

## **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:** July 2009 to December 2009

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### **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 (CS<sub>2</sub>).
- Inspecting the completed interim remedial measures (IRMs) (includes the CS<sub>2</sub> 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 CS<sub>2</sub> 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<sub>2</sub> 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<sub>2</sub> 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 November 2009. 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 CS<sub>2</sub> analysis were collected from monitoring well MW-4 (primary sample and duplicate sample) on November 17, 2009 in accordance with the O&M Plan modifications approved by NYSDEC. Laboratory analytical results from the November 17, 2009 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.
- The annual compliance inspection/evaluation was completed on November 18, 2009. No deficiencies were noted during the inspection.

## **Groundwater Monitoring Results**

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

<b>Sampling Date</b>	<b>Sample ID and Result</b>	
	<b>MW-4</b>	<b>MW-4 Duplicate</b>
<b>11/17/09</b>	<b>ND</b>	<b>ND</b>

Notes: ND - Not detected. The reporting limit for CS<sub>2</sub> is 5 µg/L.

As noted above, CS<sub>2</sub> was not detected in the groundwater samples (primary and duplicate samples) collected from monitoring well MW-4 in November 2009. A copy of the analytical data package for the November 2009 sampling event is provided in Attachment A.

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**ATTACHMENT A**  
**LABORATORY ANALYTICAL PACKAGE**  
**NOVEMBER 2009 SAMPLING EVENT**

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## Analytical Report

Work Order: RSK0825

### Project Description

3M Tonawanda, NY - Semi-Annual Monitoring

For:

Tom Drew

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

1400 Weston Way

West Chester, PA 19380



Mark Nemec

Customer Service Manager

mark.nemec@testamericainc.com

Tuesday, December 8, 2009

The test results in this report meet all NELAP requirements for analytes for which accreditation is required or available. Any exception to NELAP requirements are noted in this report. Pursuant to NELAP, this report may not be reproduced, except in full, without the written approval of the laboratory. All questions regarding this test report should be directed to the TestAmerica Project manager who has signed this report.

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Received: 11/17/09  
Reported: 12/08/09 09:28

## TestAmerica Buffalo Current Certifications

As of 1/27/2009

<b>STATE</b>	<b>Program</b>	<b>Cert # / Lab ID</b>
<b>Arkansas</b>	CWA, RCRA, SOIL	88-0686
<b>California*</b>	NELAP CWA, RCRA	01169CA
<b>Connecticut</b>	SDWA, CWA, RCRA, SOIL	PH-0568
<b>Florida*</b>	NELAP CWA, RCRA	E87672
<b>Georgia*</b>	SDWA, NELAP CWA, RCRA	956
<b>Illinois*</b>	NELAP SDWA, CWA, RCRA	200003
<b>Iowa</b>	SW/CS	374
<b>Kansas*</b>	NELAP SDWA, CWA, RCRA	E-10187
<b>Kentucky</b>	SDWA	90029
<b>Kentucky UST</b>	UST	30
<b>Louisiana*</b>	NELAP CWA, RCRA	2031
<b>Maine</b>	SDWA, CWA	NY0044
<b>Maryland</b>	SDWA	294
<b>Massachusetts</b>	SDWA, CWA	M-NY044
<b>Michigan</b>	SDWA	9937
<b>Minnesota</b>	SDWA, CWA, RCRA	036-999-337
<b>New Hampshire*</b>	NELAP SDWA, CWA	233701
<b>New Jersey*</b>	NELAP, SDWA, CWA, RCRA,	NY455
<b>New York*</b>	NELAP, AIR, SDWA, CWA, RCRA, CLP	10026
<b>Oklahoma</b>	CWA, RCRA	9421
<b>Pennsylvania*</b>	NELAP CWA, RCRA	68-00281
<b>Tennessee</b>	SDWA	02970
<b>Texas*</b>	NELAP CWA, RCRA	T104704412-08-TX
<b>USDA</b>	FOREIGN SOIL PERMIT	S-41579
<b>USDOE</b>	Department of Energy	DOECAP-STB
<b>Virginia</b>	SDWA	278
<b>Washington*</b>	NELAP CWA, RCRA	C1677
<b>Wisconsin</b>	CWA, RCRA	998310390
<b>West Virginia</b>	CWA, RCRA	252

\*As required under the indicated accreditation, the test results in this report meet all NELAP requirements for parameters for which accreditation is required or available. Any exceptions to NELAP requirements are noted in this report.

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## CASE NARRATIVE

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

A pertinent document is appended to this report, 1 page, is included and is an integral part of this report.

Reproduction of this analytical report is permitted only in its entirety. This report shall not be reproduced except in full without the written approval of the laboratory.

TestAmerica Laboratories, Inc. certifies that the analytical results contained herein apply only to the samples tested as received by our Laboratory.

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## DATA QUALIFIERS AND DEFINITIONS

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



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## Executive Summary - Detections

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

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## Sample Summary

Sample Identification	Lab Number	Client Matrix	Date/Time Sampled	Date/Time Received	Sample Qualifiers
MW-04	RSK0825-01	Water	11/17/09 12:10	11/17/09 12:35	
MW-04 DUP	RSK0825-02	Water	11/17/09 12:10	11/17/09 12:35	
FB-MW-04	RSK0825-03	Water	11/17/09 11:50	11/17/09 12:35	
TRIP BLANK	RSK0825-04	Water	11/17/09 11:20	11/17/09 12:35	

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## Analytical Report

Analyte	Sample Result	Data Qualifiers	RL	MDL	Units	Dil Fac	Date Analyzed	Lab Tech	Batch	Method
Sample ID: RSK0825-01 (MW-04 - Water)						Sampled: 11/17/09 12:10		Recvd: 11/17/09 12:35		
<u>Volatile Organic Compounds by EPA 8260B</u>										
Carbon disulfide	ND		5.0	0.19	ug/L	1.00	11/24/09 16:17	DHC	9K24017	8260B
1,2-Dichloroethane-d4	99 %		Surr Limits: (66-137%)				11/24/09 16:17	DHC	9K24017	8260B
4-Bromofluorobenzene	97 %		Surr Limits: (73-120%)				11/24/09 16:17	DHC	9K24017	8260B
Toluene-d8	96 %		Surr Limits: (71-126%)				11/24/09 16:17	DHC	9K24017	8260B

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## Analytical Report

Analyte	Sample Result	Data Qualifiers	RL	MDL	Units	Dil Fac	Date Analyzed	Lab Tech	Batch	Method
Sample ID: RSK0825-02 (MW-04 DUP - Water)						Sampled: 11/17/09 12:10		Recvd: 11/17/09 12:35		
<u>Volatile Organic Compounds by EPA 8260B</u>										
Carbon disulfide	ND		5.0	0.19	ug/L	1.00	11/24/09 16:42	DHC	9K24017	8260B
1,2-Dichloroethane-d4	96 %		Surr Limits: (66-137%)				11/24/09 16:42	DHC	9K24017	8260B
4-Bromofluorobenzene	96 %		Surr Limits: (73-120%)				11/24/09 16:42	DHC	9K24017	8260B
Toluene-d8	94 %		Surr Limits: (71-126%)				11/24/09 16:42	DHC	9K24017	8260B

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## Analytical Report

Analyte	Sample Result	Data Qualifiers	RL	MDL	Units	Dil Fac	Date Analyzed	Lab Tech	Batch	Method
Sample ID: RSK0825-03 (FB-MW-04 - Water)						Sampled: 11/17/09 11:50		Recvd: 11/17/09 12:35		
<u>Volatile Organic Compounds by EPA 8260B</u>										
Carbon disulfide	ND		5.0	0.19	ug/L	1.00	11/24/09 17:06	DHC	9K24017	8260B
1,2-Dichloroethane-d4	97 %		Surr Limits: (66-137%)				11/24/09 17:06	DHC	9K24017	8260B
4-Bromofluorobenzene	96 %		Surr Limits: (73-120%)				11/24/09 17:06	DHC	9K24017	8260B
Toluene-d8	94 %		Surr Limits: (71-126%)				11/24/09 17:06	DHC	9K24017	8260B

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## Analytical Report

Analyte	Sample Result	Data Qualifiers	RL	MDL	Units	Dil Fac	Date Analyzed	Lab Tech	Batch	Method
Sample ID: RSK0825-04 (TRIP BLANK - Water)						Sampled: 11/17/09 11:20		Recvd: 11/17/09 12:35		
<u>Volatile Organic Compounds by EPA 8260B</u>										
Carbon disulfide	ND		5.0	0.19	ug/L	1.00	11/24/09 17:30	DHC	9K24017	8260B
1,2-Dichloroethane-d4	98 %		Surr Limits: (66-137%)				11/24/09 17:30	DHC	9K24017	8260B
4-Bromofluorobenzene	97 %		Surr Limits: (73-120%)				11/24/09 17:30	DHC	9K24017	8260B
Toluene-d8	97 %		Surr Limits: (71-126%)				11/24/09 17:30	DHC	9K24017	8260B

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## SAMPLE EXTRACTION DATA

Parameter	Batch	Lab Number	Wt/Vol Extracte	Units	Extract Volume	Units	Date Prepared	Lab Tech	Extraction Method
Volatile Organic Compounds by EPA 8260B									
8260B	9K24017	RSK0825-01	5.00	mL	5.00	mL	11/24/09 08:00	JRS	5030B MS
8260B	9K24017	RSK0825-02	5.00	mL	5.00	mL	11/24/09 08:00	JRS	5030B MS
8260B	9K24017	RSK0825-03	5.00	mL	5.00	mL	11/24/09 08:00	JRS	5030B MS
8260B	9K24017	RSK0825-04	5.00	mL	5.00	mL	11/24/09 08:00	JRS	5030B MS

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### LABORATORY QC DATA

Analyte	Source Result	Spike Level	RL	MDL	Units	Result	% REC	% REC Limits	% RPD	RPD Limit	Data Qualifiers
<b>Volatile Organic Compounds by EPA 8260B</b>											
<b>Blank Analyzed: 11/24/09 (Lab Number:9K24017-BLK1, Batch: 9K24017)</b>											
Carbon disulfide			5.0	0.19	ug/L	ND					
Surrogate:					ug/L		97	66-137			
1,2-Dichloroethane-d4											
Surrogate:					ug/L		100	73-120			
4-Bromofluorobenzene											
Surrogate: Toluene-d8					ug/L		95	71-126			
<b>LCS Analyzed: 11/24/09 (Lab Number:9K24017-BS1, Batch: 9K24017)</b>											
1,1,1,2-Tetrachloroethane		25.0	1.0	0.35	ug/L	24.9	100	76-122			
1,1,1-Trichloroethane		25.0	1.0	0.26	ug/L	24.3	97	73-126			
1,1,2,2-Tetrachloroethane		25.0	1.0	0.21	ug/L	24.4	98	70-126			
1,1,2-Trichloroethane		25.0	1.0	0.23	ug/L	24.0	96	76-122			
1,1,2-Trichlorotrifluoroethane		25.0	1.0	0.31	ug/L	23.2	93	60-140			
1,1-Dichloroethane		25.0	1.0	0.38	ug/L	24.0	96	71-129			
1,1-Dichloroethene		25.0	1.0	0.29	ug/L	23.6	94	65-138			
1,1-Dichloropropene		25.0	1.0	0.18	ug/L	24.0	96	72-122			
1,1-Dimethoxyethane			5.0	1.6	ug/L	ND					
1,2,3-Trichlorobenzene		25.0	1.0	0.41	ug/L	23.5	94	64-121			
1,2,3-Trichloropropane		25.0	1.0	0.16	ug/L	24.4	97	68-131			
1,2,3-Trimethylbenzene			1.0	0.26	ug/L	ND					
1,2,4-Trichlorobenzene		25.0	1.0	0.41	ug/L	23.2	93	70-122			
1,2,4-Trimethylbenzene		25.0	1.0	0.33	ug/L	23.4	94	76-121			
1,2-Dibromo-3-chloropropane		25.0	1.0	0.39	ug/L	22.2	89	56-134			
1,2-Dibromoethane (EDB)		25.0	1.0	0.17	ug/L	24.2	97	77-120			
1,2-Dichlorobenzene		25.0	1.0	0.20	ug/L	22.9	92	77-120			
1,2-Dichloroethane		25.0	1.0	0.21	ug/L	23.9	96	75-127			
1,2-Dichloroethene, Total		50.0	2.0	0.70	ug/L	47.2	94	72-124			
1,2-Dichloropropane		25.0	1.0	0.33	ug/L	23.7	95	76-120			
1,3,5-Trichlorobenzene			1.0	0.23	ug/L	ND					
1,3,5-Trimethylbenzene		25.0	1.0	0.22	ug/L	23.1	92	77-121			
1,3-Dichlorobenzene		25.0	1.0	0.36	ug/L	22.8	91	77-120			
1,3-Dichloropropane		25.0	1.0	0.21	ug/L	23.6	94	75-120			
1,3-Dichloropropene, Total		50.0	2.0	0.72	ug/L	50.4	101				
1,4-Dichlorobenzene		25.0	1.0	0.39	ug/L	22.6	91	75-120			
1,4-Dioxane			40	9.3	ug/L	ND					
2,2-Dichloropropane		25.0	1.0	0.40	ug/L	24.8	99	63-136			
2-Butanone (MEK)		125	5.0	1.3	ug/L	129	103	57-140			

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### LABORATORY QC DATA

Analyte	Source Result	Spike Level	RL	MDL	Units	Result	% REC	% REC Limits	% RPD	RPD Limit	Data Qualifiers
<b><u>Volatile Organic Compounds by EPA 8260B</u></b>											
<b>LCS Analyzed: 11/24/09 (Lab Number:9K24017-BS1, Batch: 9K24017)</b>											
2-Chloroethyl vinyl ether		125	5.0	0.96	ug/L	126	101	60-140			
2-Chlorotoluene		25.0	1.0	0.20	ug/L	22.8	91	76-121			
2-Hexanone		125	5.0	1.2	ug/L	132	106	65-127			
2-Methylthiophene			1.0	0.44	ug/L	ND					
3-Chlorotoluene			1.0	0.45	ug/L	ND					
3-Methylthiophene			1.0	0.53	ug/L	ND					
4-Chlorotoluene		25.0	1.0	0.37	ug/L	23.2	93	77-121			
4-Isopropyltoluene		25.0	1.0	0.31	ug/L	23.4	93	73-120			
4-Methyl-2-pentanone (MIBK)		125	5.0	0.91	ug/L	131	105	71-125			
Acetone		125	5.0	1.3	ug/L	124	99	56-142			
Acetonitrile		1000	40	19	ug/L	993	99	60-140			
Acrolein		500	20	5.5	ug/L	488	98	60-140			
Acrylonitrile		125	5.0	0.83	ug/L	126	101	63-138			
Allyl chloride			1.0	0.17	ug/L	ND		60-140			
Benzene		25.0	1.0	0.41	ug/L	23.7	95	71-124			
Bromobenzene		25.0	1.0	0.17	ug/L	23.4	94	78-120			
Bromochloromethane		25.0	1.0	0.39	ug/L	23.8	95	72-130			
Bromodichloromethane		25.0	1.0	0.39	ug/L	25.1	100	80-122			
Bromoform		25.0	1.0	0.26	ug/L	18.8	75	66-128			
Bromomethane		25.0	1.0	0.28	ug/L	24.3	97	36-150			
Carbon disulfide		25.0	1.0	0.19	ug/L	23.3	93	59-134			
Carbon Tetrachloride		25.0	1.0	0.27	ug/L	24.4	98	72-134			
Chlorobenzene		25.0	1.0	0.32	ug/L	23.0	92	72-120			
Chlorodibromomethane		25.0	1.0	0.32	ug/L	22.3	89	75-125			
Chlorodifluoromethane			1.0	0.26	ug/L	ND					
Chloroethane		25.0	1.0	0.32	ug/L	23.9	96	69-136			
Chloroform		25.0	1.0	0.34	ug/L	23.9	95	73-127			
Chloromethane		25.0	1.0	0.35	ug/L	24.1	96	49-142			
Chloroprene			1.0	0.18	ug/L	ND		60-140			
cis-1,2-Dichloroethene		25.0	1.0	0.38	ug/L	23.6	94	74-124			
cis-1,3-Dichloropropene		25.0	1.0	0.36	ug/L	25.3	101	74-124			
Cyclohexane		25.0	1.0	0.53	ug/L	23.8	95	70-130			
Cyclohexanone			10	5.9	ug/L	ND					
Dibromomethane		25.0	1.0	0.41	ug/L	24.8	99	76-127			
Dichlorodifluoromethane		25.0	1.0	0.29	ug/L	23.0	92	33-157			
Dichlorofluoromethane			1.0	0.34	ug/L	ND					
Dicyclopentadiene			1.0	0.22	ug/L	ND					

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<b>Volatile Organic Compounds by EPA 8260B</b>											
<b>LCS Analyzed: 11/24/09 (Lab Number:9K24017-BS1, Batch: 9K24017)</b>											
Diethyl ether			5.0	0.13	ug/L	ND					
Epichlorohydrin			20	1.0	ug/L	ND					
Ethyl Acetate			1.0	0.16	ug/L	ND					
Ethyl Methacrylate		25.0	1.0	0.26	ug/L	23.7	95	60-140			
Ethyl tert-Butyl Ether			1.0	0.29	ug/L	ND		75-125			
Ethylbenzene		25.0	1.0	0.18	ug/L	23.6	94	77-123			
Heptane			20	0.39	ug/L	ND					
Hexachlorobutadiene		25.0	1.0	0.28	ug/L	21.9	88	62-124			
Hexane			10	1.0	ug/L	ND					
Iodomethane		25.0	1.0	0.32	ug/L	20.6	82	52-151			
Isobutanol			40	20	ug/L	ND		60-140			
Isopropyl alcohol			20	6.7	ug/L	ND					
Isopropyl ether			1.0	0.17	ug/L	ND		75-125			
Isopropylbenzene		25.0	1.0	0.19	ug/L	23.1	92	77-122			
Methacrylonitrile			5.0	0.12	ug/L	ND		60-140			
Methyl Acetate		25.0	1.0	0.50	ug/L	26.8	107	60-140			
Methyl Methacrylate			1.0	0.14	ug/L	ND		60-140			
Methyl tert-Butyl Ether		25.0	1.0	0.16	ug/L	24.5	98	64-127			
Methylcyclohexane		25.0	1.0	0.50	ug/L	23.8	95	60-140			
Methylene Chloride		25.0	1.0	0.44	ug/L	23.4	94	57-132			
m-Monochlorobenzotrifluoride			1.0	0.49	ug/L	ND					
m-Xylene & p-Xylene		50.0	2.0	0.66	ug/L	47.1	94	76-122			
Naphthalene		25.0	1.0	0.43	ug/L	25.4	102	54-140			
n-Butanol			40	8.8	ug/L	ND					
n-Butylbenzene		25.0	1.0	0.28	ug/L	23.2	93	71-128			
n-Propylbenzene		25.0	1.0	0.18	ug/L	23.7	95	77-120			
o-Monochlorobenzotrifluoride			1.0	0.50	ug/L	ND					
o-Xylene		25.0	1.0	0.36	ug/L	23.5	94	76-122			
Pentachloroethane			1.0	0.34	ug/L	ND					
p-Monochlorobenzotrifluoride			1.0	0.21	ug/L	ND					
Propionitrile			10	1.9	ug/L	ND		60-140			
Propylene Oxide			5.0	0.60	ug/L	ND					
sec-Butylbenzene		25.0	1.0	0.30	ug/L	23.2	93	74-127			
Styrene		25.0	1.0	0.18	ug/L	24.0	96	70-130			
t-Amyl alcohol			1.0	1.0	ug/L	ND		75-125			
t-Butanol			20	3.6	ug/L	ND		75-125			

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

Work Order: RSK0825

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

Project Number: RFW

Received: 11/17/09  
Reported: 12/08/09 09:28

## LABORATORY QC DATA

Analyte	Source Result	Spike Level	RL	MDL	Units	Result	% REC	% REC Limits	% RPD	RPD Limit	Data Qualifiers
<b><u>Volatile Organic Compounds by EPA 8260B</u></b>											
<b>LCS Analyzed: 11/24/09 (Lab Number:9K24017-BS1, Batch: 9K24017)</b>											
Tert-Amyl Methyl Ether			1.0	0.27	ug/L	ND		75-125			
tert-Butylbenzene		25.0	1.0	0.30	ug/L	22.9	92	75-123			
Tetrachloroethene		25.0	1.0	0.36	ug/L	23.4	94	74-122			
Tetrahydrofuran		125	5.0	1.3	ug/L	124	99				
Toluene		25.0	1.0	0.51	ug/L	23.3	93	70-122			
trans-1,2-Dichloroethene		25.0	1.0	0.42	ug/L	23.6	95	73-127			
trans-1,3-Dichloropropene		25.0	1.0	0.37	ug/L	25.1	100	72-123			
trans-1,4-Dichloro-2-butene		125	5.0	2.1	ug/L	124	100	38-155			
Trichloroethene		25.0	1.0	0.46	ug/L	23.6	94	74-123			
Trichlorofluoromethane		25.0	1.0	0.15	ug/L	24.0	96	62-152			
Vinyl acetate		125	5.0	0.85	ug/L	131	105	50-144			
Vinyl chloride		25.0	1.0	0.24	ug/L	23.7	95	65-133			
Xylenes, total		75.0	3.0	0.66	ug/L	70.6	94	76-122			
2-Nitropropane			5.0	0.74	ug/L	ND					
Surrogate: 1,2-Dichloroethane-d4					ug/L		96	66-137			
Surrogate: 4-Bromofluorobenzene					ug/L		103	73-120			
Surrogate: Toluene-d8					ug/L		97	71-126			





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

*The Trusted Integrator for Sustainable Solutions*

January 12, 2010

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

W.O. No. 02181.086.017

Re: Periodic Review Report (July 2009 to December 2009) and IC/EC Certification  
3M Tonawanda, New York Facility  
Order on Consent # B9-0369-91-04, Site Code #915148

Dear Mr. Sadowski:

In accordance with the referenced Order on Consent (Order) and at 3M's direction, we are submitting the periodic review report for the 3M Tonawanda, NY facility for the period extending from July 2009 to December 2009.

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

Should you have any comments or questions, please contact me at 610-701-3677.

Very truly yours,

WESTON SOLUTIONS, INC.

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

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





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



Site No. 915148 Site Details Box 1

Site Name 3M O-Cel-O Sponge Plant

Site Address: 305 SAWYER AVENUE Zip Code: 14150

City/Town: Tonawanda

County: Erie

Allowable Use(s) (if applicable, does not address local zoning): Industrial

Site Acreage: 1.0

Owner: ~~Minnesota Mining & Manufacturing Company~~ 3M  
3M Center Building 224-5N-40, St. Paul, MN 55144-1000

Reporting Period: ~~December 25, 2009 to January 15, 2010~~ JANUARY 1, 2009 to  
DECEMBER 31, 2009

Verification of Site Details

Box 2

YES NO

1. Is the information in Box 1 correct?

☐ YES ☒ NO

If NO, are changes handwritten above or included on a separate sheet?

☒

2. Has some or all of the site property been sold, subdivided, merged, or undergone a tax map amendment during this Reporting Period?

☐ YES ☒ NO

If YES, is documentation or evidence that documentation has been previously submitted included with this certification?

☐

3. Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period?

☐ YES ☒ NO

If YES, is documentation (or evidence that documentation has been previously submitted) included with this certification?

☐

4. If use of the site is restricted, is the current use of the site consistent with those restrictions?

☒ YES ☐ NO

If NO, is an explanation included with this certification?

☐

5. For non-significant-threat Brownfield Cleanup Program Sites subject to ECL 27-1415.7(c), has any new information revealed that assumptions made in the Qualitative Exposure Assessment regarding offsite contamination are no longer valid?

☐ YES ☐ NO

If YES, is the new information or evidence that new information has been previously submitted included with this Certification?

☐

6. For non-significant-threat Brownfield Cleanup Program Sites subject to ECL 27-1415.7(c), are the assumptions in the Qualitative Exposure Assessment still valid (must be certified every five years)?

☐ YES ☐ NO

If NO, are changes in the assessment included with this certification?

☐

**SITE NO. 915148**

**Description of Institutional Controls**

Parcel

Institutional Control

S\_B\_L Image: 65.09-6-5

Landuse Restriction  
Monitoring Plan

**Description of Engineering Controls**

Parcel

Engineering Control

S\_B\_L Image: 65.09-6-5

Fencing/Access Control

Attach documentation if IC/ECs cannot be certified or why IC/ECs are no longer applicable.  
(See instructions)

---

**Control Description for Site No. 915148**

**Parcel: 65.09-6-5**

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

### Periodic Review Report (PRR) Certification Statements

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

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

b) to the best of my knowledge and belief, the work and conclusions described in this certification are in accordance with the requirements of the site remedial program, and generally accepted

YES NO

☒ ☐

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

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

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

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

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

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

YES NO

☒ ☐

3. If this site has an Operation and Maintenance (O&M) Plan (or equivalent as required in the Decision Document);

I certify by checking "YES" below that the O&M Plan Requirements (or equivalent as required in the Decision Document) are being met.

☒ ☐

4. If this site has a Monitoring Plan (or equivalent as required in the remedy selection document);

I certify by checking "YES" below that the requirements of the Monitoring Plan (or equivalent as required in the Decision Document) is being met.

YES NO

☒ ☐



IC CERTIFICATIONS  
SITE NO. 915148

Box 6

**SITE OWNER OR DESIGNATED REPRESENTATIVE SIGNATURE**

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

I Douglas Lane at 305 Sawyer Ave, Tonawanda NY  
print name print business address

am certifying as owner (Owner or Remedial Party)

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

  
Signature of Owner or Remedial Party Rendering Certification

JANUARY 6, 2010  
Date

IC/EC CERTIFICATIONS

Box 7

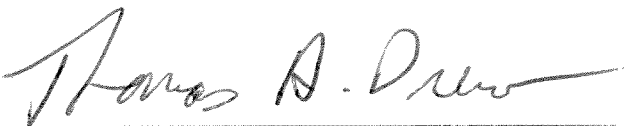
**QUALIFIED ENVIRONMENTAL PROFESSIONAL (QEP) SIGNATURE**

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.

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

am certifying as a Qualified Environmental Professional for the Owner

(Owner or Remedial Party) for the Site named in the Site Details Section of this form.

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

Stamp (if Required)

JANUARY 12, 2010  
Date