



Weston Solutions, Inc.  
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*The Trusted Integrator for Sustainable Solutions*

March 8, 2016

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

W.O. No. 02181.086.024

Re: Periodic Review Report (February 14, 2015 to February 14, 2016)  
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 (PRR) for the 3M Tonawanda, NY facility for the period extending from February 14, 2015 to February 14, 2016.

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



## **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:** February 14, 2015 to February 14, 2016

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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 (PRR) 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 April 2015 and November 2015. The results from these sampling events are presented herein, along with a description of any maintenance activity conducted in the swale. Also, all analytical results presented in this (PRR) will be uploaded into NYSDEC's EQuIS system in March 2016.

### **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) and lysimeter LY-02 on April 29, 2015 in accordance with the O&M Plan modifications approved by NYSDEC. Laboratory analytical results from the April 29, 2015 sampling event are provided in this report. Photographs of the site groundwater monitoring well and lysimeter taken on November 9, 2015 are provided in Attachment A.
- Groundwater samples for CS<sub>2</sub> analysis were collected from monitoring well MW-4 (primary sample and duplicate sample) on November 3, 2015 pursuant to the O&M Plan modifications. The sampling results from the November 3, 2015 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. Photographs showing the condition of the drainage swale, catch basin and fencing at the time of the site inspection in November 2015 are provided in Attachment A.
- The annual compliance inspection/evaluation was completed on November 9, 2015. 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>LY-02</b>
<b>4/29/2015</b>	<b>0.48 J</b>	<b>ND</b>	<b>200</b>
<b>11/03/2015</b>	<b>ND</b>	<b>ND</b>	<b>NS</b>

Notes: ND: Not detected at the reporting limit. The reporting limit for CS<sub>2</sub> is 5 µg/L for MW-4, and 40 mg/L for LY-02 due to sample dilution at the laboratory.

NS: Not sampled per approved plan.

J: Result is less than the reporting limit of 5 µg/L but greater than or equal to the method detection limit of 0.19 µg/L and the concentration is an approximate value.

As noted above, CS<sub>2</sub> was not detected above the reporting limit in the groundwater samples collected from monitoring well MW-4 in April 2015 and November 2015. CS<sub>2</sub> was detected at a concentration of 200 mg/L in the pore water sample collected from lysimeter LY-02. This finding is consistent with previous sample results. A copy of the completed well purging/sampling forms and the laboratory data packages for the April 2015 and November 2015 sampling events is provided in Attachment B.



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, 2015 to February 14, 2016

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

**Box 2**

- |   | YES                                 | NO                       |
|---|-------------------------------------|--------------------------|
| 6. Is the current site use consistent with the use(s) listed below?<br>Industrial | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 7. Are all ICs/ECs in place and functioning as designed?                          | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**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

**Description of Institutional Controls**ParcelOwnerInstitutional Control**65.09-6-5**

Minnesota Mining &amp; Manufacturing

Landuse Restriction  
Monitoring Plan

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.

**Description of Engineering Controls**ParcelEngineering Control**65.09-6-5**

Fencing/Access Control

**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 complete.

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  
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  
Signature of Owner, Remedial Party, or Designated Representative  
Rendering Certification

2-29-16  
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 DREW at 1400 WESTON WAY, WEST CHESTER, PA  
print name print business address

am certifying as a Qualified Environmental Professional for the 3M COMPANY  
(Owner or Remedial Party)

Thomas A. Drew

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

Stamp  
(Required for PE)

3/7/2016

Date

**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 June 12, 2015 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, 2015

Expiration Date: August 31, 2018

Permit No. 116

Date: 8/19/15 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	<u>12,000</u>	<u>x</u>	<u>      </u>
B. Cooling Water	<u>                    </u>	<u>      </u>	<u>x</u>
C. Boiler Blowdown	<u>                    </u>	<u>      </u>	<u>x</u>
D. Process Wastewater	<u>                    </u>	<u>      </u>	<u>x</u>
E. Other	<u>                    </u>	<u>      </u>	<u>x</u>
F. Other	<u>                    </u>	<u>      </u>	<u>x</u>

**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: September 1, 2015*

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	"
Total Sulfate	" "	None	Monitoring

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 25<sup>th</sup> 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 REAPPLY**

*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.*



**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 June 11, 2015 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, 2015

Expiration Date: August 31, 2018

Permit No. 566

Date: 8/19/15 Signed: Paul Morrow  
Paul Morrow  
Town of Tonawanda  
Pretreatment Coordinator

**WASTEWATER STREAMS AUTHORIZED FOR DISCHARGE**

WASTEWATER STREAM	APPROXIMATE FLOW(GPD)	YES	NO
A. Sanitary Discharge	<u>500</u>	<u>x</u>	<u>      </u>
B. Cooling Water	<u>110,000</u>	<u>x</u>	<u>      </u>
C. Boiler Blowdown	<u>30,000</u>	<u>x</u>	<u>      </u>
D. Process Wastewater	<u>635,000</u>	<u>x</u>	<u>      </u>
E. Laboratory Drains	<u>500</u>	<u>x</u>	<u>      </u>
F. Water Treatment	<u>150,000</u>	<u>x</u>	<u>      </u>

**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: September 1, 2015*

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 <sup>1</sup>
Total Chrome	Every 6 Months	5.2 mg/l	Compliance <sup>2</sup>
Total Nickel	"	5.0 mg/l	Compliance <sup>2</sup>
Priority Pollutant Volatiles	"	---	Compliance <sup>2</sup>
including Acrolein and Acrylonitrile			
Priority Pollutant Semivolatiles	"	---	Compliance <sup>2</sup>
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.*



Permit No: 566

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 25<sup>th</sup> 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 REAPPLY**

*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.



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**ATTACHMENT A**  
**SITE PHOTOGRAPHS – NOVEMBER 9, 2015**

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### Groundwater Monitoring Well



### Catch Basin, Swale and Fencing





## Lysimeter



## Drainage Collection



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**ATTACHMENT B  
WELL PURGING/SAMPLING FORMS  
AND LABORATORY ANALYTICAL PACKAGES  
APRIL 2015 AND NOVEMBER 2015 SAMPLING EVENTS**

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## WELL PURGING/SAMPLING FORMS

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## Well Evacuation/Sampling Form

<b>SITE INFORMATION</b> <u>TONAWANDA</u>		4/29/15							
Well No.: <u>MW-04</u>		Weather: <u>Sunny</u> Cloudy Rain Temp: <u>55</u>							
Sampling Team: <u>Greg Flaschke</u>		Sampler's Signature: <u>[Signature]</u>							
<b>WELL INFORMATION</b>									
Protective Casing: <u>Intact</u> / Damaged		Concrete Base: <u>Intact</u> / Damaged							
Locked: <u>YES</u> / NO		Well Diameter: <u>2"</u>							
<b>WELL EVACUATION INFORMATION</b>									
A. Total Depth (Top of Casing = TOC):	<u>72.90</u>	Well Evacuation Method <input checked="" type="checkbox"/> BAILER <input type="checkbox"/> 2-Inch Grundfos <input type="checkbox"/> Peristaltic Pump <input type="checkbox"/> Other (Specify) _____							
B. Depth to Water (DTW) (TOC):	<u>-31.27</u>								
C. Column of Standing Water (C=A-B):	<u>41.63</u>								
D. Purge Factor	<u>x 0.16</u>								
E. One Well Volume:	<u>6.6</u>								
F. Three Well Volumes (gallons):	<u>19.8</u>	<b>TOTAL VOLUME PURGED:</b> <u>20</u>							
Sampled using <b>LOW-FLOW</b>									
<b>INDICATOR PARAMETERS</b>									
Time	<u>1249</u>	<u>1259</u>	<u>1309</u>	<u>1339</u>					
Purge Rate (gal. per minute)									
Total Gallons Purged									
Temperature (°C):	<u>14.5</u>	<u>13.8</u>	<u>13.7</u>	<u>13.9</u>					
Specific Conductivity (s):	<u>354.0</u>	<u>829</u>	<u>2864</u>	<u>2885</u>					
pH:	<u>9.95</u>	<u>10.80</u>	<u>10.68</u>	<u>8.62</u>					
<b>SECONDARY PARAMETERS</b>									
ORP (mV):	<u>—</u>	<u>—</u>	<u>—</u>	<u>—</u>					
Dissolved Oxygen (mg/L):	<u>—</u>	<u>—</u>	<u>—</u>	<u>—</u>					
Turbidity:	<u>64.2</u>	<u>178</u>	<u>85.8</u>	<u>80.0</u>					
NAPL Observed: YES / <u>NO</u>					Well Pumped Dry: YES / <u>NO</u>				
ODOR: YES / <u>NO</u>					Other: _____				
Odor Type: ( ) Solvent ( ) Septic ( ) Other									
<b>SAMPLE COLLECTION INFORMATION</b>					<b>SAMPLE DATE:</b> <u>4/29/15</u>				
Sample No.		Time		Sample No.		Time			
Media Sample ID: <u>MW-04</u>				Rinsate Blank: YES / <u>NO</u>					
Duplicate: <u>YES</u> / NO <u>MW-04</u>				Field Blank: YES / <u>NO</u>					
Parameters: <input checked="" type="checkbox"/> 8260 VOC CS <sub>2</sub> ( ) Fluorides ( ) Chlorides ( ) TDS ( ) Metals (Total RCRA) Non-filtered ( ) Metals (Total RCRA) Filtered				Also sampled for: _____					
<b>COMMENTS</b>									
<u>CS<sub>2</sub> (5ppb)</u>					Well Pumped Dry: YES / <u>NO</u>				
					Volume Purged: <u>20</u>				
					Well Requires Maintenance? YES / <u>NO</u>				
					Access Requires Maintenance? YES / <u>NO</u>				





## Well Evacuation/Sampling Form

<b>SITE INFORMATION</b> <u>TOWAWANDA</u>		<u>11/3/15</u>							
Well No.: <u>MW-4</u>	Weather: <u>Sunny</u> Cloudy Rain	Temp: <u>60°</u>							
Sampling Team: <u>Greg Flaszko</u>	Sampler's Signature: <u>[Signature]</u>								
<b>WELL INFORMATION</b>									
Protective Casing: <u>Intact</u> / Damaged	Concrete Base: <u>Intact</u> / Damaged								
Locked: <u>YES</u> / NO	Well Diameter: <u>2"</u>								
<b>WELL EVACUATION INFORMATION</b>									
A. Total Depth (Top of Casing = TOC):	<u>72.90</u>	Well Evacuation Method <input checked="" type="checkbox"/> BAILER <input type="checkbox"/> 2-Inch Grundfos <input type="checkbox"/> Peristaltic Pump <input type="checkbox"/> Other (Specify) _____							
B. Depth to Water (DTW) (TOC):	<u>-31.72</u>								
C. Column of Standing Water (C=A-B):	<u>41.18</u>								
D. Purge Factor	<u>x .16</u>								
E. One Well Volume:	<u>6.5</u>								
F. Three Well Volumes (gallons):	<u>19.5</u>	TOTAL VOLUME PURGED: <u>20</u>							
Sampled using <b>LOW-FLOW</b>									
<b>INDICATOR PARAMETERS</b>									
Time	<u>1205</u>	<u>1220</u>	<u>1230</u>	<u>1241</u>					
Purge Rate (gal. per minute)									
Total Gallons Purged									
Temperature (°C):	<u>13.7</u>	<u>13.3</u>	<u>13.0</u>	<u>12.8</u>					
Specific Conductivity (s):	<u>1717</u>	<u>1778</u>	<u>3284</u>	<u>3374</u>					
pH:	<u>6.83</u>	<u>11.60</u>	<u>8.50</u>	<u>8.42</u>					
<b>SECONDARY PARAMETERS</b>									
ORP (mV):									
Dissolved Oxygen (mg/L):									
Turbidity:	<u>27.4</u>	<u>31.8</u>	<u>136.4</u>	<u>76.4</u>					
NAPL Observed: YES / <u>NO</u>					Well Pumped Dry: YES / <u>NO</u>				
ODOR: YES / <u>NO</u>					Other:				
Odor Type: ( ) Solvent ( ) Septic ( ) Other									
<b>SAMPLE COLLECTION INFORMATION</b>					<b>SAMPLE DATE:</b> <u>11/3/15</u>				
Sample No.	Time	Sample No.	Time						
Media Sample ID: <u>MW-4</u>	<u>1245</u>	Rinsate Blank: <u>YES</u> / NO <u>FB-MW-4</u>	<u>1230</u>						
Duplicate: <u>YES</u> / NO <u>MW-4 Dup</u>	<u>1245</u>	Field Blank: YES / NO							
Parameters: <input checked="" type="checkbox"/> 8260-VOC <u>CS<sub>2</sub></u> ( ) Fluorides ( ) Chlorides ( ) TDS ( ) Metals (Total RCRA) Non-filtered ( ) Metals (Total RCRA) Filtered		Also sampled for:							
<b>COMMENTS</b>									
<u>CS<sub>2</sub> Only</u> <u>5 ppb</u>					Well Pumped Dry: YES / <u>NO</u> Volume Purged: <u>20</u> Well Requires Maintenance? YES / <u>NO</u> Access Requires Maintenance? YES / <u>NO</u>				

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## LABORATORY ANALYTICAL PACKAGES

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# 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: 480-79378-1

Client Project/Site: 3M Tonawanda

Sampling Event: 3M Tonawanda, NY - Semi-Annual Monit.

For:

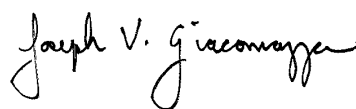
Weston Solutions, Inc.

1400 Weston Way

PO BOX 2653

West Chester, Pennsylvania 19380

Attn: Mr. Tom Drew



Authorized for release by:

5/12/2015 8:57:10 AM

Joe Giacomazza, Project Management Assistant II

[joe.giacomazza@testamericainc.com](mailto:joe.giacomazza@testamericainc.com)

Designee for

Brian Fischer, Manager of Project Management

(716)504-9835

[brian.fischer@testamericainc.com](mailto:brian.fischer@testamericainc.com)

### LINKS

Review your project  
results through

TotalAccess

Have a Question?



Visit us at:

[www.testamericainc.com](http://www.testamericainc.com)

*The test results in this report meet all 2003 NELAC and 2009 TNI requirements for accredited parameters, exceptions are noted in this report. This report may not be reproduced except in full, and with written approval from the laboratory. For questions please contact the Project Manager at the e-mail address or telephone number listed on this page.*

*This report has been electronically signed and authorized by the signatory. Electronic signature is intended to be the legally binding equivalent of a traditionally handwritten signature.*

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

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## Definitions/Glossary

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

TestAmerica Job ID: 480-79378-1

### 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.
α	Listed under the "D" column to designate that the result is reported on a dry weight basis
%R	Percent Recovery
CFL	Contains Free Liquid
CNF	Contains no Free Liquid
DER	Duplicate error ratio (normalized absolute difference)
Dil Fac	Dilution Factor
DL, RA, RE, IN	Indicates a Dilution, Re-analysis, Re-extraction, or additional Initial metals/anion analysis of the sample
DLC	Decision level concentration
MDA	Minimum detectable activity
EDL	Estimated Detection Limit
MDC	Minimum detectable concentration
MDL	Method Detection Limit
ML	Minimum Level (Dioxin)
NC	Not Calculated
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: 480-79378-1

**Job ID: 480-79378-1**

**Laboratory: TestAmerica Buffalo**

### Narrative

#### Job Narrative 480-79378-1

#### Receipt

The samples were received on 4/29/2015 2:50 PM; the samples arrived in good condition, properly preserved and, where required, on ice. The temperature of the cooler at receipt was 5.8° C.

#### GC/MS VOA

Method(s) 8260C: The following sample was diluted to bring the concentration of target analytes within the calibration range: LY-02 (480-79378-2). Elevated reporting limits (RLs) are provided.

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

## Detection Summary

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

TestAmerica Job ID: 480-79378-1

### Client Sample ID: Trip Blank

Lab Sample ID: 480-79378-1

No Detections.

### Client Sample ID: LY-02

Lab Sample ID: 480-79378-2

Analyte	Result	Qualifier	RL	MDL	Unit	Dil Fac	D	Method	Prep Type
Carbon disulfide	200000		40000	1500	ug/L	8000		8260C	Total/NA

### Client Sample ID: FB-MW-04

Lab Sample ID: 480-79378-3

No Detections.

### Client Sample ID: MW-04

Lab Sample ID: 480-79378-4

Analyte	Result	Qualifier	RL	MDL	Unit	Dil Fac	D	Method	Prep Type
Carbon disulfide	0.48	J	5.0	0.19	ug/L	1		8260C	Total/NA

### Client Sample ID: MW-04 DUP

Lab Sample ID: 480-79378-5

No Detections.

This Detection Summary does not include radiochemical test results.

TestAmerica Buffalo

# Client Sample Results

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

TestAmerica Job ID: 480-79378-1

## Client Sample ID: Trip Blank

Date Collected: 04/29/15 11:30

Date Received: 04/29/15 14:50

## Lab Sample ID: 480-79378-1

Matrix: Water

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

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Carbon disulfide	ND		5.0	0.19	ug/L	-		05/06/15 22:08	1
Surrogate	%Recovery	Qualifier	Limits				Prepared	Analyzed	Dil Fac
1,2-Dichloroethane-d4 (Surr)	96		66 - 137					05/06/15 22:08	1
Toluene-d8 (Surr)	97		71 - 126					05/06/15 22:08	1
4-Bromofluorobenzene (Surr)	101		73 - 120					05/06/15 22:08	1

## Client Sample ID: LY-02

Date Collected: 04/29/15 13:15

Date Received: 04/29/15 14:50

## Lab Sample ID: 480-79378-2

Matrix: Monitor Well

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

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Carbon disulfide	200000		40000	1500	ug/L	-		05/06/15 22:32	8000
Surrogate	%Recovery	Qualifier	Limits				Prepared	Analyzed	Dil Fac
1,2-Dichloroethane-d4 (Surr)	95		66 - 137					05/06/15 22:32	8000
Toluene-d8 (Surr)	96		71 - 126					05/06/15 22:32	8000
4-Bromofluorobenzene (Surr)	102		73 - 120					05/06/15 22:32	8000

## Client Sample ID: FB-MW-04

Date Collected: 04/29/15 13:30

Date Received: 04/29/15 14:50

## Lab Sample ID: 480-79378-3

Matrix: Monitor Well

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

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Carbon disulfide	ND		5.0	0.19	ug/L	-		05/06/15 22:56	1
Surrogate	%Recovery	Qualifier	Limits				Prepared	Analyzed	Dil Fac
1,2-Dichloroethane-d4 (Surr)	94		66 - 137					05/06/15 22:56	1
Toluene-d8 (Surr)	94		71 - 126					05/06/15 22:56	1
4-Bromofluorobenzene (Surr)	99		73 - 120					05/06/15 22:56	1

## Client Sample ID: MW-04

Date Collected: 04/29/15 13:45

Date Received: 04/29/15 14:50

## Lab Sample ID: 480-79378-4

Matrix: Monitor Well

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

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Carbon disulfide	0.48	J	5.0	0.19	ug/L	-		05/06/15 23:19	1
Surrogate	%Recovery	Qualifier	Limits				Prepared	Analyzed	Dil Fac
1,2-Dichloroethane-d4 (Surr)	97		66 - 137					05/06/15 23:19	1
Toluene-d8 (Surr)	98		71 - 126					05/06/15 23:19	1
4-Bromofluorobenzene (Surr)	103		73 - 120					05/06/15 23:19	1

TestAmerica Buffalo

# Client Sample Results

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

TestAmerica Job ID: 480-79378-1

**Client Sample ID: MW-04 DUP**

**Date Collected: 04/29/15 13:45**

**Date Received: 04/29/15 14:50**

**Lab Sample ID: 480-79378-5**

**Matrix: Monitor Well**

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

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Carbon disulfide	ND		5.0	0.19	ug/L			05/06/15 23:43	1

Surrogate	%Recovery	Qualifier	Limits	Prepared	Analyzed	Dil Fac
1,2-Dichloroethane-d4 (Surr)	98		66 - 137		05/06/15 23:43	1
Toluene-d8 (Surr)	99		71 - 126		05/06/15 23:43	1
4-Bromofluorobenzene (Surr)	102		73 - 120		05/06/15 23:43	1

# Surrogate Summary

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

TestAmerica Job ID: 480-79378-1

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

Matrix: Monitor Well

Prep Type: Total/NA

Lab Sample ID	Client Sample ID	Percent Surrogate Recovery (Acceptance Limits)		
		12DCE (66-137)	TOL (71-126)	BFB (73-120)
480-79378-2	LY-02	95	96	102
480-79378-3	FB-MW-04	94	94	99
480-79378-4	MW-04	97	98	103
480-79378-5	MW-04 DUP	98	99	102

### Surrogate Legend

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

TOL = Toluene-d8 (Surr)

BFB = 4-Bromofluorobenzene (Surr)

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

Matrix: Water

Prep Type: Total/NA

Lab Sample ID	Client Sample ID	Percent Surrogate Recovery (Acceptance Limits)		
		12DCE (66-137)	TOL (71-126)	BFB (73-120)
480-79378-1	Trip Blank	96	97	101
LCS 480-240901/5	Lab Control Sample	91	93	93
MB 480-240901/7	Method Blank	95	94	99

### Surrogate Legend

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

TOL = Toluene-d8 (Surr)

BFB = 4-Bromofluorobenzene (Surr)



# QC Sample Results

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

TestAmerica Job ID: 480-79378-1

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

Lab Sample ID: MB 480-240901/7

Matrix: Water

Analysis Batch: 240901

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			05/06/15 21:07	1

Surrogate	MB %Recovery	MB Qualifier	Limits	Prepared	Analyzed	Dil Fac
1,2-Dichloroethane-d4 (Surr)	95		66 - 137		05/06/15 21:07	1
Toluene-d8 (Surr)	94		71 - 126		05/06/15 21:07	1
4-Bromofluorobenzene (Surr)	99		73 - 120		05/06/15 21:07	1

Lab Sample ID: LCS 480-240901/5

Matrix: Water

Analysis Batch: 240901

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Surrogate	LCS %Recovery	LCS Qualifier	Limits
1,2-Dichloroethane-d4 (Surr)	91		66 - 137
Toluene-d8 (Surr)	93		71 - 126
4-Bromofluorobenzene (Surr)	93		73 - 120

## QC Association Summary

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

TestAmerica Job ID: 480-79378-1

### GC/MS VOA

#### Analysis Batch: 240901

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
480-79378-1	Trip Blank	Total/NA	Water	8260C	
480-79378-2	LY-02	Total/NA	Monitor Well	8260C	
480-79378-3	FB-MW-04	Total/NA	Monitor Well	8260C	
480-79378-4	MW-04	Total/NA	Monitor Well	8260C	
480-79378-5	MW-04 DUP	Total/NA	Monitor Well	8260C	
LCS 480-240901/5	Lab Control Sample	Total/NA	Water	8260C	
MB 480-240901/7	Method Blank	Total/NA	Water	8260C	

# Lab Chronicle

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

TestAmerica Job ID: 480-79378-1

## Client Sample ID: Trip Blank

Date Collected: 04/29/15 11:30

Date Received: 04/29/15 14:50

## Lab Sample ID: 480-79378-1

Matrix: Water

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Analysis	8260C		1	240901	05/06/15 22:08	NQN	TAL BUF

## Client Sample ID: LY-02

Date Collected: 04/29/15 13:15

Date Received: 04/29/15 14:50

## Lab Sample ID: 480-79378-2

Matrix: Monitor Well

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Analysis	8260C		8000	240901	05/06/15 22:32	NQN	TAL BUF

## Client Sample ID: FB-MW-04

Date Collected: 04/29/15 13:30

Date Received: 04/29/15 14:50

## Lab Sample ID: 480-79378-3

Matrix: Monitor Well

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Analysis	8260C		1	240901	05/06/15 22:56	NQN	TAL BUF

## Client Sample ID: MW-04

Date Collected: 04/29/15 13:45

Date Received: 04/29/15 14:50

## Lab Sample ID: 480-79378-4

Matrix: Monitor Well

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Analysis	8260C		1	240901	05/06/15 23:19	NQN	TAL BUF

## Client Sample ID: MW-04 DUP

Date Collected: 04/29/15 13:45

Date Received: 04/29/15 14:50

## Lab Sample ID: 480-79378-5

Matrix: Monitor Well

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Analysis	8260C		1	240901	05/06/15 23:43	NQN	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: 480-79378-1

## Laboratory: TestAmerica Buffalo

The certifications listed below are applicable to this report.

Authority	Program	EPA Region	Certification ID	Expiration Date
New York	NELAP	2	10026	03-31-16

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## Method Summary

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

TestAmerica Job ID: 480-79378-1

Method	Method Description	Protocol	Laboratory
8260C	Volatile Organic Compounds by 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: 480-79378-1

Lab Sample ID	Client Sample ID	Matrix	Collected	Received
480-79378-1	Trip Blank	Water	04/29/15 11:30	04/29/15 14:50
480-79378-2	LY-02	Monitor Well	04/29/15 13:15	04/29/15 14:50
480-79378-3	FB-MW-04	Monitor Well	04/29/15 13:30	04/29/15 14:50
480-79378-4	MW-04	Monitor Well	04/29/15 13:45	04/29/15 14:50
480-79378-5	MW-04 DUP	Monitor Well	04/29/15 13:45	04/29/15 14:50

# TestAmerica

THE LEADER IN ENVIRONMENTAL TESTING

Temperature on Receipt \_\_\_\_\_

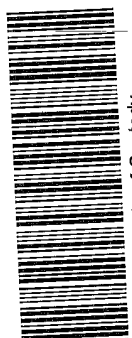
Drinking Water? Yes ☐ No ☐

## Chain of Custody Record

TAL-4124 (1007)

Client <b>Western Solutions</b>		Project Manager <b>Tom Drew</b>		Date <b>4/29/15</b>	Chain of Custody Number <b>284679</b>
Address <b>1410 Western Way</b>		Telephone Number (Area Code)/Fax Number <b>610-701-3500</b>		Lab Number	Page <b>1</b> of <b>1</b>
City <b>W Chester</b>	State <b>PA</b>	Zip Code <b>19380</b>	Site Contact <b>Tom Fleschowski</b>	Analysis (Attach list if more space is needed)	
Project Name and Location (State) <b>IONAWANDA, NY</b>			Lab Contact <b>Sally Hoffman</b>	Special Instructions/ Conditions of Receipt	
Contract/Purchase Order/Quote No.					

Sample I.D. No. and Description (Containers for each sample may be combined on one line)	Date	Time	Matrix					Containers & Preservatives					Analysis
			Air	Aqueous	Sed.	Soil	Unpres.	H2SO4	HNO3	HCl	NaOH	ZnAc	
Trip Blank	4/29/15	1130								3			AS Only
LY-02		1315								3			6 ppb
FB-MW-04		1330								3			Detection
MW-04		1345								3			Limit
MW-04 Dup		1345								3			



480-79378 Chain of Custody

Possible Hazard Identification		Sample Disposal		(A fee may be assessed if samples are retained longer than 1 month)	
<input type="checkbox"/> Non-Hazard	<input type="checkbox"/> Flammable	<input type="checkbox"/> Skin Irritant	<input type="checkbox"/> Poison B	<input type="checkbox"/> Unknown	<input type="checkbox"/> Return To Client
Turn Around Time Required		QC Requirements (Specify)		Disposal By Lab <input type="checkbox"/> Archive For _____ Months	
<input type="checkbox"/> 24 Hours	<input type="checkbox"/> 48 Hours	<input type="checkbox"/> 7 Days	<input type="checkbox"/> 14 Days	<input type="checkbox"/> 21 Days	<input type="checkbox"/> Other _____
Relinquished By		Relinquished By		Relinquished By	
Date <b>4/29/15</b>		Date <b>4/29/15</b>		Date <b>4/29/15</b>	
Time <b>1450</b>		Time <b>1450</b>		Time <b>1450</b>	
Signature <i>[Signature]</i>		Signature <i>[Signature]</i>		Signature <i>[Signature]</i>	
Comments		Comments		Comments	

#1 5.8

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



## Login Sample Receipt Checklist

Client: Weston Solutions, Inc.

Job Number: 480-79378-1

Login Number: 79378

List Number: 1

Creator: Kolb, Chris M

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 solutions
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

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: 480-90375-1

Client Project/Site: 3M Tonawanda

Sampling Event: 3M Tonawanda, NY - Semi-Annual Monit.

For:

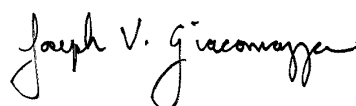
Weston Solutions, Inc.

1400 Weston Way

PO BOX 2653

West Chester, Pennsylvania 19380

Attn: Mr. Tom Drew



Authorized for release by:

11/16/2015 10:42:51 AM

Joe Giacomazza, Project Management Assistant II

[joe.giacomazza@testamericainc.com](mailto:joe.giacomazza@testamericainc.com)

Designee for

Judy Stone, Senior Project Manager

(484)685-0868

[judy.stone@testamericainc.com](mailto:judy.stone@testamericainc.com)

### LINKS

Review your project  
results through

TotalAccess

Have a Question?



Visit us at:

[www.testamericainc.com](http://www.testamericainc.com)

*The test results in this report meet all 2003 NELAC and 2009 TNI requirements for accredited parameters, exceptions are noted in this report. This report may not be reproduced except in full, and with written approval from the laboratory. For questions please contact the Project Manager at the e-mail address or telephone number listed on this page.*

*This report has been electronically signed and authorized by the signatory. Electronic signature is intended to be the legally binding equivalent of a traditionally handwritten signature.*

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

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## Definitions/Glossary

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

TestAmerica Job ID: 480-90375-1

### Glossary

Abbreviation	These commonly used abbreviations may or may not be present in this report.
α	Listed under the "D" column to designate that the result is reported on a dry weight basis
%R	Percent Recovery
CFL	Contains Free Liquid
CNF	Contains no Free Liquid
DER	Duplicate error ratio (normalized absolute difference)
Dil Fac	Dilution Factor
DL, RA, RE, IN	Indicates a Dilution, Re-analysis, Re-extraction, or additional Initial metals/anion analysis of the sample
DLC	Decision level concentration
MDA	Minimum detectable activity
EDL	Estimated Detection Limit
MDC	Minimum detectable concentration
MDL	Method Detection Limit
ML	Minimum Level (Dioxin)
NC	Not Calculated
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: 480-90375-1

**Job ID: 480-90375-1**

**Laboratory: TestAmerica Buffalo**

### Narrative

#### Job Narrative 480-90375-1

#### Receipt

The samples were received on 11/3/2015 1:42 PM; the samples arrived in good condition, properly preserved and, where required, on ice. The temperature of the cooler at receipt was 5.0° C.

#### GC/MS VOA

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

## Detection Summary

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

TestAmerica Job ID: 480-90375-1

**Client Sample ID: Trip Blank**

**Lab Sample ID: 480-90375-1**

☐ No Detections.

**Client Sample ID: FB-MW-4**

**Lab Sample ID: 480-90375-2**

☐ No Detections.

**Client Sample ID: MW-4**

**Lab Sample ID: 480-90375-3**

☐ No Detections.

**Client Sample ID: MW-4 DUP**

**Lab Sample ID: 480-90375-4**

☐ No Detections.

This Detection Summary does not include radiochemical test results.

TestAmerica Buffalo

# Client Sample Results

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

TestAmerica Job ID: 480-90375-1

## Client Sample ID: Trip Blank

Date Collected: 11/03/15 11:00

Date Received: 11/03/15 13:42

## Lab Sample ID: 480-90375-1

Matrix: Water

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

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Carbon disulfide	ND		5.0	0.19	ug/L	-		11/13/15 15:03	1
Surrogate	%Recovery	Qualifier	Limits				Prepared	Analyzed	Dil Fac
1,2-Dichloroethane-d4 (Surr)	107		66 - 137					11/13/15 15:03	1
Toluene-d8 (Surr)	100		71 - 126					11/13/15 15:03	1
4-Bromofluorobenzene (Surr)	99		73 - 120					11/13/15 15:03	1

## Client Sample ID: FB-MW-4

Date Collected: 11/03/15 12:30

Date Received: 11/03/15 13:42

## Lab Sample ID: 480-90375-2

Matrix: Water

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

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Carbon disulfide	ND		5.0	0.19	ug/L	-		11/13/15 15:48	1
Surrogate	%Recovery	Qualifier	Limits				Prepared	Analyzed	Dil Fac
1,2-Dichloroethane-d4 (Surr)	109		66 - 137					11/13/15 15:48	1
Toluene-d8 (Surr)	105		71 - 126					11/13/15 15:48	1
4-Bromofluorobenzene (Surr)	101		73 - 120					11/13/15 15:48	1

## Client Sample ID: MW-4

Date Collected: 11/03/15 12:45

Date Received: 11/03/15 13:42

## Lab Sample ID: 480-90375-3

Matrix: Water

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

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Carbon disulfide	ND		5.0	0.19	ug/L	-		11/14/15 00:20	1
Surrogate	%Recovery	Qualifier	Limits				Prepared	Analyzed	Dil Fac
1,2-Dichloroethane-d4 (Surr)	104		66 - 137					11/14/15 00:20	1
Toluene-d8 (Surr)	100		71 - 126					11/14/15 00:20	1
4-Bromofluorobenzene (Surr)	98		73 - 120					11/14/15 00:20	1

## Client Sample ID: MW-4 DUP

Date Collected: 11/03/15 12:45

Date Received: 11/03/15 13:42

## Lab Sample ID: 480-90375-4

Matrix: Water

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

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Carbon disulfide	ND		5.0	0.19	ug/L	-		11/13/15 16:34	1
Surrogate	%Recovery	Qualifier	Limits				Prepared	Analyzed	Dil Fac
1,2-Dichloroethane-d4 (Surr)	101		66 - 137					11/13/15 16:34	1
Toluene-d8 (Surr)	98		71 - 126					11/13/15 16:34	1
4-Bromofluorobenzene (Surr)	96		73 - 120					11/13/15 16:34	1

TestAmerica Buffalo



# Surrogate Summary

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

TestAmerica Job ID: 480-90375-1

## Method: 8260C - Volatile Organic Compounds by 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)
480-90375-1	Trip Blank	107	100	99
480-90375-2	FB-MW-4	109	105	101
480-90375-3	MW-4	104	100	98
480-90375-4	MW-4 DUP	101	98	96
LCS 480-274827/5	Lab Control Sample	102	107	109
LCS 480-274999/4	Lab Control Sample	101	101	104
MB 480-274827/7	Method Blank	104	100	102
MB 480-274999/6	Method Blank	104	102	100

### Surrogate Legend

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

TOL = Toluene-d8 (Surr)

BFB = 4-Bromofluorobenzene (Surr)

# QC Sample Results

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

TestAmerica Job ID: 480-90375-1

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

Lab Sample ID: MB 480-274827/7

Matrix: Water

Analysis Batch: 274827

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	-		11/13/15 11:40	1
Surrogate	%Recovery	MB Qualifier	Limits				Prepared	Analyzed	Dil Fac
1,2-Dichloroethane-d4 (Surr)	104		66 - 137					11/13/15 11:40	1
Toluene-d8 (Surr)	100		71 - 126					11/13/15 11:40	1
4-Bromofluorobenzene (Surr)	102		73 - 120					11/13/15 11:40	1

Lab Sample ID: LCS 480-274827/5

Matrix: Water

Analysis Batch: 274827

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Analyte		Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec. Limits	
Carbon disulfide		25.0	24.7		ug/L	-	99	59 - 134	
Surrogate	%Recovery	LCS Qualifier	Limits						
1,2-Dichloroethane-d4 (Surr)	102		66 - 137						
Toluene-d8 (Surr)	107		71 - 126						
4-Bromofluorobenzene (Surr)	109		73 - 120						

Lab Sample ID: MB 480-274999/6

Matrix: Water

Analysis Batch: 274999

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	-		11/13/15 21:50	1
Surrogate	%Recovery	MB Qualifier	Limits				Prepared	Analyzed	Dil Fac
1,2-Dichloroethane-d4 (Surr)	104		66 - 137					11/13/15 21:50	1
Toluene-d8 (Surr)	102		71 - 126					11/13/15 21:50	1
4-Bromofluorobenzene (Surr)	100		73 - 120					11/13/15 21:50	1

Lab Sample ID: LCS 480-274999/4

Matrix: Water

Analysis Batch: 274999

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Analyte		Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec. Limits	
Carbon disulfide		25.0	26.3		ug/L	-	105	59 - 134	
Surrogate	%Recovery	LCS Qualifier	Limits						
1,2-Dichloroethane-d4 (Surr)	101		66 - 137						
Toluene-d8 (Surr)	101		71 - 126						
4-Bromofluorobenzene (Surr)	104		73 - 120						

TestAmerica Buffalo

## QC Association Summary

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

TestAmerica Job ID: 480-90375-1

### GC/MS VOA

#### Analysis Batch: 274827

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
480-90375-1	Trip Blank	Total/NA	Water	8260C	
480-90375-2	FB-MW-4	Total/NA	Water	8260C	
480-90375-4	MW-4 DUP	Total/NA	Water	8260C	
LCS 480-274827/5	Lab Control Sample	Total/NA	Water	8260C	
MB 480-274827/7	Method Blank	Total/NA	Water	8260C	

#### Analysis Batch: 274999

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
480-90375-3	MW-4	Total/NA	Water	8260C	
LCS 480-274999/4	Lab Control Sample	Total/NA	Water	8260C	
MB 480-274999/6	Method Blank	Total/NA	Water	8260C	

# Lab Chronicle

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

TestAmerica Job ID: 480-90375-1

## Client Sample ID: Trip Blank

Date Collected: 11/03/15 11:00

Date Received: 11/03/15 13:42

## Lab Sample ID: 480-90375-1

Matrix: Water

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Analysis	8260C		1	274827	11/13/15 15:03	JWG	TAL BUF

## Client Sample ID: FB-MW-4

Date Collected: 11/03/15 12:30

Date Received: 11/03/15 13:42

## Lab Sample ID: 480-90375-2

Matrix: Water

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Analysis	8260C		1	274827	11/13/15 15:48	JWG	TAL BUF

## Client Sample ID: MW-4

Date Collected: 11/03/15 12:45

Date Received: 11/03/15 13:42

## Lab Sample ID: 480-90375-3

Matrix: Water

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Analysis	8260C		1	274999	11/14/15 00:20	LCH	TAL BUF

## Client Sample ID: MW-4 DUP

Date Collected: 11/03/15 12:45

Date Received: 11/03/15 13:42

## Lab Sample ID: 480-90375-4

Matrix: Water

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Analysis	8260C		1	274827	11/13/15 16:34	JWG	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: 480-90375-1

## Laboratory: TestAmerica Buffalo

The certifications listed below are applicable to this report.

Authority	Program	EPA Region	Certification ID	Expiration Date
New York	NELAP	2	10026	03-31-16

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## Method Summary

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

TestAmerica Job ID: 480-90375-1

Method	Method Description	Protocol	Laboratory
8260C	Volatile Organic Compounds by 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: 480-90375-1

Lab Sample ID	Client Sample ID	Matrix	Collected	Received
480-90375-1	Trip Blank	Water	11/03/15 11:00	11/03/15 13:42
480-90375-2	FB-MW-4	Water	11/03/15 12:30	11/03/15 13:42
480-90375-3	MW-4	Water	11/03/15 12:45	11/03/15 13:42
480-90375-4	MW-4 DUP	Water	11/03/15 12:45	11/03/15 13:42



## Login Sample Receipt Checklist

Client: Weston Solutions, Inc.

Job Number: 480-90375-1

Login Number: 90375

List Source: TestAmerica Buffalo

List Number: 1

Creator: Wallace, Cameron

Question	Answer	Comment
Radioactivity either was not measured or, if measured, is at or below background	True	
The cooler's custody seal, if present, is intact.	True	
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	True	
Cooler Temperature is acceptable.	True	
Cooler Temperature is recorded.	True	
COC is present.	True	
COC is filled out in ink and legible.	True	
COC is filled out with all pertinent information.	True	
Is the Field Sampler's name present on COC?	True	
There are no discrepancies between the sample IDs on the containers and the COC.	True	
Samples are received within Holding Time.	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	
Samples received within 48 hours of sampling.	True	
Samples requiring field filtration have been filtered in the field.	True	
Chlorine Residual checked.	N/A	