



Weston Solutions, Inc.
1400 Weston Way
P.O. Box 2653
West Chester, PA 19380
610-701-3000
WestonSolutions.com



February 26, 2020

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

**Re: Periodic Review Report (February 14, 2019 to February 14, 2020)
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, 2019 to February 14, 2020.

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.

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

c: J. Martin, 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: Jeannie Martin (3M Corporate)
Keith Held (3M Tonawanda)

NYSDEC Project Lead: Glenn May

Reporting Period: February 14, 2019 to February 14, 2020

Background

The New York State Department of Environmental Conservation (NYSDEC) issued a Record of Decision (ROD) (Registry No. 915148) for the 3M facility in Tonawanda, New York. This ROD presents the selected remedial action for the Tonawanda facility based on the site's Administrative Record and public input. Following ROD issuance, the NYSDEC reclassified the 3M Tonawanda site from "Class 3 – Does not present a significant threat to the public health or environment – action may be deferred", to "Class 4 – Site properly closed – requires continued management."

3M is implementing the selected ROD remedy, No Further Action with Monitoring, under an Order on Consent (Index # B9-0369-91-04) (Order) according to the NYSDEC-approved Operation and Maintenance Work Plan (O&M Work Plan), which was made part of the Order. The original O&M Work Plan called for:

- Filing a Declaration of Covenants and Restrictions with the property deed at the Erie County Clerk's Office. This was completed and was reported in the initial progress report for the period ending March 31, 2001.
- Performing long-term groundwater monitoring. Involved semiannual sampling of site monitor wells MW-1, MW-2, MW-3, and MW-4 and annual sampling of the two site lysimeters, LY-1 and LY-2, with groundwater samples analyzed for carbon disulfide (CS₂).
- Inspecting the completed interim remedial measures (IRMs) (includes the CS₂ tank system, and the catch basin and associated swale) and maintaining the integrity of the IRMs.

Semiannual 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 CS₂ 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 CS₂ 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 CS₂ 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 2019 and November 2019. 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 EQulS system in March 2020.

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 CS₂ analysis were collected from monitoring well MW-4 (primary sample and duplicate sample) and lysimeter LY-02 on April 30, 2019, in accordance with the O&M Plan modifications approved by NYSDEC. Laboratory analytical results from the April 2019 sampling event are provided in this report. Photographs of the site groundwater monitoring well and lysimeter taken on November 4, 2019 are provided in Attachment A.
- Groundwater samples for CS₂ analysis were collected from monitoring well MW-4 (primary sample and duplicate sample) on November 19, 2019 pursuant to the O&M Plan modifications. The sampling results from the November 2019 event are provided in this report.
- Groundwater samples for 1,4-dioxane and polyfluoroalkyl substances (PFAS) analysis were collected from monitoring well MW-4 (primary sample and duplicate sample) on November 19, 2019. This sampling was conducted at the request of the NYSDEC to support a Statewide evaluation of the presence of 1,4-dioxane and PFAS in groundwater. The sampling results from the November 2019 event for 1,4-dioxane and PFAS will be provided to the NYSDEC under separate cover.

- 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 monitoring well, lysimeter, drainage swale, catch basin and fencing at the time of the site inspection in November 2019 are provided in Attachment A.
- The annual compliance inspection/evaluation was completed on November 4, 2019. No deficiencies were noted during the inspection.

Groundwater Monitoring Results

Summary of Carbon Disulfide Water Analytical Results

Sampling Date	Sample ID and Result		
	MW-4 (µg/L)	MW-4 Duplicate (µg/L)	LY-02 (mg/L)
4/30/2019	< 5	< 5	190
11/19/2019	< 5	< 5	NS

Notes:

NS: Not sampled per approved plan.

As noted above, CS₂ was not detected in the groundwater samples collected from monitoring well MW-4 in April 2019 and November 2019. CS₂ was detected at a concentration of 190 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 2019 and November 2019 sampling events is provided in Attachment B.

ATTACHMENT A
SITE PHOTOGRAPHS – NOVEMBER 4, 2019

Groundwater Monitoring Well MW-4



Catch Basin, Swale and Fencing



Lysimeter LY-2



Drainage Collection



**ATTACHMENT B
WELL PURGING/SAMPLING FORMS
AND LABORATORY ANALYTICAL PACKAGES
APRIL 2019 AND NOVEMBER 2019 SAMPLING EVENTS**

WELL PURGING/SAMPLING FORMS



Well Evacuation/Sampling Form

SITE INFORMATION		TONAWANDA		2019 April 30					
Well No.: MW-4	Weather: Sunny Cloudy Rain		Temp: 43°						
Sampling Team: Greg Flasinski	Sampler's Signature: <i>[Signature]</i>								
WELL INFORMATION									
Protective Casing: <input checked="" type="radio"/> Intact / <input type="radio"/> Damaged	Concrete Base: <input checked="" type="radio"/> Intact / <input type="radio"/> Damaged								
Locked: <input checked="" type="radio"/> YES / <input type="radio"/> NO	Well Diameter: <input checked="" type="radio"/> 2-INCH / <input type="radio"/> 4-INCH / <input type="radio"/> 6-INCH								
WELL EVACUATION INFORMATION									
A. Total Depth (Top of Casing = TOC):	72.90	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):	-31.17								
C. Column of Standing Water (C=A-B):	41.83								
D. Purge Factor	x 0.16								
E. One Well Volume:	6.7								
F. Three Well Volumes (gallons):	20.1	TOTAL VOLUME PURGED: 20.1							
INDICATOR PARAMETERS									
Time	1032	1042	1057	1107					
Purge Rate (gal. per minute)									
Total Gallons Purged									
Temperature (°C):	10.7	10.5	10.1	10.2					
Specific Conductivity (s):	860	2067	3143	3221					
pH:	9.26	10.74	8.74	8.53					
SECONDARY PARAMETERS									
ORP (mV):	-	-	-	-					
Dissolved Oxygen (mg/L):	-	-	-	-					
Turbidity:	86.3	174.3	107.4	64.3					
NAPL Observed: YES / NO					Well Pumped Dry: YES / NO				
ODOR: YES / NO					Other:				
Odor Type: () Solvent () Septic () Other									
SAMPLE COLLECTION INFORMATION					SAMPLE DATE:				
Sample No.	Time	Sample No.	Time						
Media Sample ID: OCO-GW-MW04-D-190430	1115	Rinsate Blank: YES/NO							
Duplicate: YES/NO OCO-GW-MW04-DB-	1115	Field Blank: YES/NO	OCO-W-190430	1115					
Parameters: <input checked="" type="checkbox"/> VOC-CS2 () 190430			Trp Blank @ 1000 OCO-W-TB01-190430						
COMMENTS									
MW-1 31.12 MW-2 32.96 MW-3 33.70 MW-4 31.17					Well Pumped Dry: YES / NO Volume Purged: Well Requires Maintenance? YES / NO Access Requires Maintenance? YES / NO				



Figure 1
Well Purging/Sampling Form

SITE INFORMATION Confidential Tonawanda, NY											
Well No.: MW-4					Weather: Sunny Cloudy Rain Temp: 35						
Sampling Team: Greg Flasiwski					Sampler's Signature: <i>[Signature]</i>						
WELL INFORMATION											
Protective Casing: <input checked="" type="radio"/> Intact / <input type="radio"/> Damaged					Concrete Base: <input checked="" type="radio"/> Intact / <input type="radio"/> Damaged						
Locked: <input checked="" type="radio"/> Yes / <input type="radio"/> No					Well Diameter: <input checked="" type="radio"/> 2-inch <input type="radio"/> 4-inch <input type="radio"/> 6-inch						
WELL EVACUATION INFORMATION											
A. Total Well Depth from Top of Casing (TOC):		72.90			Well Evacuation Method						
B. Depth to Water (ft below TOC):		-30.53			<input checked="" type="checkbox"/> Bailer						
C. Column of Standing Water (ft) (C=A-B):		42.37			<input type="checkbox"/> 2-Inch Grundfos						
D. Purge Factor:		x 0.16			<input type="checkbox"/> Peristaltic Pump						
E. One Well Volume (gallons):		6.78			<input type="checkbox"/> Other (Specify)						
F. Five Well Volumes (gallons):		33.9			Total Volume Purged (gallons): 25.75						
INDICATOR PARAMETERS											
Time:	1042	1055	1108	1122	1135	1147					
Purge Rate (gal. per minute):	0.4	0.4	0.4	0.37	0.4	0.4					
Temperature (degrees C):	13.2	12.8	12.7	12.6	12.6	12.6					
Specific Cond (mS/cm):	875	820	3820	3970	3953	3967					
pH:	9.92	10.28	8.50	8.08	7.98	7.96					
Turbidity (NTU):	15.2	120	+++	687	326	270					
Depth to Water (ft below TOC):	30.53	30.70	30.90	30.88	30.81	30.80					
NAPL Observed: Yes / <input checked="" type="radio"/> No					Well Pumped Dry: Yes / <input checked="" type="radio"/> No						
ODOR: Yes / <input checked="" type="radio"/> No					Other:						
SAMPLE COLLECTION INFORMATION SAMPLE DATE: 11/19/19											
Sample No.				Time		Sample No.				Time	
Media Sample ID: OCO-GW-MW04-0-191119				1210		Rinse Blank: <input checked="" type="radio"/> Yes <input type="radio"/> No OCO-W-FB01-FB-191119				1030	
Duplicate: <input checked="" type="radio"/> Yes <input type="radio"/> No OCO-GW-MW04-DB-191119				1210		Trip Blank: <input checked="" type="radio"/> Yes <input type="radio"/> No OCO-W-TB01-TB-191119				900	
Parameters:											
<input checked="" type="checkbox"/> CS ₂ <input checked="" type="checkbox"/> 1,4-Dioxane <input checked="" type="checkbox"/> PFAS											
Well # DTW (Feet below TOC)										COMMENTS	
MW-1 27.57										Well Requires Maintenance? Yes <input checked="" type="radio"/> No	
MW-2 30.88										Access Requires Maintenance? Yes <input checked="" type="radio"/> No	
MW-3 32.63											
MW-4 30.53											

LABORATORY ANALYTICAL PACKAGES

ANALYTICAL REPORT

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

Laboratory Job ID: 480-152858-1
Client Project/Site: 3M Tonawanda
Revision: 1

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

Attn: Mr. Tom Drew



Authorized for release by:
5/15/2019 3:02:08 PM

Judy Stone, Senior Project Manager
(484)685-0868
judy.stone@testamericainc.com

LINKS

Review your project
results through

TotalAccess

Have a Question?



Visit us at:

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.

Table of Contents

Cover Page	1
Table of Contents	2
Definitions/Glossary	3
Case Narrative	4
Detection Summary	5
Client Sample Results	6
Surrogate Summary	8
QC Sample Results	9
QC Association Summary	10
Lab Chronicle	11
Certification Summary	12
Method Summary	13
Sample Summary	14
Chain of Custody	15
Receipt Checklists	18



Definitions/Glossary

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

Job ID: 480-152858-1

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
CFL	Contains Free Liquid
CNF	Contains No Free Liquid
DER	Duplicate Error Ratio (normalized absolute difference)
Dil Fac	Dilution Factor
DL	Detection Limit (DoD/DOE)
DL, RA, RE, IN	Indicates a Dilution, Re-analysis, Re-extraction, or additional Initial metals/anion analysis of the sample
DLC	Decision Level Concentration (Radiochemistry)
EDL	Estimated Detection Limit (Dioxin)
LOD	Limit of Detection (DoD/DOE)
LOQ	Limit of Quantitation (DoD/DOE)
MDA	Minimum Detectable Activity (Radiochemistry)
MDC	Minimum Detectable Concentration (Radiochemistry)
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 (Radiochemistry)
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

Job ID: 480-152858-1

Job ID: 480-152858-1

Laboratory: Eurofins TestAmerica, Buffalo

Narrative

Job Narrative
480-152858-1

Revision (1)

The client revised the sample IDs to be unique from previous events and requested a revised report and EDD files.

Receipt

The samples were received on 4/30/2019 11:45 AM; the samples arrived in good condition, properly preserved and, where required, on ice. The temperature of the cooler at receipt was 2.7° C.

GC/MS VOA

Method(s) 8260C: The following sample was diluted to bring the concentration of target analytes within the calibration range: OCO-GW-LY02-0-190430 (480-152858-3). 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.

VOA Prep

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

Job ID: 480-152858-1

Client Sample ID: OCO-GW-MW04-0-190430

Lab Sample ID: 480-152858-1

No Detections.

Client Sample ID: OCO-GW-MW04-DB-190430

Lab Sample ID: 480-152858-2

No Detections.

Client Sample ID: OCO-GW-LY02-0-190430

Lab Sample ID: 480-152858-3

Analyte	Result	Qualifier	RL	MDL	Unit	Dil Fac	D	Method	Prep Type
Carbon disulfide	190000		5000	160	ug/L	1000		8260C	Total/NA

Client Sample ID: OCO-W-FB01-FB-190430

Lab Sample ID: 480-152858-4

No Detections.

Client Sample ID: OCO-W-TB01-TB-190430

Lab Sample ID: 480-152858-5

No Detections.

This Detection Summary does not include radiochemical test results.

Eurofins TestAmerica, Buffalo

Client Sample Results

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

Job ID: 480-152858-1

Client Sample ID: OCO-GW-MW04-0-190430

Lab Sample ID: 480-152858-1

Date Collected: 04/30/19 11:15

Matrix: Water

Date Received: 04/30/19 11:45

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

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Carbon disulfide	ND		5.0	0.16	ug/L			05/10/19 10:47	1
Surrogate	%Recovery	Qualifier	Limits				Prepared	Analyzed	Dil Fac
1,2-Dichloroethane-d4 (Surr)	103		74 - 132					05/10/19 10:47	1
4-Bromofluorobenzene	98		77 - 124					05/10/19 10:47	1
Toluene-d8 (Surr)	102		80 - 120					05/10/19 10:47	1
Dibromofluoromethane (Surr)	100		72 - 131					05/10/19 10:47	1

Client Sample ID: OCO-GW-MW04-DB-190430

Lab Sample ID: 480-152858-2

Date Collected: 04/30/19 11:15

Matrix: Water

Date Received: 04/30/19 11:45

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

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Carbon disulfide	ND		5.0	0.16	ug/L			05/10/19 11:10	1
Surrogate	%Recovery	Qualifier	Limits				Prepared	Analyzed	Dil Fac
1,2-Dichloroethane-d4 (Surr)	103		74 - 132					05/10/19 11:10	1
4-Bromofluorobenzene	98		77 - 124					05/10/19 11:10	1
Toluene-d8 (Surr)	100		80 - 120					05/10/19 11:10	1
Dibromofluoromethane (Surr)	99		72 - 131					05/10/19 11:10	1

Client Sample ID: OCO-GW-LY02-0-190430

Lab Sample ID: 480-152858-3

Date Collected: 04/30/19 11:30

Matrix: Water

Date Received: 04/30/19 11:45

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

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Carbon disulfide	190000		5000	160	ug/L			05/10/19 11:32	1000
Surrogate	%Recovery	Qualifier	Limits				Prepared	Analyzed	Dil Fac
1,2-Dichloroethane-d4 (Surr)	98		74 - 132					05/10/19 11:32	1000
4-Bromofluorobenzene	99		77 - 124					05/10/19 11:32	1000
Toluene-d8 (Surr)	101		80 - 120					05/10/19 11:32	1000
Dibromofluoromethane (Surr)	97		72 - 131					05/10/19 11:32	1000

Client Sample ID: OCO-W-FB01-FB-190430

Lab Sample ID: 480-152858-4

Date Collected: 04/30/19 11:10

Matrix: Water

Date Received: 04/30/19 11:45

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

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Carbon disulfide	ND		5.0	0.16	ug/L			05/10/19 10:03	1
Surrogate	%Recovery	Qualifier	Limits				Prepared	Analyzed	Dil Fac
1,2-Dichloroethane-d4 (Surr)	100		74 - 132					05/10/19 10:03	1
4-Bromofluorobenzene	98		77 - 124					05/10/19 10:03	1
Toluene-d8 (Surr)	100		80 - 120					05/10/19 10:03	1
Dibromofluoromethane (Surr)	99		72 - 131					05/10/19 10:03	1

Eurofins TestAmerica, Buffalo

Client Sample Results

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

Job ID: 480-152858-1

Client Sample ID: OCO-W-TB01-TB-190430

Lab Sample ID: 480-152858-5

Date Collected: 04/30/19 10:00

Matrix: Water

Date Received: 04/30/19 11:45

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

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Carbon disulfide	ND		5.0	0.16	ug/L			05/10/19 10:25	1

Surrogate	%Recovery	Qualifier	Limits	Prepared	Analyzed	Dil Fac
1,2-Dichloroethane-d4 (Surr)	101		74 - 132		05/10/19 10:25	1
4-Bromofluorobenzene	101		77 - 124		05/10/19 10:25	1
Toluene-d8 (Surr)	100		80 - 120		05/10/19 10:25	1
Dibromofluoromethane (Surr)	99		72 - 131		05/10/19 10:25	1

Surrogate Summary

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

Job ID: 480-152858-1

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	DCA (74-132)	BFB (77-124)	TOL (80-120)	DBFM (72-131)
480-152858-1	OCO-GW-MW04-0-190430	103	98	102	100
480-152858-2	OCO-GW-MW04-DB-190430	103	98	100	99
480-152858-3	OCO-GW-LY02-0-190430	98	99	101	97
480-152858-4	OCO-W-FB01-FB-190430	100	98	100	99
480-152858-5	OCO-W-TB01-TB-190430	101	101	100	99
LCS 460-608963/3	Lab Control Sample	99	104	101	101
LCSD 460-608963/4	Lab Control Sample Dup	100	101	99	101
MB 460-608963/7	Method Blank	101	100	103	100

Surrogate Legend

DCA = 1,2-Dichloroethane-d4 (Surr)

BFB = 4-Bromofluorobenzene

TOL = Toluene-d8 (Surr)

DBFM = Dibromofluoromethane (Surr)

QC Sample Results

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

Job ID: 480-152858-1

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

Lab Sample ID: MB 460-608963/7

Matrix: Water

Analysis Batch: 608963

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	0.16	ug/L			05/10/19 08:33	1
Surrogate	%Recovery	MB Qualifier	Limits				Prepared	Analyzed	Dil Fac
1,2-Dichloroethane-d4 (Surr)	101		74 - 132					05/10/19 08:33	1
4-Bromofluorobenzene	100		77 - 124					05/10/19 08:33	1
Toluene-d8 (Surr)	103		80 - 120					05/10/19 08:33	1
Dibromofluoromethane (Surr)	100		72 - 131					05/10/19 08:33	1

Lab Sample ID: LCS 460-608963/3

Matrix: Water

Analysis Batch: 608963

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec. Limits
Carbon disulfide	20.0	17.5		ug/L		88	69 - 133
Surrogate	%Recovery	LCS Qualifier	Limits				
1,2-Dichloroethane-d4 (Surr)	99		74 - 132				
4-Bromofluorobenzene	104		77 - 124				
Toluene-d8 (Surr)	101		80 - 120				
Dibromofluoromethane (Surr)	101		72 - 131				

Lab Sample ID: LCSD 460-608963/4

Matrix: Water

Analysis Batch: 608963

Client Sample ID: Lab Control Sample Dup

Prep Type: Total/NA

Analyte	Spike Added	LCSD Result	LCSD Qualifier	Unit	D	%Rec	%Rec. Limits	RPD	RPD Limit
Carbon disulfide	20.0	18.9		ug/L		95	69 - 133	7	30
Surrogate	%Recovery	LCSD Qualifier	Limits						
1,2-Dichloroethane-d4 (Surr)	100		74 - 132						
4-Bromofluorobenzene	101		77 - 124						
Toluene-d8 (Surr)	99		80 - 120						
Dibromofluoromethane (Surr)	101		72 - 131						

Eurofins TestAmerica, Buffalo

QC Association Summary

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

Job ID: 480-152858-1

GC/MS VOA

Analysis Batch: 608963

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
480-152858-1	OCO-GW-MW04-0-190430	Total/NA	Water	8260C	
480-152858-2	OCO-GW-MW04-DB-190430	Total/NA	Water	8260C	
480-152858-3	OCO-GW-LY02-0-190430	Total/NA	Water	8260C	
480-152858-4	OCO-W-FB01-FB-190430	Total/NA	Water	8260C	
480-152858-5	OCO-W-TB01-TB-190430	Total/NA	Water	8260C	
MB 460-608963/7	Method Blank	Total/NA	Water	8260C	
LCS 460-608963/3	Lab Control Sample	Total/NA	Water	8260C	
LCSD 460-608963/4	Lab Control Sample Dup	Total/NA	Water	8260C	

Lab Chronicle

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

Job ID: 480-152858-1

Client Sample ID: OCO-GW-MW04-0-190430

Lab Sample ID: 480-152858-1

Date Collected: 04/30/19 11:15

Matrix: Water

Date Received: 04/30/19 11:45

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Analysis	8260C		1	608963	05/10/19 10:47	SZD	TAL EDI

Client Sample ID: OCO-GW-MW04-DB-190430

Lab Sample ID: 480-152858-2

Date Collected: 04/30/19 11:15

Matrix: Water

Date Received: 04/30/19 11:45

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Analysis	8260C		1	608963	05/10/19 11:10	SZD	TAL EDI

Client Sample ID: OCO-GW-LY02-0-190430

Lab Sample ID: 480-152858-3

Date Collected: 04/30/19 11:30

Matrix: Water

Date Received: 04/30/19 11:45

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Analysis	8260C		1000	608963	05/10/19 11:32	SZD	TAL EDI

Client Sample ID: OCO-W-FB01-FB-190430

Lab Sample ID: 480-152858-4

Date Collected: 04/30/19 11:10

Matrix: Water

Date Received: 04/30/19 11:45

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Analysis	8260C		1	608963	05/10/19 10:03	SZD	TAL EDI

Client Sample ID: OCO-W-TB01-TB-190430

Lab Sample ID: 480-152858-5

Date Collected: 04/30/19 10:00

Matrix: Water

Date Received: 04/30/19 11:45

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Analysis	8260C		1	608963	05/10/19 10:25	SZD	TAL EDI

Laboratory References:

TAL EDI = Eurofins TestAmerica, Edison, 777 New Durham Road, Edison, NJ 08817, TEL (732)549-3900

Accreditation/Certification Summary

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

Job ID: 480-152858-1

Laboratory: Eurofins TestAmerica, Buffalo

The accreditations/certifications listed below are applicable to this report.

Authority	Program	EPA Region	Identification Number	Expiration Date
New York	NELAP	2	10026	03-31-20

Laboratory: Eurofins TestAmerica, Edison

The accreditations/certifications listed below are applicable to this report.

Authority	Program	EPA Region	Identification Number	Expiration Date
New York	NELAP	2	11452	04-01-20

Method Summary

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

Job ID: 480-152858-1

Method	Method Description	Protocol	Laboratory
8260C	Volatile Organic Compounds by GC/MS	SW846	TAL EDI
5030C	Purge and Trap	SW846	TAL EDI

Protocol References:

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

Laboratory References:

TAL EDI = Eurofins TestAmerica, Edison, 777 New Durham Road, Edison, NJ 08817, TEL (732)549-3900

Sample Summary

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

Job ID: 480-152858-1

Lab Sample ID	Client Sample ID	Matrix	Collected	Received
480-152858-1	OCO-GW-MW04-0-190430	Water	04/30/19 11:15	04/30/19 11:45
480-152858-2	OCO-GW-MW04-DB-190430	Water	04/30/19 11:15	04/30/19 11:45
480-152858-3	OCO-GW-LY02-0-190430	Water	04/30/19 11:30	04/30/19 11:45
480-152858-4	OCO-W-FB01-FB-190430	Water	04/30/19 11:10	04/30/19 11:45
480-152858-5	OCO-W-TB01-TB-190430	Water	04/30/19 10:00	04/30/19 11:45

eurolins Environment Testing
TestAmerica

5/15/2019 (Rev. 1)

Chain of Custody Record

Client Information Client Contact: Greg Flasinski Company: Weston Solutions, Inc. Address: 1400 Weston Way PO BOX 2653 City: West Chester State: PA, 19380 Phone: 610-701-3000(Tel) 610-701-7401(Fax) Email: greg.flasinski@westonsolutions.com Project Name: 3M Tonawanda Site:		Analysis Requested Due Date Requested: TAT Requested (days): PO #: 0055600 WO #: 02181.086.017.0001 Project #: 48003524 SSOW#:		Lab PM: Stone, Judy L E-Mail: judy.stone@testamericainc.com Carrier Tracking No(s): 480-129168-27804.1 Page: 1 of 1 Job #:			
Sample Identification		Due Date Requested:		Analysis Requested		Lab PM: Stone, Judy L E-Mail: judy.stone@testamericainc.com Carrier Tracking No(s): 480-129168-27804.1 Page: 1 of 1 Job #:	
MW-4 MW-4 DUP LY-2 FB-MW-4 Trip Blank		Sample Date 4/30/19 4/30/19 4/30/19 4/30/19 4/30/19		Sample Time 1115 1115 1130 1110 1000		Matrix (W=water, S=solid, O=water/oil, BT=Tissue, A=Air) Water Water Water Water Water Water	
Sample Type (C=Comp, G=grab) G G G G G		Preservation Code: A A A A A		Field Filtered Sample (Yes or No) A A A A A		Perform MS/MSD (Yes or No) A A A A A	
8260C - 8260 Carbon Disulfide 8260C - 8260 Carbon Disulfide		N N N N N		N N N N N		N N N N N	
Special Instructions/Note: 480-152858 Chain of Custody		Total Number of		Preservation Codes: A - HCL M - Hexane B - NaOH N - None C - Zn Acetate O - AsNaO2 D - Nitric Acid		Barcode 480-152858 Chain of Custody	
Possible Hazard Identification <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"/> Radiological Deliverable Requested: I, II, III, IV, Other (specify)							
Sample Disposal (A fee may be assessed if samples are retained longer than 1 month) <input type="checkbox"/> Return To Client <input type="checkbox"/> Disposal By Lab <input type="checkbox"/> Archive For _____ Months Special Instructions/QC Requirements:							
Received by: <i>Chen Jiao Cui</i> Date/Time: 4/30/19 14:57 Received by: _____ Date/Time: _____ Received by: _____ Date/Time: _____ Received by: _____ Date/Time: _____ Cooler Temperature(s) °C and Other Remarks: 2.7 #1 ICE							

Chain of Custody Record



eurofins

Environment Testing
 TestAmerica

Client Information (Sub Contract Lab)		Sampler: Stone, Judy L		Carrier Tracking No(s): 480-49459.1		COC No: 480-49459.1	
Client Contact: Shipping/Receiving		Phone: judy.stone@testamericainc.com		State of Origin: New York		Page: Page 1 of 1	
Company: TestAmerica Laboratories, Inc.		Address: 777 New Durham Road,		Job #: 480-152858-1		Preservation Codes:	
City: Edison		State, Zip: NJ, 08817		Due Date Requested: 5/10/2019		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 Other:	
Phone: 732-549-3900(Tel) 732-549-3679(Fax)		PO #: 48003524		TAT Requested (days):		M - Hexane N - None O - AsNaO2 P - Na2O4S Q - Na2SO3 R - Na2SO3 S - H2SO4 T - TSP Dodecahydrate U - Acetone V - MCAA W - pH 4-5 Z - other (specify)	
Email: 3M Tonawanda		Project #: SSOW#:		Analysis Requested		Total Number of Containers:	
Sample Identification - Client ID (Lab ID)		Sample Date		Sample Time		Sample Type (C=Comp, G=grab)	
Matrix (Wet/dry, Sealed, On-wash, etc.)		Preservation Code		Field Filtered Sample (Yes or No)		8260C/5030C (MOD) Pick a reference price	
MW-4 (480-152858-1)	4/30/19	11:15 Eastern	Water	X	X	3	
MW-4 DUP (480-152858-2)	4/30/19	11:15 Eastern	Water	X	X	3	
LY-2 (480-152858-3)	4/30/19	11:30 Eastern	Water	X	X	3	
FB-MW-4 (480-152858-4)	4/30/19	11:10 Eastern	Water	X	X	3	
TRIP BLANK (480-152858-5)	4/30/19	10:00 Eastern	Water	X	X	3	
Note: Since laboratory accreditations are subject to change, TestAmerica Laboratories, Inc. places the ownership of method, analyte & accreditation compliance upon our subcontract laboratories. This sample shipment is forwarded under chain-of-custody. If the laboratory does not currently maintain accreditation in the State of Origin listed above for analysis/test/matrix being analyzed, the samples must be shipped back to the TestAmerica laboratory or other instructions will be provided. Any changes to accreditation status should be brought to TestAmerica Laboratories, Inc. attention immediately. If all requested accreditations are current to date, return the signed Chain of Custody attesting to said compliance to TestAmerica Laboratories, Inc.							
Possible Hazard Identification Unconfirmed Deliverable Requested: I, II, III, IV, Other (specify)							
Sample Disposal (A fee may be assessed if samples are retained longer than 1 month) <input type="checkbox"/> Return To Client <input type="checkbox"/> Disposal By Lab <input type="checkbox"/> Archive For _____ Months							
Special Instructions/QC Requirements:							
Empty Kit Relinquished by: Angela Pina Date: 5-14-19 Time: 1400 Company: via PENEY							
Relinquished by: Angela Pina Date/Time: 05/16/19 Company: TA Edison							
Relinquished by: Angela Pina Date/Time: 09:00 Company: TA Edison							
Relinquished by: Angela Pina Date/Time: 09:00 Company: TA Edison							
Custody Seal No.: CS PRESENT Cooler Temperature(s) °C and Other Remarks: 2.1°C IR#9							

Login Sample Receipt Checklist

Client: Weston Solutions, Inc.

Job Number: 480-152858-1

Login Number: 152858

List Source: Eurofins 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 (Excluding tests with immediate HTs)..	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	

Login Sample Receipt Checklist

Client: Weston Solutions, Inc.

Job Number: 480-152858-1

Login Number: 152858

List Number: 2

Creator: Armbruster, Chris

List Source: Eurofins TestAmerica, Edison

List Creation: 05/07/19 02:01 PM

Question	Answer	Comment
Radioactivity wasn't checked or is \leq background as measured by a survey meter.	N/A	
The cooler's custody seal, if present, is intact.	True	
Sample custody seals, if present, are intact.	N/A	
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	2.1°C IR9
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 containers received and the COC.	True	
Samples are received within Holding Time (excluding tests with immediate HTs)	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	
Containers requiring zero headspace have no headspace or bubble is $<6\text{mm}$ (1/4").	True	
Multiphasic samples are not present.	True	
Samples do not require splitting or compositing.	True	
Residual Chlorine Checked.	N/A	

ANALYTICAL REPORT

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

Laboratory Job ID: 480-162997-1
Client Project/Site: 3M Tonawanda
Revision: 1

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

Attn: Mr. Tom Drew



Authorized for release by:
12/3/2019 10:39:23 AM

Judy Stone, Senior Project Manager
(484)685-0868
judy.stone@testamericainc.com

LINKS

Review your project
results through

TotalAccess

Have a Question?



Visit us at:

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.

Table of Contents

Cover Page	1
Table of Contents	2
Definitions/Glossary	3
Case Narrative	4
Detection Summary	5
Client Sample Results	6
Surrogate Summary	8
Isotope Dilution Summary	9
QC Sample Results	10
QC Association Summary	12
Lab Chronicle	13
Certification Summary	14
Method Summary	15
Sample Summary	16
Chain of Custody	17
Receipt Checklists	18



Definitions/Glossary

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

Job ID: 480-162997-1

Qualifiers

GC/MS Semi VOA

Qualifier	Qualifier Description
E	Result exceeded calibration range.

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
CFL	Contains Free Liquid
CNF	Contains No Free Liquid
DER	Duplicate Error Ratio (normalized absolute difference)
Dil Fac	Dilution Factor
DL	Detection Limit (DoD/DOE)
DL, RA, RE, IN	Indicates a Dilution, Re-analysis, Re-extraction, or additional Initial metals/anion analysis of the sample
DLC	Decision Level Concentration (Radiochemistry)
EDL	Estimated Detection Limit (Dioxin)
LOD	Limit of Detection (DoD/DOE)
LOQ	Limit of Quantitation (DoD/DOE)
MDA	Minimum Detectable Activity (Radiochemistry)
MDC	Minimum Detectable Concentration (Radiochemistry)
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 (Radiochemistry)
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

Job ID: 480-162997-1

Job ID: 480-162997-1

Laboratory: Eurofins TestAmerica, Buffalo

Narrative

Job Narrative 480-162997-1

Revision (1)

The report has been revised to report an undiluted analysis for sample OCO-GW-MW04-DB- 191119 (480-162997-2) as requested by the client. The sample ID for the trip blank was also corrected to remove an extra space.

Receipt

The samples were received on 11/19/2019 1:20 PM; the samples arrived in good condition, properly preserved and, where required, on ice. The temperature of the cooler at receipt was 3.1° C.

Receipt Exceptions

The sample ID on the chain of custody was incorrect and has been revised to match the sample ID of the MS/MSD samples as requested by the client: OCO-GW-MW04-0-191119 (480-162997-1).

GC/MS VOA

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

GC/MS Semi VOA

Method 8270D SIM ID: The following sample was diluted due to color and appearance: OCO-GW-MW04-DB- 191119 (480-162997-2). Elevated reporting limits (RL) are provided.

Method 8270D SIM ID: The 1,4-Dioxane result reported for samples OCO-GW-MW04-0-191119 (480-162997-1[MS]) and OCO-GW-MW04-0-191119 (480-162997-1[MSD]) have an E flag qualifier indicating the results are over the calibration range on the raw data. The actual amounts are within the calibration range; however, the E flag is generated based upon the bias corrected concentration. The LIMS system calculates a bias correction based on the recovery of the 1,4-Dioxane-d8 isotope.

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

Organic Prep

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

Job ID: 480-162997-1

Client Sample ID: OCO-GW-MW04-0-191119

Lab Sample ID: 480-162997-1

Analyte	Result	Qualifier	RL	MDL	Unit	Dil Fac	D	Method	Prep Type
1,4-Dioxane	0.40		0.20	0.098	ug/L	1		8270D SIM ID	Total/NA

Client Sample ID: OCO-GW-MW04-DB- 191119

Lab Sample ID: 480-162997-2

Analyte	Result	Qualifier	RL	MDL	Unit	Dil Fac	D	Method	Prep Type
1,4-Dioxane	0.42		0.20	0.10	ug/L	1		8270D SIM ID	Total/NA

Client Sample ID: OCO-W-FB01-FB-191119

Lab Sample ID: 480-162997-3

No Detections.

Client Sample ID: OCO-W-TB01-TB-191119

Lab Sample ID: 480-162997-4

No Detections.

This Detection Summary does not include radiochemical test results.

Eurofins TestAmerica, Buffalo

Client Sample Results

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

Job ID: 480-162997-1

Client Sample ID: OCO-GW-MW04-0-191119

Lab Sample ID: 480-162997-1

Date Collected: 11/19/19 12:10

Matrix: Water

Date Received: 11/19/19 13:20

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	-		11/22/19 16:02	1
Surrogate	%Recovery	Qualifier	Limits				Prepared	Analyzed	Dil Fac
1,2-Dichloroethane-d4 (Surr)	100		77 - 120					11/22/19 16:02	1
Toluene-d8 (Surr)	95		80 - 120					11/22/19 16:02	1
4-Bromofluorobenzene (Surr)	95		73 - 120					11/22/19 16:02	1
Dibromofluoromethane (Surr)	97		75 - 123					11/22/19 16:02	1

Method: 8270D SIM ID - Semivolatile Organic Compounds (GC/MS SIM / Isotope Dilution)

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
1,4-Dioxane	0.40		0.20	0.098	ug/L	-	11/22/19 08:42	11/25/19 15:01	1
Isotope Dilution	%Recovery	Qualifier	Limits				Prepared	Analyzed	Dil Fac
1,4-Dioxane-d8	31		15 - 110				11/22/19 08:42	11/25/19 15:01	1

Client Sample ID: OCO-GW-MW04-DB- 191119

Lab Sample ID: 480-162997-2

Date Collected: 11/19/19 12:10

Matrix: Water

Date Received: 11/19/19 13:20

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	-		11/22/19 16:26	1
Surrogate	%Recovery	Qualifier	Limits				Prepared	Analyzed	Dil Fac
1,2-Dichloroethane-d4 (Surr)	103		77 - 120					11/22/19 16:26	1
Toluene-d8 (Surr)	92		80 - 120					11/22/19 16:26	1
4-Bromofluorobenzene (Surr)	89		73 - 120					11/22/19 16:26	1
Dibromofluoromethane (Surr)	100		75 - 123					11/22/19 16:26	1

Method: 8270D SIM ID - Semivolatile Organic Compounds (GC/MS SIM / Isotope Dilution)

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
1,4-Dioxane	0.42		0.20	0.10	ug/L	-	11/22/19 08:42	12/02/19 12:53	1
Isotope Dilution	%Recovery	Qualifier	Limits				Prepared	Analyzed	Dil Fac
1,4-Dioxane-d8	30		15 - 110				11/22/19 08:42	12/02/19 12:53	1

Client Sample ID: OCO-W-FB01-FB-191119

Lab Sample ID: 480-162997-3

Date Collected: 11/19/19 10:30

Matrix: Water

Date Received: 11/19/19 13:20

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	-		11/22/19 16:51	1
Surrogate	%Recovery	Qualifier	Limits				Prepared	Analyzed	Dil Fac
1,2-Dichloroethane-d4 (Surr)	106		77 - 120					11/22/19 16:51	1
Toluene-d8 (Surr)	91		80 - 120					11/22/19 16:51	1
4-Bromofluorobenzene (Surr)	91		73 - 120					11/22/19 16:51	1
Dibromofluoromethane (Surr)	103		75 - 123					11/22/19 16:51	1

Method: 8270D SIM ID - Semivolatile Organic Compounds (GC/MS SIM / Isotope Dilution)

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
1,4-Dioxane	ND		0.20	0.10	ug/L	-	11/22/19 08:42	11/25/19 15:48	1

Eurofins TestAmerica, Buffalo

Client Sample Results

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

Job ID: 480-162997-1

Client Sample ID: OCO-W-FB01-FB-191119

Lab Sample ID: 480-162997-3

Date Collected: 11/19/19 10:30

Matrix: Water

Date Received: 11/19/19 13:20

<i>Isotope Dilution</i>	<i>%Recovery</i>	<i>Qualifier</i>	<i>Limits</i>	<i>Prepared</i>	<i>Analyzed</i>	<i>Dil Fac</i>
1,4-Dioxane-d8	30		15 - 110	11/22/19 08:42	11/25/19 15:48	1

Client Sample ID: OCO-W-TB01-TB-191119

Lab Sample ID: 480-162997-4

Date Collected: 11/19/19 09:00

Matrix: Water

Date Received: 11/19/19 13:20

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

<i>Analyte</i>	<i>Result</i>	<i>Qualifier</i>	<i>RL</i>	<i>MDL</i>	<i>Unit</i>	<i>D</i>	<i>Prepared</i>	<i>Analyzed</i>	<i>Dil Fac</i>
Carbon disulfide	ND		5.0	0.19	ug/L	-		11/22/19 17:15	1
<i>Surrogate</i>	<i>%Recovery</i>	<i>Qualifier</i>	<i>Limits</i>				<i>Prepared</i>	<i>Analyzed</i>	<i>Dil Fac</i>
1,2-Dichloroethane-d4 (Surr)	98		77 - 120					11/22/19 17:15	1
Toluene-d8 (Surr)	88		80 - 120					11/22/19 17:15	1
4-Bromofluorobenzene (Surr)	89		73 - 120					11/22/19 17:15	1
Dibromofluoromethane (Surr)	95		75 - 123					11/22/19 17:15	1

Surrogate Summary

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

Job ID: 480-162997-1

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)			
		DCA (77-120)	TOL (80-120)	BFB (73-120)	DBFM (75-123)
480-162997-1	OCO-GW-MW04-0-191119	100	95	95	97
480-162997-1 MS	OCO-GW-MW04-0-191119	101	92	96	101
480-162997-1 MSD	OCO-GW-MW04-0-191119	95	92	93	95
480-162997-2	OCO-GW-MW04-DB- 191119	103	92	89	100
480-162997-3	OCO-W-FB01-FB-191119	106	91	91	103
480-162997-4	OCO-W-TB01-TB-191119	98	88	89	95
LCS 480-506126/5	Lab Control Sample	99	94	100	95
MB 480-506126/7	Method Blank	103	93	97	110

Surrogate Legend

DCA = 1,2-Dichloroethane-d4 (Surr)

TOL = Toluene-d8 (Surr)

BFB = 4-Bromofluorobenzene (Surr)

DBFM = Dibromofluoromethane (Surr)

Isotope Dilution Summary

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

Job ID: 480-162997-1

Method: 8270D SIM ID - Semivolatile Organic Compounds (GC/MS SIM / Isotope Dilution)

Matrix: Water

Prep Type: Total/NA

Percent Isotope Dilution Recovery (Acceptance Limits)

Lab Sample ID	Client Sample ID	DXE	
		(15-110)	
480-162997-1	OCO-GW-MW04-0-191119	31	
480-162997-1 MS	OCO-GW-MW04-0-191119	30	
480-162997-1 MSD	OCO-GW-MW04-0-191119	33	
480-162997-2	OCO-GW-MW04-DB- 191119	30	
480-162997-3	OCO-W-FB01-FB-191119	30	
LCS 480-506155/2-A	Lab Control Sample	31	
MB 480-506155/1-A	Method Blank	32	

Surrogate Legend

DXE = 1,4-Dioxane-d8

QC Sample Results

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

Job ID: 480-162997-1

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

Lab Sample ID: MB 480-506126/7

Matrix: Water

Analysis Batch: 506126

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			11/22/19 12:34	1
Surrogate	%Recovery	MB Qualifier	Limits				Prepared	Analyzed	Dil Fac
1,2-Dichloroethane-d4 (Surr)	103		77 - 120					11/22/19 12:34	1
Toluene-d8 (Surr)	93		80 - 120					11/22/19 12:34	1
4-Bromofluorobenzene (Surr)	97		73 - 120					11/22/19 12:34	1
Dibromofluoromethane (Surr)	110		75 - 123					11/22/19 12:34	1

Lab Sample ID: LCS 480-506126/5

Matrix: Water

Analysis Batch: 506126

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	21.5		ug/L		86	59 - 134
Surrogate	%Recovery	LCS Qualifier	Limits				
1,2-Dichloroethane-d4 (Surr)	99		77 - 120				
Toluene-d8 (Surr)	94		80 - 120				
4-Bromofluorobenzene (Surr)	100		73 - 120				
Dibromofluoromethane (Surr)	95		75 - 123				

Lab Sample ID: 480-162997-1 MS

Matrix: Water

Analysis Batch: 506126

Client Sample ID: OCO-GW-MW04-0-191119

Prep Type: Total/NA

Analyte	Sample Result	Sample Qualifier	Spike Added	MS Result	MS Qualifier	Unit	D	%Rec	%Rec. Limits
Carbon disulfide	ND		25.0	22.7		ug/L		91	59 - 134
Surrogate	%Recovery	MS Qualifier	Limits						
1,2-Dichloroethane-d4 (Surr)	101		77 - 120						
Toluene-d8 (Surr)	92		80 - 120						
4-Bromofluorobenzene (Surr)	96		73 - 120						
Dibromofluoromethane (Surr)	101		75 - 123						

Lab Sample ID: 480-162997-1 MSD

Matrix: Water

Analysis Batch: 506126

Client Sample ID: OCO-GW-MW04-0-191119

Prep Type: Total/NA

Analyte	Sample Result	Sample Qualifier	Spike Added	MSD Result	MSD Qualifier	Unit	D	%Rec	%Rec. Limits	RPD	Limit
Carbon disulfide	ND		25.0	21.4		ug/L		85	59 - 134	6	15
Surrogate	%Recovery	MSD Qualifier	Limits								
1,2-Dichloroethane-d4 (Surr)	95		77 - 120								
Toluene-d8 (Surr)	92		80 - 120								
4-Bromofluorobenzene (Surr)	93		73 - 120								
Dibromofluoromethane (Surr)	95		75 - 123								

Eurofins TestAmerica, Buffalo

QC Sample Results

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

Job ID: 480-162997-1

Method: 8270D SIM ID - Semivolatile Organic Compounds (GC/MS SIM / Isotope Dilution)

Lab Sample ID: MB 480-506155/1-A

Matrix: Water

Analysis Batch: 506566

Client Sample ID: Method Blank

Prep Type: Total/NA

Prep Batch: 506155

Analyte	MB Result	MB Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
1,4-Dioxane	ND		0.20	0.10	ug/L		11/22/19 08:42	11/25/19 13:27	1
Isotope Dilution	MB %Recovery	MB Qualifier	Limits				Prepared	Analyzed	Dil Fac
1,4-Dioxane-d8	32		15 - 110				11/22/19 08:42	11/25/19 13:27	1

Lab Sample ID: LCS 480-506155/2-A

Matrix: Water

Analysis Batch: 506566

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Prep Batch: 506155

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec. Limits
1,4-Dioxane	1.00	1.19		ug/L		119	40 - 140
Isotope Dilution	LCS %Recovery	LCS Qualifier	Limits				
1,4-Dioxane-d8	31		15 - 110				

Lab Sample ID: 480-162997-1 MS

Matrix: Water

Analysis Batch: 506566

Client Sample ID: OCO-GW-MW04-0-191119

Prep Type: Total/NA

Prep Batch: 506155

Analyte	Sample Result	Sample Qualifier	Spike Added	MS Result	MS Qualifier	Unit	D	%Rec	%Rec. Limits
1,4-Dioxane	0.40		1.00	1.56	E	ug/L		116	40 - 140
Isotope Dilution	MS %Recovery	MS Qualifier	Limits						
1,4-Dioxane-d8	30		15 - 110						

Lab Sample ID: 480-162997-1 MSD

Matrix: Water

Analysis Batch: 506566

Client Sample ID: OCO-GW-MW04-0-191119

Prep Type: Total/NA

Prep Batch: 506155

Analyte	Sample Result	Sample Qualifier	Spike Added	MSD Result	MSD Qualifier	Unit	D	%Rec	%Rec. Limits	RPD	Limit
1,4-Dioxane	0.40		0.980	1.54	E	ug/L		116	40 - 140	1	20
Isotope Dilution	MSD %Recovery	MSD Qualifier	Limits								
1,4-Dioxane-d8	33		15 - 110								

QC Association Summary

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

Job ID: 480-162997-1

GC/MS VOA

Analysis Batch: 506126

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
480-162997-1	OCO-GW-MW04-0-191119	Total/NA	Water	8260C	
480-162997-2	OCO-GW-MW04-DB- 191119	Total/NA	Water	8260C	
480-162997-3	OCO-W-FB01-FB-191119	Total/NA	Water	8260C	
480-162997-4	OCO-W-TB01-TB-191119	Total/NA	Water	8260C	
MB 480-506126/7	Method Blank	Total/NA	Water	8260C	
LCS 480-506126/5	Lab Control Sample	Total/NA	Water	8260C	
480-162997-1 MS	OCO-GW-MW04-0-191119	Total/NA	Water	8260C	
480-162997-1 MSD	OCO-GW-MW04-0-191119	Total/NA	Water	8260C	

GC/MS Semi VOA

Prep Batch: 506155

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
480-162997-1	OCO-GW-MW04-0-191119	Total/NA	Water	3510C	
480-162997-2	OCO-GW-MW04-DB- 191119	Total/NA	Water	3510C	
480-162997-3	OCO-W-FB01-FB-191119	Total/NA	Water	3510C	
MB 480-506155/1-A	Method Blank	Total/NA	Water	3510C	
LCS 480-506155/2-A	Lab Control Sample	Total/NA	Water	3510C	
480-162997-1 MS	OCO-GW-MW04-0-191119	Total/NA	Water	3510C	
480-162997-1 MSD	OCO-GW-MW04-0-191119	Total/NA	Water	3510C	

Analysis Batch: 506566

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
480-162997-1	OCO-GW-MW04-0-191119	Total/NA	Water	8270D SIM ID	506155
480-162997-3	OCO-W-FB01-FB-191119	Total/NA	Water	8270D SIM ID	506155
MB 480-506155/1-A	Method Blank	Total/NA	Water	8270D SIM ID	506155
LCS 480-506155/2-A	Lab Control Sample	Total/NA	Water	8270D SIM ID	506155
480-162997-1 MS	OCO-GW-MW04-0-191119	Total/NA	Water	8270D SIM ID	506155
480-162997-1 MSD	OCO-GW-MW04-0-191119	Total/NA	Water	8270D SIM ID	506155

Analysis Batch: 507629

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
480-162997-2	OCO-GW-MW04-DB- 191119	Total/NA	Water	8270D SIM ID	506155

Lab Chronicle

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

Job ID: 480-162997-1

Client Sample ID: OCO-GW-MW04-0-191119

Lab Sample ID: 480-162997-1

Date Collected: 11/19/19 12:10

Matrix: Water

Date Received: 11/19/19 13:20

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Analysis	8260C		1	506126	11/22/19 16:02	S1V	TAL BUF
Total/NA	Prep	3510C			506155	11/22/19 08:42	JMP	TAL BUF
Total/NA	Analysis	8270D SIM ID		1	506566	11/25/19 15:01	JMM	TAL BUF

Client Sample ID: OCO-GW-MW04-DB- 191119

Lab Sample ID: 480-162997-2

Date Collected: 11/19/19 12:10

Matrix: Water

Date Received: 11/19/19 13:20

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Analysis	8260C		1	506126	11/22/19 16:26	S1V	TAL BUF
Total/NA	Prep	3510C			506155	11/22/19 08:42	JMP	TAL BUF
Total/NA	Analysis	8270D SIM ID		1	507629	12/02/19 12:53	JMM	TAL BUF

Client Sample ID: OCO-W-FB01-FB-191119

Lab Sample ID: 480-162997-3

Date Collected: 11/19/19 10:30

Matrix: Water

Date Received: 11/19/19 13:20

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Analysis	8260C		1	506126	11/22/19 16:51	S1V	TAL BUF
Total/NA	Prep	3510C			506155	11/22/19 08:42	JMP	TAL BUF
Total/NA	Analysis	8270D SIM ID		1	506566	11/25/19 15:48	JMM	TAL BUF

Client Sample ID: OCO-W-TB01-TB-191119

Lab Sample ID: 480-162997-4

Date Collected: 11/19/19 09:00

Matrix: Water

Date Received: 11/19/19 13:20

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Analysis	8260C		1	506126	11/22/19 17:15	S1V	TAL BUF

Laboratory References:

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

Accreditation/Certification Summary

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

Job ID: 480-162997-1

Laboratory: Eurofins TestAmerica, Buffalo

The accreditations/certifications listed below are applicable to this report.

Authority	Program	Identification Number	Expiration Date
New York	NELAP	10026	03-31-20

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16

Method Summary

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

Job ID: 480-162997-1

Method	Method Description	Protocol	Laboratory
8260C	Volatile Organic Compounds by GC/MS	SW846	TAL BUF
8270D SIM ID	Semivolatile Organic Compounds (GC/MS SIM / Isotope Dilution)	SW846	TAL BUF
3510C	Liquid-Liquid Extraction (Separatory Funnel)	SW846	TAL BUF
5030C	Purge and Trap	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 = Eurofins TestAmerica, Buffalo, 10 Hazelwood Drive, Amherst, NY 14228-2298, TEL (716)691-2600

Sample Summary

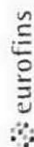
Client: Weston Solutions, Inc.
Project/Site: 3M Tonawanda

Job ID: 480-162997-1

Lab Sample ID	Client Sample ID	Matrix	Collected	Received	Asset ID
480-162997-1	OCO-GW-MW04-0-191119	Water	11/19/19 12:10	11/19/19 13:20	
480-162997-2	OCO-GW-MW04-DB- 191119	Water	11/19/19 12:10	11/19/19 13:20	
480-162997-3	OCO-W-FB01-FB-191119	Water	11/19/19 10:30	11/19/19 13:20	
480-162997-4	OCO-W-TB01-TB-191119	Water	11/19/19 09:00	11/19/19 13:20	

Eurofins TestAmerica, Buffalo
10 Hazelwood Drive
Amherst, NY 14228-2298
Phone: 716-691-2600 Fax: 716-691-7991

Chain of Custody Record



Environment Testing
TestAmerica

Client Information		Lab PM:		Carrier Tracking No(s):		COC No:	
Client Contact: Greg Flasiński		Stone, Judy L				480-137968-31020.1	
Company: Weston Solutions, Inc.		E-Mail: judy.stone@testamericainc.com				Page 1 of 1	
Address: 1400 Weston Way PO BOX 2653 City: West Chester State, Zip: PA, 19380		Due Date Requested: TAT Requested (days):		Analysis Requested		Preservation Codes: A - HCL B - NaOH C - Zn Acetate D - Nitric Acid E - NaHSO4 F - MeOH G - Amchlor H - Ascorbic Acid I - Ice M - Hexane N - None O - AsNaO2 P - Na2CO3 Q - Na2SO3 R - Na2SO4 S - H2SO4 T - TSP Dodecahydrate U - Acetone V - MCAA W - pH 4-5 Z - other (specify)	
Phone: 610-701-3000(Tel) 610-701-7401(Fax)		PO #: 0100619 (6/19)		Field Filtered Sample (Yes or No)		Preservation Codes:	
Email: greg.flasinski@westonsolutions.com		WO #: 02181.086.017 0001		Perform MS/MSD (Yes or No)		A - HCL B - NaOH C - Zn Acetate D - Nitric Acid E - NaHSO4 F - MeOH G - Amchlor H - Ascorbic Acid I - Ice M - Hexane N - None O - AsNaO2 P - Na2CO3 Q - Na2SO3 R - Na2SO4 S - H2SO4 T - TSP Dodecahydrate U - Acetone V - MCAA W - pH 4-5 Z - other (specify)	
Project Name: 3M Tonawanda		Project #: 48003524		8260C - 8260 Carbon Disulfide			
Site: 3M Tonawanda		SSOW#:		8270D - SIM - MS - ID - 1,4-Dioxane			
Sample Identification		Sample Date	Sample Time	Sample Type (C=Comp, G=grab)	Matrix (W=Water, S=solid, O=soil, BT=issue, A=air)	Special Instructions/Note:	
OCO-GW-MW04-191119	11/19/19	1210	6	Water	N		
OCO-GW-MW04-DB-191119	11/19/19	1210	6	Water	N		
OCO-W-FB01-FB-191119	11/19/19	1030	6	Water	N		
MS OCO-GW-MW04-DB-191119	11/19/19	1210	6	Water	N		
MSD OCO-GW-MW04-DB-191119	11/19/19	1210	6	Water	N		
OCO-W-TB01-TB-191119	11/19/19	900	6	Water	N		
Possible Hazard Identification		Sample Disposal (A fee may be assessed if samples are retained longer than 1 month)		Special Instructions/Note:			
<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"/> Radiological		Return To Client <input type="checkbox"/> Disposal By Lab <input type="checkbox"/> Archive For <input type="checkbox"/> Months					
Deliverable Requested: I, II, III, IV, Other (specify)		Special Instructions/QC Requirements:					
Empty Kit Relinquished By:		Date:		Method of Shipment:			
Relinquished by: [Signature]		Date/Time: 11/19/19		Received by: [Signature]		Company: Weston	
Relinquished by:		Date/Time:		Received by:		Company:	
Relinquished by:		Date/Time:		Received by: [Signature]		Company: 11-19-19 1320 JAS	
Custody Seals Intact: <input type="checkbox"/> Yes <input type="checkbox"/> No		Custody Seal No.:		Cooler Temperature(s) °C and Other Remarks:		31 2.1 #1	

Login Sample Receipt Checklist

Client: Weston Solutions, Inc.

Job Number: 480-162997-1

Login Number: 162997

List Source: Eurofins TestAmerica, Buffalo

List Number: 1

Creator: Manhardt, Kara M

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 (Excluding tests with immediate HTs)..	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	



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: 1.000

Reporting Period: February 14, 2019 to February 14, 2020

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? ☐ ☒

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

Description of Institutional ControlsParcelOwnerInstitutional Control**65.09-6-5**

Minnesota Mining & Manufacturing Company

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 ControlsParcelEngineering Control**65.09-6-5**Fencing/Access Control
Monitoring Wells

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 THOR HILGENFELDT at 305 SAWYER AVE. TONAWANDA, NY 14150
print name print business address

am certifying as OWNER (Owner or Remedial Party)

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


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

2/24/2020
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 at WESTON SOLUTIONS, INC.
print name 1400 WESTON WAY, WEST CHESTER, PA
print business address 19380

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

Thomas A. Drew 2/26/2020
Signature of Qualified Environmental Professional, for Date
the Owner or Remedial Party, Rendering Certification
Stamp
(Required for PE)