Weston Solutions, Inc.
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West Chester, Pennsylvania 19380
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www.westonsolutions.com

*The Trusted Integrator for Sustainable Solutions*

May 2, 2013

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

W.O. No. 02181.086.020

Re: Revised Periodic Review Report (February 14, 2012 to February 14, 2013)
3M Tonawanda, New York Facility

Dear Mr. Sadowski:

On behalf of 3M, we are submitting the revised Periodic Review Report for the 3M Tonawanda, NY facility for the period extending from February 14, 2012 to February 14, 2013. This revised report addresses review comments received from the New York State Department of Environmental Conservation in correspondence dated April 23, 2013.

Specifically, the revised report includes copies of the well purging/sampling forms for the monitoring events completed in this reporting period, and the justification for not resampling monitor well MW-4 to verify the trace levels of $CS_2$ (i.e., below the 5 µg/L reporting limit) detected in the groundwater samples. As you know, by electronic correspondence on July 31, 2012, Mr. Glenn May of the NYSDEC approved leaving the trigger level at 5 µg/L $CS_2$ for resampling monitor well MW-4 since it was consistent with the historic trigger level that was based on the laboratory reporting limit for $CS_2$.

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

Very truly yours,
WESTON SOLUTIONS, INC.

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

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



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# PERIODIC REVIEW REPORT
**(Revised May 2013)**

| | |
|---|---|
| **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)<br>Keith Held (3M Tonawanda) |
| **NYSDEC Project Lead:** | Glenn May |
| **Reporting Period:** | February 14, 2012 to February 14, 2013 |

## 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 ($CS_2$).
- 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 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 $CS_2$ 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 periodic review report reflects the O&M monitoring and reporting modifications agreed upon with NYSDEC. Sampling of the reduced monitoring network under the modified O&M Plan was completed in June 2012 and November 2012. The results from these sampling events are presented herein, along with a description of any maintenance activity conducted in the swale. Also, electronic data deliverables for sampling activities presented in this PRR have been submitted to the NYSDEC.

## 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 $CS_2$ analysis were collected from monitoring well MW-4 (primary sample and duplicate sample) and lysimeter LY-02 on June 18, 2012 in accordance with the O&M Plan modifications approved by NYSDEC. The completed well purging/sampling form for the June 18 sampling event is provided in Attachment A. For the lysimeter, purging of the water contained in the lysimeter was performed two times before the pore water sample was collected from LY-02. Laboratory analytical results from the June 18, 2012 sampling event are provided in Attachment B. Photographs of a site groundwater monitoring well and lysimeter are provided in Attachment C.

- Groundwater samples for $CS_2$ analysis were collected from monitoring well MW-4 (primary sample and duplicate sample) on November 20, 2012 pursuant to the O&M Plan modifications. The completed well purging/sampling form for the November 20 sampling event is provided in Attachment A. The laboratory analytical results from the November 20, 2012 sampling event are provided in Attachment B.

- 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 drainage swale and catch basin are provided in Attachment C.

- The annual compliance inspection/evaluation was completed by facility personnel on November 19, 2012. No deficiencies were noted during the inspection.

## Groundwater Monitoring Results

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

| Sampling Date | Sample ID and Result | | |
|---|---|---|---|
| | MW-4 | MW-4 Duplicate | LY-02 |
| 6/18/2012 | 0.0025 J | 0.0021 J | 420 |
| 11/20/2012 | 0.00038 J | 0.00049 J | NS |

Notes: J – Result is less than reporting limit but greater than or equal to the method detection limit and the concentration is an approximate value. The reporting limit for $CS_2$ is 5 µg/L for MW-4, and 40 mg/L for LY-02 due to sample dilution at lab.
NS: Not sampled per approved plan.

As noted above, $CS_2$ was not detected above the reporting limit in the groundwater samples (primary and duplicate samples) collected from monitoring well MW-4 in June and November 2012. $CS_2$ was detected at a concentration of 420 mg/L in the pore water sample collected from lysimeter LY-02. This finding is generally consistent with previous sample results. A copy of the laboratory data packages for the June 2012 and November 2012 sampling events is provided in Attachment B.

It is important to note that pursuant to agreement reached with Mr. Glenn May of the NYSDEC (electronic correspondence on July 31, 2012), re-sampling of monitoring well MW-4 was not completed for the June 2012 and November 2012 sampling events since the trigger level of 5 µg/L $CS_2$ for re-sampling was not reached. Per NYSDEC's request, the estimated values for $CS_2$ in the groundwater samples collected from monitoring well MW-4 have been shown in the above data summary table.

# ATTACHMENT A
# COMPLETED WELL PURGING/SAMPLING FORMS

# Well Evacuation/Sampling Form

| SITE INFORMATION | | | |
|---|---|---|---|
| | | | 6/18/12 |
| **Well No.:** MW-4 | | Weather: Sunny (Cloudy) Rain | Temp: 78° |
| Sampling Team: Greg Flaswick | | Sampler's Signature: | |

| WELL INFORMATION | | | |
|---|---|---|---|
| Protective Casing: (Intact) / Damaged | | Concrete Base: (Intact) / Damaged | |
| Locked: (YES) / NO | | Well Diameter: 2" | |

| WELL EVACUATION INFORMATION | | |
|---|---|---|
| A. Total Depth (Top of Casing = TOC): | 72.90 | Well Evacuation Method<br>(X) BAILER<br>( ) 2-Inch Grundfos<br>( ) Peristaltic Pump<br>( ) Other (Specify) |
| B. Depth to Water (DTW) (TOC): | -32.88 | |
| C. Column of Standing Water (C=A-B): | 40.02 | |
| D. Purge Factor | X .16 | |
| E. One Well Volume: | 6.4 | |
| **F. Three Well Volumes (gallons):** | 19.2 | **TOTAL VOLUME PURGED:** 19.5 |

**INDICATOR PARAMETERS**

| | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| Time | 1020 | | 1035 | | 1050 | | 1105 | | | |
| Purge Rate (gal. per minute) | Bail | | Bail | | Bail | | Bail | | | |
| Total Gallons Purged | 0 | | 6.5 | | 13 | | 19.5 | | | |
| Temperature (°C): | 15.1 | | 13.1 | | 13.1 | | 13.1 | | | |
| Specific Conductivity (s): | 886 | | 2947 | | 3925 | | 4007 | | | |
| pH: | 9.13 | | 9.48 | | 7.74 | | 7.11 | | | |
| *SECONDARY PARAMETERS* | | | | | | | | | | |
| ORP (mV): | — | | — | | — | | — | | | |
| Dissolved Oxygen (mg/L): | — | | — | | — | | — | | | |
| Turbidity: | 86 | | 206 | | 342 | | 318 | | | |

| | |
|---|---|
| **NAPL Observed: YES / (NO)** | **Well Pumped Dry: YES / (NO)** |
| **ODOR: YES / (NO)** | **Other:** |
| **Odor Type: ( ) Solvent ( ) Septic ( ) Other** | |

**SAMPLE COLLECTION INFORMATION** **SAMPLE DATE:** 6/18/12

| Sample No. | Time | Sample No. | Time |
|---|---|---|---|
| Media Sample ID: MW-4 | 1130 | Rinsate Blank: (YES) / NO FB-MW-04 | 1120 |
| Duplicate: YES / NO MW-4 Dup | 1130 | Field Blank: YES / NO | |

Parameters: (X) ~~8260~~ VOC ( ) Fluorides
( ) Chlorides * $CS_2$ Only
( ) TDS
( ) Metals (Total RCRA) Non-filtered
( ) Metals (Total RCRA) Filtered

**COMMENTS**

**Well Pumped Dry: YES / (NO)**
**Volume Purged:** 19.5
**Well Requires Maintenance? YES / (NO)**
**Access Requires Maintenance? YES / (NO)**

Purge Factors: 1" (0.04); 2" (0.16); 3" (0.37); 4" (0.65); 6" (1.47); 8" (2.61); 10" (4.08)

# Well Evacuation/Sampling Form

| SITE INFORMATION | | | |
|---|---|---|---|
| Well No.: MW-4 | | Weather: (Sunny) Cloudy Rain Temp: 35° | 11/20/12 |
| Sampling Team: Greg Flasiusk | | Sampler's Signature: | |

| WELL INFORMATION | | | |
|---|---|---|---|
| Protective Casing: (Intact) / Damaged | | Concrete Base: (Intact) / Damaged | |
| Locked: (YES) / NO | | Well Diameter: 2" | |

| WELL EVACUATION INFORMATION | | | |
|---|---|---|---|
| A. Total Depth (Top of Casing = TOC): | 72.90 | Well Evacuation Method<br>X BAILER<br>( ) 2-Inch Grundfos<br>( ) Peristaltic Pump<br>( ) Other (Specify) | |
| B. Depth to Water (DTW) (TOC): | -32.60 | | |
| C. Column of Standing Water (C=A-B): | 40.30 | | |
| D. Purge Factor | X 0.16 | | |
| E. One Well Volume: | 6.45 | | |
| **F. Three Well Volumes (gallons):** | 19.35 | **TOTAL VOLUME PURGED:** 20 | |

**INDICATOR PARAMETERS**

| | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Time | 1025 | 1032 | 1038 | 1050 | | | | | |
| Purge Rate (gal. per minute) | Bail | Bail | Bail | Bail | | | | | |
| Total Gallons Purged | Ø | 6.5 | 13 | 20 | | | | | |
| Temperature (°C): | 13.0 | 13.1 | 12.5 | 12.6 | | | | | |
| Specific Conductivity (s): | 104.7 | 1494 | 2825 | 2646 | | | | | |
| pH: | 8.56 | 11.09 | 8.65 | 8.21 | | | | | |
| *SECONDARY PARAMETERS* | | | | | | | | | |
| ORP (mV): | — | — | — | — | | | | | |
| Dissolved Oxygen (mg/L): | — | — | — | — | | | | | |
| Turbidity: | 68 | 111 | 247 | 223 | | | | | |

| | |
|---|---|
| NAPL Observed: YES / (NO) | Well Pumped Dry: YES / (NO) |
| ODOR: YES / (NO) | Other: |
| Odor Type: ( ) Solvent ( ) Septic ( ) Other | |

**SAMPLE COLLECTION INFORMATION** **SAMPLE DATE:** 11/21/12

| Sample No. | Time | Sample No. | Time |
|---|---|---|---|
| Media Sample ID: MW-4 | 1105 | Rinsate Blank: (YES) / NO FieldBlank-MW-04 | 1015 |
| Duplicate: (YES) / NO MW-4 Dup | 1105 | Field Blank: YES / NO | |

Parameters: ~~8260~~ VOC * ( ) Fluorides
( ) Chlorides * $CS_2$ ONLY
( ) TDS
( ) Metals (Total RCRA) Non-filtered
( ) Metals (Total RCRA) Filtered

**COMMENTS**

| | |
|---|---|
| | Well Pumped Dry: YES / (NO)<br>Volume Purged: ~ 20 Gallon<br>Well Requires Maintenance? YES / (NO)<br>Access Requires Maintenance? YES / (NO) |

Purge Factors: 1" (0.04); 2" (0.16); 3" (0.37); 4" (0.65); 6" (1.47); 8" (2.61); 10" (4.08)

# ATTACHMENT B
# LABORATORY ANALYTICAL PACKAGES
# JUNE AND NOVEMBER 2012 SAMPLING EVENTS

TestAmerica

THE LEADER IN ENVIRONMENTAL TESTING

# ANALYTICAL REPORT

TestAmerica Laboratories, Inc.
TestAmerica Buffalo
10 Hazelwood Drive
Amherst, NY 14228-2298
Tel: (716)691-2600

TestAmerica Job ID: 480-21428-1
Client Project/Site: 3M Tonawanda
Sampling Event: 3M Tonawanda, NY - Semi-Annual Monit.

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

Attn: Mr. Tom Drew

*Authorized for release by:*
*6/26/2012 11:47:44 AM*

Mark Nemec
Customer Service Manager
mark.nemec@testamericainc.com

# Table of Contents

# Definitions/Glossary

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

TestAmerica Job ID: 480-21428-1

## Qualifiers

### GC/MS VOA

| Qualifier | Qualifier Description |
|---|---|
| J | Result is less than the RL but greater than or equal to the MDL and the concentration is an approximate value. |

## Glossary

| Abbreviation | These commonly used abbreviations may or may not be present in this report. |
|---|---|
| ☼ | Listed under the "D" column to designate that the result is reported on a dry weight basis |
| %R | Percent Recovery |
| CNF | Contains no Free Liquid |
| DL, RA, RE, IN | Indicates a Dilution, Reanalysis, Re-extraction, or additional Initial metals/anion analysis of the sample |
| EDL | Estimated Detection Limit |
| EPA | United States Environmental Protection Agency |
| MDL | Method Detection Limit |
| ML | Minimum Level (Dioxin) |
| ND | Not detected at the reporting limit (or MDL or EDL if shown) |
| PQL | Practical Quantitation Limit |
| QC | Quality Control |
| RL | Reporting Limit |
| RPD | Relative Percent Difference, a measure of the relative difference between two points |
| TEF | Toxicity Equivalent Factor (Dioxin) |
| TEQ | Toxicity Equivalent Quotient (Dioxin) |

# Case Narrative

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

TestAmerica Job ID: 480-21428-1

## Job ID: 480-21428-1

**Laboratory: TestAmerica Buffalo**

**Narrative**

**Job Narrative**
**480-21428-1**

**Comments**
No additional comments.

**Receipt**
The samples were received on 6/18/2012 12:25 PM; the samples arrived in good condition, properly preserved and, where required, on ice. The temperature of the cooler at receipt was 5.2° C.

**GC/MS VOA**
Method(s) 8260B: The following sample(s) was diluted due to the abundance of target analytes: LY-02 (480-21428-5). Elevated reporting limits (RLs) are provided.

No other analytical or quality issues were noted.

# Detection Summary

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

TestAmerica Job ID: 480-21428-1

## Client Sample ID: Trip Blank — Lab Sample ID: 480-21428-1

No Detections

## Client Sample ID: FB-MW-04 — Lab Sample ID: 480-21428-2

No Detections

## Client Sample ID: MW-04 — Lab Sample ID: 480-21428-3

| Analyte | Result | Qualifier | RL | MDL | Unit | Dil Fac | D | Method | Prep Type |
|---|---|---|---|---|---|---|---|---|---|
| Carbon disulfide | 2.5 | J | 5.0 | 0.19 | ug/L | 1 | | 8260B | Total/NA |

## Client Sample ID: MW-04 DUP — Lab Sample ID: 480-21428-4

| Analyte | Result | Qualifier | RL | MDL | Unit | Dil Fac | D | Method | Prep Type |
|---|---|---|---|---|---|---|---|---|---|
| Carbon disulfide | 2.1 | J | 5.0 | 0.19 | ug/L | 1 | | 8260B | Total/NA |

## Client Sample ID: LY-02 — Lab Sample ID: 480-21428-5

| Analyte | Result | Qualifier | RL | MDL | Unit | Dil Fac | D | Method | Prep Type |
|---|---|---|---|---|---|---|---|---|---|
| Carbon disulfide | 420000 | | 40000 | 1500 | ug/L | 8000 | | 8260B | Total/NA |

## Client Sample ID: Trip Blank

Lab Sample ID: 480-21428-1
Matrix: Water

Date Collected: 06/18/12 09:30
Date Received: 06/18/12 12:25

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

| Analyte | Result | Qualifier | RL | MDL | Unit | D | Prepared | Analyzed | Dil Fac |
|---|---|---|---|---|---|---|---|---|---|
| Carbon disulfide | ND | | 5.0 | 0.19 | ug/L | | | 06/22/12 13:33 | 1 |

| Surrogate | %Recovery | Qualifier | Limits | Prepared | Analyzed | Dil Fac |
|---|---|---|---|---|---|---|
| 1,2-Dichloroethane-d4 (Surr) | 103 | | 66 - 137 | | 06/22/12 13:33 | 1 |
| Toluene-d8 (Surr) | 101 | | 71 - 126 | | 06/22/12 13:33 | 1 |
| 4-Bromofluorobenzene (Surr) | 96 | | 73 - 120 | | 06/22/12 13:33 | 1 |

## Client Sample ID: FB-MW-04

Lab Sample ID: 480-21428-2
Matrix: Monitor Well

Date Collected: 06/18/12 11:20
Date Received: 06/18/12 12:25

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

| Analyte | Result | Qualifier | RL | MDL | Unit | D | Prepared | Analyzed | Dil Fac |
|---|---|---|---|---|---|---|---|---|---|
| Carbon disulfide | ND | | 5.0 | 0.19 | ug/L | | | 06/22/12 14:01 | 1 |

| Surrogate | %Recovery | Qualifier | Limits | Prepared | Analyzed | Dil Fac |
|---|---|---|---|---|---|---|
| 1,2-Dichloroethane-d4 (Surr) | 102 | | 66 - 137 | | 06/22/12 14:01 | 1 |
| Toluene-d8 (Surr) | 100 | | 71 - 126 | | 06/22/12 14:01 | 1 |
| 4-Bromofluorobenzene (Surr) | 95 | | 73 - 120 | | 06/22/12 14:01 | 1 |

## Client Sample ID: MW-04

Lab Sample ID: 480-21428-3
Matrix: Monitor Well

Date Collected: 06/18/12 11:30
Date Received: 06/18/12 12:25

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

| Analyte | Result | Qualifier | RL | MDL | Unit | D | Prepared | Analyzed | Dil Fac |
|---|---|---|---|---|---|---|---|---|---|
| Carbon disulfide | 2.5 | J | 5.0 | 0.19 | ug/L | | | 06/22/12 14:29 | 1 |

| Surrogate | %Recovery | Qualifier | Limits | Prepared | Analyzed | Dil Fac |
|---|---|---|---|---|---|---|
| 1,2-Dichloroethane-d4 (Surr) | 105 | | 66 - 137 | | 06/22/12 14:29 | 1 |
| Toluene-d8 (Surr) | 100 | | 71 - 126 | | 06/22/12 14:29 | 1 |
| 4-Bromofluorobenzene (Surr) | 97 | | 73 - 120 | | 06/22/12 14:29 | 1 |

## Client Sample ID: MW-04 DUP

Lab Sample ID: 480-21428-4
Matrix: Monitor Well

Date Collected: 06/18/12 11:30
Date Received: 06/18/12 12:25

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

| Analyte | Result | Qualifier | RL | MDL | Unit | D | Prepared | Analyzed | Dil Fac |
|---|---|---|---|---|---|---|---|---|---|
| Carbon disulfide | 2.1 | J | 5.0 | 0.19 | ug/L | | | 06/22/12 14:57 | 1 |

| Surrogate | %Recovery | Qualifier | Limits | Prepared | Analyzed | Dil Fac |
|---|---|---|---|---|---|---|
| 1,2-Dichloroethane-d4 (Surr) | 110 | | 66 - 137 | | 06/22/12 14:57 | 1 |
| Toluene-d8 (Surr) | 98 | | 71 - 126 | | 06/22/12 14:57 | 1 |
| 4-Bromofluorobenzene (Surr) | 99 | | 73 - 120 | | 06/22/12 14:57 | 1 |

## Client Sample ID: LY-02

Lab Sample ID: 480-21428-5
Matrix: Monitor Well

Date Collected: 06/18/12 11:45
Date Received: 06/18/12 12:25

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

| Analyte | Result | Qualifier | RL | MDL | Unit | D | Prepared | Analyzed | Dil Fac |
|---|---|---|---|---|---|---|---|---|---|
| Carbon disulfide | 420000 | | 40000 | 1500 | ug/L | | | 06/22/12 15:25 | 8000 |

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

TestAmerica Job ID: 480-21428-1

**Client Sample ID: LY-02**
**Date Collected: 06/18/12 11:45**
**Date Received: 06/18/12 12:25**

**Lab Sample ID: 480-21428-5**
**Matrix: Monitor Well**

| Surrogate | %Recovery | Qualifier | Limits | Prepared | Analyzed | Dil Fac |
|---|---|---|---|---|---|---|
| 1,2-Dichloroethane-d4 (Surr) | 103 | | 66 - 137 | | 06/22/12 15:25 | 8000 |
| Toluene-d8 (Surr) | 99 | | 71 - 126 | | 06/22/12 15:25 | 8000 |
| 4-Bromofluorobenzene (Surr) | 94 | | 73 - 120 | | 06/22/12 15:25 | 8000 |

# Surrogate Summary

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

TestAmerica Job ID: 480-21428-1

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

**Matrix: Monitor Well**

**Prep Type: Total/NA**

| | | Percent Surrogate Recovery (Acceptance Limits) | | |
|---|---|---|---|---|
| Lab Sample ID | Client Sample ID | 12DCE (66-137) | TOL (71-126) | BFB (73-120) |
| 480-21428-2 | FB-MW-04 | 102 | 100 | 95 |
| 480-21428-3 | MW-04 | 105 | 100 | 97 |
| 480-21428-4 | MW-04 DUP | 110 | 98 | 99 |
| 480-21428-5 | LY-02 | 103 | 99 | 94 |

**Surrogate Legend**

12DCE = 1,2-Dichloroethane-d4 (Surr)
TOL = Toluene-d8 (Surr)
BFB = 4-Bromofluorobenzene (Surr)

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

**Matrix: Water**

**Prep Type: Total/NA**

| | | Percent Surrogate Recovery (Acceptance Limits) | | |
|---|---|---|---|---|
| Lab Sample ID | Client Sample ID | 12DCE (66-137) | TOL (71-126) | BFB (73-120) |
| 480-21428-1 | Trip Blank | 103 | 101 | 96 |
| LCS 480-69633/24 | Lab Control Sample | 101 | 101 | 100 |
| MB 480-69633/4 | Method Blank | 103 | 101 | 96 |

**Surrogate Legend**

12DCE = 1,2-Dichloroethane-d4 (Surr)
TOL = Toluene-d8 (Surr)
BFB = 4-Bromofluorobenzene (Surr)

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

**Lab Sample ID: MB 480-69633/4**
**Matrix: Water**
**Analysis Batch: 69633**

**Client Sample ID: Method Blank**
**Prep Type: Total/NA**

| Analyte | MB Result | MB Qualifier | RL | MDL | Unit | D | Prepared | Analyzed | Dil Fac |
|---|---|---|---|---|---|---|---|---|---|
| Carbon disulfide | ND | | 5.0 | 0.19 | ug/L | | | 06/22/12 12:36 | 1 |

| Surrogate | MB %Recovery | MB Qualifier | Limits | Prepared | Analyzed | Dil Fac |
|---|---|---|---|---|---|---|
| 1,2-Dichloroethane-d4 (Surr) | 103 | | 66 - 137 | | 06/22/12 12:36 | 1 |
| Toluene-d8 (Surr) | 101 | | 71 - 126 | | 06/22/12 12:36 | 1 |
| 4-Bromofluorobenzene (Surr) | 96 | | 73 - 120 | | 06/22/12 12:36 | 1 |

**Lab Sample ID: LCS 480-69633/24**
**Matrix: Water**
**Analysis Batch: 69633**

**Client Sample ID: Lab Control Sample**
**Prep Type: Total/NA**

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

# QC Association Summary

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

TestAmerica Job ID: 480-21428-1

## GC/MS VOA

### Analysis Batch: 69633

| Lab Sample ID | Client Sample ID | Prep Type | Matrix | Method | Prep Batch |
|---|---|---|---|---|---|
| 480-21428-1 | Trip Blank | Total/NA | Water | 8260B | |
| 480-21428-2 | FB-MW-04 | Total/NA | Monitor Well | 8260B | |
| 480-21428-3 | MW-04 | Total/NA | Monitor Well | 8260B | |
| 480-21428-4 | MW-04 DUP | Total/NA | Monitor Well | 8260B | |
| 480-21428-5 | LY-02 | Total/NA | Monitor Well | 8260B | |
| LCS 480-69633/24 | Lab Control Sample | Total/NA | Water | 8260B | |
| MB 480-69633/4 | Method Blank | Total/NA | Water | 8260B | |

# Lab Chronicle

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

TestAmerica Job ID: 480-21428-1

## Client Sample ID: Trip Blank

**Lab Sample ID: 480-21428-1**

**Date Collected: 06/18/12 09:30**
**Matrix: Water**
**Date Received: 06/18/12 12:25**

| Prep Type | Batch Type | Batch Method | Run | Dilution Factor | Batch Number | Prepared or Analyzed | Analyst | Lab |
|---|---|---|---|---|---|---|---|---|
| Total/NA | Analysis | 8260B | | 1 | 69633 | 06/22/12 13:33 | CDC | TAL BUF |

## Client Sample ID: FB-MW-04

**Lab Sample ID: 480-21428-2**

**Date Collected: 06/18/12 11:20**
**Matrix: Monitor Well**
**Date Received: 06/18/12 12:25**

| Prep Type | Batch Type | Batch Method | Run | Dilution Factor | Batch Number | Prepared or Analyzed | Analyst | Lab |
|---|---|---|---|---|---|---|---|---|
| Total/NA | Analysis | 8260B | | 1 | 69633 | 06/22/12 14:01 | CDC | TAL BUF |

## Client Sample ID: MW-04

**Lab Sample ID: 480-21428-3**

**Date Collected: 06/18/12 11:30**
**Matrix: Monitor Well**
**Date Received: 06/18/12 12:25**

| Prep Type | Batch Type | Batch Method | Run | Dilution Factor | Batch Number | Prepared or Analyzed | Analyst | Lab |
|---|---|---|---|---|---|---|---|---|
| Total/NA | Analysis | 8260B | | 1 | 69633 | 06/22/12 14:29 | CDC | TAL BUF |

## Client Sample ID: MW-04 DUP

**Lab Sample ID: 480-21428-4**

**Date Collected: 06/18/12 11:30**
**Matrix: Monitor Well**
**Date Received: 06/18/12 12:25**

| Prep Type | Batch Type | Batch Method | Run | Dilution Factor | Batch Number | Prepared or Analyzed | Analyst | Lab |
|---|---|---|---|---|---|---|---|---|
| Total/NA | Analysis | 8260B | | 1 | 69633 | 06/22/12 14:57 | CDC | TAL BUF |

## Client Sample ID: LY-02

**Lab Sample ID: 480-21428-5**

**Date Collected: 06/18/12 11:45**
**Matrix: Monitor Well**
**Date Received: 06/18/12 12:25**

| Prep Type | Batch Type | Batch Method | Run | Dilution Factor | Batch Number | Prepared or Analyzed | Analyst | Lab |
|---|---|---|---|---|---|---|---|---|
| Total/NA | Analysis | 8260B | | 8000 | 69633 | 06/22/12 15:25 | CDC | TAL BUF |

**Laboratory References:**

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

# Certification Summary

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

TestAmerica Job ID: 480-21428-1

| Laboratory | Authority | Program | EPA Region | Certification ID |
|---|---|---|---|---|
| TestAmerica Buffalo | Arkansas DEQ | State Program | 6 | 88-0686 |
| TestAmerica Buffalo | California | NELAC | 9 | 1169CA |
| TestAmerica Buffalo | Connecticut | State Program | 1 | PH-0568 |
| TestAmerica Buffalo | Florida | NELAC | 4 | E87672 |
| TestAmerica Buffalo | Georgia | State Program | 4 | 956 |
| TestAmerica Buffalo | Georgia | State Program | 4 | N/A |
| TestAmerica Buffalo | Illinois | NELAC | 5 | 200003 |
| TestAmerica Buffalo | Iowa | State Program | 7 | 374 |
| TestAmerica Buffalo | Kansas | NELAC | 7 | E-10187 |
| TestAmerica Buffalo | Kentucky | State Program | 4 | 90029 |
| TestAmerica Buffalo | Kentucky (UST) | State Program | 4 | 30 |
| TestAmerica Buffalo | Louisiana | NELAC | 6 | 02031 |
| TestAmerica Buffalo | Maine | State Program | 1 | NY00044 |
| TestAmerica Buffalo | Maryland | State Program | 3 | 294 |
| TestAmerica Buffalo | Massachusetts | State Program | 1 | M-NY044 |
| TestAmerica Buffalo | Michigan | State Program | 5 | 9937 |
| TestAmerica Buffalo | Minnesota | NELAC | 5 | 036-999-337 |
| TestAmerica Buffalo | New Hampshire | NELAC | 1 | 2337 |
| TestAmerica Buffalo | New Hampshire | NELAC | 1 | 2973 |
| TestAmerica Buffalo | New Jersey | NELAC | 2 | NY455 |
| TestAmerica Buffalo | New York | NELAC | 2 | 10026 |
| TestAmerica Buffalo | North Dakota | State Program | 8 | R-176 |
| TestAmerica Buffalo | Oklahoma | State Program | 6 | 9421 |
| TestAmerica Buffalo | Oregon | NELAC | 10 | NY200003 |
| TestAmerica Buffalo | Pennsylvania | NELAC | 3 | 68-00281 |
| TestAmerica Buffalo | Tennessee | State Program | 4 | TN02970 |
| TestAmerica Buffalo | Texas | NELAC | 6 | T104704412-11-2 |
| TestAmerica Buffalo | USDA | Federal | | P330-11-00386 |
| TestAmerica Buffalo | Virginia | NELAC | 3 | 460185 |
| TestAmerica Buffalo | Virginia | State Program | 3 | 00278 |
| TestAmerica Buffalo | Washington | State Program | 10 | C784 |
| TestAmerica Buffalo | West Virginia DEP | State Program | 3 | 252 |
| TestAmerica Buffalo | Wisconsin | State Program | 5 | 998310390 |

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

# Method Summary

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

TestAmerica Job ID: 480-21428-1

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

**Protocol References:**

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

**Laboratory References:**

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

# Sample Summary

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

TestAmerica Job ID: 480-21428-1

| Lab Sample ID | Client Sample ID | Matrix | Collected | Received |
|---|---|---|---|---|
| 480-21428-1 | Trip Blank | Water | 06/18/12 09:30 | 06/18/12 12:25 |
| 480-21428-2 | FB-MW-04 | Monitor Well | 06/18/12 11:20 | 06/18/12 12:25 |
| 480-21428-3 | MW-04 | Monitor Well | 06/18/12 11:30 | 06/18/12 12:25 |
| 480-21428-4 | MW-04 DUP | Monitor Well | 06/18/12 11:30 | 06/18/12 12:25 |
| 480-21428-5 | LY-02 | Monitor Well | 06/18/12 11:45 | 06/18/12 12:25 |

# Chain of Custody Record

Temperature on Receipt _____

Drinking Water? Yes ☐ No ☒

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

TAL-4124 (1007)

| | | | |
|---|---|---|---|
| Client: 3M Tonawanda / Western | Project Manager: Tom Drew 610.701.3500 | Date: 6/18/12 | Chain of Custody Number: 213484 |
| Address: 1400 Western Way | Telephone Number (Area Code)/Fax Number | Lab Number | Page 1 of 1 |
| City: WChester / State: PA / Zip Code: 19380 | Site Contact: Greg Klasuski 610.721.0583 | Lab Contact: Mark Nemec | Analysis (Attach list if more space is needed) |
| Project Name and Location (State): 3M Tonawanda | Carrier/Waybill Number | | |
| 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 | CS2 | Special Instructions/ Conditions of Receipt |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Trip Blank | 6/18/12 | 930 | | ✓ | | | | | | 3 | | | 1 | CS2 Only |
| FB-MW-04 | | 1120 | | ✓ | | | | | | 3 | | | 1 | |
| MW-04 | | 1130 | | ✓ | | | | | | 3 | | | 1 | * 5 ppb detected |
| MW-04 Dup | | 1130 | | ✓ | | | | | | 3 | | | 1 | |
| LYC-02 | | 1145 | | ✓ | | | | | | 3 | | | 1 | |

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 | 6/18/12 | 1225 | 1. Received By | 6/18/12 | 1225 |
| 2. Relinquished By | Date | Time | 2. Received By | Date | Time |
| 3. Relinquished By | Date | Time | 3. Received By | Date | Time |

Comments: 5.2 #2

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

Page 15 of 16

6/26/2012

# Login Sample Receipt Checklist

Client: Weston Solutions, Inc.

Job Number: 480-21428-1

**Login Number: 21428**
**List Number: 1**
**Creator: Janish, Carl**

**List Source: TestAmerica Buffalo**

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

LINKS

Review your project results through TotalAccess

Have a Question? Ask The Expert

Visit us at: www.testamericainc.com

# TestAmerica

THE LEADER IN ENVIRONMENTAL TESTING

# ANALYTICAL REPORT

TestAmerica Laboratories, Inc.
TestAmerica Buffalo
10 Hazelwood Drive
Amherst, NY 14228-2298
Tel: (716)691-2600

TestAmerica Job ID: 480-28830-1
Client Project/Site: 3M Tonawanda
Sampling Event: 3M Tonawanda, NY - Semi-Annual Monit.

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

Attn: Mr. Tom Drew

Peggy Gray-Erdmann

*Authorized for release by:*
*12/3/2012 9:27:59 AM*
Peggy Gray-Erdmann
Project Manager II
peggy.gray-erdmann@testamericainc.com

Designee for

Mark Nemec
Customer Service Manager
mark.nemec@testamericainc.com

# Table of Contents

# Definitions/Glossary

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

TestAmerica Job ID: 480-28830-1

## Qualifiers

### GC/MS VOA

| Qualifier | Qualifier Description |
|---|---|
| J | Result is less than the RL but grester than or equal to the MDL and the concentration is an approximate value. |

## Glossary

| Abbreviation | These commonly used abbreviations may or may not be present in this report. |
|---|---|
| ☼ | Listed under the "D" column to designate that the result is reported on a dry weight basis |
| %R | Percent Recovery |
| CNF | Contains no Free Liquid |
| DER | Duplicate error ratio (normalized absolute difference) |
| DL, RA, RE, IN | Indicates a Dilution, Reanalysis, Re-extraction, or additional Initial metals/anion analysis of the sample |
| DLC | Decision level concentration |
| EDL | Estimated Detection Limit |
| EPA | United States Environmental Protection Agency |
| MDA | Minimum detectable activity |
| MDC | Minimum detectable concentration |
| MDL | Method Detection Limit |
| ML | Minimum Level (Dioxin) |
| ND | Not detected at the reporting limit (or MDL or EDL if shown) |
| PQL | Practical Quantitation Limit |
| QC | Quality Control |
| RER | Relative error ratio |
| 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) |

# Case Narrative

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

TestAmerica Job ID: 480-28830-1

Job ID: 480-28830-1

Laboratory: TestAmerica Buffalo

Narrative

Job Narrative
480-28830-1

**Comments**
No additional comments.

**Receipt**
The samples were received on 11/20/2012 11:40 AM; the samples arrived in good condition, properly preserved and, where required, on ice. The temperature of the cooler at receipt was 3.7° C.

**GC/MS VOA**
No analytical or quality issues were noted.

# Detection Summary

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

TestAmerica Job ID: 480-28830-1

## Client Sample ID: MW-04 — Lab Sample ID: 480-28830-1

| Analyte | Result | Qualifier | RL | MDL | Unit | Dil Fac | D | Method | Prep Type |
|---|---|---|---|---|---|---|---|---|---|
| Carbon disulfide | 0.38 | J | 5.0 | 0.19 | ug/L | 1 | | 8260B | Total/NA |

## Client Sample ID: MW-04 DUP — Lab Sample ID: 480-28830-2

| Analyte | Result | Qualifier | RL | MDL | Unit | Dil Fac | D | Method | Prep Type |
|---|---|---|---|---|---|---|---|---|---|
| Carbon disulfide | 0.49 | J | 5.0 | 0.19 | ug/L | 1 | | 8260B | Total/NA |

## Client Sample ID: FB-MW-04 — Lab Sample ID: 480-28830-3

No Detections

## Client Sample ID: Trip Blank — Lab Sample ID: 480-28830-4

No Detections

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

TestAmerica Job ID: 480-28830-1

**Client Sample ID: MW-04** — **Lab Sample ID: 480-28830-1**
Date Collected: 11/20/12 11:05 — Matrix: Monitor Well
Date Received: 11/20/12 11:40

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

| Analyte | Result | Qualifier | RL | MDL | Unit | D | Prepared | Analyzed | Dil Fac |
|---|---|---|---|---|---|---|---|---|---|
| Carbon disulfide | 0.38 | J | 5.0 | 0.19 | ug/L | | | 11/30/12 12:32 | 1 |

| Surrogate | %Recovery | Qualifier | Limits | Prepared | Analyzed | Dil Fac |
|---|---|---|---|---|---|---|
| 1,2-Dichloroethane-d4 (Surr) | 95 | | 66 - 137 | | 11/30/12 12:32 | 1 |
| Toluene-d8 (Surr) | 109 | | 71 - 126 | | 11/30/12 12:32 | 1 |
| 4-Bromofluorobenzene (Surr) | 108 | | 73 - 120 | | 11/30/12 12:32 | 1 |

**Client Sample ID: MW-04 DUP** — **Lab Sample ID: 480-28830-2**
Date Collected: 11/20/12 11:05 — Matrix: Monitor Well
Date Received: 11/20/12 11:40

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

| Analyte | Result | Qualifier | RL | MDL | Unit | D | Prepared | Analyzed | Dil Fac |
|---|---|---|---|---|---|---|---|---|---|
| Carbon disulfide | 0.49 | J | 5.0 | 0.19 | ug/L | | | 11/30/12 12:55 | 1 |

| Surrogate | %Recovery | Qualifier | Limits | Prepared | Analyzed | Dil Fac |
|---|---|---|---|---|---|---|
| 1,2-Dichloroethane-d4 (Surr) | 94 | | 66 - 137 | | 11/30/12 12:55 | 1 |
| Toluene-d8 (Surr) | 104 | | 71 - 126 | | 11/30/12 12:55 | 1 |
| 4-Bromofluorobenzene (Surr) | 103 | | 73 - 120 | | 11/30/12 12:55 | 1 |

**Client Sample ID: FB-MW-04** — **Lab Sample ID: 480-28830-3**
Date Collected: 11/20/12 10:15 — Matrix: Monitor Well
Date Received: 11/20/12 11:40

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

| Analyte | Result | Qualifier | RL | MDL | Unit | D | Prepared | Analyzed | Dil Fac |
|---|---|---|---|---|---|---|---|---|---|
| Carbon disulfide | ND | | 5.0 | 0.19 | ug/L | | | 11/30/12 13:18 | 1 |

| Surrogate | %Recovery | Qualifier | Limits | Prepared | Analyzed | Dil Fac |
|---|---|---|---|---|---|---|
| 1,2-Dichloroethane-d4 (Surr) | 99 | | 66 - 137 | | 11/30/12 13:18 | 1 |
| Toluene-d8 (Surr) | 96 | | 71 - 126 | | 11/30/12 13:18 | 1 |
| 4-Bromofluorobenzene (Surr) | 107 | | 73 - 120 | | 11/30/12 13:18 | 1 |

**Client Sample ID: Trip Blank** — **Lab Sample ID: 480-28830-4**
Date Collected: 11/20/12 10:00 — Matrix: Water
Date Received: 11/20/12 11:40

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

| Analyte | Result | Qualifier | RL | MDL | Unit | D | Prepared | Analyzed | Dil Fac |
|---|---|---|---|---|---|---|---|---|---|
| Carbon disulfide | ND | | 5.0 | 0.19 | ug/L | | | 11/30/12 13:40 | 1 |

| Surrogate | %Recovery | Qualifier | Limits | Prepared | Analyzed | Dil Fac |
|---|---|---|---|---|---|---|
| 1,2-Dichloroethane-d4 (Surr) | 99 | | 66 - 137 | | 11/30/12 13:40 | 1 |
| Toluene-d8 (Surr) | 108 | | 71 - 126 | | 11/30/12 13:40 | 1 |
| 4-Bromofluorobenzene (Surr) | 106 | | 73 - 120 | | 11/30/12 13:40 | 1 |

# Surrogate Summary

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

TestAmerica Job ID: 480-28830-1

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

Matrix: Monitor Well

Prep Type: Total/NA

| | | Percent Surrogate Recovery (Acceptance Limits) | | |
|---|---|---|---|---|
| Lab Sample ID | Client Sample ID | 12DCE (66-137) | TOL (71-126) | BFB (73-120) |
| 480-28830-1 | MW-04 | 95 | 109 | 108 |
| 480-28830-2 | MW-04 DUP | 94 | 104 | 103 |
| 480-28830-3 | FB-MW-04 | 99 | 96 | 107 |

Surrogate Legend

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

TOL = Toluene-d8 (Surr)

BFB = 4-Bromofluorobenzene (Surr)

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

Matrix: Water

Prep Type: Total/NA

| | | Percent Surrogate Recovery (Acceptance Limits) | | |
|---|---|---|---|---|
| Lab Sample ID | Client Sample ID | 12DCE (66-137) | TOL (71-126) | BFB (73-120) |
| 480-28830-4 | Trip Blank | 99 | 108 | 106 |
| LCS 480-93488/4 | Lab Control Sample | 98 | 109 | 108 |
| MB 480-93488/5 | Method Blank | 94 | 104 | 103 |

Surrogate Legend

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

TOL = Toluene-d8 (Surr)

BFB = 4-Bromofluorobenzene (Surr)

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

TestAmerica Job ID: 480-28830-1

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

Lab Sample ID: MB 480-93488/5
Matrix: Water
Analysis Batch: 93488

Client Sample ID: Method Blank
Prep Type: Total/NA

| Analyte | MB Result | MB Qualifier | RL | MDL | Unit | D | Prepared | Analyzed | Dil Fac |
|---|---|---|---|---|---|---|---|---|---|
| Carbon disulfide | ND | | 5.0 | 0.19 | ug/L | | | 11/30/12 09:26 | 1 |

| *Surrogate* | *MB %Recovery* | *MB Qualifier* | *Limits* | *Prepared* | *Analyzed* | *Dil Fac* |
|---|---|---|---|---|---|---|
| *1,2-Dichloroethane-d4 (Surr)* | *94* | | *66 - 137* | | *11/30/12 09:26* | *1* |
| *Toluene-d8 (Surr)* | *104* | | *71 - 126* | | *11/30/12 09:26* | *1* |
| *4-Bromofluorobenzene (Surr)* | *103* | | *73 - 120* | | *11/30/12 09:26* | *1* |

Lab Sample ID: LCS 480-93488/4
Matrix: Water
Analysis Batch: 93488

Client Sample ID: Lab Control Sample
Prep Type: Total/NA

| *Surrogate* | *LCS %Recovery* | *LCS Qualifier* | *Limits* |
|---|---|---|---|
| *1,2-Dichloroethane-d4 (Surr)* | *98* | | *66 - 137* |
| *Toluene-d8 (Surr)* | *109* | | *71 - 126* |
| *4-Bromofluorobenzene (Surr)* | *108* | | *73 - 120* |

# QC Association Summary

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

TestAmerica Job ID: 480-28830-1

## GC/MS VOA

**Analysis Batch: 93488**

| Lab Sample ID | Client Sample ID | Prep Type | Matrix | Method | Prep Batch |
|---|---|---|---|---|---|
| 480-28830-1 | MW-04 | Total/NA | Monitor Well | 8260B | |
| 480-28830-2 | MW-04 DUP | Total/NA | Monitor Well | 8260B | |
| 480-28830-3 | FB-MW-04 | Total/NA | Monitor Well | 8260B | |
| 480-28830-4 | Trip Blank | Total/NA | Water | 8260B | |
| LCS 480-93488/4 | Lab Control Sample | Total/NA | Water | 8260B | |
| MB 480-93488/5 | Method Blank | Total/NA | Water | 8260B | |

# Lab Chronicle

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

TestAmerica Job ID: 480-28830-1

**Client Sample ID: MW-04**
Date Collected: 11/20/12 11:05
Date Received: 11/20/12 11:40

**Lab Sample ID: 480-28830-1**
Matrix: Monitor Well

| Prep Type | Batch Type | Batch Method | Run | Dilution Factor | Batch Number | Prepared or Analyzed | Analyst | Lab |
|---|---|---|---|---|---|---|---|---|
| Total/NA | Analysis | 8260B | | 1 | 93488 | 11/30/12 12:32 | RL | TAL BUF |

**Client Sample ID: MW-04 DUP**
Date Collected: 11/20/12 11:05
Date Received: 11/20/12 11:40

**Lab Sample ID: 480-28830-2**
Matrix: Monitor Well

| Prep Type | Batch Type | Batch Method | Run | Dilution Factor | Batch Number | Prepared or Analyzed | Analyst | Lab |
|---|---|---|---|---|---|---|---|---|
| Total/NA | Analysis | 8260B | | 1 | 93488 | 11/30/12 12:55 | RL | TAL BUF |

**Client Sample ID: FB-MW-04**
Date Collected: 11/20/12 10:15
Date Received: 11/20/12 11:40

**Lab Sample ID: 480-28830-3**
Matrix: Monitor Well

| Prep Type | Batch Type | Batch Method | Run | Dilution Factor | Batch Number | Prepared or Analyzed | Analyst | Lab |
|---|---|---|---|---|---|---|---|---|
| Total/NA | Analysis | 8260B | | 1 | 93488 | 11/30/12 13:18 | RL | TAL BUF |

**Client Sample ID: Trip Blank**
Date Collected: 11/20/12 10:00
Date Received: 11/20/12 11:40

**Lab Sample ID: 480-28830-4**
Matrix: Water

| Prep Type | Batch Type | Batch Method | Run | Dilution Factor | Batch Number | Prepared or Analyzed | Analyst | Lab |
|---|---|---|---|---|---|---|---|---|
| Total/NA | Analysis | 8260B | | 1 | 93488 | 11/30/12 13:40 | RL | TAL BUF |

**Laboratory References:**

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

# Certification Summary

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

TestAmerica Job ID: 480-28830-1

## Laboratory: TestAmerica Buffalo

All certifications held by this laboratory are listed. Not all certifications are applicable to this report.

| Authority | Program | EPA Region | Certification ID | Expiration Date |
|---|---|---|---|---|
| Arkansas DEQ | State Program | 6 | 88-0686 | 07-06-13 |
| California | NELAC | 9 | 1169CA | 09-30-13 |
| Connecticut | State Program | 1 | PH-0568 | 09-30-14 |
| Florida | NELAC | 4 | E87672 | 06-30-13 |
| Georgia | State Program | 4 | N/A | 03-31-13 |
| Georgia | State Program | 4 | 956 | 06-30-13 |
| Georgia | State Program | 4 | 956 | 06-30-13 |
| Illinois | NELAC | 5 | 200003 | 09-30-13 |
| Iowa | State Program | 7 | 374 | 03-01-13 |
| Kansas | NELAC | 7 | E-10187 | 01-31-13 |
| Kentucky | State Program | 4 | 90029 | 12-31-12 |
| Kentucky (UST) | State Program | 4 | 30 | 04-01-13 |
| Louisiana | NELAC | 6 | 02031 | 06-30-13 |
| Maine | State Program | 1 | NY00044 | 12-04-12 |
| Maryland | State Program | 3 | 294 | 03-31-13 |
| Massachusetts | State Program | 1 | M-NY044 | 06-30-13 |
| Michigan | State Program | 5 | 9937 | 04-01-13 |
| Minnesota | NELAC | 5 | 036-999-337 | 12-31-12 |
| New Hampshire | NELAC | 1 | 2973 | 09-11-13 |
| New Hampshire | NELAC | 1 | 2337 | 11-17-13 |
| New Jersey | NELAC | 2 | NY455 | 06-30-13 |
| New York | NELAC | 2 | 10026 | 03-31-13 |
| North Dakota | State Program | 8 | R-176 | 03-31-13 |
| Oklahoma | State Program | 6 | 9421 | 08-31-13 |
| Oregon | NELAC | 10 | NY200003 | 06-09-13 |
| Pennsylvania | NELAC | 3 | 68-00281 | 07-31-13 |
| Rhode Island | State Program | 1 | LAO00328 | 12-31-13 |
| Tennessee | State Program | 4 | TN02970 | 04-01-13 |
| Texas | NELAC | 6 | T104704412-11-2 | 07-31-13 |
| USDA | Federal | | P330-11-00386 | 11-22-14 |
| Virginia | NELAC | 3 | 460185 | 09-14-13 |
| Washington | State Program | 10 | C784 | 02-10-13 |
| West Virginia DEP | State Program | 3 | 252 | 09-30-13 |
| Wisconsin | State Program | 5 | 998310390 | 08-31-13 |

# Method Summary

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

TestAmerica Job ID: 480-28830-1

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

**Protocol References:**

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

**Laboratory References:**

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

# Sample Summary

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

TestAmerica Job ID: 480-28830-1

| Lab Sample ID | Client Sample ID | Matrix | Collected | Received |
|---|---|---|---|---|
| 480-28830-1 | MW-04 | Monitor Well | 11/20/12 11:05 | 11/20/12 11:40 |
| 480-28830-2 | MW-04 DUP | Monitor Well | 11/20/12 11:05 | 11/20/12 11:40 |
| 480-28830-3 | FB-MW-04 | Monitor Well | 11/20/12 10:15 | 11/20/12 11:40 |
| 480-28830-4 | Trip Blank | Water | 11/20/12 10:00 | 11/20/12 11:40 |

## Login Sample Receipt Checklist

Client: Weston Solutions, Inc.

Job Number: 480-28830-1

**Login Number: 28830**
**List Number: 1**
**Creator: Janish, Carl**

**List Source: TestAmerica Buffalo**

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

**TestAmerica Buffalo**
10 Hazelwood Drive
Amherst, NY 14228-2298
Phone (716) 691-2600 Fax (716) 691-7991

# Chain of Custody Record

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

| Client Information | Sampler: Greg Flasiak | Lab PM: Nemec, Mark | Carrier Tracking No(s): | COC No: 480-29074-4655.1 |
|---|---|---|---|---|
| Client Contact: Mr. Tom Drew | Phone: 610-701-0583 | E-Mail: mark.nemec@testamericainc.com | | Page: Page 1 of 1 |
| Company: Weston Solutions, Inc. | | | | Job #: |
| Address: 1400 Weston Way PO BOX 2653 | Due Date Requested: | Analysis Requested | | Preservation Codes: |
| City: West Chester | TAT Requested (days): | | | A - HCL, B - NaOH, C - Zn Acetate, D - Nitric Acid, E - NaHSO4, F - MeOH, G - Amchlor, H - Ascorbic Acid, I - Ice, J - DI Water, K - EDTA, L - EDA, M - Hexane, N - None, O - AsNaO2, P - Na2O4S, Q - Na2SO3, R - Na2S2O3, S - H2SO4, T - TSP Dodecahydrate, U - Acetone, V - MCAA, W - ph 4-5, Z - other (specify) |
| State, Zip: PA, 19380 | | | | |
| Phone: 610-701-7302(Tel) 610-701-7401(Fax) | PO #: Purchase Order not requir | | | |
| Email: t.drew@westonsolutions.com | WO #: | | | Other: |
| Project Name: 3M Tonawanda/ Event Desc: 3M Tonawanda, NY - Semi-Annual | Project #: 48003524 | | | |
| Site: New York | SSOW#: | | | |

| Sample Identification | Sample Date | Sample Time | Sample Type (C=Comp, G=grab) | Matrix (Water, Solid, Oil/Solid, Tissue, Air) | Field Filtered Sample (Yes or No) | Perform MS/MSD (Yes or No) | 8260B - (MOD) Pick x reference price | Total Number of containers | Special Instructions/Note: |
|---|---|---|---|---|---|---|---|---|---|
| | | | Preservation Code: | | | | A | | |
| MW-04 | 11/20/12 | 1105 | | Water | | | 3 | | |
| MW-04 DUP | 11/20/12 | 1105 | | Water | | | 3 | | |
| FB-MW-04 | 11/20/12 | 1015 | | Water | | | 3 | | |
| ~~LY-01~~ | | | | ~~Water~~ | | | | | GTF |
| Trip Blank | 11/20/12 | 1000 | | Water | | | 3 | | |
| | | | | | | | | | * 5 ppb detection |
| | | | | | | | | | CS2 |

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

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

Deliverable Requested: I, II, III, IV, Other (specify)

Special Instructions/QC Requirements:

| Empty Kit Relinquished by: | Date: | Time: | Method of Shipment: |
|---|---|---|---|

| Relinquished by | Date/Time | Company | Received by | Date/Time | Company |
|---|---|---|---|---|---|
| | 11/20/12 1740 | Weston | | 11/20/12 1140 | TA Buffalo |
| Relinquished by | Date/Time | Company | Received by | Date/Time | Company |
| Relinquished by | Date/Time | Company | Received by | Date/Time | Company |

Custody Seals Intact: △ Yes △ No | Custody Seal No.:

Cooler Temperature(s) °C and Other Remarks: 3.7 ☑3

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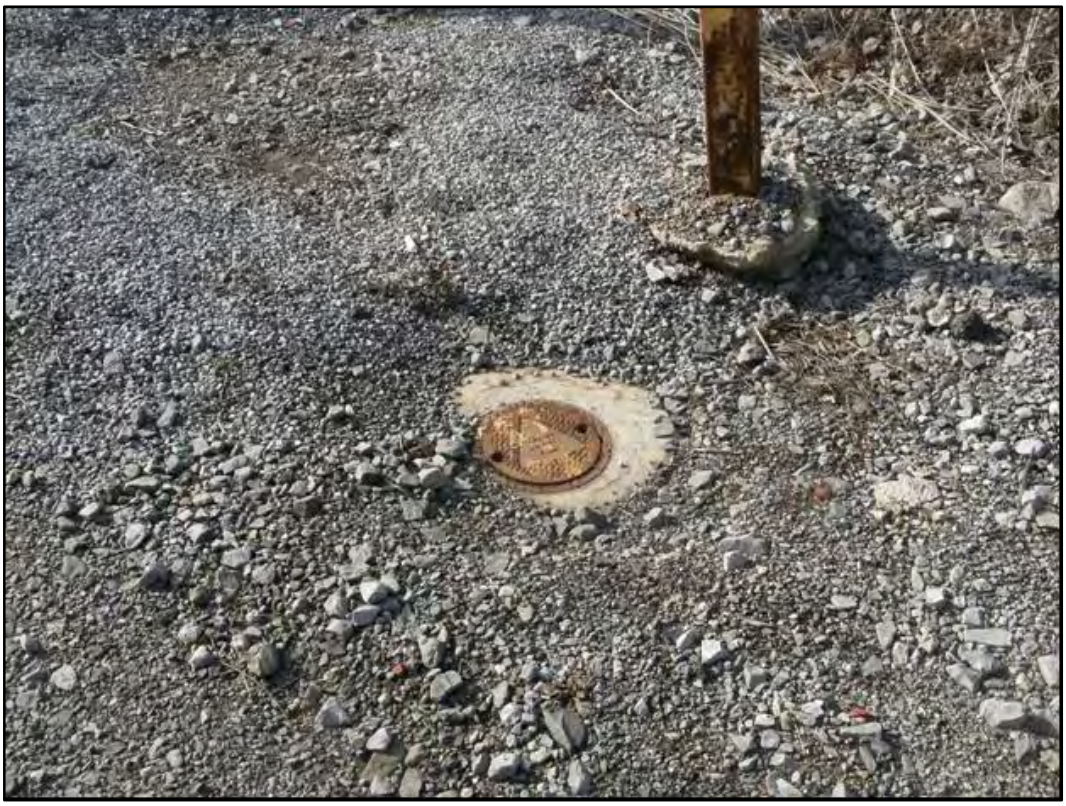
12/3/2012

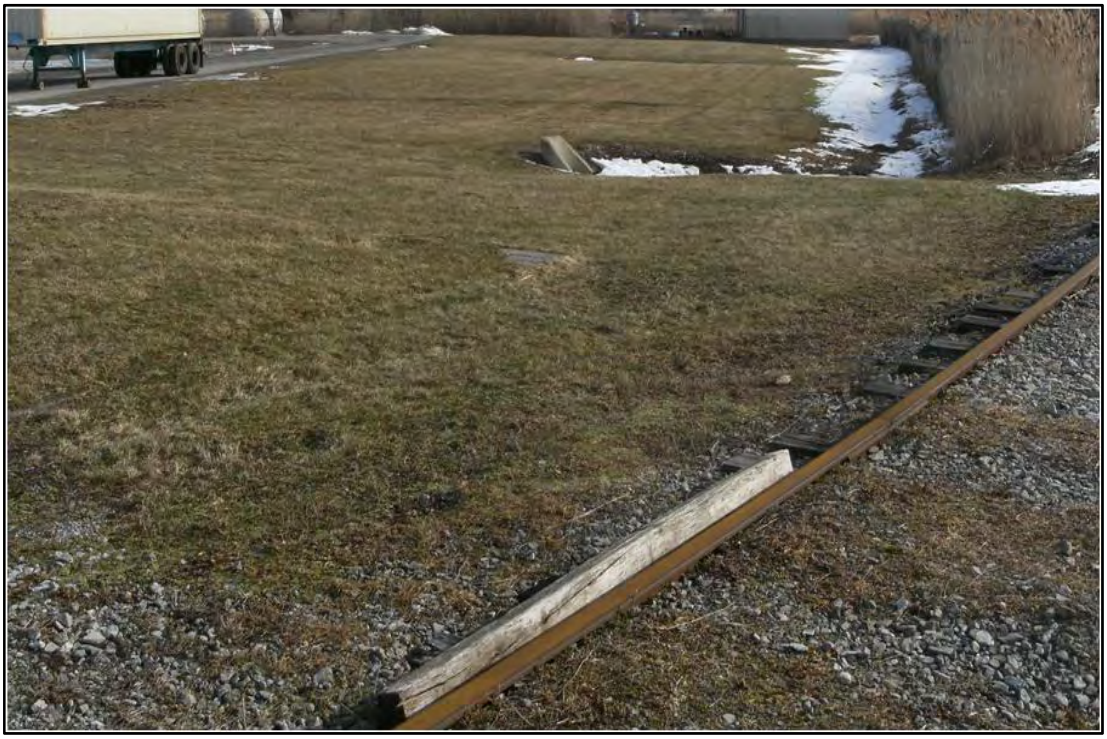
15 14 13 12 11 10 9 8 7 6 5 4 3 2 1

# ATTACHMENT C
# SITE PHOTOGRAPHS

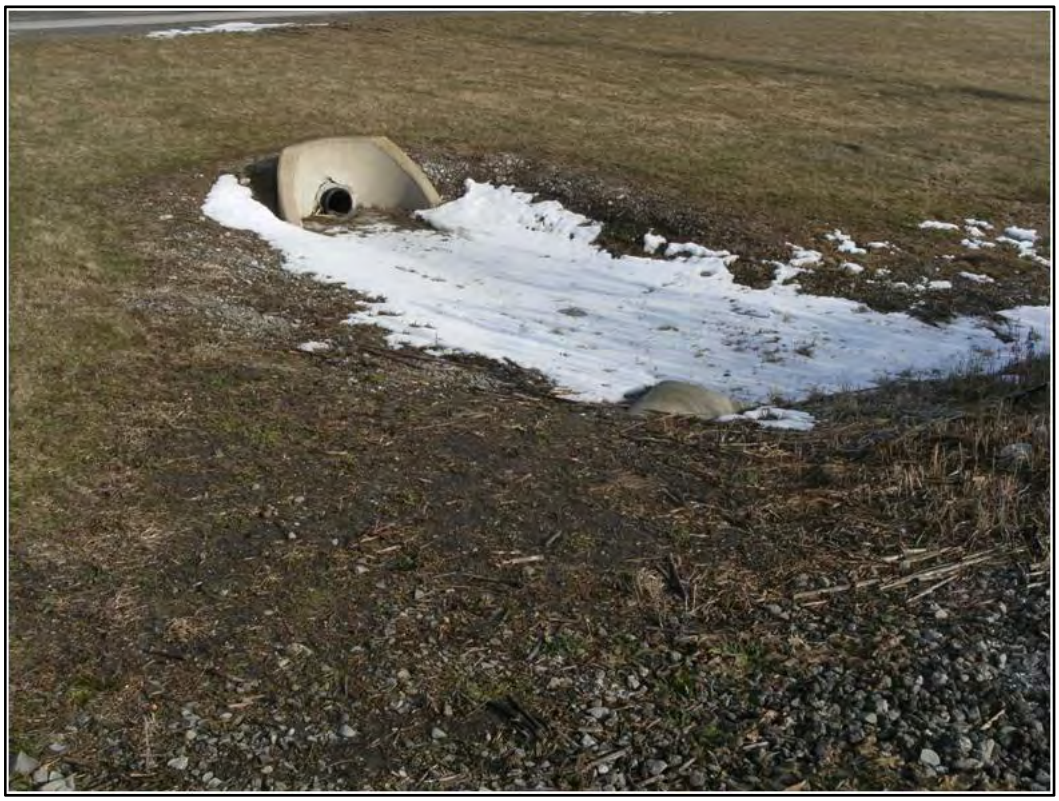
## Groundwater Monitoring Well



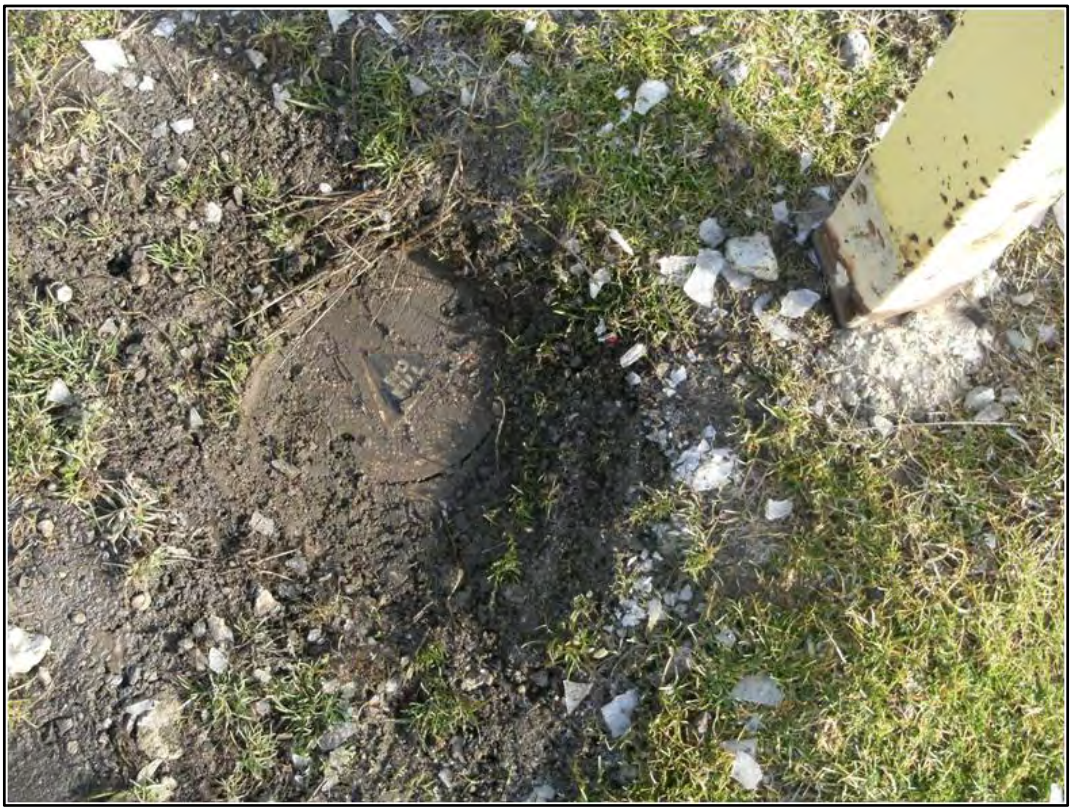
## Catch Basin and Swale



## Drainage Collection



## Lysimeter



Enclosure 2

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

**Site Details** **Box 1**

**Site No. 915148**

**Site Name 3M O-Cel-O Sponge Plant**

Site Address: 305 SAWYER AVENUE Zip Code: 14150
City/Town: Tonawanda
County: Erie
Site Acreage: 1.0

Reporting Period: February 14, 2012 to February 14, 2013

| | YES | NO |
|---|---|---|
| 1. Is the information above correct? | ☒ | ☐ |
| If NO, include handwritten above or 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? | ☐ | ☒ |
| 3. Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))? | ☐ | ☒ |
| 4. Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period? See attachment | ☒ | ☐ |
| **If you answered YES to questions 2 thru 4, include documentation or evidence that documentation has been previously submitted with this certification form.** | | |
| 5. Is the site currently undergoing development? | ☐ | ☒ |

**Box 2**

| | YES | NO |
|---|---|---|
| 6. Is the current site use consistent with the use(s) listed below? Industrial | ☒ | ☐ |
| 7. Are all ICs/ECs in place and functioning as designed? | ☒ | ☐ |

**IF THE ANSWER TO EITHER QUESTION 6 OR 7 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 issues.**

Signature of Owner, Remedial Party or Designated Representative Date

**SITE NO. 915148** **Box 3**

**Description of Institutional Controls**

| Parcel | Owner | Institutional Control |
|---|---|---|
| **65.09-6-5** | Minnesota Mining & Manufacturing | |
| | | Landuse Restriction |
| | | Monitoring Plan |

**Box 4**

**Description of Engineering Controls**

| Parcel | Engineering Control |
|---|---|
| **65.09-6-5** | |
| | Fencing/Access Control |

**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.

**Box 5**

**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 engineering practices; and the information presented is accurate and compete.

| 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 |
|---|---|
| ☒ | ☐ |

**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 issues.**

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.

I Carl Carleton at 305 Sawyer Ave Tonawanda NY 14150
print name print business address

am certifying as Plant Manager (Owner or Remedial Party)

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

Carl Carleton 2-28-2013
Signature of Owner, Remedial Party, or Designated Representative Rendering Certification — Date

**IC/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.

I Thomas A. Drew (print name) at 1400 Weston Way, West Chester, PA 19380 (print business address),

am certifying as a Qualified Environmental Professional for the Owner (Owner or Remedial Party)

Thomas A Drew

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

Stamp (Required for PE)

3/5/2013

Date

**Attachment to Institutional and Engineering Controls Certification Form**

| | |
|---|---|
| **Site Name and Number:** | 3M O-CEL-O<br>Sponge Plant/915148 |
| **Reporting Period:** | February 14, 2012 to February 14, 2013 |

This attachment provides the required documentation for Box 1, Question 4 of the IC/EC Certification Form for the referenced site. In the above noted reporting period, NYSDEC reissued the Tonawanda facility's General Permit for Stormwater Discharges Associated with the Industrial Activity, and the Town of Tonawanda reissued two industrial sewer discharge permits for the facility. Documentation associated with these permits is provided with this attachment.

**New York State Department of Environmental Conservation**
**Division of Water**
**Bureau of Water Permits, 4th Floor**
625 Broadway, Albany, New York 12233-3505
**Phone:** (518) 402-8111 **Fax:** (518) 402-9029 **Website:** www.dec.state.ny.us

Joe Martens
Commissioner

January 28, 2013

KEITH HELD
3M TONAWANDA
305 SAWYER AVE
TONAWANDA, NY 14150

Re: Acknowledgement of Notice of Intent for Coverage under SPDES Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (GP-0-12-001)

Dear CARIE MATHISON:

This is to acknowledge that the New York State Department of Environmental Conservation (the Department) has received a complete Notice of Intent (NOI) for coverage under the State Pollutant Discharge Elimination System (SPDES) Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (MSGP) GP-0-12-001 for the following facility:

3M TONAWANDA
305 SAWYER AVE
TONAWANDA, NY 14150-7798

The permit identification number for this facility is NYR00D034. Please be sure to include this permit identification number on any forms or correspondence you send the Department related to this general permit.

Unless notified by the Department to the contrary, this authorization becomes effective 30 calendar days after the NOI receive date of 12/18/2012, and is conditioned upon the following:

- The information submitted in the NOI received by the Department is accurate and complete.
- The Owner or Operator has developed and is implementing a Stormwater Pollution Prevention Plan (SWPPP) that complies with MSGP GP-0-12-001.
- When applicable, project review pursuant to the State Environmental Quality Review Act (SEQR) has been satisfied.
- All applicable Uniform Procedures Act (Environmental Conservation Law, 6NYRCC Part 621) permits have been obtained. Contact your Regional Permit Administrator (http://www.dec.ny.gov/permits/363.html) for further information.

Please be advised that an Annual Certification Report (ACR) must be completed and submitted for each facility that has obtained permit coverage under this general permit. A copy of the ACR can be found on the Departments website, listed on the next page. An ACR must be completed at the end of calendar year 2013 and must be submitted by February 28, 2014, to:

MSGP Permit Coordinator
NYSDEC, Division of Water
Bureau of Water Permits
625 Broadway
Albany, New York 12233-3505

An ACR must be completed and submitted for each calendar year, thereafter, by February 28th.

In addition to the above, if your facility has stormwater discharges that are subject to benchmark or compliance monitoring (based upon information submitted in your NOI), then you are required to submit your sampling results on Discharge Monitoring Report (DMR) forms. These forms must be completed and submitted along with your Annual Certification Report as indicated above. DMRs will be sent to your facility in 2013. Only results submitted on DMRs provided by the Department will be accepted. The Owner or Operator is responsible for making sure they understand all monitoring requirements and have the appropriate forms. If you do not receive the correct DMRs, please contact the Department.

If the result of one or more parameters for which analysis of benchmark or compliance monitoring was required exceeds the applicable benchmark cut-off concentration or effluent limitation, the facility must implement corrective actions to address the exceedance. Corrective actions include identifying the cause of the exceedance, implementing BMPs to address the cause of the exceedance, revisions to the facility's SWPPP to prevent the exceedance from reoccurring, and collecting an additional sample to determine the effectiveness of the corrective action. The facility must collect the additional sample at the outfall where the exceedance occurred during the first six months of the following calendar year and complete analysis for the pollutant(s) that exceeded the benchmark cut-off concentration or effluent limitation. Results of the analysis must be reported on a Corrective Action Form by July 31st of the calendar year which the sample was collected. A copy of the Corrective Action Form can be found on the Department's website.

If there are changes to your existing general permit or if you no longer need this general permit you must submit a Notice of Modification (NOM) form to modify your general permit or a Notice of Termination (NOT) form to terminate your general permit as soon as possible. If you are selling the facility, it is your responsibility to submit a NOT terminating your coverage and you must notify the new owner, in writing, of the need to obtain the general permit for stormwater discharges.

The Department's website contains the following links related to the MSGP:

| | |
|---|---|
| Stormwater Information Page | http://www.dec.ny.gov/chemical/8468.html |
| Multi-Sector General Permit Page | http://www.dec.ny.gov/chemical/9009.html |
| The MSGP Toolbox | http://www.dec.ny.gov/chemical/62803.html |
| Notice of Intent Form | http://www.dec.ny.gov/docs/water_pdf/gpnoi.pdf |
| Notice of Termination Form | http://www.dec.ny.gov/docs/water_pdf/msgp012001not.pdf |
| Notice of Modification Form | Coming Soon! |
| Annual Certification Form | http://www.dec.ny.gov/chemical/9009.html |
| Corrective Action Form | Coming Soon! |
| No Exposure Page | http://www.dec.ny.gov/chemical/62833.html |

No Exposure Certification Form http://www.dec.ny.gov/docs/water_pdf/noexposure.pdf

The annual regulatory fee for the MSGP will be billed by the Department each fall.

Coverage under this permit does not necessarily mean that you do not need other permits under the Uniform Procedures Act. You should check with your Regional Permit Administrator (http://www.dec.ny.gov/permits/363.html) for further information.

If you have any questions or require additional information, please contact me at (518) 402-8244 or rpwaldro@gw.dec.state.ny.us.

Sincerely,

Ryan P. Waldron, P.E.
MSGP Permit Coordinator

Permit No. 566

**TOWN OF TONAWANDA**

**INDUSTRIAL SEWER CONNECTION PERMIT**

Company Name: 3M Company
Division Name (if Applicable)

Mailing Address: 305 Sawyer Avenue
Street or P.O. Box
Tonawanda, NY 14150
City, State and Zip Code

Facility Address: 305 Sawyer Ave
Street or P.O. Box
Tonawanda, NY 14150
City, State and Zip Code

*The above Industrial User is authorized to discharge industrial wastewater to the Town of Tonawanda sewer system in compliance with the Town's Sewer Use Ordinance Number 2-2000, any applicable provisions of Federal or State law or regulation, and in accordance with discharge point(s), effluent limitations, monitoring requirements, and other conditions set forth herein.*

*This permit is granted in accordance with the application filed on May 2, 2012 in the office of the Pretreatment Administrator, and in conformity with plans, specifications, and other data submitted to the Town in support of the above application.*

Effective Date: September 1, 2012

Expiration Date: August 31, 2015

Permit No. 566

Date: 8/9/12 Signed:

Paul Morrow
Town of Tonawanda
Pretreatment Coordinator

Permit No. 566

Modified Date: 8/17/12

**WASTEWATER STREAMS AUTHORIZED FOR DISCHARGE**

| WASTEWATER STREAM | APPROXIMATE FLOW(GPD) | YES | NO |
|---|---|---|---|
| A. Sanitary Discharge | 1000 | x | |
| B. Cooling Water | 120,000 | x | |
| C. Boiler Blowdown | 34,000 | x | |
| D. Process Wastewater | 515,000 | x | |
| E. Laboratory Drains | 500 | x | |
| F. Water Treatment | 150,000 | x | |

## PART 1 - WASTEWATER DISCHARGE LIMITATIONS AND MONITORING REQUIREMENTS

### A. LOCALLY DERIVED LIMITATIONS

*The industrial user shall comply with the following locally derived effluent limitations effective as of:* ***August 9, 2012***

MONITORING LOCATION: Sampling/Monitoring Station GPS Coordinates 42.9765, -789117
SAMPLE TYPE: 24 hour Composite except for SGT- HEM, HEM, Temperature, and pH which will be grabs

| PARAMETERS | SAMPLE FREQUENCY | LIMIT | PURPOSE |
|---|---|---|---|
| pH | Monthly | 5.0-9.5 SU | Compliance |
| Hexane Extractable Materials | " | 300 mg/l | " |
| SGT- HEM | " | 100 mg/l | " |
| Biochemical Oxygen Demand | " | 250 mg/l | Surcharge |
| Total Suspended Solids | " | " | " |
| Total Phosphorus | " | 6.0 mg/l | " |
| Chemical Oxygen Demand | " | — | Interference[1] |
| Total Chrome | Every 6 Months | 5.2 mg/l | Compliance[2] |
| Total Nickel | " | 5.0 mg/l | Compliance[2] |
| Total Selenium | " | — | Compliance[2] |
| Priority Pollutant Volatiles including Acrolein and Acrylonitrile | " | — | Compliance[2] |
| Priority Pollutant Semivolatiles | " | — | Compliance[2] |
| Temperature (field) | Monthly | 150°F | Compliance |

SGT- HEM= Silica Gel Treated Hexane Extractable Materials

*Note: The complete list of discharge limitations for dischargers to the Town Treatment Plant is contained in the Town's Local Law 2-2000. On the basis of the application and previous monitoring, parameters deemed applicable to this discharge have been excerpted and their limitations included above. The discharger should be aware that all other limitations apply and should consider all such limitations when considering process changes or plant modifications.*

## PART II - SPECIAL CONDITIONS/COMPLIANCE SCHEDULE

1. *The Industrial User shall develop, within 6 months of the effective date of this permit, an accidental spill prevention plan to eliminate or minimize the accidental or slug discharge of pollutants into the sewer system, which could have an effect on the Town's treatment plant, sludge, or cause the Town to violate its SPDES permit.*

## PART III - REPORTING REQUIREMENTS

1. *All Industries requiring submittal of self-monitoring reports (SMR's) must submit all laboratory reports on all discharge analysis from the location specified in this permit.If analysis are performed more frequently than required in this permit then those analysis must be submitted to this office.Whenever possible all lab analysis must be performed using a EPA specified method from "Guidelines Establishing Test Procedures for the Analysis under the Clean Water Act". Persons signing SMR's must be a responsible company official, ie; owner, corporate manager, or supervise more than two hundred fifty (250) employees. Any of the above may appoint a company representative to sign SMR's but written notice must be supplied to this office authorizing said employee to sign.*

*The following statement will be required on all SMR's and baseline monitoring reports (BMR):*

***" I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who managed the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violation."***

2. *The Industrial User shall notify the Town immediately upon any accidental or slug discharge to the sanitary sewer system. Formal written notification discussing circumstances and remedies shall be submitted to the Town within 5 days of the occurrence.*

3. *The Industrial User shall notify the Town 30 days prior to the introduction of new wastewater or pollutants or any substantial change in the volume or characteristics of the wastewater being introduced into the POTW from the User's industrial processes.*

4. *Any upset experienced by the Industrial User of its treatment that places it in a temporary state of non-compliance with wastewater discharge limitations contained in this permit or other limitations specified in the Town's Ordinance shall be reported to the Town within 24 hours of first awareness of the commencement of the upset. Immediate resampling for the non-compliance pollutant shall begin. A detailed report shall be filed within 5 days.*

5. *The Industrial User is required to submit to the Town reports on the results of its sampling of the pollutants specified in Part I of this Permit. This report shall also contain monthly flows.*

*6. All reports shall be submitted to the following address by the 25th day of the month following the reporting period:*

***Paul Morrow, Pretreatment Coordinator***
***Wastewater Treatment Facility***
***779 Two Mile Creek Road***
***Tonawanda, New York 14150***

**PART IV - STANDARD CONDITIONS**

*1. The Industrial User shall comply with all the general prohibitive discharge standards in Article IV of the Local Law 2-2000.*

*a. BOD 250 mg/l, SS 250 mg/l, P 6 mg/l are not to be construed as discharge limits of the above pollutants but as a baseline for generating abnormal sewer charges.*

**2. RIGHT OF ENTRY**

*The Industrial User shall, after reasonable notification by the Town, allow the Town or its representatives, exhibiting proper credentials and identification, to enter upon the premises of the User, at all reasonable hours, for the purposes of inspection, sampling, or records inspection. Reasonable hours in the context of inspection and sampling includes any time the Industrial User is operating any process which results in a process wastewater discharge to the Town's sewerage system.*

**3. RECORDS RETENTION**

*The Industrial User shall retain and preserve for no less than three (3) years, any records, books, documents, memoranda, reports, correspondence and all summaries thereof, relating to monitoring, sampling and chemical analysis made by or in behalf of the User in connection with its discharge.*

*a) All records that pertain to matters that are the subject of special orders or any other enforcement or litigation activities brought by the Town shall be retained and preserved by the Industrial User until all enforcement activities have concluded and all periods of limitation with respect to any and all appeals have expired.*

4. **CONFIDENTIAL INFORMATION**

*Except for data determined to be confidential under Article VII, Section 4 of the Town's Ordinance, all reports required by this permit shall be available for public inspection at the office of the Pretreatment Coordinator, Wastewater Treatment Facility, 779 Two Mile Creek Road, Tonawanda, New York 14150.*

5. **RECORDING OF RESULTS**

*For each measurement or sample taken pursuant to the requirements of this permit, the user shall record the following information:*

*a) The exact place, date and time of sampling;*
*b) The dates the analyses were performed;*
*c) The person(s) who performed the analyses;*
*d) The analytical techniques or methods used, and*
*e) The results of all required analyses.*
*f) Where sanitary sewer discharge is measured by a mechanical or electronic device, accuracy of device shall be certified correct every year by the manufacturer*
*g) Where sanitary sewer discharge is measured by percentage of consumed water, percentage shall be certified correct every two years by a licensed professional engineer .*

6. **DILUTION**

*No Industrial User shall increase the use of potable or process water or, in any way, attempt to dilute a discharge as a partial or complete substitute for adequate treatment to achieve compliance with the limitations contained in this permit*

7. **PROPER DISPOSAL OF PRETREATMENT SLUDGES AND SPENT CHEMICALS**

*The disposal of sludges and spent chemicals generated shall be done in accordance with Section 405 of the Clean Water Act and Subtitles C and D of the Resource Conservation and Recovery Act.*

8. **TOXIC SUBSTANCES**

*All waters shall be maintained free of toxic substances in concentrations that are toxic to or produce detrimental physiological responses in human, plant, animal, or aquatic life.*

**9. REVOCATION OF PERMIT**

*The permit issued to the Industrial User by the Town may be revoked when after inspection, monitoring or analysis it is determined that the discharge of wastewater to the sanitary sewer is in violation of Federal, State, or local laws, ordinances, or regulations. Additionally, falsification or intentional misrepresentation of data or statements pertaining to the permit application or any other required reporting form, shall be cause for permit revocation.*

**10. LIMITATIONS ON PERMIT TRANSFER**

*Transfer of permit. Industrial waste permits are issued to a specific user for a specific operation. In the event of any change in ownership of the industrial facility, the permittee shall notify the new owner of the existence of the permit by letter, a copy of which shall be forwarded to the Pretreatment Administrator 30 days prior to change of ownership. A new industrial waste permit must be issued to the new owner.*

**11. FALSIFYING INFORMATION OR TAMPERING WITH MONITORING EQUIPMENT**

*Knowingly making any false statement on any report or other document required by this permit or knowingly rendered any monitoring device or method inaccurate, may result in punishment under the criminal law of the Town, as well as being subjected to civil penalties and relief.*

**12. MODIFICATION OR REVISION OF THE PERMIT**

*a) The terms and conditions of this permit may be subject to modification by the Town at any time as limitations or requirements as identified the Town's Ordinance, are modified or other just cause exists.*

*b) This permit may also be modified to incorporate special conditions resulting from the issuance of a special order.*

*c) The terms and conditions may be modified as a result of EPA promulgating a new federal Pretreatment standard.*

*d) Any permit modifications which result in new conditions in the permit shall include a reasonable time schedule for compliance if necessary.*

**14. DUTY TO REAPPL**

*The Town shall notify a User one hundred and eighty (180) days prior to the expiration of the User's Permit. Within ninety (90) days of the notification, the User shall reapply for re- issuance of the permit on a form provided by the Town.*

**15. SEVERABILITY**

*The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.*

**16. LIMITATIONS**

*The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any invasion of personal rights, nor any infringement of Federal, State or Local regulations.*

**18. ENFORCEMENT OF THE SEWER USE LAW AND PERMITS**

*The Town has developed and received USEPA approval of its Enforcement Response Plan which details the standard responses to be taken by the Town when it encounters various violations of the Sewer Use Law or the terms of this permit. Copies of this document are available at the office of the Pretreatment Administrator. Town of Tonawanda Sewer Use Ordinance 2-2000 Article VI 165-33 allows for punitive Administrative fines of up to $5,000 per day.*

**19. ADDITIONAL SPECAIL CONDITIONS**

1. ***Disposal of Concentrated Zinc Wastes***
*Concentrated zinc wastes shall not be discharged to the sewer system but shall be shipped to off-site disposal. Documentation of disposal manifests are to made available upon request to the Pretreatment Administrator.*

2. All permittees discharging process wastewaters or concentrated deionizer backwash waters shall maintain on file with the pretreatment office, an accidental spill prevention plan to eliminate or minimize the accidental or slug discharge of pollutants into the sewer system, which could have an effect on the Town's treatment plant, sludge, or cause the Town to violate its SPDES permit. Such Slug discharge plans shall be reviewed and updated as necessary every three years upon permit renewal, or sooner if a new wastestream is introduced into the sewer system.

**Footnotes from page 2**

Footnote 1-Quaternary Ammonium compounds can interfere with BOD analysis

Footnote 2- The Town of Tonawanda Wastewater Treatment Plant SPDES permit states that the Pretreatment Program will, " Require through Permits each SIU to collect one 24 hour flow proportioned sample composite (where feasible) effluent sample every six months and analyze each of those samples for all priority pollutants that can reasonably be expected to be detectable in that discharge at levels greater than level found in domestic sewage." Upon historical data review and review of your Industrial Waste Questionnaire analysis marked with this footnote were added to your permit to comply with our SPDES permit.

Permit No. 116

**TOWN OF TONAWANDA**

**INDUSTRIAL SEWER CONNECTION PERMIT**

Company Name: 3M Company
Division Name (if Applicable)

Mailing Address: 305 Sawyer Ave
Street or P.O. Box
Tonawanda, NY 14150
City, State and Zip Code

Facility Address: 305 Sawyer Ave
Street or P.O. Box
Tonawanda, NY 14150
City, State and Zip Code

*The above Industrial User is authorized to discharge industrial wastewater to the Town of Tonawanda sewer system in compliance with the Town's Sewer Use Ordinance Number 2-2000, any applicable provisions of Federal or State law or regulation, and in accordance with discharge point(s), effluent limitations, monitoring requirements, and other conditions set forth herein.*

*This permit is granted in accordance with the application filed on May 2, 2012 in the office of the Pretreatment Administrator, and in conformity with plans, specifications, and other data submitted to the Town in support of the above application.*

Effective Date: September 1, 2012

Expiration Date: August 31, 2015

Permit No. 116

Date: 8/8/12 Signed: Paul Morrow

Paul Morrow
Town of Tonawanda
Pretreatment Coordinator

Permit No. 116

Modified Date:

**WASTEWATER STREAMS AUTHORIZED FOR DISCHARGE**

| WASTEWATER STREAM | APPROXIMATE FLOW(GPD) | YES | NO |
|---|---|---|---|
| A. Sanitary Discharge | 12,000 | x | |
| B. Cooling Water | | | x |
| C. Boiler Blowdown | | | x |
| D. Process Wastewater | | | x |
| E. Other | | | x |
| F. Other | | | x |

**PART 1 - WASTEWATER DISCHARGE LIMITATIONS AND MONITORING REQUIREMENTS**

A. **LOCALLY DERIVED LIMITATIONS**

*The industrial user shall comply with the following locally derived effluent limitations effective as of:* ***August 8, 2012***

MONITORING LOCATION: Sanitary Manhole at GPS Coordinates 42.9766, -78.9192
SAMPLE TYPE: 24 Composite for all parameters except pH and Oil and Grease which will be grab

| PARAMETERS | SAMPLE FREQUENCY | LIMIT | PURPOSE |
|---|---|---|---|
| pH | Semi-annual | 5.0-9.5 SU | Compliance |
| Hexane Extractable Material | " " | 300 mg/l | " |
| Biochemical Oxygen Demand | " " | 250 mg/l | Surcharge |
| Total Suspended Solids | " " | " | " |
| Total Phosphorus | " " | 6.0 mg/l | " |

The discharge flow for this permit is unmetered. An estimated flow of 12,000 gallons per day will be used for all billing associated with this permit as per agreement between the Town of Tonawanda and 3M Company.

*Note: The complete list of discharge limitations for dischargers to the Town Treatment Plant is contained in the Town's Local Law 2-2000. On the basis of the application and previous monitoring, parameters deemed applicable to this discharge have been excerpted and their limitations included above. The discharger should be aware that all other limitations apply and should consider all such limitations when considering process changes or plant modifications.*

## PART II - SPECIAL CONDITIONS/COMPLIANCE SCHEDULE

1. *The Industrial User shall develop, within 6 months of the effective date of this permit, an accidental spill prevention plan to eliminate or minimize the accidental or slug discharge of pollutants into the sewer system, which could have an effect on the Town's treatment plant, sludge, or cause the Town to violate its SPDES permit.*

## PART III - REPORTING REQUIREMENTS

1. *All Industries requiring submittal of self-monitoring reports (SMR's) must submit all laboratory reports on all discharge analysis from the location specified in this permit.If analysis are performed more frequently than required in this permit then those analysis must be submitted to this office.Whenever possible all lab analysis must be performed using a EPA specified method from "Guidelines Establishing Test Procedures for the Analysis under the Clean Water Act". Persons signing SMR's must be a responsible company official, ie; owner, corporate manager, or supervise more than two hundred fifty (250) employees. Any of the above may appoint a company representative to sign SMR's but written notice must be supplied to this office authorizing said employee to sign.*

*The following statement will be required on all SMR's and baseline monitoring reports (BMR):*

***" I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who managed the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violation."***

2. *The Industrial User shall notify the Town immediately upon any accidental or slug discharge to the sanitary sewer system. Formal written notification discussing circumstances and remedies shall be submitted to the Town within 5 days of the occurrence.*

3. *The Industrial User shall notify the Town 30 days prior to the introduction of new wastewater or pollutants or any substantial change in the volume or characteristics of the wastewater being introduced into the POTW from the User's industrial processes.*

4. *Any upset experienced by the Industrial User of its treatment that places it in a temporary state of non-compliance with wastewater discharge limitations contained in this permit or other limitations specified in the Town's Ordinance shall be reported to the Town within 24 hours of first awareness of the commencement of the upset. Immediate resampling for the non-compliance pollutant shall begin. A detailed report shall be filed within 5 days.*

5. *The Industrial User is required to submit to the Town reports on the results of its sampling of the pollutants specified in Part I of this Permit. This report shall also contain estimated monthly flows.*

*6. All reports shall be submitted to the following address by the 25th day of the month following the reporting period:*

***Paul Morrow, Pretreatment Coordinator***
***Wastewater Treatment Facility***
***779 Two Mile Creek Road***
***Tonawanda, New York 14150***

**PART IV - STANDARD CONDITIONS**

*1. The Industrial User shall comply with all the general prohibitive discharge standards in Article IV of the Local Law 2-2000.*

*a. BOD 250 mg/l, SS 250 mg/l, P 6 mg/l are not to be construed as discharge limits of the above pollutants but as a baseline for generating abnormal sewer charges.*

**2. RIGHT OF ENTRY**

*The Industrial User shall, after reasonable notification by the Town, allow the Town or its representatives, exhibiting proper credentials and identification, to enter upon the premises of the User, at all reasonable hours, for the purposes of inspection, sampling, or records inspection. Reasonable hours in the context of inspection and sampling includes any time the Industrial User is operating any process which results in a process wastewater discharge to the Town's sewerage system.*

**3. RECORDS RETENTION**

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