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March 9, 2022

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

Re: Periodic Review Report (February 14, 2021 to February 14, 2022)
and IC/EC Certification
3M O-Cel-O Sponge Site, Tonawanda, New York
Order on Consent # B9-0369-91-04, Site Code #915148

Dear Mr. May:

In accordance with the referenced Order on Consent (Order) and at the direction of 3M Company (3M), we are submitting the Periodic Review Report (PRR) for the 3M O-Cel-O Sponge Site in Tonawanda, New York for the period extending from February 14, 2021 to February 14, 2022. This PRR includes a proposed modification to the sampling frequency of groundwater monitoring well MW-4 from semiannual to annual, consistent with the current sampling frequency of lysimeter LY-2. Carbon disulfide (CS_2) has not been detected above the laboratory reporting limit in bedrock monitoring well MW-4 during the last 16 years of semiannual sampling.

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 610-701-3428.

Very truly yours,

WESTON SOLUTIONS, INC.

Rachel Montalto

Rachel Montalto
Project Manager

c: B. Chambers, 3M (w/ enclosure)
K. Held, 3M (w/ enclosure)

PERIODIC REVIEW REPORT

Site Name and Location:	3M O-Cel-O Sponge Site, Tonawanda, New York
Registry Number:	915148
Order on Consent:	B9-0369-91-04
3M Project Contacts:	Britta Chambers (3M Corporate) Keith Held (3M Tonawanda)
NYSDEC Project Lead:	Glenn May
Reporting Period:	February 14, 2021, to February 14, 2022

Background

The New York State Department of Environmental Conservation (NYSDEC) issued a Record of Decision (ROD) (Registry No. 915148) for the 3M Company (3M) O-Cel-O Sponge Site in Tonawanda, New York in March 1999. This ROD presents the selected remedial action for the Tonawanda facility based on the site's Administrative Record and public input. Following ROD issuance, the NYSDEC reclassified the 3M Tonawanda site from "Class 3 – Does not present a significant threat to the public health or environment – action may be deferred", to "Class 4 – Site properly closed – requires continued management."

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

- Filing a Declaration of Covenants and Restrictions with the property deed at the Erie County Clerk's Office. This was completed and was reported in the initial progress report for the period ending March 31, 2001.

- Performing long-term groundwater monitoring. Involved semiannual sampling of site monitor wells MW-1, MW-2, MW-3, and MW-4 and annual sampling of the two site lysimeters, LY-1 and LY-2, with groundwater samples analyzed for carbon disulfide (CS_2).

- Inspecting the completed interim remedial measures (IRMs) (includes the CS_2 tank system, and the catch basin and associated swale) and maintaining the integrity of the IRMs.

Semiannual periodic review reports have been submitted by 3M to NYSDEC summarizing project activities that occurred in the previous reporting periods. In August 2005, the Five-Year Evaluation Report was submitted by 3M to NYSDEC. The 2005 report concluded that the selected remedy has been effective in meeting remediation goals outlined in the 1999 ROD and remains protective of human health and the environment. The aforementioned evaluation report also contained a recommended future course of action for the facility, including reductions in groundwater monitoring and reporting under the Order/O&M Plan.

By letter of May 18, 2006, NYSDEC provided comment on the Five-Year Evaluation Report. Based on the presence of CS_2 in the subsurface environment, NYSDEC required continued monitoring at this facility, but required only one site monitoring well (MW-4) and one site lysimeter (LY-02) be monitored for CS_2 on a semiannual basis and annual basis, respectively. According to the May 2006 NYSDEC correspondence, reporting on the maintenance of the drainage swale and associated catch basins would continue under the Order/O&M Plan; however, reporting on the continued operations, maintenance, and inspection of the existing CS_2 tank system could be completed by 3M under NYSDEC's Chemical Bulk Storage Program.

This Periodic Review Report (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 May 2021 and November 2021. The results from these sampling events are presented herein, along with a description of any maintenance activity conducted in the swale. All analytical results presented in this (PRR) will be uploaded into NYSDEC's EQuIS system in March 2022.

Summary of Activities Performed During the Reporting Period

The following is a summary of activities performed by 3M during the reporting period:

- Groundwater samples for CS_2 analysis were collected from monitoring well MW-4 (primary sample and duplicate sample) and lysimeter LY-02 on May 20, 2021, in accordance with the O&M Plan modifications approved by NYSDEC. Photographs of the site groundwater monitoring well and lysimeter are provided in Attachment A. The May 2021 well purging/sampling forms and laboratory analytical results are provided in this report as Attachments B and C, respectively.

- Groundwater samples for CS_2 analysis were collected from monitoring well MW-4 (primary sample and duplicate sample) on November 16, 2021, pursuant to the O&M Plan modifications. The November 2021 well purging/sampling forms and laboratory analytical results are provided in Attachments B and C of this report, respectively.

- 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 2021 are provided in Attachment A.

- The annual compliance inspection/evaluation was completed on November 8, 2021. No deficiencies were noted during the inspection. The Institutional and Engineering Controls Certification Form is provided as Attachment D.

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)
5/20/2021	< 5	< 5	260
11/16/2021	< 5	< 5	NS

Notes:
µg/L: micrograms per liter
mg/L: milligrams per liter
< : Not detected above the laboratory reporting limit of 5 µg/L
NS: Not sampled per approved plan.

As noted above, CS_2 was not detected in the groundwater samples collected from monitoring well MW-4 in May 2021 and November 2021. CS_2 was detected at a concentration of 260 milligrams per liter 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 May 2021 and November 2021 sampling events are provided in Attachments B and C.

Recommendation

CS_2 has not been detected above the laboratory reporting limit of 5 micrograms per liter in bedrock monitoring well MW-4 during the last 16 years of semiannual sampling. As such, 3M proposes to modify the MW-4 sampling frequency from semiannual to annual. Lysimeter LY-02 will continue to be sampled on an annual basis.

With NYSDEC's approval, annual sampling of groundwater monitoring well MW-4 and lysimeter LY-02 will commence in May 2022. The current O&M Plan will be revised to reflect this change in sampling frequency. The revised O&M Plan will be submitted to NYSDEC for review prior to the next sampling event.

ATTACHMENT A
SITE PHOTOGRAPHS – NOVEMBER 8, 2021

Groundwater Monitoring Well MW-4

Catch Basin, Swale and Fencing

Lysimeter LY-2

Drainage Collection

ATTACHMENT B
WELL PURGING/SAMPLING FORMS

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Restoring Resource Efficiency

Figure 1
Well Purging/Sampling Form

SITE INFORMATION Confidential Tonawanda, NY 5/20/21

Well No.: MW-4	Weather: (Sunny) Cloudy Rain Temp: 80°
Sampling Team: Greg Flasinski	Sampler's Signature:

WELL INFORMATION

Protective Casing: (Intact) / Damaged	Concrete Base: (Intact) / Damaged
Locked: (Yes) / No	Well Diameter: (2-inch) 4-inch 6-inch

WELL EVACUATION INFORMATION

A. Total Well Depth from Top of Casing (TOC):	72.90
B. Depth to Water (ft below TOC):	31.36
C. Column of Standing Water (ft) (C=A-B):	41.54
D. Purge Factor:	x 0.16
E. One Well Volume (gallons):	6.65
F. Five Well Volumes (gallons):	33.25

Well Evacuation Method
- (✓) Bailer
- ( ) 2-Inch Grundfos
- ( ) Peristaltic Pump
- ( ) Other (Specify)

Total Volume Purged (gallons): 34

INDICATOR PARAMETERS

Time:	1022	1034	1047	1101	1112	1125			
Purge Rate (gal. per minute):									
Temperature (degrees C):	18.71	15.38	15.56	15.61	15.74	15.68			
Specific Cond (mS/cm):	4705	3643	3729	3737	3705	3684			
pH:	11.79	11.29	10.40	9.29	8.77	8.46			
Turbidity (NTU):	300	101	141	115	120	101			
Depth to Water (ft below TOC):	31.36	31.71	31.69	31.71	31.80	31.64			

NAPL Observed: Yes / (No)	Well Pumped Dry: Yes (No)
ODOR: Yes / (No)	Other:

SAMPLE COLLECTION INFORMATION SAMPLE DATE: 5/20/21

Sample No.	Time	Sample No.	Time
Media Sample ID: OCO-GW-MW04-0-210520 (MS/MSD)	1130	Rinse Blank: Yes (No)	
Duplicate: (Yes) No OCO-GW-MW04-DB-210520	1135	Trip Blank: Yes (No) OCO-W-TB01-TB-210520	1000
Parameters:		Equip Blank OCO-GW-MW04-EQ-210520 (4)	
(✓) CS_2 ( ) 1,4-Dioxane ( ) PFAS		Equip. lab provided water poured through the bailer	

COMMENTS

MW-1 25.78
MW-2 31.69
MW-3 33.02

Well Requires Maintenance?	Yes / (No)
Access Requires Maintenance?	Yes / (No)

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

Figure 1
Well Purging/Sampling Form

SITE INFORMATION Confidential Tonawanda, NY — 11/16/21

Well No.: MW-04	Weather: (Sunny) Cloudy Rain Temp: 42
Sampling Team: Greg Flasinski	Sampler's Signature:

WELL INFORMATION

Protective Casing: (Intact) / Damaged	Concrete Base: (Intact) / Damaged
Locked: (Yes) / No	Well Diameter: (2-inch) 4-inch 6-inch

WELL EVACUATION INFORMATION

A. Total Well Depth from Top of Casing (TOC):	72.90
B. Depth to Water (ft below TOC):	-32.01
C. Column of Standing Water (ft) (C=A-B):	40.89
D. Purge Factor:	x 0.16
E. One Well Volume (gallons):	6.54
F. ~~Five~~ Three Well Volumes (gallons):	19.62

Well Evacuation Method
- (✓) Bailer
- ( ) 2-Inch Grundfos
- ( ) Peristaltic Pump
- ( ) Other (Specify) _____

Total Volume Purged (gallons): 21

INDICATOR PARAMETERS

Time:	1251	1307	1322	1337					
Purge Rate (gal. per minute):	Ø	0.44	0.47	0.47					
Temperature (degrees C):	14.5	12.7	12.6	12.3					
Specific Cond (mS/cm):	3582	2697	2668	2857					
pH:	12.01	11.11	8.78	7.95					
Turbidity (NTU):	153	200	147	84.1					
Depth to Water (ft below TOC):	32.01	32.76	32.86	32.94					

NAPL Observed: Yes / (No)	**Well Pumped Dry:** Yes / (No)
ODOR: Yes / (No)	**Other:**

SAMPLE COLLECTION INFORMATION — **SAMPLE DATE:** 11/16/21

Sample No. MS/MSD	Time	Sample No.	Time
Media Sample ID: BCO-GW-MW04-Ø-211116	1345	Rinse Blank: Yes/(No) BCO-W-MW04-EB-211116	1245
Duplicate: Yes/No BCO-GW-MW04-DB-211116	1350	Trip Blank: Yes/No BCO-W-TB01-TB-211116	1200
Parameters:			
(✓) CS_2 ( ) 1,4-Dioxane ( ) PFAS			

COMMENTS

MW-1 29.94
MW-2 32.27
MW-3 33.63

Well Requires Maintenance? Yes / (No)
Access Requires Maintenance? Yes / (No)

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

ATTACHMENT C
LABORATORY ANALYTICAL PACKAGES

eurofins | Environment Testing America

ANALYTICAL REPORT

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

Laboratory Job ID: 480-185013-1
Client Project/Site: 3M Tonawanda

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

Attn: Rachel Montalto

Judy Stone

Authorized for release by:
5/27/2021 12:13:29 PM

Judy Stone, Senior Project Manager
(484)685-0868
Judy.Stone@Eurofinset.com

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Definitions/Glossary

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

Job ID: 480-185013-1

Qualifiers

GC/MS VOA

Qualifier	Qualifier Description
F2	MS/MSD RPD exceeds control limits
J	Result is less than the RL but greater than or equal to the MDL and the concentration is an approximate value.

Glossary

Abbreviation	These commonly used abbreviations may or may not be present in this report.
¤	Listed under the "D" column to designate that the result is reported on a dry weight basis
%R	Percent Recovery
CFL	Contains Free Liquid
CFU	Colony Forming Unit
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)
MCL	EPA recommended "Maximum Contaminant Level"
MDA	Minimum Detectable Activity (Radiochemistry)
MDC	Minimum Detectable Concentration (Radiochemistry)
MDL	Method Detection Limit
ML	Minimum Level (Dioxin)
MPN	Most Probable Number
MQL	Method Quantitation Limit
NC	Not Calculated
ND	Not Detected at the reporting limit (or MDL or EDL if shown)
NEG	Negative / Absent
POS	Positive / Present
PQL	Practical Quantitation Limit
PRES	Presumptive
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)
TNTC	Too Numerous To Count

Case Narrative

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

Job ID: 480-185013-1

Job ID: 480-185013-1

Laboratory: Eurofins TestAmerica, Buffalo

Narrative

Job Narrative
480-185013-1

Comments
No additional comments.

Receipt
The samples were received on 5/20/2021 12:00 PM. Unless otherwise noted below, the samples arrived in good condition, and where required, properly preserved and on ice. The temperature of the cooler at receipt was 4.7º C.

GC/MS VOA
Method 8260C: The following sample was diluted to bring the concentration of target analytes within the calibration range: OCO-GW-LY02-0-210520 (480-185013-3). 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.

Detection Summary

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

Job ID: 480-185013-1

Client Sample ID: OCO-GW-MW04-0-210520 — Lab Sample ID: 480-185013-1

No Detections.

Client Sample ID: OCO-GW-MW04-DB-210520 — Lab Sample ID: 480-185013-2

No Detections.

Client Sample ID: OCO-GW-LY02-0-210520 — Lab Sample ID: 480-185013-3

Analyte	Result	Qualifier	RL	MDL	Unit	Dil Fac	D	Method	Prep Type
Carbon disulfide	260000		25000	950	ug/L	5000		8260C	Total/NA

Client Sample ID: OCO-W-MW04-EB-210520 — Lab Sample ID: 480-185013-4

Analyte	Result	Qualifier	RL	MDL	Unit	Dil Fac	D	Method	Prep Type
Carbon disulfide	0.81	J	5.0	0.19	ug/L	1		8260C	Total/NA

Client Sample ID: OCO-W-TB01-TB-210520 — Lab Sample ID: 480-185013-5

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

This Detection Summary does not include radiochemical test results.

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

Job ID: 480-185013-1

Client Sample ID: OCO-GW-MW04-0-210520

Lab Sample ID: 480-185013-1

Date Collected: 05/20/21 11:30
Matrix: Water
Date Received: 05/20/21 12:00

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

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Carbon disulfide	ND	F2	5.0	0.19	ug/L			05/24/21 12:26	1

Surrogate	*%Recovery*	*Qualifier*	*Limits*	*Prepared*	*Analyzed*	*Dil Fac*
1,2-Dichloroethane-d4 (Surr)	*102*		*77 - 120*		*05/24/21 12:26*	*1*
Toluene-d8 (Surr)	*94*		*80 - 120*		*05/24/21 12:26*	*1*
4-Bromofluorobenzene (Surr)	*95*		*73 - 120*		*05/24/21 12:26*	*1*
Dibromofluoromethane (Surr)	*99*		*75 - 123*		*05/24/21 12:26*	*1*

Client Sample ID: OCO-GW-MW04-DB-210520

Lab Sample ID: 480-185013-2

Date Collected: 05/20/21 11:35
Matrix: Water
Date Received: 05/20/21 12:00

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			05/24/21 12:49	1

Surrogate	*%Recovery*	*Qualifier*	*Limits*	*Prepared*	*Analyzed*	*Dil Fac*
1,2-Dichloroethane-d4 (Surr)	*100*		*77 - 120*		*05/24/21 12:49*	*1*
Toluene-d8 (Surr)	*95*		*80 - 120*		*05/24/21 12:49*	*1*
4-Bromofluorobenzene (Surr)	*100*		*73 - 120*		*05/24/21 12:49*	*1*
Dibromofluoromethane (Surr)	*98*		*75 - 123*		*05/24/21 12:49*	*1*

Client Sample ID: OCO-GW-LY02-0-210520

Lab Sample ID: 480-185013-3

Date Collected: 05/20/21 11:50
Matrix: Water
Date Received: 05/20/21 12:00

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

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Carbon disulfide	**260000**		25000	950	ug/L			05/25/21 20:13	5000

Surrogate	*%Recovery*	*Qualifier*	*Limits*	*Prepared*	*Analyzed*	*Dil Fac*
1,2-Dichloroethane-d4 (Surr)	*84*		*77 - 120*		*05/25/21 20:13*	*5000*
Toluene-d8 (Surr)	*89*		*80 - 120*		*05/25/21 20:13*	*5000*
4-Bromofluorobenzene (Surr)	*83*		*73 - 120*		*05/25/21 20:13*	*5000*
Dibromofluoromethane (Surr)	*78*		*75 - 123*		*05/25/21 20:13*	*5000*

Client Sample ID: OCO-W-MW04-EB-210520

Lab Sample ID: 480-185013-4

Date Collected: 05/20/21 10:15
Matrix: Water
Date Received: 05/20/21 12:00

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

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Carbon disulfide	**0.81**	**J**	5.0	0.19	ug/L			05/25/21 12:38	1

Surrogate	*%Recovery*	*Qualifier*	*Limits*	*Prepared*	*Analyzed*	*Dil Fac*
1,2-Dichloroethane-d4 (Surr)	*101*		*77 - 120*		*05/25/21 12:38*	*1*
Toluene-d8 (Surr)	*95*		*80 - 120*		*05/25/21 12:38*	*1*
4-Bromofluorobenzene (Surr)	*99*		*73 - 120*		*05/25/21 12:38*	*1*
Dibromofluoromethane (Surr)	*96*		*75 - 123*		*05/25/21 12:38*	*1*

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

Job ID: 480-185013-1

Client Sample ID: OCO-W-TB01-TB-210520
Date Collected: 05/20/21 10:00
Date Received: 05/20/21 12:00

Lab Sample ID: 480-185013-5
Matrix: Water

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			05/25/21 13:02	1

Surrogate	*%Recovery*	*Qualifier*	*Limits*	*Prepared*	*Analyzed*	*Dil Fac*
1,2-Dichloroethane-d4 (Surr)	*95*		*77 - 120*		*05/25/21 13:02*	*1*
Toluene-d8 (Surr)	*91*		*80 - 120*		*05/25/21 13:02*	*1*
4-Bromofluorobenzene (Surr)	*94*		*73 - 120*		*05/25/21 13:02*	*1*
Dibromofluoromethane (Surr)	*95*		*75 - 123*		*05/25/21 13:02*	*1*

Surrogate Summary

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

Job ID: 480-185013-1

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

Matrix: Water

Prep Type: Total/NA

		Percent Surrogate Recovery (Acceptance Limits)			
		DCA	TOL	BFB	DBFM
Lab Sample ID	Client Sample ID	(77-120)	(80-120)	(73-120)	(75-123)
480-185013-1	OCO-GW-MW04-0-210520	102	94	95	99
480-185013-1 MS	OCO-GW-MW04-0-210520	99	92	97	93
480-185013-1 MSD	OCO-GW-MW04-0-210520	99	95	104	96
480-185013-2	OCO-GW-MW04-DB-210520	100	95	100	98
480-185013-3	OCO-GW-LY02-0-210520	84	89	83	78
480-185013-4	OCO-W-MW04-EB-210520	101	95	99	96
480-185013-5	OCO-W-TB01-TB-210520	95	91	94	95
LCS 480-582267/5	Lab Control Sample	102	98	107	100
LCS 480-582474/5	Lab Control Sample	99	93	97	94
LCS 480-582478/5	Lab Control Sample	87	89	87	80
LCSD 480-582478/6	Lab Control Sample Dup	84	94	91	81
MB 480-582267/7	Method Blank	102	96	98	100
MB 480-582474/7	Method Blank	105	98	104	101
MB 480-582478/8	Method Blank	86	96	87	85

Surrogate Legend

DCA = 1,2-Dichloroethane-d4 (Surr)
TOL = Toluene-d8 (Surr)
BFB = 4-Bromofluorobenzene (Surr)
DBFM = Dibromofluoromethane (Surr)

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

Lab Sample ID: MB 480-582267/7
Matrix: Water
Analysis Batch: 582267

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			05/24/21 10:54	1

Surrogate	*MB %Recovery*	*MB Qualifier*	*Limits*	*Prepared*	*Analyzed*	*Dil Fac*
1,2-Dichloroethane-d4 (Surr)	*102*		*77 - 120*		*05/24/21 10:54*	*1*
Toluene-d8 (Surr)	*96*		*80 - 120*		*05/24/21 10:54*	*1*
4-Bromofluorobenzene (Surr)	*98*		*73 - 120*		*05/24/21 10:54*	*1*
Dibromofluoromethane (Surr)	*100*		*75 - 123*		*05/24/21 10:54*	*1*

Lab Sample ID: LCS 480-582267/5
Matrix: Water
Analysis Batch: 582267

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	22.7		ug/L		91	59 - 134		

Surrogate	*LCS %Recovery*	*LCS Qualifier*	*Limits*
1,2-Dichloroethane-d4 (Surr)	*102*		*77 - 120*
Toluene-d8 (Surr)	*98*		*80 - 120*
4-Bromofluorobenzene (Surr)	*107*		*73 - 120*
Dibromofluoromethane (Surr)	*100*		*75 - 123*

Lab Sample ID: 480-185013-1 MS
Matrix: Water
Analysis Batch: 582267

Client Sample ID: OCO-GW-MW04-0-210520
Prep Type: Total/NA

Analyte	Sample Result	Sample Qualifier	Spike Added	MS Result	MS Qualifier	Unit	D	%Rec	%Rec. Limits		
Carbon disulfide	ND	F2	25.0	28.9		ug/L		116	59 - 134		

Surrogate	*MS %Recovery*	*MS Qualifier*	*Limits*
1,2-Dichloroethane-d4 (Surr)	*99*		*77 - 120*
Toluene-d8 (Surr)	*92*		*80 - 120*
4-Bromofluorobenzene (Surr)	*97*		*73 - 120*
Dibromofluoromethane (Surr)	*93*		*75 - 123*

Lab Sample ID: 480-185013-1 MSD
Matrix: Water
Analysis Batch: 582267

Client Sample ID: OCO-GW-MW04-0-210520
Prep Type: Total/NA

Analyte	Sample Result	Sample Qualifier	Spike Added	MSD Result	MSD Qualifier	Unit	D	%Rec	%Rec. Limits	RPD	RPD Limit
Carbon disulfide	ND	F2	25.0	23.7	F2	ug/L		95	59 - 134	20	15

Surrogate	*MSD %Recovery*	*MSD Qualifier*	*Limits*
1,2-Dichloroethane-d4 (Surr)	*99*		*77 - 120*
Toluene-d8 (Surr)	*95*		*80 - 120*
4-Bromofluorobenzene (Surr)	*104*		*73 - 120*
Dibromofluoromethane (Surr)	*96*		*75 - 123*

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

Lab Sample ID: MB 480-582474/7
Matrix: Water
Analysis Batch: 582474

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			05/25/21 11:38	1

Surrogate	*MB %Recovery*	*MB Qualifier*	*Limits*	*Prepared*	*Analyzed*	*Dil Fac*
1,2-Dichloroethane-d4 (Surr)	*105*		*77 - 120*		*05/25/21 11:38*	*1*
Toluene-d8 (Surr)	*98*		*80 - 120*		*05/25/21 11:38*	*1*
4-Bromofluorobenzene (Surr)	*104*		*73 - 120*		*05/25/21 11:38*	*1*
Dibromofluoromethane (Surr)	*101*		*75 - 123*		*05/25/21 11:38*	*1*

Lab Sample ID: LCS 480-582474/5
Matrix: Water
Analysis Batch: 582474

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	20.2		ug/L		81	59 - 134		

Surrogate	*LCS %Recovery*	*LCS Qualifier*	*Limits*
1,2-Dichloroethane-d4 (Surr)	*99*		*77 - 120*
Toluene-d8 (Surr)	*93*		*80 - 120*
4-Bromofluorobenzene (Surr)	*97*		*73 - 120*
Dibromofluoromethane (Surr)	*94*		*75 - 123*

Lab Sample ID: MB 480-582478/8
Matrix: Water
Analysis Batch: 582478

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			05/25/21 11:26	1

Surrogate	*MB %Recovery*	*MB Qualifier*	*Limits*	*Prepared*	*Analyzed*	*Dil Fac*
1,2-Dichloroethane-d4 (Surr)	*86*		*77 - 120*		*05/25/21 11:26*	*1*
Toluene-d8 (Surr)	*96*		*80 - 120*		*05/25/21 11:26*	*1*
4-Bromofluorobenzene (Surr)	*87*		*73 - 120*		*05/25/21 11:26*	*1*
Dibromofluoromethane (Surr)	*85*		*75 - 123*		*05/25/21 11:26*	*1*

Lab Sample ID: LCS 480-582478/5
Matrix: Water
Analysis Batch: 582478

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	27.8		ug/L		111	59 - 134		

Surrogate	*LCS %Recovery*	*LCS Qualifier*	*Limits*
1,2-Dichloroethane-d4 (Surr)	*87*		*77 - 120*
Toluene-d8 (Surr)	*89*		*80 - 120*
4-Bromofluorobenzene (Surr)	*87*		*73 - 120*
Dibromofluoromethane (Surr)	*80*		*75 - 123*

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

Lab Sample ID: LCSD 480-582478/6
Matrix: Water
Analysis Batch: 582478

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			25.0	25.1		ug/L		100	59 - 134	10	15

Surrogate	*LCSD %Recovery*	*LCSD Qualifier*	*Limits*
1,2-Dichloroethane-d4 (Surr)	*84*		*77 - 120*
Toluene-d8 (Surr)	*94*		*80 - 120*
4-Bromofluorobenzene (Surr)	*91*		*73 - 120*
Dibromofluoromethane (Surr)	*81*		*75 - 123*

QC Association Summary

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

Job ID: 480-185013-1

GC/MS VOA

Analysis Batch: 582267

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
480-185013-1	OCO-GW-MW04-0-210520	Total/NA	Water	8260C	
480-185013-2	OCO-GW-MW04-DB-210520	Total/NA	Water	8260C	
MB 480-582267/7	Method Blank	Total/NA	Water	8260C	
LCS 480-582267/5	Lab Control Sample	Total/NA	Water	8260C	
480-185013-1 MS	OCO-GW-MW04-0-210520	Total/NA	Water	8260C	
480-185013-1 MSD	OCO-GW-MW04-0-210520	Total/NA	Water	8260C	

Analysis Batch: 582474

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
480-185013-4	OCO-W-MW04-EB-210520	Total/NA	Water	8260C	
480-185013-5	OCO-W-TB01-TB-210520	Total/NA	Water	8260C	
MB 480-582474/7	Method Blank	Total/NA	Water	8260C	
LCS 480-582474/5	Lab Control Sample	Total/NA	Water	8260C	

Analysis Batch: 582478

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
480-185013-3	OCO-GW-LY02-0-210520	Total/NA	Water	8260C	
MB 480-582478/8	Method Blank	Total/NA	Water	8260C	
LCS 480-582478/5	Lab Control Sample	Total/NA	Water	8260C	
LCSD 480-582478/6	Lab Control Sample Dup	Total/NA	Water	8260C	

Lab Chronicle

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

Job ID: 480-185013-1

Client Sample ID: OCO-GW-MW04-0-210520

Lab Sample ID: 480-185013-1

Date Collected: 05/20/21 11:30
Matrix: Water
Date Received: 05/20/21 12:00

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Analysis	8260C		1	582267	05/24/21 12:26	CRL	TAL BUF

Client Sample ID: OCO-GW-MW04-DB-210520

Lab Sample ID: 480-185013-2

Date Collected: 05/20/21 11:35
Matrix: Water
Date Received: 05/20/21 12:00

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Analysis	8260C		1	582267	05/24/21 12:49	CRL	TAL BUF

Client Sample ID: OCO-GW-LY02-0-210520

Lab Sample ID: 480-185013-3

Date Collected: 05/20/21 11:50
Matrix: Water
Date Received: 05/20/21 12:00

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Analysis	8260C		5000	582478	05/25/21 20:13	WJD	TAL BUF

Client Sample ID: OCO-W-MW04-EB-210520

Lab Sample ID: 480-185013-4

Date Collected: 05/20/21 10:15
Matrix: Water
Date Received: 05/20/21 12:00

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Analysis	8260C		1	582474	05/25/21 12:38	CRL	TAL BUF

Client Sample ID: OCO-W-TB01-TB-210520

Lab Sample ID: 480-185013-5

Date Collected: 05/20/21 10:00
Matrix: Water
Date Received: 05/20/21 12:00

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Analysis	8260C		1	582474	05/25/21 13:02	CRL	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: 480-185013-1

Laboratory: Eurofins TestAmerica, Buffalo

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

Authority	Program	Identification Number	Expiration Date
New York	NELAP	10026	04-01-22

Method Summary

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

Job ID: 480-185013-1

Method	Method Description	Protocol	Laboratory
8260C	Volatile Organic Compounds by GC/MS	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: 480-185013-1

Lab Sample ID	Client Sample ID	Matrix	Collected	Received	Asset ID
480-185013-1	OCO-GW-MW04-0-210520	Water	05/20/21 11:30	05/20/21 12:00	
480-185013-2	OCO-GW-MW04-DB-210520	Water	05/20/21 11:35	05/20/21 12:00	
480-185013-3	OCO-GW-LY02-0-210520	Water	05/20/21 11:50	05/20/21 12:00	
480-185013-4	OCO-W-MW04-EB-210520	Water	05/20/21 10:15	05/20/21 12:00	
480-185013-5	OCO-W-TB01-TB-210520	Water	05/20/21 10:00	05/20/21 12:00	

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

Chain of Custody Record

eurofins | Environment Testing America

Client Information	Sampler: Greg Flasinski	Lab PM: Stone, Judy L	Carrier Tracking No(s):	COC No: 480-160727-35365.1
Client Contact: Greg Flasinski	Phone: 610. 721-0583	E-Mail: Judy.Stone@Eurofinset.com	State of Origin:	Page: Page 1 of 1
Company: Weston Solutions, Inc.	PWSID:			Job #:
Address: 1400 Weston Way PO BOX 2653	Due Date Requested:			
City: West Chester	TAT Requested (days):			
State, Zip: PA, 19380	Compliance Project: Δ Yes Δ No			
Phone: 610-701-3147(Tel)	PO #: 0100619 (6/19 amending for 2020)			
Email: greg.flasinski@westonsolutions.com	WO #: 02181.086.027.0001			
Project Name: 3M Tonawanda	Project #: 48003524			
Site:	SSOW#:			

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, J - DI Water, K - EDTA, L - EDA, M - Hexane, N - None, O - AsNaO2, P - Na2O4S, Q - Na2SO3, R - Na2S2O3, S - H2SO4, T - TSP Dodecahydrate, U - Acetone, V - MCAA, W - pH 4-5, Z - other (specify)

Other:

Sample Identification	Sample Date	Sample Time	Sample Type (C=Comp, G=grab)	Matrix (W=water, S=solid, O=waste/oil, BT=Tissue, A=Air)	Field Filtered Sample (Yes or No)	Perform MS/MSD (Yes or No)	8260C - 8260 Carbon Disulfide	8260C - 8260 Carbon Disulfide	Total Number of containers	Special Instructions/Note:
			Preservation Code:				A	N		
OCO-GW-MW04-0-210520 MS|MSD	5/20/21	1130	G	Water	N	X	6			
OCO-GW-MW04-DB-210520	5/20/21	1135		Water	N		3			
OCO-GW-LY02-0-210520	5/20/21	1150		Water	N		3			
OCO-W-MW04-EB-210520	5/20/21	1015		Water	N		3			
				Water						
OCO-W-TB01-TB-210520	5/20/21	1000	G	Water	N		2			

480-185013 Chain of Custody

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

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

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

Special Instructions/QC Requirements:

Empty Kit Relinquished by:	Date:	Time:	Method of Shipment:		
Relinquished by:	Date/Time: 5/20/21	Company: Weston	Received by:	Date/Time: 5/20/21 1200	Company: TA
Relinquished by:	Date/Time:	Company	Received by:	Date/Time:	Company
Relinquished by:	Date/Time:	Company	Received by:	Date/Time:	Company

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

Cooler Temperature(s) °C and Other Remarks: 4.7 #1 ICE

Ver: 11/01/2020

5/27/2021

Login Sample Receipt Checklist

Client: Weston Solutions, Inc.

Job Number: 480-185013-1

Login Number: 185013

List Source: Eurofins TestAmerica, Buffalo

List Number: 1

Creator: Stopa, Erik S

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	Limited volume for MS/MSD - 3 vials for both
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	

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ANALYTICAL REPORT

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

Laboratory Job ID: 480-192458-1
Client Project/Site: 3M Tonawanda

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

Attn: Rachel Montalto

Authorized for release by:
11/30/2021 11:21:57 AM

Steve Hartmann, Project Manager I
(413)572-4000
Steve.Hartmann@Eurofinset.com

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Definitions/Glossary

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

Job ID: 480-192458-1

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
CFU	Colony Forming Unit
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)
MCL	EPA recommended "Maximum Contaminant Level"
MDA	Minimum Detectable Activity (Radiochemistry)
MDC	Minimum Detectable Concentration (Radiochemistry)
MDL	Method Detection Limit
ML	Minimum Level (Dioxin)
MPN	Most Probable Number
MQL	Method Quantitation Limit
NC	Not Calculated
ND	Not Detected at the reporting limit (or MDL or EDL if shown)
NEG	Negative / Absent
POS	Positive / Present
PQL	Practical Quantitation Limit
PRES	Presumptive
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)
TNTC	Too Numerous To Count

Case Narrative

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

Job ID: 480-192458-1

Job ID: 480-192458-1

Laboratory: Eurofins TestAmerica, Buffalo

Narrative

Job Narrative
480-192458-1

Comments
No additional comments.

Receipt
The samples were received on 11/16/2021 2:30 PM. Unless otherwise noted below, the samples arrived in good condition, and where required, properly preserved and on ice. The temperature of the cooler at receipt was 1.9º 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

Job ID: 480-192458-1

Client Sample ID: OCO-W-TB01-TB-211116 **Lab Sample ID: 480-192458-1**

No Detections.

Client Sample ID: OCO-W-MW04-EB-211116 **Lab Sample ID: 480-192458-2**

No Detections.

Client Sample ID: OCO-GW-MW04-0-211116 **Lab Sample ID: 480-192458-3**

No Detections.

Client Sample ID: OCO-GW-MW04-DB-211116 **Lab Sample ID: 480-192458-4**

No Detections.

This Detection Summary does not include radiochemical test results.

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

Job ID: 480-192458-1

Client Sample ID: OCO-W-TB01-TB-211116

Lab Sample ID: 480-192458-1

Date Collected: 11/16/21 12:00
Matrix: Water
Date Received: 11/16/21 14:30

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			11/19/21 05:00	1

Surrogate	*%Recovery*	*Qualifier*	*Limits*	*Prepared*	*Analyzed*	*Dil Fac*
1,2-Dichloroethane-d4 (Surr)	*103*		*77 - 120*		*11/19/21 05:00*	*1*
Toluene-d8 (Surr)	*99*		*80 - 120*		*11/19/21 05:00*	*1*
4-Bromofluorobenzene (Surr)	*95*		*73 - 120*		*11/19/21 05:00*	*1*
Dibromofluoromethane (Surr)	*102*		*75 - 123*		*11/19/21 05:00*	*1*

Client Sample ID: OCO-W-MW04-EB-211116

Lab Sample ID: 480-192458-2

Date Collected: 11/16/21 12:45
Matrix: Water
Date Received: 11/16/21 14:30

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			11/19/21 05:23	1

Surrogate	*%Recovery*	*Qualifier*	*Limits*	*Prepared*	*Analyzed*	*Dil Fac*
1,2-Dichloroethane-d4 (Surr)	*104*		*77 - 120*		*11/19/21 05:23*	*1*
Toluene-d8 (Surr)	*102*		*80 - 120*		*11/19/21 05:23*	*1*
4-Bromofluorobenzene (Surr)	*99*		*73 - 120*		*11/19/21 05:23*	*1*
Dibromofluoromethane (Surr)	*106*		*75 - 123*		*11/19/21 05:23*	*1*

Client Sample ID: OCO-GW-MW04-0-211116

Lab Sample ID: 480-192458-3

Date Collected: 11/16/21 13:45
Matrix: Water
Date Received: 11/16/21 14:30

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			11/19/21 05:46	1

Surrogate	*%Recovery*	*Qualifier*	*Limits*	*Prepared*	*Analyzed*	*Dil Fac*
1,2-Dichloroethane-d4 (Surr)	*105*		*77 - 120*		*11/19/21 05:46*	*1*
Toluene-d8 (Surr)	*100*		*80 - 120*		*11/19/21 05:46*	*1*
4-Bromofluorobenzene (Surr)	*98*		*73 - 120*		*11/19/21 05:46*	*1*
Dibromofluoromethane (Surr)	*104*		*75 - 123*		*11/19/21 05:46*	*1*

Client Sample ID: OCO-GW-MW04-DB-211116

Lab Sample ID: 480-192458-4

Date Collected: 11/16/21 13:50
Matrix: Water
Date Received: 11/16/21 14:30

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			11/19/21 06:09	1

Surrogate	*%Recovery*	*Qualifier*	*Limits*	*Prepared*	*Analyzed*	*Dil Fac*
1,2-Dichloroethane-d4 (Surr)	*98*		*77 - 120*		*11/19/21 06:09*	*1*
Toluene-d8 (Surr)	*102*		*80 - 120*		*11/19/21 06:09*	*1*
4-Bromofluorobenzene (Surr)	*98*		*73 - 120*		*11/19/21 06:09*	*1*
Dibromofluoromethane (Surr)	*100*		*75 - 123*		*11/19/21 06:09*	*1*

Surrogate Summary

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

Job ID: 480-192458-1

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

Matrix: Water

Prep Type: Total/NA

		Percent Surrogate Recovery (Acceptance Limits)			
		DCA	TOL	BFB	DBFM
Lab Sample ID	Client Sample ID	(77-120)	(80-120)	(73-120)	(75-123)
480-192458-1	OCO-W-TB01-TB-211116	103	99	95	102
480-192458-2	OCO-W-MW04-EB-211116	104	102	99	106
480-192458-3	OCO-GW-MW04-0-211116	105	100	98	104
480-192458-3 MS	OCO-GW-MW04-0-211116	98	101	102	100
480-192458-3 MSD	OCO-GW-MW04-0-211116	98	101	103	100
480-192458-4	OCO-GW-MW04-DB-211116	98	102	98	100
LCS 480-605649/6	Lab Control Sample	96	103	100	98
MB 480-605649/8	Method Blank	103	101	98	101

Surrogate Legend

DCA = 1,2-Dichloroethane-d4 (Surr)
TOL = Toluene-d8 (Surr)
BFB = 4-Bromofluorobenzene (Surr)
DBFM = Dibromofluoromethane (Surr)

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

Lab Sample ID: MB 480-605649/8
Matrix: Water
Analysis Batch: 605649

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			11/19/21 00:22	1

Surrogate	*MB %Recovery*	*MB Qualifier*	*Limits*	*Prepared*	*Analyzed*	*Dil Fac*
1,2-Dichloroethane-d4 (Surr)	*103*		*77 - 120*		*11/19/21 00:22*	*1*
Toluene-d8 (Surr)	*101*		*80 - 120*		*11/19/21 00:22*	*1*
4-Bromofluorobenzene (Surr)	*98*		*73 - 120*		*11/19/21 00:22*	*1*
Dibromofluoromethane (Surr)	*101*		*75 - 123*		*11/19/21 00:22*	*1*

Lab Sample ID: LCS 480-605649/6
Matrix: Water
Analysis Batch: 605649

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	28.7		ug/L		115	59 - 134		

Surrogate	*LCS %Recovery*	*LCS Qualifier*	*Limits*
1,2-Dichloroethane-d4 (Surr)	*96*		*77 - 120*
Toluene-d8 (Surr)	*103*		*80 - 120*
4-Bromofluorobenzene (Surr)	*100*		*73 - 120*
Dibromofluoromethane (Surr)	*98*		*75 - 123*

Lab Sample ID: 480-192458-3 MS
Matrix: Water
Analysis Batch: 605649

Client Sample ID: OCO-GW-MW04-0-211116
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	32.5		ug/L		130	59 - 134		

Surrogate	*MS %Recovery*	*MS Qualifier*	*Limits*
1,2-Dichloroethane-d4 (Surr)	*98*		*77 - 120*
Toluene-d8 (Surr)	*101*		*80 - 120*
4-Bromofluorobenzene (Surr)	*102*		*73 - 120*
Dibromofluoromethane (Surr)	*100*		*75 - 123*

Lab Sample ID: 480-192458-3 MSD
Matrix: Water
Analysis Batch: 605649

Client Sample ID: OCO-GW-MW04-0-211116
Prep Type: Total/NA

Analyte	Sample Result	Sample Qualifier	Spike Added	MSD Result	MSD Qualifier	Unit	D	%Rec	%Rec. Limits	RPD	RPD Limit
Carbon disulfide	ND		25.0	30.9		ug/L		124	59 - 134	5	15

Surrogate	*MSD %Recovery*	*MSD Qualifier*	*Limits*
1,2-Dichloroethane-d4 (Surr)	*98*		*77 - 120*
Toluene-d8 (Surr)	*101*		*80 - 120*
4-Bromofluorobenzene (Surr)	*103*		*73 - 120*
Dibromofluoromethane (Surr)	*100*		*75 - 123*

QC Association Summary

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

Job ID: 480-192458-1

GC/MS VOA

Analysis Batch: 605649

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
480-192458-1	OCO-W-TB01-TB-211116	Total/NA	Water	8260C	
480-192458-2	OCO-W-MW04-EB-211116	Total/NA	Water	8260C	
480-192458-3	OCO-GW-MW04-0-211116	Total/NA	Water	8260C	
480-192458-4	OCO-GW-MW04-DB-211116	Total/NA	Water	8260C	
MB 480-605649/8	Method Blank	Total/NA	Water	8260C	
LCS 480-605649/6	Lab Control Sample	Total/NA	Water	8260C	
480-192458-3 MS	OCO-GW-MW04-0-211116	Total/NA	Water	8260C	
480-192458-3 MSD	OCO-GW-MW04-0-211116	Total/NA	Water	8260C	

Lab Chronicle

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

Job ID: 480-192458-1

Client Sample ID: OCO-W-TB01-TB-211116

Lab Sample ID: 480-192458-1

Date Collected: 11/16/21 12:00
Matrix: Water
Date Received: 11/16/21 14:30

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Analysis	8260C		1	605649	11/19/21 05:00	WJD	TAL BUF

Client Sample ID: OCO-W-MW04-EB-211116

Lab Sample ID: 480-192458-2

Date Collected: 11/16/21 12:45
Matrix: Water
Date Received: 11/16/21 14:30

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Analysis	8260C		1	605649	11/19/21 05:23	WJD	TAL BUF

Client Sample ID: OCO-GW-MW04-0-211116

Lab Sample ID: 480-192458-3

Date Collected: 11/16/21 13:45
Matrix: Water
Date Received: 11/16/21 14:30

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Analysis	8260C		1	605649	11/19/21 05:46	WJD	TAL BUF

Client Sample ID: OCO-GW-MW04-DB-211116

Lab Sample ID: 480-192458-4

Date Collected: 11/16/21 13:50
Matrix: Water
Date Received: 11/16/21 14:30

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Analysis	8260C		1	605649	11/19/21 06:09	WJD	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: 480-192458-1

Laboratory: Eurofins TestAmerica, Buffalo

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

Authority	Program	Identification Number	Expiration Date
New York	NELAP	10026	04-01-22

Method Summary

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

Job ID: 480-192458-1

Method	Method Description	Protocol	Laboratory
8260C	Volatile Organic Compounds by GC/MS	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: 480-192458-1

Lab Sample ID	Client Sample ID	Matrix	Collected	Received
480-192458-1	OCO-W-TB01-TB-211116	Water	11/16/21 12:00	11/16/21 14:30
480-192458-2	OCO-W-MW04-EB-211116	Water	11/16/21 12:45	11/16/21 14:30
480-192458-3	OCO-GW-MW04-0-211116	Water	11/16/21 13:45	11/16/21 14:30
480-192458-4	OCO-GW-MW04-DB-211116	Water	11/16/21 13:50	11/16/21 14:30

Chain of Custody Record

424413

eurofins | Environment Testing TestAmerica

Address: _____

Regulatory Program: ☐ DW ☐ NPDES ☐ RCRA ☐ Other:

TAL-8210

Client Contact	Project Manager: Rachel Montalto	Site Contact:	Date: 11/16/21	COC No:
Company Name: Western Solutions	Tel/Email: 484-433-2377	Lab Contact: Judy Stone	Carrier: Hand	1 of 1 COCs
Address: 1 Western Way	Analysis Turnaround Time			Sampler:
City/State/Zip: Wchester PA	☐ CALENDAR DAYS ☐ WORKING DAYS			For Lab Use Only:
Phone: 610 701 0583	TAT if different from Below _____			Walk-in Client:
Fax: Greg Flasinski	☐ 2 weeks ☐ 1 week ☐ 2 days ☐ 1 day			Lab Sampling:
Project Name: TONAWANDA				Job / SDG No.:
Site:				
PO #				

Sample Identification	Sample Date	Sample Time	Sample Type (C=Comp, G=Grab)	Matrix	# of Cont.	Filtered Sample (Y/N)	Perform MS/MSD (Y/N)	CS_2	Sample Specific Notes:
OCO-W-TB01-TB-211116	11/16/21	1300	G	W	2	N	N	X	CS_2 5 ppb
OCO-W-MW04-EB-211116		1245			3	N	N	X	
OCO-GW-MW04-01-211116 MS/MSD		1345			9	N	Y	X	
OCO-GW-MW04-DB-211116		1350				N	N	X	

480-192458 Chain of Custody

Preservation Used: 1= Ice, 2= HCl; 3= H_2SO_4; 4=HNO_3; 5=NaOH; 6= Other _____ 2

Possible Hazard Identification:
Are any samples from a listed EPA Hazardous Waste? Please List any EPA Waste Codes for the sample in the Comments Section if the lab is to dispose of the sample.

☐ Non-Hazard ☐ Flammable ☐ Skin Irritant ☐ Poison B ☐ Unknown

Sample Disposal (A fee may be assessed if samples are retained longer than 1 month)

☐ Return to Client ☐ Disposal by Lab ☐ Archive for _____ Months

Special Instructions/QC Requirements & Comments:

CS_2 only (5 ppb) Rachel.Montalto@westernsolutions.com NATACC.DATA@westernsolutions.com

Custody Seals Intact: ☐ Yes ☐ No | Custody Seal No.: | Cooler Temp. (°C): Obs'd: 1.9 ICE Corr'd: _____ | Therm ID No.: _____

	Company	Date/Time	Received by:	Company	Date/Time
Relinquished by:	Western	11/16/21		11-16-21 TAB	11-16-21 1411:30
Relinquished by:	Company:	Date/Time:	Received by:	Company:	Date/Time:
Relinquished by:	Company:	Date/Time:	Received in Laboratory by:	Company:	Date/Time:

11/30/2021

Login Sample Receipt Checklist

Client: Weston Solutions, Inc.

Job Number: 480-192458-1

Login Number: 192458

List Source: Eurofins TestAmerica, Buffalo

List Number: 1

Creator: Yeager, Brian A

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.	True	
Chlorine Residual checked.	N/A	

ATTACHMENT D

INSTITUTIONAL AND ENGINEERING CONTROLS CERTIFICATION FORM

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, 2021 to February 14, 2022

	YES	NO
1. Is the information above correct?	X	☐
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?	☐	X
3. Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))?	☐	X
4. Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period?	☐	X
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?	☐	X

Box 2

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

IF THE ANSWER TO EITHER QUESTION 6 OR 7 IS NO, sign and date below and DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.

A Corrective Measures Work Plan must be submitted along with this form to address these issues.

Signature of Owner, Remedial Party or Designated Representative Date

SITE NO. 915148 **Box 3**

Description of Institutional Controls

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

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

Box 4

Description of Engineering Controls

Parcel	Engineering Control
65.09-6-5	Fencing/Access Control
	Monitoring Wells

Box 5

Periodic Review Report (PRR) Certification Statements

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

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

   b) to the best of my knowledge and belief, the work and conclusions described in this certification are in accordance with the requirements of the site remedial program, and generally accepted engineering practices; and the information presented is accurate and compete.

YES	NO
X	☐

2. For each Engineering control listed in Box 4, I certify by checking "YES" below that all of the following statements are true:

   (a) The 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
X	☐

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

2/18/2022
Date

EC CERTIFICATIONS

Box 7

Qualified Environmental Professional Signature

I certify that all information in Boxes 4 and 5 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

I THOMAS A. DREW (print name) at WESTON SOLUTIONS, INC. 1400 WESTON WAY, WEST CHESTER, PA 19380 (print business address)

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

Thomas A. Drew — Signature of Qualified Environmental Professional, for the Owner or Remedial Party, Rendering Certification

Stamp (Required for PE)

3/9/2022 — Date