Weston Solutions, Inc.
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West Chester, PA 19380
610-701-3000
WestonSolutions.com

Transmittal Via Email

March 10, 2026

Mr. Bradley Demo
New York State Department of Environmental Conservation
700 Delaware Avenue
Buffalo, New York 14209-2202

Re: Annual Periodic Review Report (February 14, 2025 to February 14, 2026) and IC/EC Certification
3M O-Cel-O Sponge Site, Tonawanda, New York
Order on Consent # B9-0369-91-04, Registry # 915148

Dear Mr. Demo:

In accordance with the referenced Order on Consent and at the direction of 3M Company, we are submitting the Annual Periodic Review Report for the 3M O-Cel-O Sponge Site in Tonawanda, New York for the period extending from February 14, 2025 to February 14, 2026. 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 610-368-0950.

Very truly yours,

WESTON SOLUTIONS, INC.

Rachel Montalto for

Thomas A. Drew, P.G.
Project Manager

c: J. Vaccaro, NYSDEC (electronic w/enclosure)
B. Chambers, 3M Global EHS (electronic w/ enclosure)
K. Held, 3M Tonawanda (electronic w/ enclosure)
C. Schifferli, 3M Tonawanda (electronic w/ enclosure)
R. Montalto, Weston (electronic 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 Global EHS Keith Held, 3M Tonawanda C. Schifferli, 3M Tonawanda
NYSDEC Project Lead:	Bradley Demo
Reporting Period:	February 14, 2025, to February 14, 2026

1.0 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 (the "Site") in March 1999. This ROD presents the selected remedial action for the Site based on the Site's Administrative Record and public input. Following ROD issuance, the NYSDEC reclassified the 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 in March 2001 and was reported in the initial progress report for the period ending March 31, 2001. Pursuant to Order requirements, the Declaration of Covenants and Restrictions provide notice that the 3M Tonawanda property is subject to the provisions of the Order and prohibits the use of a portion of the property (i.e., the Site) for residential purposes.

- Performing long-term groundwater monitoring. Involved semiannual sampling of Site monitor wells MW-01, MW-02, MW-03, and MW-04 and annual sampling of the two Site lysimeters, LY-01 and LY-02, 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 Site drainage area) and maintaining the integrity of the IRMs.

Semiannual periodic review reports (PRRs) 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 2005 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 Work 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 the Site, but required only one Site monitoring well (MW-04) and one Site lysimeter (LY-02) to 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 Site drainage features would continue under the Order/O&M Work 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.

The aforementioned monitoring and reporting modifications approved by the NYSDEC were implemented starting in June 2006. Continued monitoring and semiannual reporting in accordance with the O&M Work Plan modifications approved by NYSDEC were performed by 3M from June 2006 to March 2022.

The PRR submitted to NYSDEC in March 2022 contained a description of activities performed by 3M in the period from February 14, 2021 to February 14, 2022, and the results of Site sampling conducted in May and November 2021. This PRR also contained a proposed modification to the sampling frequency of groundwater monitoring well MW-04 from semiannually to annually, consistent with the sampling frequency of lysimeter LY-02. This proposal was based on CS_2 not being detected above the laboratory reporting limit in bedrock monitoring well MW-04 during the previous 16 years of semiannual sampling. NYSDEC approved the request to change the sampling frequency of well MW-04 from semiannually to annually, via e-mail correspondence from Mr. Glenn May (NYSDEC) on April 14, 2022. Mr. Glenn May also approved the submission of an annual PRR via e-mail correspondence on April 21, 2022. Accordingly, a revised O&M Work Plan, dated April 2022, was submitted to NYSDEC on April 26, 2022. This revised O&M Work Plan includes the approved annual sampling of well MW-04 (along with lysimeter LY-02) and the submission of one PRR (i.e., an Annual PRR) to NYSDEC to summarize annual project activities and sampling results.

This Annual PRR reflects the O&M monitoring and reporting activities specified in the April 2022 O&M Work Plan. Annual sampling of bedrock monitoring well MW-04 and lysimeter LY-02 was completed on June 17, 2025. The results from this sampling event

are presented herein, along with a description of any maintenance activity conducted at the Site. All analytical results presented in this PRR will be uploaded into NYSDEC's EQuIS system in March 2026. The annual compliance inspection and evaluation were completed on November 13, 2025, and photographs are provided in Attachment A. Additional photographs of the Site catch basin were taken in February 2026 and are included in Attachment A. Please note that the Site drainage culvert is not visible in the photographs included in Attachment A; however, the findings of the annual inspection indicated that this drainage feature is in good condition and is effectively managing surface water flow at the Site. The locations of the Site catch basin and drainage culvert are shown in Figure 1.

2.0 ANNUAL GROUNDWATER MONITORING

The annual samples for CS_2 analysis were collected from monitoring well MW-04 (primary sample and duplicate sample) and lysimeter LY-02 on June 17, 2025, in accordance with the April 2022 O&M Work Plan. The locations of MW-04 and LY-02 are depicted in Figure 1, along with the locations of monitoring wells MW-01, MW-02 and MW-03, and lysimeter LY-01.

Prior to collecting groundwater samples from MW-04, a complete round of water level measurements was recorded at the four Site monitoring wells (MW-01 through MW-04) on June 17, 2025. These water level measurements were used to generate a groundwater elevation contour map (see Figure 2). Groundwater at the Site was measured to flow to the southwest towards well MW-04, consistent with historical results.

Groundwater sampling of monitoring well MW-04 was conducted in accordance with the O&M Work Plan. Prior to sample collection, approximately three volumes of water standing in MW-04 were removed using a clean Teflon® bailer. During well purging, purge water samples were collected for field water quality measurements, including temperature, pH, specific conductance and turbidity. Following well purging, a groundwater sample and duplicate sample were collected from MW-04 using the Teflon bailer. The MW-04 well purging/sampling form is provided in Attachment B.

Sampling of lysimeter LY-02 was performed by applying a vacuum (three times) to the lysimeter, followed by pressurization to remove collected pore water from the lysimeter. The LY-02 sample was collected from the discharge tubing connected to the lysimeter.

Quality control (QC) samples were collected during the June 2025 sampling event, including a duplicate sample from MW-04, a matrix spike/matrix spike duplicate, an equipment blank and a trip blank. The equipment blank was collected by pouring laboratory-grade water into the clean bailer and then pouring this water into the sample container.

All samples were placed in an ice-packed cooler, with chain-of-custody documentation for shipment to the Eurofins Environmental Testing Laboratory in Amherst, NY. These samples were analyzed for CS_2 using Method 8260C. The laboratory analytical data package is provided in Attachment C.

As shown in Table 2-1, CS_2 was not detected in the primary groundwater sample or the duplicate groundwater sample collected from monitoring well MW-04 in June 2025. CS_2 was detected at a concentration of 140,000 micrograms per liter (µg/L; or parts per billion [ppb]) in the pore water sample collected from lysimeter LY-02 in June 2025. The MW-04 and LY-02 analytical results are consistent with historical data as shown in Table 2-2. Trendline plots depicting CS_2 analytical results for MW-04 and LY-02 samples since initiation of the monitoring program are included in Attachment D. Mann-Kendall analysis of trends indicates a statistically significant decreasing trend in CS_2 concentration in LY-02 over the monitoring period (p=1.135E-05). The statistical output is provided in Attachment E. Statistical analysis of MW-04 data is not feasible due to consistent non-detection of CS_2 in groundwater samples.

3.0 INSTITUTIONAL CONTROLS AND ENGINEERING CONTROLS (IC/ECS)

A No Further Action with Monitoring ROD was issued for the Site in March 1999. A Declaration of Covenants and Restrictions was placed on this property on March 20, 2001, prohibiting the residential use of the Site. The graded area containing the catch basin and the drainage culvert at the Site are maintained and inspected annually. Fencing is maintained in the Site area to restrict non-authorized access. Groundwater monitoring is also conducted to confirm that the Site conditions remain unchanged.

The annual compliance inspection and evaluation was completed on November 13, 2025. Vegetation and grading at the Site are in good condition and no deficiencies were noted during the inspection. No non-routine maintenance activities were necessary at the Site during the reporting period. Photographs showing the condition of monitoring well MW-04, lysimeter LY-02, drainage features, and fencing at the time of the Site inspection in November 2025 are provided in Attachment A, along with additional photo documentation acquired in February 2026 for the catch basin.

The Institutional and Engineering Controls (IC/ECs) Certification Form in Attachment F and other information contained herein indicate that the IC/ECs for the Site are in-place and functioning as designed, and that groundwater conditions in the Site area remain unchanged (i.e., no CS_2 detected in groundwater). Maintenance of interim remedial measures and institutional controls (prohibition of residential use) are being implemented as intended. Overall, the findings of this periodic review indicate that the selected remedy for the Site (i.e., No Further Action with Monitoring) remains protective of public health and the environment.

4.0 ACTION PLAN

As shown in Table 2-2 and Attachment D Figure 1, CS_2 has not been detected above the laboratory reporting limit of 5 µg/L (ppb) in bedrock monitoring well MW-4 over the past 25 years of Site monitoring[1] (i.e., 2001-2025). Furthermore, the Mann-Kendall test results in Attachment E demonstrate a statistically significant decreasing trend in CS_2

[1] The only exception being sampling results obtained in October 2004, but as indicated in Table 2-2, these results are believed to be anomalous.

concentration in lysimeter LY-02. Data collected to date indicate that migration of CS_2 to groundwater remains unlikely. An evaluation of Site data relative to monitoring program objectives is currently underway; 3M anticipates submitting a request to modify the existing groundwater monitoring program in Q2 2026. Any project-related requests will be submitted in accordance with Provision XII.L of the Order and will be provided to NYSDEC under separate cover.

During the review of the proposed program modification by NYSDEC, 3M will continue to perform groundwater monitoring, IC/EC inspections and reporting for the Site in accordance with the ROD and the April 2022 O&M Work Plan. This specifically includes annual sampling of monitoring well MW-04 and lysimeter LY-02 in Spring 2026, and inspection of the drainage culvert, catch basin and other Site features. The Annual PRR for the upcoming reporting period will be submitted to NYSDEC in March 2027.

FIGURES

Legend

- Monitoring Well Location
- Lysimeter Location
- Site Drainage Culvert
- Site Catch Basin

N
W
E
S

0 90 180 360

Feet

Imagery Source: ESRI, Maxar Mapping Service, 2024

Figure 1
Monitoring Well and Lysimeter Locations
3M Tonawanda Facility
Tonawanda, NY

File: \\oep.file.core.windows.net\confclient\GIS\3M_Tonawanda\Tonawanda.aprx, MW_Locations, 2/25/2026 2:42 PM, ricksc

Legend

- Monitoring Well Location
- Lysimeter Location
- Site Drainage Culvert
- Site Catch Basin
- Groundwater Elevation Contour (Ft MSL)
- Approximate Groundwater Flow Direction
- (570.81) Well's Groundwater Elevation (FT MSL)

N
W E
S

0 90 180 360
Feet

Imagery Source: ESRI, Maxar Mapping Service, 2024

WESTON SOLUTIONS

Figure 2
Groundwater Elevation Map
June 17, 2025
3M Tonawanda Facility
Tonawanda, NY

File: \\oep.file.core.windows.net\confclient\GIS\3M_Tonawanda\Tonawanda.aprx, GW_Elev_Map_June2025, 2/25/2026 2:44 PM, ricksc

TABLES

Table 2-1
Summary of Carbon Disulfide Water Analytical Results

Sampling Date	Sample ID and Results (µg/L; ppb)		
	MW-04	MW-04 Duplicate	LY-02
6/17/2025	< 5	< 5	140,000

Notes:

µg/L : micrograms per liter

ppb: parts per billion

<5 : Not detected above the laboratory reporting limit (RL) of 5 µg/L

Table 2-2
Carbon Disulfide Concentrations (2001 - 2025)
3M O-Cel-O Sponge Site, Tonawanda, New York

Sample Date [a, b]	MW-01	MW-02		MW-03	MW-04		LY-01	LY-02
			FD			FD		
	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)
1/19/2001	< 5.0	< 5.0	--	< 5.0	< 5.0	< 5.0	--	--
7/26/2001 - 7/27/2001	< 5.0	< 5.0	--	< 5.0	< 5.0	< 5.0	--	--
12/4/2001 - 12/5/2001	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	--	< 5.0	560000
7/24/2002	< 5.0	< 5.0	--	< 5.0	< 5.0	< 5.0	--	--
12/2/2002 - 12/3/2002	< 5.0	< 5.0	--	< 5.0	< 5.0	< 5.0	--[c]	560000
10/27/2003	< 5.0	< 5.0	--	< 5.0	< 5.0	< 5.0	< 5.0	400000
5/26/2004	< 5.0	< 5.0	--	< 5.0	< 5.0	< 5.0	--	--
10/27/2004 [d]	5.9	9.8	--	< 5.0	58	25	< 5.0	340000
4/25/2005	< 5.0	< 5.0	--	< 5.0	< 5.0	< 5.0	--	--
6/23/2006	--	--	--	--	< 5.0	< 5.0	--	380000
12/1/2006	--	--	--	--	< 5.0	< 5.0	--	--
6/13/2007	--	--	--	--	< 5.0	< 5.0	--	600000
11/6/2007	--	--	--	--	< 5.0	< 5.0	--	--
6/10/2008	--	--	--	--	< 5.0	< 5.0	--	590000
11/24/2008	--	--	--	--	< 5.0	< 5.0	--	--
6/11/2009	--	--	--	--	< 5.0	< 5.0	--	440000
11/17/2009	--	--	--	--	< 5.0	< 5.0	--	--
6/14/2010	--	--	--	--	< 5.0	< 5.0	--	290000
12/13/2010	--	--	--	--	< 5.0	< 5.0	--	--
6/6/2011	--	--	--	--	< 5.0	< 5.0	--	560000
11/21/2011	--	--	--	--	< 5.0	0.63 J	--	--
6/18/2012	--	--	--	--	2.5 J	2.1 J	--	420000
11/20/2012	--	--	--	--	0.38 J	0.49 J	--	--
6/10/2013	--	--	--	--	< 5.0	< 5.0	--	410000
11/26/2013	--	--	--	--	< 5.0	< 5.0	--	--
5/28/2014	--	--	--	--	0.45 J	0.43 J	--	310000
11/14/2014	--	--	--	--	< 5.0	< 5.0	--	--
4/29/2015	--	--	--	--	0.48 J	< 5.0	--	200000
11/3/2015	--	--	--	--	< 5.0	< 5.0	--	--
5/4/2016	--	--	--	--	0.32 JB	0.67 J	--	200000 B
11/16/2016	--	--	--	--	< 5.0	< 5.0	--	--
4/18/2017	--	--	--	--	0.34 J	0.24 J	--	260000
10/23/2017	--	--	--	--	0.24 J	0.24 J	--	--
5/3/2018	--	--	--	--	< 5.0	< 5.0	--	300000
11/5/2018	--	--	--	--	< 5.0	< 5.0	--	--
4/30/2019	--	--	--	--	< 5.0	< 5.0	--	190000
11/19/2019	--	--	--	--	< 5.0	< 5.0	--	--
5/7/2020	--	--	--	--	< 5.0	< 5.0	--	240000
12/3/2020	--	--	--	--	< 5.0	< 5.0	--	--
5/20/2021	--	--	--	--	< 5.0 F2	< 5.0	--	260000
11/16/2021	--	--	--	--	< 5.0	< 5.0	--	--
5/25/2022	--	--	--	--	< 5.0	< 5.0	--	160000
5/22/2023	--	--	--	--	0.24 J	< 5.0	--	250000
5/22/2024	--	--	--	--	< 5.0	< 5.0	--	140000
6/17/2025	--	--	--	--	< 5.0	< 5.0	--	140000

Notes:

µg/L - microgram per liter.

< - less than reported limit.

-- - not sampled.

B - compound was found in the blanks and the sample.

F2 - matrix spike/matrix spike duplicate relative percent difference (RPD) exceeds control limits.

FD - field duplicate.

Table 2-2
Carbon Disulfide Concentrations (2001 - 2025)
3M O-Cel-O Sponge Site, Tonawanda, New York

LY - lysimeter.

J - result is less than the reporting limit but greater than or equal to the method detection limit and the concentration is an approximate value.

MW - monitoring well.

[a] - Groundwater and porewater monitoring performed for the Record of Decision (ROD), March 1999, (Registry No. 915148) for the 3M Company (3M) O-Cel-O Sponge Site in Tonawanda, New York.

[b] - Initial sampling to implement the ROD included annual sampling of Site groundwater monitoring wells (MW-01, MW-02, MW-03 and MW-04) and annual sampling of the two Site lysimeters (LY-01 and LY-02) for CS_2.

In May 2006, the NYSDEC provided comment on the 5-Year Evaluation Report and required continued monitoring of only MW-04 on a semi-annual basis and LY-02 on an annual basis.

In April 2022, NYSDEC approved proposed modification; to the sampling frequency, monitoring would continue to be performed at MW-04 and LY-02 on an annual basis.

[c] - location dry at time of sampling.

[d] - As indicated in the May 23, 2005 Progress Review Report (reporting period November 1, 2004 to April 30, 2005), the October 2004 sampling results are believed to be anomalous since carbon disulfide had not been detected in any site monitoring wells during the prior four years of sampling. In addition, the semi-annual sampling performed in April 2005 did not confirm the presence of carbon disulfide in the site monitoring wells.

ATTACHMENT A
SITE PHOTOGRAPHS – NOVEMBER 2025 AND FEBRUARY 2026

Groundwater Monitoring Well MW-04

Lysimeter LY-02

Vegetated Area of the Site (View East Towards LY-02)

Site Drainage Culvert Area

Site Catch Basin (February 2026)

Site Catch Basin (View East; February 2026)

ATTACHMENT B
WELL PURGING/SAMPLING FORM

WESTON SOLUTIONS
Restoring Resource Efficiency

Figure 4-2
Well Purging/Sampling Form

SITE INFORMATION Confidential Tonawanda, NY 06/17/25

Well No.: MW-4	Weather: (Sunny) Cloudy Rain Temp. 80°
Sampling Team: Greg Flaherski	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):	-31.03
C. Column of Standing Water (ft) (C=A-B):	41.87
D. Purge Factor:	x
E. One Well Volume (gallons):	6.7
F. Three Well Volumes (gallons):	20.1

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

Total Volume Purged (gallons): 21

INDICATOR PARAMETERS

Time:	1240	1258	1326	1342					
Purge Rate (gal. per minute):	—	—	—	—					
Temperature (degrees C):	15.1	16.5	15.4	14.6					
Specific Cond (mS/cm):	3455	5066	2955	3042					
pH:	11.33	11.56	10.63	8.50					
Turbidity (NTU):	43.1	34.5	109	29.6					
Depth to Water (ft below TOC):	31.03	31.69	31.74	32.02					

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

SAMPLE COLLECTION INFORMATION **SAMPLE DATE:** 6/17/25

Sample No.	Time	Sample No.	Time
MS/MSD Media Sample ID: OCO-GW-MW04-0-250617	1350	Rinse Blank: (Yes)/No OCO-W-MW04-EB-250617	1220
Duplicate: (Yes)/No OCO-GW-MW04-DB-250617	1355	Trip Blank: (Yes)/No OCO-W-TB01-TB-250617	1200
Parameters: Only CS_2		OCO-GW-LY02-0250617	
		Purge and pressurize the LY 3 times prior to sampling.	

COMMENTS

MW-1 30.66
2 31.38
3 31.50
4 31.03

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 PACKAGE

eurofins | Environment Testing

ANALYTICAL REPORT

PREPARED FOR

Attn: Rachel Montalto
Weston Solutions Inc
1400 Weston Way
PO BOX 2653
West Chester, Pennsylvania 19380

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JOB DESCRIPTION

3M Tonawanda

JOB NUMBER

480-230417-1

Eurofins Buffalo
10 Hazelwood Drive
Amherst NY 14228-2298

See page two for job notes and contact information.

Job Notes

This report may not be reproduced except in full, and with written approval from the laboratory. The results relate only to the samples tested. For questions please contact the Project Manager at the e-mail address or telephone number listed on this page.

The test results in this report relate only to the samples as received by the laboratory and will meet all requirements of the methodology, with any exceptions noted. This report shall not be reproduced except in full, without the express written approval of the laboratory. All questions should be directed to the Eurofins Environment Testing Northeast, LLC Project Manager.

Authorization

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Revision 1

Authorized for release by
John Beninati, Project Manager I
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Table of Contents

Definitions/Glossary

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

Job ID: 480-230417-1

Qualifiers

GC/MS 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
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

Job ID: 480-230417-1 Eurofins Buffalo

Job Narrative
480-230417-1

REVISION 1

The report being provided is a revision of the original report sent on 6/25/2025. The report (revision 1) is being revised due to: Client requested laboratory sample #4 be reanalyzed to confirm the original result. Both sets of data have been reported.

Analytical test results meet all requirements of the associated regulatory program listed on the Accreditation/Certification Summary Page unless otherwise noted under the individual analysis. Data qualifiers and/or narrative comments are included to explain any exceptions, if applicable.

- Matrix QC may not be reported if insufficient sample is provided or site-specific QC samples were not submitted. In these situations, to demonstrate precision and accuracy at a batch level, a LCS/LCSD may be performed, unless otherwise specified in the method.
- Surrogate and/or isotope dilution analyte recoveries (if applicable) which are outside of the QC window are confirmed unless attributed to a dilution or otherwise noted in the narrative.

Regulated compliance samples (e.g. SDWA, NPDES) must comply with the associated agency requirements/permits.

Receipt
The samples were received on 6/17/2025 3:02 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 time was 7.2°C.

Receipt Exceptions
The following samples were received at the laboratory outside the required temperature criteria: OCO-GW-MW04-0-250617 (480-230417-1), OCO-GW-MW04-0-250617 (480-230417-1[MS]), OCO-GW-MW04-0-250617 (480-230417-1[MSD]), OCO-GW-MW04-DB-250617 (480-230417-2), OCO-W-MW04-EB-250617 (480-230417-3), OCO-GW-LY02-0-250617 (480-230417-4) and OCO-W-TB01-TB-250617 (480-230417-5). The sample(s) is considered acceptable since it was collected and submitted to the laboratory in a cooler containing ice on the same day and there is evidence that the chilling process has begun.

GC/MS VOA
Method 8260C: The following sample was diluted to bring the concentration of target analytes within the calibration range: OCO-GW-LY02-0-250617 (480-230417-4). Elevated reporting limits (RLs) are provided.

Method 8260C: The following sample was diluted to bring the concentration of target analytes within the calibration range: OCO-GW-LY02-0-250617 (480-230417-4). 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: 480-230417-1

Client Sample ID: OCO-GW-MW04-0-250617 — Lab Sample ID: 480-230417-1

No Detections.

Client Sample ID: OCO-GW-MW04-DB-250617 — Lab Sample ID: 480-230417-2

No Detections.

Client Sample ID: OCO-W-MW04-EB-250617 — Lab Sample ID: 480-230417-3

No Detections.

Client Sample ID: OCO-GW-LY02-0-250617 — Lab Sample ID: 480-230417-4

Analyte	Result	Qualifier	RL	MDL	Unit	Dil Fac	D	Method	Prep Type
Carbon disulfide	130000	E	2000	76	ug/L	400		8260C	Total/NA
Carbon disulfide - DL	140000		50000	1900	ug/L	10000		8260C	Total/NA

Client Sample ID: OCO-W-TB01-TB-250617 — Lab Sample ID: 480-230417-5

No Detections.

This Detection Summary does not include radiochemical test results.

Client Sample ID: OCO-GW-MW04-0-250617

Lab Sample ID: 480-230417-1

Date Collected: 06/17/25 13:50
Matrix: Water
Date Received: 06/17/25 15:02

Method: SW846 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			06/19/25 16:00	1

Surrogate	*%Recovery*	*Qualifier*	*Limits*	*Prepared*	*Analyzed*	*Dil Fac*
1,2-Dichloroethane-d4 (Surr)	*107*		*77 - 120*		*06/19/25 16:00*	*1*
Toluene-d8 (Surr)	*101*		*80 - 120*		*06/19/25 16:00*	*1*
4-Bromofluorobenzene (Surr)	*113*		*73 - 120*		*06/19/25 16:00*	*1*
Dibromofluoromethane (Surr)	*109*		*75 - 123*		*06/19/25 16:00*	*1*

Client Sample ID: OCO-GW-MW04-DB-250617

Lab Sample ID: 480-230417-2

Date Collected: 06/17/25 13:55
Matrix: Water
Date Received: 06/17/25 15:02

Method: SW846 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			06/19/25 16:22	1

Surrogate	*%Recovery*	*Qualifier*	*Limits*	*Prepared*	*Analyzed*	*Dil Fac*
1,2-Dichloroethane-d4 (Surr)	*109*		*77 - 120*		*06/19/25 16:22*	*1*
Toluene-d8 (Surr)	*103*		*80 - 120*		*06/19/25 16:22*	*1*
4-Bromofluorobenzene (Surr)	*111*		*73 - 120*		*06/19/25 16:22*	*1*
Dibromofluoromethane (Surr)	*111*		*75 - 123*		*06/19/25 16:22*	*1*

Client Sample ID: OCO-W-MW04-EB-250617

Lab Sample ID: 480-230417-3

Date Collected: 06/17/25 12:20
Matrix: Water
Date Received: 06/17/25 15:02

Method: SW846 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			06/19/25 16:44	1

Surrogate	*%Recovery*	*Qualifier*	*Limits*	*Prepared*	*Analyzed*	*Dil Fac*
1,2-Dichloroethane-d4 (Surr)	*109*		*77 - 120*		*06/19/25 16:44*	*1*
Toluene-d8 (Surr)	*105*		*80 - 120*		*06/19/25 16:44*	*1*
4-Bromofluorobenzene (Surr)	*112*		*73 - 120*		*06/19/25 16:44*	*1*
Dibromofluoromethane (Surr)	*111*		*75 - 123*		*06/19/25 16:44*	*1*

Client Sample ID: OCO-GW-LY02-0-250617

Lab Sample ID: 480-230417-4

Date Collected: 06/17/25 14:30
Matrix: Water
Date Received: 06/17/25 15:02

Method: SW846 8260C - Volatile Organic Compounds by GC/MS

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Carbon disulfide	**130000**	**E**	2000	76	ug/L			06/19/25 17:07	400

Surrogate	*%Recovery*	*Qualifier*	*Limits*	*Prepared*	*Analyzed*	*Dil Fac*
1,2-Dichloroethane-d4 (Surr)	*109*		*77 - 120*		*06/19/25 17:07*	*400*
Toluene-d8 (Surr)	*103*		*80 - 120*		*06/19/25 17:07*	*400*
4-Bromofluorobenzene (Surr)	*113*		*73 - 120*		*06/19/25 17:07*	*400*
Dibromofluoromethane (Surr)	*112*		*75 - 123*		*06/19/25 17:07*	*400*

Client Sample ID: OCO-GW-LY02-0-250617

Lab Sample ID: 480-230417-4

Date Collected: 06/17/25 14:30

Matrix: Water

Date Received: 06/17/25 15:02

Method: SW846 8260C - Volatile Organic Compounds by GC/MS - DL

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Carbon disulfide	140000		50000	1900	ug/L			07/01/25 16:23	10000

Surrogate	*%Recovery*	*Qualifier*	*Limits*	*Prepared*	*Analyzed*	*Dil Fac*
1,2-Dichloroethane-d4 (Surr)	*105*		*77 - 120*		*07/01/25 16:23*	*10000*
Toluene-d8 (Surr)	*103*		*80 - 120*		*07/01/25 16:23*	*10000*
4-Bromofluorobenzene (Surr)	*90*		*73 - 120*		*07/01/25 16:23*	*10000*
Dibromofluoromethane (Surr)	*94*		*75 - 123*		*07/01/25 16:23*	*10000*

Client Sample ID: OCO-W-TB01-TB-250617

Lab Sample ID: 480-230417-5

Date Collected: 06/17/25 12:00

Matrix: Water

Date Received: 06/17/25 15:02

Method: SW846 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			06/19/25 17:29	1

Surrogate	*%Recovery*	*Qualifier*	*Limits*	*Prepared*	*Analyzed*	*Dil Fac*
1,2-Dichloroethane-d4 (Surr)	*108*		*77 - 120*		*06/19/25 17:29*	*1*
Toluene-d8 (Surr)	*106*		*80 - 120*		*06/19/25 17:29*	*1*
4-Bromofluorobenzene (Surr)	*113*		*73 - 120*		*06/19/25 17:29*	*1*
Dibromofluoromethane (Surr)	*112*		*75 - 123*		*06/19/25 17:29*	*1*

Surrogate Summary

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

Job ID: 480-230417-1

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)
480-230417-1	OCO-GW-MW04-0-250617	107	101	113	109
480-230417-1 MS	OCO-GW-MW04-0-250617	104	103	107	106
480-230417-1 MSD	OCO-GW-MW04-0-250617	106	104	109	107
480-230417-2	OCO-GW-MW04-DB-250617	109	103	111	111
480-230417-3	OCO-W-MW04-EB-250617	109	105	112	111
480-230417-4	OCO-GW-LY02-0-250617	109	103	113	112
480-230417-4 - DL	OCO-GW-LY02-0-250617	105	103	90	94
480-230417-5	OCO-W-TB01-TB-250617	108	106	113	112
LCS 480-749319/6	Lab Control Sample	105	104	111	106
LCS 480-750593/6	Lab Control Sample	102	99	89	88
MB 480-749319/8	Method Blank	109	102	110	110
MB 480-750593/8	Method Blank	100	101	88	87

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 480-749319/8
Matrix: Water
Analysis Batch: 749319

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

Analyte	MB Result	MB Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Carbon disulfide	ND		5.0	0.19	ug/L			06/19/25 09:17	1

Surrogate	*MB %Recovery*	*MB Qualifier*	*Limits*	*Prepared*	*Analyzed*	*Dil Fac*
1,2-Dichloroethane-d4 (Surr)	*109*		*77 - 120*		*06/19/25 09:17*	*1*
Toluene-d8 (Surr)	*102*		*80 - 120*		*06/19/25 09:17*	*1*
4-Bromofluorobenzene (Surr)	*110*		*73 - 120*		*06/19/25 09:17*	*1*
Dibromofluoromethane (Surr)	*110*		*75 - 123*		*06/19/25 09:17*	*1*

Lab Sample ID: LCS 480-749319/6
Matrix: Water
Analysis Batch: 749319

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	21.3		ug/L		85	59 - 134		

Surrogate	*LCS %Recovery*	*LCS Qualifier*	*Limits*
1,2-Dichloroethane-d4 (Surr)	*105*		*77 - 120*
Toluene-d8 (Surr)	*104*		*80 - 120*
4-Bromofluorobenzene (Surr)	*111*		*73 - 120*
Dibromofluoromethane (Surr)	*106*		*75 - 123*

Lab Sample ID: 480-230417-1 MS
Matrix: Water
Analysis Batch: 749319

Client Sample ID: OCO-GW-MW04-0-250617
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	26.9		ug/L		108	59 - 134		

Surrogate	*MS %Recovery*	*MS Qualifier*	*Limits*
1,2-Dichloroethane-d4 (Surr)	*104*		*77 - 120*
Toluene-d8 (Surr)	*103*		*80 - 120*
4-Bromofluorobenzene (Surr)	*107*		*73 - 120*
Dibromofluoromethane (Surr)	*106*		*75 - 123*

Lab Sample ID: 480-230417-1 MSD
Matrix: Water
Analysis Batch: 749319

Client Sample ID: OCO-GW-MW04-0-250617
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	26.5		ug/L		106	59 - 134	2	15

Surrogate	*MSD %Recovery*	*MSD Qualifier*	*Limits*
1,2-Dichloroethane-d4 (Surr)	*106*		*77 - 120*
Toluene-d8 (Surr)	*104*		*80 - 120*
4-Bromofluorobenzene (Surr)	*109*		*73 - 120*
Dibromofluoromethane (Surr)	*107*		*75 - 123*

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

Lab Sample ID: MB 480-750593/8
Matrix: Water
Analysis Batch: 750593

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			07/01/25 15:48	1

Surrogate	*MB %Recovery*	*MB Qualifier*	*Limits*	*Prepared*	*Analyzed*	*Dil Fac*
1,2-Dichloroethane-d4 (Surr)	*100*		*77 - 120*		*07/01/25 15:48*	*1*
Toluene-d8 (Surr)	*101*		*80 - 120*		*07/01/25 15:48*	*1*
4-Bromofluorobenzene (Surr)	*88*		*73 - 120*		*07/01/25 15:48*	*1*
Dibromofluoromethane (Surr)	*87*		*75 - 123*		*07/01/25 15:48*	*1*

Lab Sample ID: LCS 480-750593/6
Matrix: Water
Analysis Batch: 750593

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)	*99*		*80 - 120*
4-Bromofluorobenzene (Surr)	*89*		*73 - 120*
Dibromofluoromethane (Surr)	*88*		*75 - 123*

QC Association Summary

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

Job ID: 480-230417-1

GC/MS VOA

Analysis Batch: 749319

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
480-230417-1	OCO-GW-MW04-0-250617	Total/NA	Water	8260C	
480-230417-2	OCO-GW-MW04-DB-250617	Total/NA	Water	8260C	
480-230417-3	OCO-W-MW04-EB-250617	Total/NA	Water	8260C	
480-230417-4	OCO-GW-LY02-0-250617	Total/NA	Water	8260C	
480-230417-5	OCO-W-TB01-TB-250617	Total/NA	Water	8260C	
MB 480-749319/8	Method Blank	Total/NA	Water	8260C	
LCS 480-749319/6	Lab Control Sample	Total/NA	Water	8260C	
480-230417-1 MS	OCO-GW-MW04-0-250617	Total/NA	Water	8260C	
480-230417-1 MSD	OCO-GW-MW04-0-250617	Total/NA	Water	8260C	

Analysis Batch: 750593

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
480-230417-4 - DL	OCO-GW-LY02-0-250617	Total/NA	Water	8260C	
MB 480-750593/8	Method Blank	Total/NA	Water	8260C	
LCS 480-750593/6	Lab Control Sample	Total/NA	Water	8260C	

Lab Chronicle

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

Job ID: 480-230417-1

Client Sample ID: OCO-GW-MW04-0-250617 — Lab Sample ID: 480-230417-1

Date Collected: 06/17/25 13:50 — **Matrix: Water**
Date Received: 06/17/25 15:02

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Analyst	Lab	Prepared or Analyzed
Total/NA	Analysis	8260C		1	749319	AXK	EET BUF	06/19/25 16:00

Client Sample ID: OCO-GW-MW04-DB-250617 — Lab Sample ID: 480-230417-2

Date Collected: 06/17/25 13:55 — **Matrix: Water**
Date Received: 06/17/25 15:02

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Analyst	Lab	Prepared or Analyzed
Total/NA	Analysis	8260C		1	749319	AXK	EET BUF	06/19/25 16:22

Client Sample ID: OCO-W-MW04-EB-250617 — Lab Sample ID: 480-230417-3

Date Collected: 06/17/25 12:20 — **Matrix: Water**
Date Received: 06/17/25 15:02

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Analyst	Lab	Prepared or Analyzed
Total/NA	Analysis	8260C		1	749319	AXK	EET BUF	06/19/25 16:44

Client Sample ID: OCO-GW-LY02-0-250617 — Lab Sample ID: 480-230417-4

Date Collected: 06/17/25 14:30 — **Matrix: Water**
Date Received: 06/17/25 15:02

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Analyst	Lab	Prepared or Analyzed
Total/NA	Analysis	8260C	DL	10000	750593	ATG	EET BUF	07/01/25 16:23
Total/NA	Analysis	8260C		400	749319	AXK	EET BUF	06/19/25 17:07

Client Sample ID: OCO-W-TB01-TB-250617 — Lab Sample ID: 480-230417-5

Date Collected: 06/17/25 12:00 — **Matrix: Water**
Date Received: 06/17/25 15:02

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Analyst	Lab	Prepared or Analyzed
Total/NA	Analysis	8260C		1	749319	AXK	EET BUF	06/19/25 17:29

Laboratory References:

EET BUF = Eurofins 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: 480-230417-1

Laboratory: Eurofins Buffalo

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

Authority	Program	Identification Number	Expiration Date
New York	NELAP	10026	03-31-26

Method Summary

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

Job ID: 480-230417-1

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

Protocol References:

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

Laboratory References:

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

Sample Summary

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

Job ID: 480-230417-1

Lab Sample ID	Client Sample ID	Matrix	Collected	Received
480-230417-1	OCO-GW-MW04-0-250617	Water	06/17/25 13:50	06/17/25 15:02
480-230417-2	OCO-GW-MW04-DB-250617	Water	06/17/25 13:55	06/17/25 15:02
480-230417-3	OCO-W-MW04-EB-250617	Water	06/17/25 12:20	06/17/25 15:02
480-230417-4	OCO-GW-LY02-0-250617	Water	06/17/25 14:30	06/17/25 15:02
480-230417-5	OCO-W-TB01-TB-250617	Water	06/17/25 12:00	06/17/25 15:02

Phone (716) 691 2600

Chain of Custody Record

Eurofins | Environment Testing America

Client Information	Sampler: Greg Flasinski	Lab PM: Brian Fischer	Carrier Tracking No(s): Hand delivered	COC No:
Client Contact: Greg Flasinski	Phone: 610 721 0583	E-Mail: Brian.Fischer@et.eurofinsus.com	State of Origin: NY	Page: 1 of 1
Company: Weston Solutions	PWSID:			Job #:
Address: 1400 Weston Way	Due Date Requested:			
City: West Chester	TAT Requested (days):			
State, Zip: PA 19380	Compliance Project: Δ Yes Δ No			
Phone: 610 701 3428	PO #:			
Email: greg.flasinski@westonsolutions.com NATACC.DATA@westonsolutions.com	WO #: 02181.086.034.0002			
Project Name: 3M Tonawanda	Project #: 48003524			
Site: Tonawanda	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 - Carbon Disulfide	8260C - Carbon Disulfide	Total Number of containers	Special Instructions/Note:
			Preservation Code:				A	N		
OCO-GW-MW04-0-250617	6/17/25	1350	G	Water		X	9		9	MS/MSD
OCO-GW-MW04-DB-250617	6/17/25	1355	G	Water			3		3	Field duplicate
OCO-W-MW04-EB-250617	6/17/25	1220	G	Water			3		3	Equipment blank
OCO-GW-LY02-0-250617	6/17/25	1430	G	Water			3		3	
OCO-W-TB01-TB-250617	6/17/25	1200	G	Water			2		2	Trip blank

480-230417 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: CS_2 only 5 ppb detection

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

	Relinquished by	Date/Time	Company	Received by	Date/Time	Company
	Relinquished by:	Date/Time: 6/17/25 1502	Company: Weston	Received by:	Date/Time: 6-17-25 1502	Company: TAB
	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: 7.2 FR #SC FLT

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7/2/2025 (Rev. 1)

Login Sample Receipt Checklist

Client: Weston Solutions Inc

Job Number: 480-230417-1

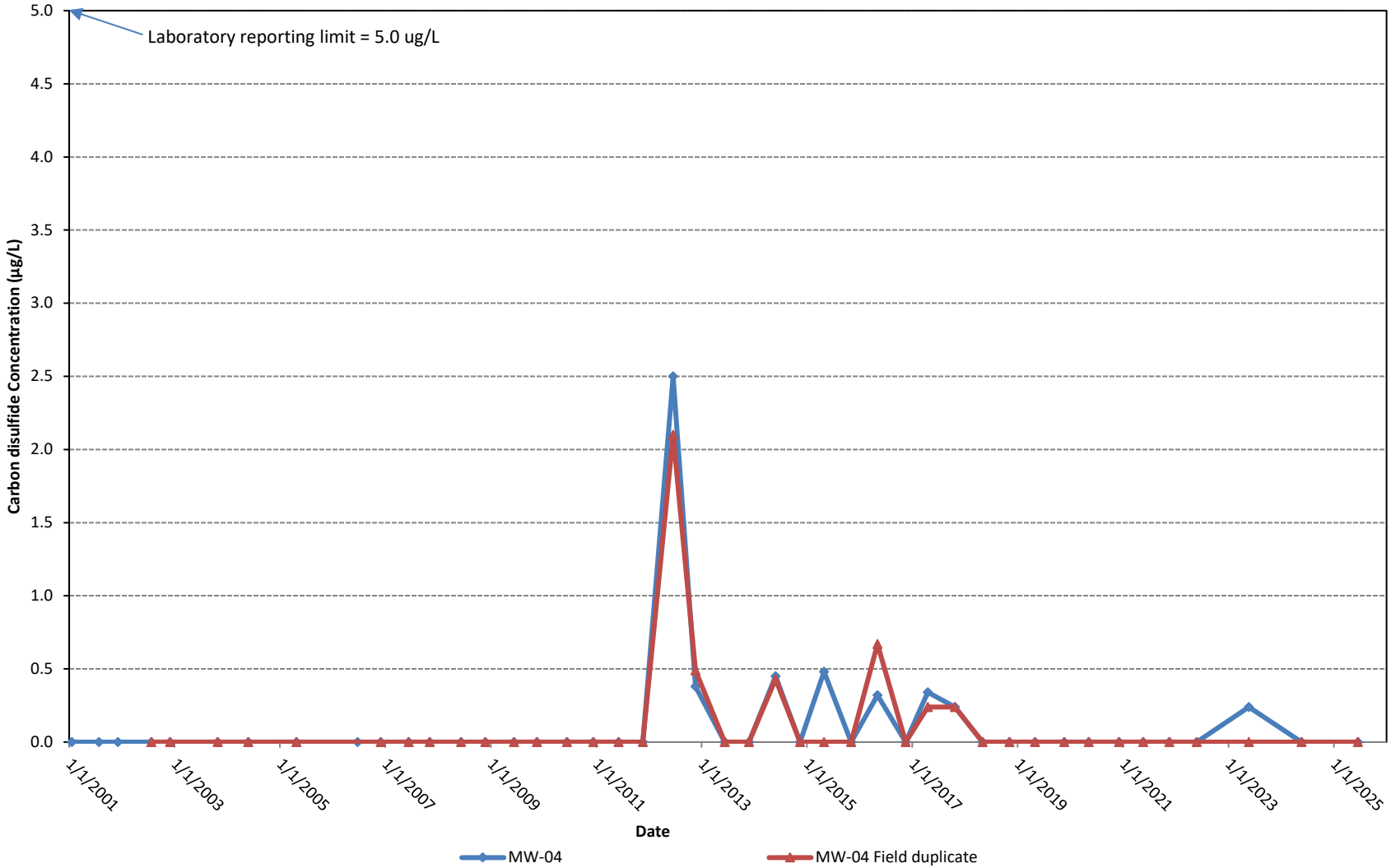
Login Number: 230417
List Number: 1
Creator: Stapleton, Kaitlyn

List Source: Eurofins Buffalo

Question	Answer	Comment
Radioactivity either was not measured or, if measured, is at or below background	True	
The cooler's custody seal, if present, is intact.	True	
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	True	
Cooler Temperature is acceptable.	True	
Cooler Temperature is recorded.	True	7.2 IR#SC ice
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 Solutions
Samples received within 48 hours of sampling.	True	
Samples requiring field filtration have been filtered in the field.	True	
Chlorine Residual checked.	N/A	

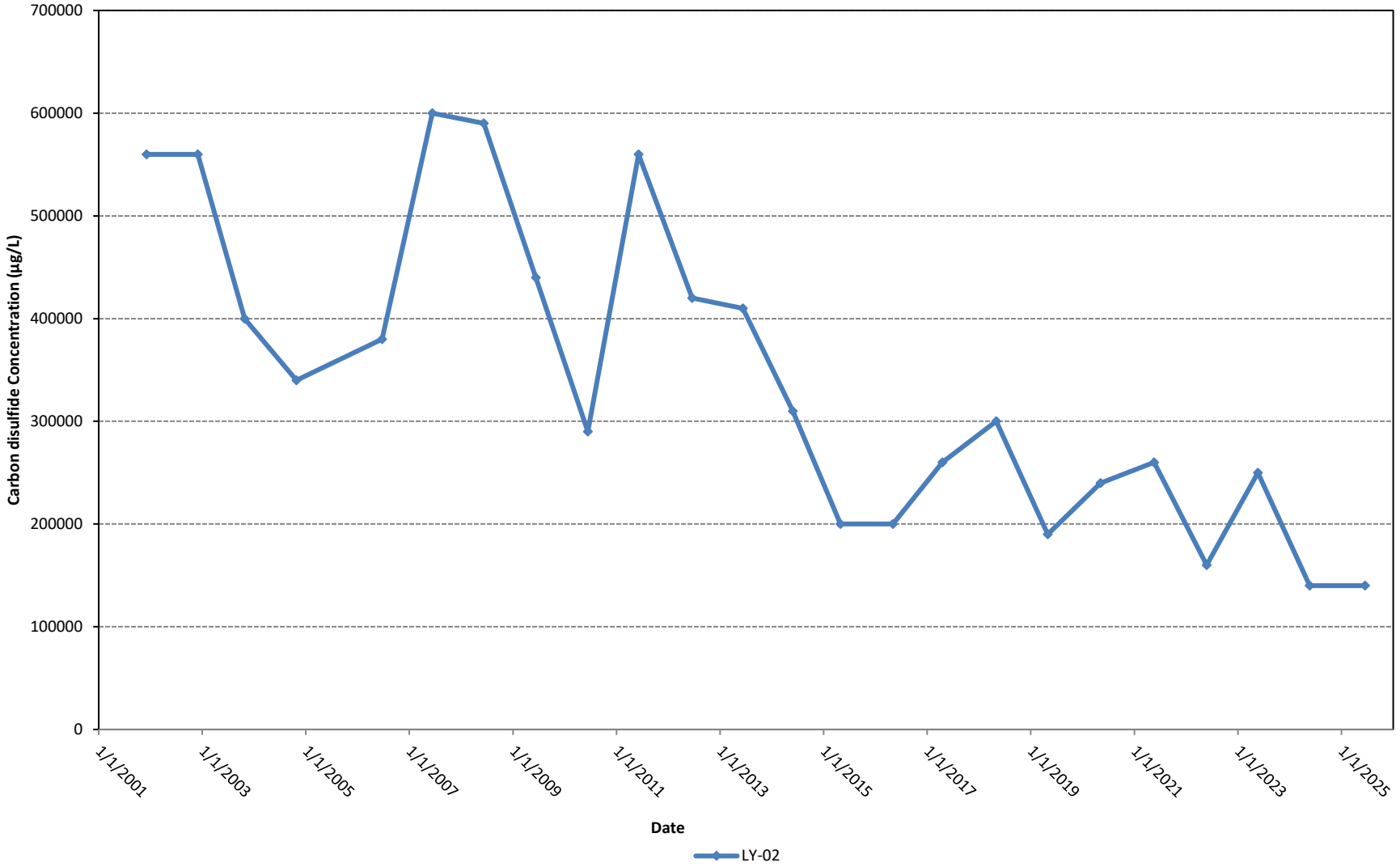
ATTACHMENT D
HISTORICAL DATA (2001 – 2025) TRENDLINE PLOTS

Attachment D: Figure 1
Carbon Disulfide Concentrations
Groundwater Monitoring Well MW-04
3M O-Cel-O Sponge Site, Tonawanda, New York

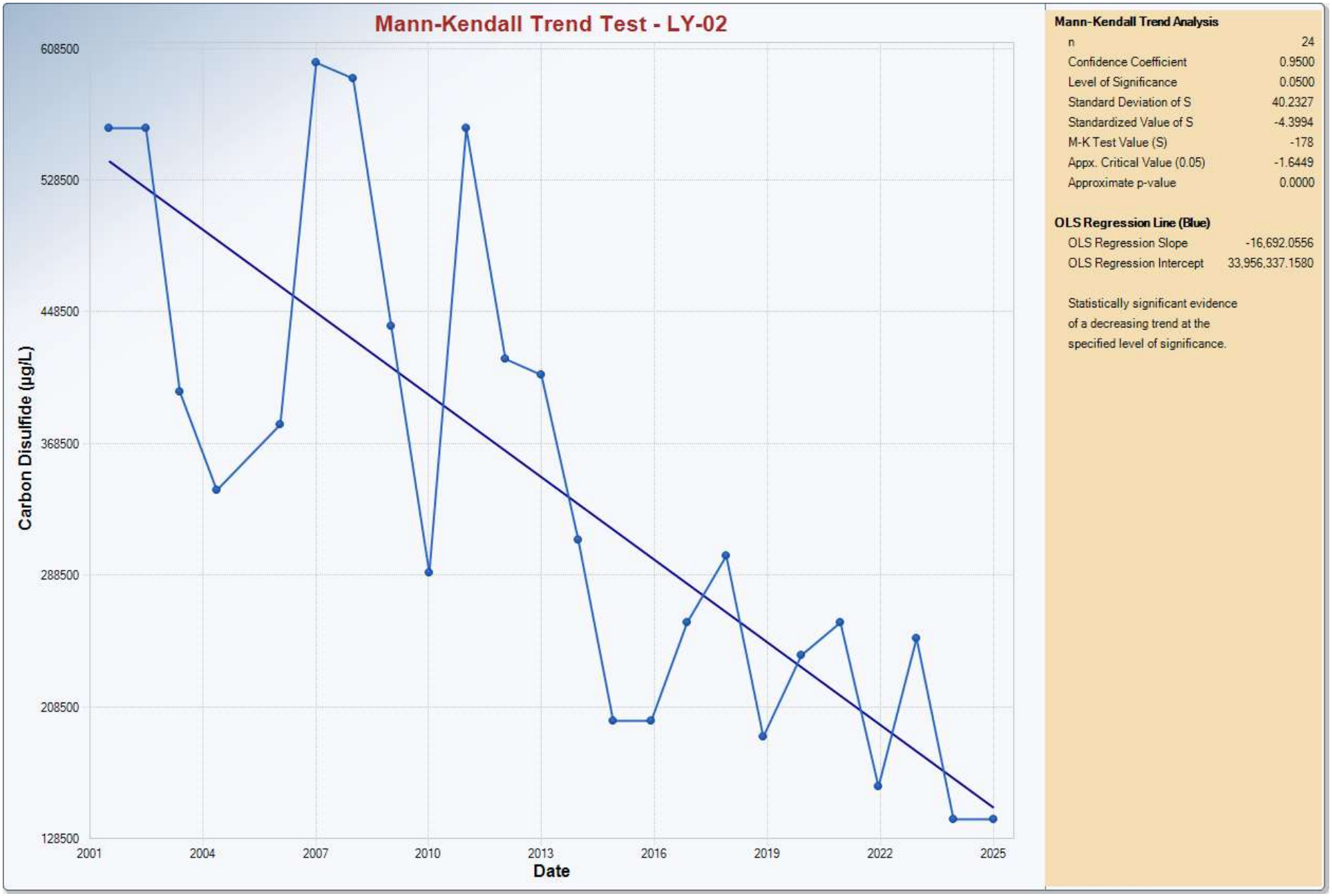


Note: Carbon disulfide was detected in the April 2005 MW-04 primary and duplicate samples ar 58 and 25 µg/L, respectively. These results were determined to be anomolous as documented in the May 23, 2005 Progress Review Report (reporting period November 1, 2004 to April 30, 2005) and are excluded from this chart.

Attachment D: Figure 2
Carbon Disulfide Concentrations
Lysimeter LY-02
3M O-Cel-O Sponge Site, Tonawanda, New York



ATTACHMENT E
STATISTICAL OUTPUT


Mann-Kendall Trend Test - LY-02
608500
528500
448500
368500
288500
208500
128500
Carbon Disulfide (µg/L)
2001
2004
2007
2010
2013
2016
2019
2022
2025
Date
Mann-Kendall Trend Analysis
n 24
Confidence Coefficient 0.9500
Level of Significance 0.0500
Standard Deviation of S 40.2327
Standardized Value of S -4.3994
M-K Test Value (S) -178
Appx. Critical Value (0.05) -1.6449
Approximate p-value 0.0000
OLS Regression Line (Blue)
OLS Regression Slope -16,692.0556
OLS Regression Intercept 33,956,337.1580
Statistically significant evidence of a decreasing trend at the specified level of significance.

ATTACHMENT F
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, 2025 to February 14, 2026

	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 Andres Parra (print name) at 305 Sawyer Avenue, Tonawanda NY 14150 (print business address),

am certifying as 3M Plant Director (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

2/20/26
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 at Weston Solutions, Inc.
1400 Weston Way
West Chester, PA 19380,

print name — print business address

am certifying as a Qualified Environmental Professional for the Owner

(Owner or Remedial Party)

Thomas Drew — _____ — 3/10/2026

Signature of Qualified Environmental Professional, for the Owner or Remedial Party, Rendering Certification — Stamp (Required for PE) — Date