

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

TestAmerica Laboratories Inc.

Mark A. Nemec Project Manager

06/25/2008



TestAmerica Buffalo Current Certifications

As of 6/15/2007

STATE	Program	Cert # / Lab ID
Arkansas	SDWA, 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
lowa	SW/CS	374
Kansas*	NELAP SDWA, CWA, RCRA	E-10187
Kentucky	SDWA	90029
Kentucky UST	UST	30
Louisiana*	NELAP CWA, RCRA	2031
Maine	SDWA, CWA	NY0044
Maryland	SDWA	294
Massachusetts	SDWA, CWA	M-NY044
Michigan	SDWA	9937
Minnesota	SDWA, CWA, RCRA	036-999-337
New Hampshire*	NELAP SDWA, CWA	233701
New Jersey*	NELAP, SDWA, CWA, RCRA,	NY455
New York*	NELAP, AIR, SDWA, CWA, RCRA, CLP	10026
Oklahoma	CWA, RCRA	9421
Pennsylvania*	Registration, NELAP CWA, RCRA	68-00281
Tennessee	SDWA	02970
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, RCRA	998310390

*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.

SAMPLE SUMMARY

				SAMPI	ED	RECEIVE	ED
LAB SAMPLE	ID CLIENT	SAMPLE ID	MATRIX	DATE	TIME	DATE	TIME
A8661204	FB-MW-04		WATER	06/10/2008	12:15	06/10/2008	13:05
A8661201	LY-02		WATER	06/10/2008	12:40	06/10/2008	13:05
A8661202	MW-04		GW	06/10/2008	12:20	06/10/2008	13:05
A8661203	MW-04 DU	P	GW	06/10/2008	12:20	06/10/2008	13:05
A8661205	TRIP BLA	NK	WATER	06/10/2008	08:00	06/10/2008	13:05

METHODS SUMMARY

Job#: A08-6612

Project#: <u>NY1A8679</u> Site Name: <u>3M Tonawanda, NY - Semi-Anual Monitoring</u>

ANALYTICAL PARAMETER METHOD METHOD 8260 - Carbon Disulfide SW8463 8260

References:

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.

SDG NARRATIVE

Job#: A08-6612

Project#: <u>NY1A8679</u> Site Name: <u>3M Tonawanda, NY - Semi-Anual Monitoring</u>

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

A08-6612

Sample Cooler(s) were received at the following temperature(s); 4.0 °C All samples were received in good condition.

GC/MS Volatile Data

The requested target analyte list does not include any spiking compounds routinely analyzed. Spike recovery data has not been included in the report.

The results presented in this report relate only to the analytical testing and condition of the sample at receipt. This report pertains to only those samples actually tested. All pages of this report are integral parts of the analytical data. Therefore, this report should be reproduced only in its entirety.

Date: 06/25/2008 Time: 08:34:14

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			Parameter (Inorganic)/Method (Organic)	<u>Dilution</u>	Code
	LY-02	A8661201	8260	8000.00	008
Dilution	Code Definition:				
		002 – sample matrix	effects		
		003 - excessive foa	ming		
		004 - high levels o	f non-target compounds		
		005 – sample matrix	resulted in method non-compliance for an Inte	rnal Standa	rd
		006 – sample matrix	resulted in method non-compliance for Surroga	te	
		007 - nature of the	TCLP matrix		
		008 - high concentr	ation of target analyte(s)		
		009 - sample turbid	ity		
		010 – sample color			
		011 - insufficient	volume for lower dilution		

- 012 sample viscosity
- 013 other



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.
- G Indicates a value greater than or equal to the project reporting limit but less than the laboratory quantitation limit
- 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.

3M Tonawanda, NY - Semi-Anual Monitoring 3M Tonawanda, NY - Semi-Annual Monitoring METHOD 8260 - CARBON DISULFIDE

Client ID Job No Lab ID Sample Date	FB-MW-04 A08-6612 06/10/2008	A8661204	LY-02 A08-6612 06/10/2008	A8661201	MW-04 A08-6612 06/10/2008	A8661202	MW-04 DUP A08-6612 06/10/2008	A8661203
Analyte Un	Sample	Reporting	Sample	Reporting	Sample	Reporting	Sample	Reporting
	ts Value	Limit	Value	Limit	Value	Limit	Value	Limit
Carbon Disulfide UG/I	. ND	5.0	590000	1800	ND	5.0	ND	5.0
Chlorobenzene-D5%1,4-Difluorobenzene%1,4-Dichlorobenzene-D4%Toluene-D8%p-Bromofluorobenzene%	88	50-200	82	50-200	82	50-200	80	50-200
	84	50-200	79	50-200	79	50-200	79	50-200
	84	50-200	79	50-200	80	50-200	80	50-200
	103	71-126	107	71-126	108	71-126	110	71-126
	100	73-120	104	73-120	107	73-120	109	73-120

Chronology and QC Summary Package

3M Tonawanda, NY - Semi-Anual Monitoring 3M Tonawanda, NY - Semi-Annual Monitoring METHOD 8260 - CARBON DISULFIDE

Client ID Job No Lab ID Sample Date		VBLK32 A08-6612	A8B1755702						-
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		NÀ	
Chlorobenzene-D5 1,4-Difluorobenzene 1,4-Dichlorobenzene-D4 Toluene-D8 p-Bromofluorobenzene 1,2-Dichloroethane-D4	X X X X X X	90 87 87 111 105 103	50-200 50-200 50-200 71-126 73-120 66-137	NA NA NA NA NA		NA NA NA NA NA		NA NA NA NA NA	

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3M Tonawanda, NY - Semi-Anual Monitoring 3M Tonawanda, NY - Semi-Annual Monitoring METHOD 8260 - CARBON DISULFIDE

Client ID Job No Lab ID Sample Date		TRIP BLANK A08-6612 06/10/2008	A8661205						
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	l
Chlorobenzene-D5	*	85	50-200	NA		NA		NA	
1,4-Difluorobenzene	X	82	50-200	NA		NA		NA	
1,4-Dichlorobenzene-D4	*	81	50-200	NA		NA		NA	
Toluene-D8	 X	108	71-126	NA		NA		NA	
p-Bromofluorobenzene	X	108	73-120	NA		NA		NA	
1,2-Dichloroethane-D4	 X	106	66-137	L NA	Į	L NA	l	L NA	l

Date:	06/25/2008
Time:	08:35:02

WESTON SOLUTIONS, INC. SAMPLE CHRONOLOGY

METHOD 8260 - CARBON DISULFIDE

Client Sample ID	FB-MW-04	LY-02	MW-04	MW-04 DUP	
Job No & Lab Sample ID	A08-661 2 A8661204	A08-6612 A8661201	A08-6612 A8661202	A08-6612 A8661203	
Sample Date Received Date Extraction Date Analysis Date Extraction HT Met? Analytical HT Met? Sample Matrix Dilution Fact r Sample wt/vol % Dry	06/10/2008 12:15 06/10/2008 13:05 06/21/2008 17:12 - YES WATER 1.0 0.005 LITERS	06/10/2008 12:40 06/10/2008 13:05 06/21/2008 18:16 	06/10/2008 12:20 06/10/2008 13:05 06/21/2008 17:55 	06/10/2008 12:20 06/10/2008 13:05 06/21/2008 17:33 - YES GW 1.0 0.005 LITERS	

WESTON SOLUTIONS, INC. QC SAMPLE CHRONOLOGY

METHOD 8260 - CARBON DISULFIDE

Client Sample ID Job No & Lab Sample ID	TRIP BLANK A08-6612 A8661205		
Sample Date Received Date Extraction Date Analysis Date Extraction HT Met? Analytical HT Met? Sample Matrix Dilution Factor Sample wt/vol % Dry	06/10/2008 08:00 06/10/2008 13:05 06/21/2008 16:50 YES WATER 1.0 0.005 LITERS		

Date: 06/25/2008	WESTON SOLUTIONS, INC.	Rept: AN1248
Time: 08:35:02	QC SAMPLE CHRONOLOGY	Page: 3

METHOD 8260 - CARBON DISULFIDE

Client Sample ID Job No & Lab Sample ID	VBLK32 A08-6612 A8B1755702		
Sample Date Received Date Extraction Date Analysis Date Extraction HT Met? Analytical HT Met? Sample Matrix Dilution Factor Sample wt/vol % Dry	06/21/2008 13:13 _ 		

Chain of Custody Record



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