

Taylor, Sheree L.

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**From:** Joe Minor  
**Sent:** August 25, 2012 9:29 PM  
**To:** clerk@hamilton.ca  
**Subject:** PFOS: Transport Canada  
**Attachments:** transport.pdf

>  
> To: The Mayor and All Members of Council c/o the Clerk  
>  
> Please include this communication in the next official (publicly  
> accessible) information package for Hamilton City Council.  
>  
> This attachment is the letter from the Minister of Transport.  
>  
> Thanks,  
>  
> Joe Minor

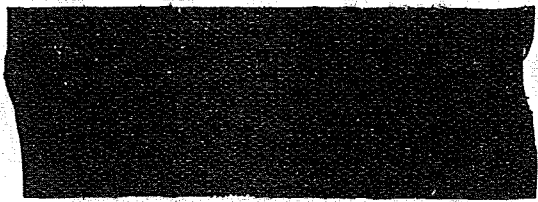
Ministre des Transports,  
de l'Infrastructure et des Collectivités  
et ministre de l'Agence de développement  
économique du Canada pour les régions du Québec



Minister of Transport,  
Infrastructure and Communities  
and Minister of the Economic Development Agency  
of Canada for the Regions of Quebec

Ottawa, Canada K1A 0N5

JUL 30 2012



Dear Mr. Minor:

I am writing in response to the petition that you sent to the Office of the Commissioner of the Environment and Sustainable Development, dated March 27, 2012, regarding your request for federal assistance in dealing with Perfluorocarbon (PFC) contamination (including PFOS and PFECHS) at the Hamilton International Airport (Ontario, Canada) pursuant to Section 22 of the *Auditor General Act*.

Your petition has been reviewed in relation to Transport Canada's mandate. I understand that the Minister of the Environment, the President of the Treasury Board and Minister for the Asia-Pacific Gateway, the Minister of Health, the Minister of Fisheries and Oceans, the Minister of Public Works and Government Services, and the Minister of National Defence will also respond to your letter according to their mandate and legislative responsibilities.

With respect to Transport Canada's area of responsibility, I am pleased to offer responses to questions 1, 2, 8 and 9 as well as your supplementary questions (SQ1-3), received via email following the receipt of the petition. Regarding the questions addressed to Transport Canada, I am pleased to offer the attached information.

Thank you for bringing your concerns to the Commissioner of the Environment and Sustainable Development. I trust, as they relate to Transport Canada, that the foregoing has clarified your questions regarding the presence of PFC and PFOS at the Hamilton International Airport.

Yours sincerely,

Denis Lebel, P.C., M.P

## ENVIRONMENTAL PETITION # 332

| Q# | Question  | Answers  |
|----|---|--|
| Q1 | <p>Will the federal government (including Transport Canada and any other departments that might have relevant information) please provide whatever information it can with respect to when, where, and how much PFCs were used at Hamilton International Airport?</p> | <p>From 1965 to 1996, the airport was leased to the City of Hamilton. In 1996, ownership of Hamilton International Airport was transferred to the Regional Municipality of Hamilton Wentworth. As such, Transport Canada has limited records for the Hamilton International Airport.</p> <p>Historically, there were two former Fire Training Areas at the airport. The initial Fire Training Area (FTA1) was used from 1965 until 1984. The second Fire Training Area (FTA2) was constructed in 1985 and was used until 1994. A map showing the locations of these Fire Training Areas is attached in Annex 1.</p> <p>Prior to the closure in 1994, FTA2 was used to conduct training for Transport Canada and Hamilton International Airport fire fighters.</p> <p>A 1994 Interim Surface and Groundwater Monitoring Program at the Hamilton International Airport Fire Training Area report, prepared by Decommissioning Consulting Services Limited, indicated that 16,296 litres of Aqueous Film Forming Foam (AFFF) was used during fire training activities in 1993 at the Hamilton International Airport. Table 2.4, which includes an inventory of fuels and fire fighting materials used in 1993 from the 1994 report, is attached in Annex 2. Transport Canada does not have a copy of the final report. The final report is mentioned in the 2011 Initial Subsurface Investigation Perfluorooctane Sulfonate (PFOS) and Perfluorooctanoate (PFOA) prepared by Exp Services Inc. for the Hamilton International Airport. It is suggested to contact the City of Hamilton or the Hamilton International Airport directly to obtain a copy of the report.</p> |

Q2

Will the federal government (including Transport Canada, Environment Canada and any other departments that might have relevant information (e.g., the Pesticide Management Regulatory Agency?)) please use their technical expertise to help us understand what PFCs were used at the airport after ownership was transferred?

**Transport Canada as Regulatory Authority & Information from Airport Regulators**

It would be useful to know the regulations regarding AFFF's and AHF's and how they have changed with time.

Part of the problem facing current investigations is the current airport operator does not know what is in the formulation they stock, in part because they are "trade secrets". Transport Canada should know, or be able to find out, what these formulations are.

As a result of the ownership transfer in 1996 to the Regional Municipality of Hamilton Wentworth, Transport Canada has no record of PFCs used at Hamilton International Airport after that year. Note that the Fire Training Area was closed in 1994.

With respect to live fire training exercises and the use of AFFF, from 1981 to 1996 these exercises were conducted at airports owned by Transport Canada in accordance with the *Airport Emergency Services Firefighter Training Policy and Aircraft Emergency and Fire Training Manual Part II*. The policy required that the minimum annual training materials allotment for firefighter personnel was Foam 450 litres protein and/or 340 litres AFFF, and are attached in Annex 3.

After 1996, live fire training exercises were regulated under Part III of the *Canadian Aviation Regulations (CARs)*, Subpart 303 – Aircraft Rescue and Fire fighting at Airports and Aerodromes – which replaced the *Airport Emergency Firefighter Training Policy and Fire Training Manual Part II*. Firefighter training requirements are documented in CAR 303, Division III–Personnel Requirements–and must be conducted in accordance with the referenced Standard 323 –Aircraft Fire Fighting at Airports and Aerodromes – with specific reference to 323.14–Training of Personnel–, in particular 323.14(2)(xi)

CAR 303 can be found on the Transport Canada website at: <http://www.tc.gc.ca/eng/civilaviation/regserv/cars/part3-subpart3-157.htm>

CAR 323 can be found on the Transport Canada website at: <http://www.tc.gc.ca/eng/civilaviation/regserv/cars/part3-standards-323-1022.htm>

The 1994 Interim Surface and Groundwater Monitoring Program at the Hamilton International Airport Fire Training Area report, prepared by Decommissioning Consulting Services Limited, included a table of the approximate chemical composition, as well as a copy of the Material Safety Data Sheets (MSDSs) for the AFFFs, namely FC206 (3M Canada Inc.) and 6% AFFF–Government (Angus Fire Amour Ltd). The volume of AFFF referenced in Table 2.4 in Question 1 does not specify the type of AFFF used. A copy of Table 2.2 and the MSDSs for the AFFFs from the 1994 report are attached in Annex 4.

With respect to Aviation Hydraulic Fluids, specifics on the fluid formulations are not known. The CARs Part V, Chapter 525 of the *Airworthiness Manual*, Subchapter F, section 525.1435 *Hydraulic Systems*, article (b)(5) states that each hydraulic system shall be designed to use any suitable hydraulic fluid specified by the airplane manufacturer. For information on the formulations, aircraft manufacturers may be contacted directly.

CAR 525 can be found on the Transport Canada website at: <http://www.tc.gc.ca/eng/civilaviation/regserv/cars/part5-standards-525-sub-f-1742.htm>

|           |  |   |
|-----------|--|---|
| <p>Q8</p> | <p>Will the federal government (Transport Canada, Public works and Government Services Canada, Real Property Institute of Canada, Environment Canada) please use its experience with contaminated sites and their clean up to assist with the cleanup of the toxic mess at Hamilton International Airport?</p> | <p>Transport Canada works with other departments, including Health Canada and Environment Canada, to protect human health and the environment associated with contaminated sites. As a member of the Federal Contaminated Sites Action Plan working group, Transport Canada participates in various meetings and conferences, such as the recent Real Property Institute of Canada (RPIC) Federal Contaminated Sites National Workshop held on April 30-May 3, 2012, This forum provides an opportunity for federal departments to discuss and share their experiences concerning various contaminated site issues and remedial options. At the recent RPIC workshop, an environmental consultant, on behalf of Transport Canada, delivered a presentation on PFCs and a poster abstract. A copy of the presentation and poster are attached in Annex 5.</p> <p>Transport Canada is currently reviewing the situation at Hamilton International Airport and will make a decision on its involvement with any cleanup after completing its review.</p>   |
| <p>Q9</p> | <p>Will the federal government (e.g., Transport Canada, RCAF, Public works and Government Services Canada, Real Property Institute of Canada, Environment Canada) please make its best efforts to publicly identify other locations contaminated with PFOS?</p>  | <p>As a federal department, Transport Canada is required to provide information regarding its contaminated sites on the Federal Contaminated Sites Inventory (FCSI) in compliance with the Treasury Board Reporting Standard on Real Property. TC uses the FCSI to publicly identify its known contaminated sites. Sufficient information needs to be known about a site to confirm whether or not it is considered contaminated. According to the Treasury Board Policy on the Management of Real Property, a contaminated site is a site at which substances occur at concentrations that: (1) are above background levels and pose, or are likely to pose, an immediate or long-term hazard to human health or the environment, or (2) exceed the levels specified in policies and regulations.</p> <p>Given that PFOS is an emerging contaminant, soil and groundwater guidelines/standards to assess an immediate or long-term hazard to human health or the environment, or to determine exceedences of contaminant levels are not available. Moreover, recent sampling and analytical studies of groundwater have indicated that concentration levels of PFOS have been difficult to accurately quantify. Sound sampling and analytical procedures are necessary to ensure data collected is scientifically defensible. The department is working closely with Health Canada and Environment Canada to establish national guidance on PFOS management for the purpose of assessing an immediate or long-term hazard to human health or the environment. TC is reviewing the circumstances in which this substance may have been used at Canadian airports.</p> <p>As part of this response, TC is providing a list of sites that have confirmed the presence of PFOS in Annex 6, recognizing that these sites are not identified on the FCSI in relation to PFOS, due to the preceding issues.</p> |



|            |  |   |
|------------|--|---|
| <p>SQ2</p> | <p>I am interested in knowing:</p> <ol style="list-style-type: none"> <li>1) Is PFOS (perfluorooctane sulfonate) a contaminant on "FCSI Site Number 08708009"?</li> <li>2) Is "FCSI Site Number 08708009" the site in "eastern Ontario" that is referred to in the following abstract: <a href="http://www.rpic-ibic.ca/downloads/FCS_2012/2012_PosterAbstracts.pdf">http://www.rpic-ibic.ca/downloads/FCS_2012/2012_PosterAbstracts.pdf</a></li> <li>3) If "FCSI Site Number 08708009" is not the same as the site referred to by Mr.Tarnocai, could you please put me in contact with someone who would know where the site referred to in the abstract is? (Mr.Tarnocai was not cooperative on this matter.)</li> </ol>   | <ol style="list-style-type: none"> <li>1) PFOS has been detected at FCSI Site Number 08708009- Ottawa Macdonald-Cartier International Airport, former DND Fire Training Area.</li> <li>2) FCSI Site Number 08708009 is not the site in "eastern Ontario" referred to in the abstract. The site mentioned in the abstract is located at CFB Trenton and is under the purview of the Department of National Defence (DND).</li> <li>3) DND advises that inquiries regarding this site should be directed to Major Holly Apostoliuk, Department of National Defence, at 204-833-2500 extension 2030.</li> </ol>  |
| <p>SQ3</p> | <p>I am interested in more information about "Contaminated Site N0033001".</p> <ol style="list-style-type: none"> <li>1) Is/was this site contaminated with PFOS? It appears that \$2,120,435.86 was spent on remediation at this site.</li> <li>2) Was all of this federal money?</li> <li>3) If not, how much was federal money?</li> <li>4) Where can I find out more information about what remedial actions were done at this site, and see data regarding their effectiveness?</li> <li>5) Is this site the same site that is described in the following link as being in the "interior of British Columbia"? <a href="http://www.rpic-ibic.ca/downloads/FCS_2012/2012_PosterAbstracts.pdf">http://www.rpic-ibic.ca/downloads/FCS_2012/2012_PosterAbstracts.pdf</a></li> </ol> | <p>FCSI Site Number N0033001-Williams Lake Airport</p> <ol style="list-style-type: none"> <li>1) During the hydrocarbon cleanup of the Williams Lake Airport former fire training area (FTA), Transport Canada discovered the existence of PFOS. Upon this discovery, Transport Canada completed an assessment to determine risks to human health and the environment. In the absence of PFOS environmental quality standards/guidelines, risk-based targets for specific PFCs were developed. Results of the assessment indicated that due to the subsurface conditions, there is no risk to human or ecological receptors at the site.</li> </ol> <p>Transport Canada has not done any specific remediation of PFOS at the Williams Lake Airport. To date, Transport Canada has spent \$2.9M to remediate the hydrocarbon contamination at the fire training area at Williams Lake Airport.</p> <ol style="list-style-type: none"> <li>2) Yes, all of the expenditures reported in the Federal Contaminated Sites Inventory for Site Number N0033001 were from federal funding.</li> <li>3) Response provided in question SQ3-2.</li> <li>4) Remedial work at the site began in 2005 with the installation of a remediation extraction system designed to remove liquid hydrocarbons (fuel). The vacuum enhanced extraction system has been operated annually. Liquid hydrocarbons were targeted for removal since they are capable of migrating underground. The most recent monitoring data indicates that the liquid hydrocarbons have been effectively removed. We are currently finalizing a risk management plan in preparation to decommission the extraction system.</li> <li>5) Yes, this is the same site.</li> </ol> |

|  |   |                                       |
|--|---|---------------------------------------|
|  | <p>6) If the site from the link is a different site, then could you please let me know the location of the "interior of British Columbia" site?</p> | <p>6) Yes, this is the same site.</p> |
|--|---|---------------------------------------|



**Taylor, Sheree L.**

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**From:** Joe Minor [jminor@cogeco.ca]  
**Sent:** August 25, 2012 10:18 PM  
**To:** clerk@hamilton.ca  
**Subject:** PFOS: Transport Canada Annexes 1-3  
**Attachments:** Annex123.pdf

>  
>>  
>> To: The Mayor and All Members of Council c/o the Clerk  
>>  
>> Please include this communication in the next official (publicly  
>> accessible) information package for Hamilton City Council.  
>>  
>> This attachment contains supplemental information (Annexes 1-3) from  
>> the Minister of Transport.  
>>  
>> Thanks,  
>>  
>> Joe Minor  
>

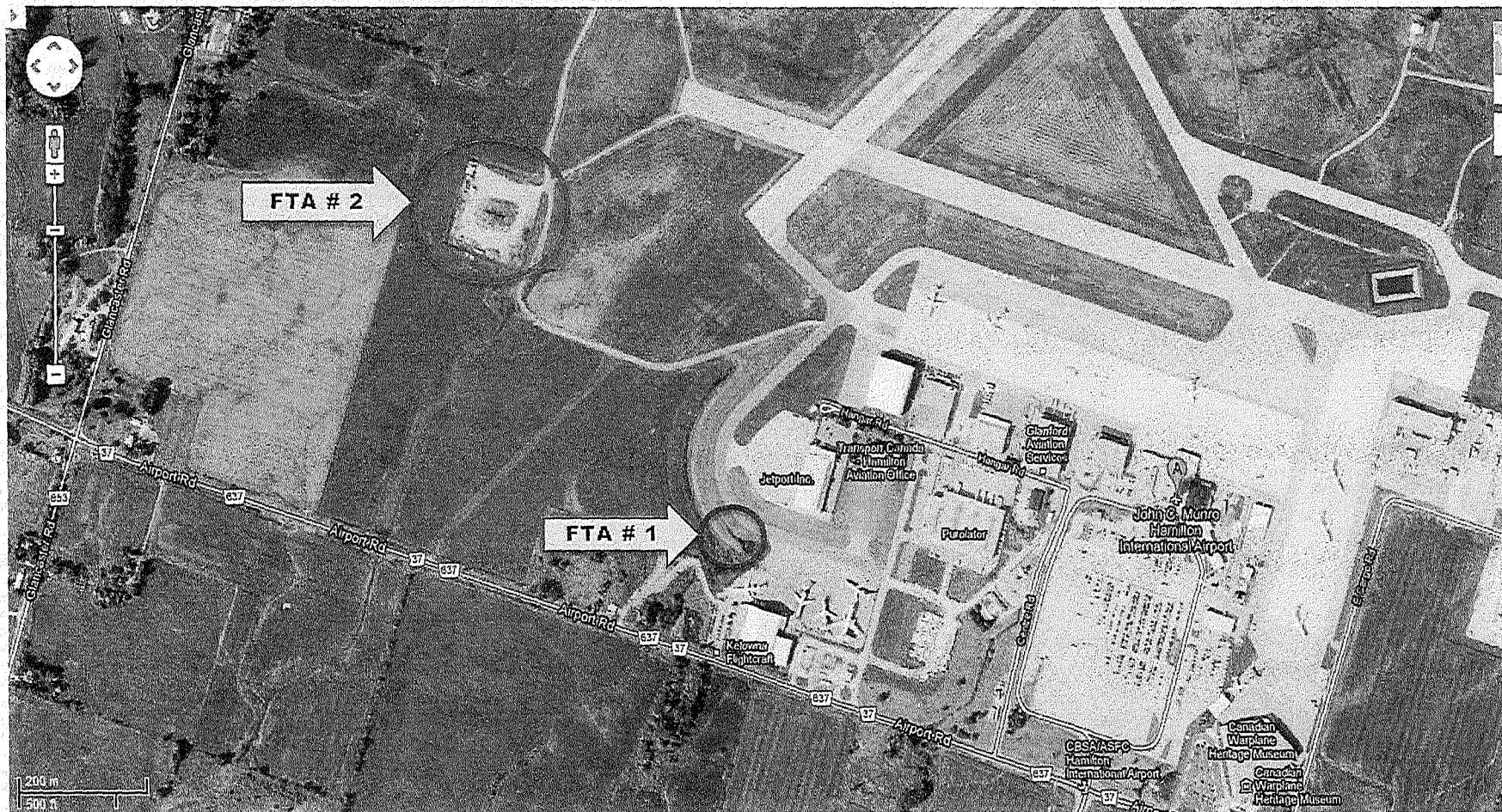
*ENVIRONMENTAL PETITION # 332*

**ANNEX 1  
LOCATION OF HAMILTON AIRPORT FORMER  
FIRE TRAINING AREAS**



Hamilton  
International  
Airport  
Authority

# LOCATION OF HAMILTON AIRPORT FORMER FIRE TRAINING AREAS



**ANNEX 2**

**Table 2.4 – INVENTORY OF FIRE TRAINING  
MATERIALS USED IN 1993 AT THE HAMILTON  
AIRPORT FTA**

TABLE 2.4

INVENTORY OF FIRE TRAINING MATERIALS USED IN 1993 AT THE HAMILTON AIRPORT FTA

| FIRE TRAINING MATERIAL              | FIRE TRAINING SESSIONS, 1993 - WEEK OF |            |            |            |             |             |            |           |            |           | TOTAL   |
|-------------------------------------|--|------------|------------|------------|-------------|-------------|------------|-----------|------------|-----------|---------|
|                                     | 17<br>May                              | 21<br>June | 12<br>July | 30<br>Aug. | 13<br>Sept. | 27<br>Sept. | 18<br>Oct. | 1<br>Nov. | 15<br>Nov. | 6<br>Dec. |         |
| Unleaded Gasoline, ℓ                | 32,049                                 | 41,388     | 5,900      | 39,663     | 21,247      | 24,003      | 32,827     | 2,394     | 23,037     | 20,433    | 242,941 |
| Aqueous Film Forming Foam (AFFF), ℓ | 978                                    | 1,769      | 440        | 1,840      | 1,755       | 1,765       | 2,852      | 232       | 2,347      | 2,318     | 16,296  |
| Dry Chemical (Purple K), Kg         | 2,721                                  | 0          | 816        | 930        | 930         | 2,404       | 1,792      | 0         | 1,270      | 590       | 10,523  |
| Nitrogen Cylinders                  | 20                                     | 3          | 8          | 9          | 9           | 28          | 18         | 1         | 13         | 6         | 118     |

*ENVIRONMENTAL PETITION # 332*

**ANNEX 3  
AIRPORT EMERGENCY SERVICES  
FIREFIGHTER TRAINING POLICY  
AND  
AIRCRAFT EMERGENCY AND FIRE TRAINING  
MANUAL PART II**

TP 3193

AIRPORT EMERGENCY SERVICES  
FIREFIGHTER TRAINING

AK-12-06-002

SERVICES D'URGENCE AÉROPORTUAIRES  
FORMATION DES POMPIERS

48 pages  
(scan separately)

Airports and Construction Services Directorate  
Airport Services and Security Branch  
Airport Emergency Services Division

Direction générale des services des aéroports et de la construction  
Direction des services et sûreté aéroportuares  
Division des services d'urgence aéroportuares

OPR/BPR: DGK/DKS/KSET

NOVEMBER/NOVEMRRE 1981

**Taylor, Sheree L.**

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**From:** Joe Minor [jminor@cogeco.ca]  
**Sent:** August 25, 2012 10:48 PM  
**To:** clerk@hamilton.ca  
**Subject:** PFOS: Transport Canada Annex 4  
**Attachments:** Annex4.pdf

To: The Mayor and All Members of Council c/o the Clerk

Please include this communication in the next official (publicly accessible) information package for Hamilton City Council.

This attachment contains supplemental information (Annex 4) from the Minister of Transport.

Thanks,

Joe Minor



*ENVIRONMENTAL PETITION # 332*

**ANNEX 4**  
**Table 2.2 – FIRE RETARDANT AGENTS**  
**MSDS FOR AFFF**

**TABLE 2.2**  
**FIRE RETARDANT AGENTS**

| PRODUCT NAME                  | MANUFACTURER              | COMPOSITION   |
|-------------------------------|---------------------------|---|
| Purple K                      | Pyrene Fire Security Inc. | 95% potassium bicarbonate                                 |
|                               |                           | 5% siliceous muscoirte (mica)                             |
|                               |                           | - pigments (methyl violet, barium lithol red, Red Lake C) |
| 6% AFFF - Government          | Angus Fire Amour Ltd.     | 65 - 89% water  |
|                               |                           | 10 - 30% 2-(2-Butoxy ethoxy) ethanol                      |
|                               |                           | 1 - 5% Octylphenoxypoly-ethoxyethanol                     |
| FC-206 Light Water Brand AFFF | 3M Canada Inc.            | 80% water   |
|                               |                           | 15% 2-(2-Butoxy ethoxy) ethanol                           |
|                               |                           | <5% Fluoroalkyl surfactants                               |
|                               |                           | <5% Synthetic detergents                                  |

MATERIAL SAFETY DATA SHEET

WHMIS CLASSIFICATION: D2B

USE: FIRE FIGHTING FOAM

I. IDENTIFICATION

ANGUS FIRE ARMOUR LTD.,  
P.O. BOX 189,  
THURSO, QUÉBEC  
J0X 3B0

ANGUS FIRE ARMOUR LTD.,  
11 CURITY AVENUE,  
TORONTO, ONTARIO  
M4B 1X5

PRODUCT NAME: 6% AFFF - GOVERNMENT

CHEMICAL NAME: Not Appl.

CHEMICAL FAMILY: Not Appl.

FORMULA: Not Appl.

MOLECULAR WEIGHT: Not Appl.

SYNONYMS: Not Av.

CAS #: Not Appl.

CAS NAME: Not Appl.

II. PHYSICAL DATA

BOILING POINT, 97°C  
760 mm Hg

FREEZING POINT -3°C

SPECIFIC GRAVITY 1.02  
(H<sub>2</sub>O = 1)

VAPOUR PRESSURE Not Av.  
at 20°C

VAPOUR DENSITY Not Av.  
(air = 1)

SOLUBILITY IN WATER 100%  
% by wt

PERCENT VOLATILES 80%  
BY VOLUME

EVAPORATION RATE 0.46  
(Butyl Acetate = 1)

APPEARANCE AND ODOUR Clear straw coloured liquid, mild sweet odour

EMERGENCY PHONE NUMBER : (819) 985-2901 OR (416) 755-7785

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### III. HAZARDOUS INGREDIENTS

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| MATERIAL                    | CAS #     | % BY WEIGHT | HAZARDS |
|-----------------------------|-----------|-------------|---------|
| 2-(2-Butoxy-ethyl)ethanol   | 112-34-5  | 10-30       | Toxic   |
| Octylphenoxypolyethylglycol | 9036-19-5 | 1-5         | Toxic   |

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### IV. HEALTH HAZARD DATA

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#### EFFECTS OF ACUTE OVEREXPOSURE

**SWALLOWING** Slightly toxic. May produce signs of intoxication characterized by incoordination, dizziness, drowsiness, headache, nausea, mental confusion, possibly slurred speech and stupor, depending on the quantity of material ingested.

**SKIN ABSORPTION** Prolonged or widespread skin contact may result in the absorption of potentially harmful amounts of material.

**INHALATION** Inhalation of vapours from heated product may cause irritation of the upper respiratory tract.

**SKIN CONTACT** Brief contact should not be irritating. Prolonged contact may cause skin irritation with redness and swelling at the site of contact.

**EYE CONTACT** Causes stinging and pain with excess redness and swelling of the conjunctiva.

**EFFECTS OF CHRONIC OVEREXPOSURE** Prolonged exposure to mist generated at elevated temperature may result in the inhalation of potentially harmful amounts of material.

## EMERGENCY AND FIRST AID PROCEDURES

|            |  |
|------------|--|
| SMELLING   | If victim is conscious, give 2 glasses of water and induce vomiting.                           |
| SKIN       | Remove contaminated clothing and flush skin with plenty of water. Wash clothing before reuse.  |
| EYES       | Immediately flush with plenty of running water for at least 15 minutes. Get medical attention. |
| INHALATION | Move to fresh air. If symptoms develop, call a physician.                                      |

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## V. EXPOSURE LIMITS AND TOXICOLOGICAL DATA

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|                                    | TLV-TWA ppm<br>ACGIH 1988-89 | LD50<br>Rat oral | LC50<br>Rat inhalation | LD50<br>Rabbit skin |
|------------------------------------|------------------------------|------------------|------------------------|---------------------|
| 2-(2-Butoxy-<br>ethoxy)ethanol     | Not Av.                      | 6560 mg/kg       | Not Av.                | 4120 mg/kg          |
| Octylphenoxypoly-<br>ethoxyethanol | Not Av.                      | > 2 g/kg         | Not Av.                | > 3 g/kg            |

Toxicity data references: MSDS for TRITON X-102 SURFACTANT (DAN  
HYERS & ROBERS INC., 1989-01-10). RTECS supplied by CCOHS,  
April 1989.

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## VI. FIRE AND EXPLOSION HAZARD DATA

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|   |   |
|---|---|
| FLASH POINT<br>(test method (s))            | Not Appl.   |
| FLAMMABLE LIMITS<br>IN AIR<br>(% by volume) | Not Appl.   |
| EXTINGUISHING<br>MEDIA                      | After water evaporates, remaining material will burn. Use water spray, carbon dioxide, alcohol-type or all-purpose-type foam. |

SPECIAL FIRE  
FIGHTING  
PROCEDURES

Use a self-contained breathing apparatus  
and protective clothing.

UNUSUAL FIRE AND  
EXPLOSION HAZARDS

Not Av.

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### VII. REACTIVITY DATA

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#### STABILITY

UNSTABLE    STABLE  
                  X

CONDITIONS  
TO AVOID : None

INCOMPATIBILITY :  
(materials to avoid)

High concentration of alkali at  
elevated temperatures.

HAZARDOUS COMBUSTION OR  
DECOMPOSITION PRODUCTS :

Carbon monoxide and carbon dioxide

#### HAZARDOUS POLYMERIZATION

MAY OCCUR    WILL NOT OCCUR  
                  X

CONDITIONS  
TO AVOID : None

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### VIII. SPILL OR LEAK PROCEDURES

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STEPS TO BE TAKEN  
IF MATERIAL IS  
RELEASED OR SPILLED

Soak up with solid absorbent and  
collect for disposal.

WASTE DISPOSAL METHOD

Dispose in accordance with Federal,  
Provincial and Municipal regulations.

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IX. SPECIAL PROTECTION INFORMATION

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RESPIRATORY PROTECTION (specify type)      None required in normal use.

VENTILATION      General (mechanical) ventilation

PROTECTIVE GLOVES      Rubber

EYE PROTECTION      Safety goggles

OTHER PROTECTIVE EQUIPMENT      Eyes bath and safety shower.

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X. SPECIAL PRECAUTIONS

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PRECAUTIONS TO BE TAKEN  
IN HANDLING AND STORING

Avoid contact with eyes, skin  
and clothing.  
Wash thoroughly after handling.

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XI. PREPARATION

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MSDS PREPARED BY: Eco-Research (Canada) Inc.

TELEPHONE NO.: (514) 697-3273

DATE: May 1989

N.B. : This information is given in good faith, though no  
warranty, express or implied, can be given since  
results may vary in accordance with applications.

3M Canada Inc.  
Post Office Box 5757  
London, Ontario N6A 4T1  
Medical Emergency Telephone: (519)451-2500, Ext. 2222

=====  
Material Safety Data Sheet  
=====

Document id : 10-3818-1 Issue date : 12/08/93  
Version : 3.00 Supersedes date : 09/13/93

Prepared by: Corporate Loss Prevention Department, 3M Canada Inc.  
Telephone: (519) 452-6102, Fax: (519) 452-6015.

-----  
1 Product Identification  
-----

Tradename:

FC-206 LIGHT WATER BRAND AQUEOUS FILM FORMING FOAM

3M Product ID:

CF-1206-0205-1 CF-1206-0206-9 CF-1206-0211-9 ZF-0002-0054-1  
ZF-0002-0055-8 ZF-0002-0092-1 ZF-0002-0119-2 ZF-0002-4108-1  
ZF-0002-4109-9 CF-1206-0269-7

Intended Use of Product:

Fluorochemical

-----  
2 Chemical Composition  
-----

| Ingredient Name                         | CAS Number | Percentage  |
|---|------------|-------------|
| WATER                                   | 7732-18-5  | 75.0 - 83.0 |
| ETHANOL, 2-(2-BUTOXYETHOXY)-            | 112-34-5   | 16.6 - 18.4 |
| ALKYL SULFATE SALTS                     | ---        | 1.0 - 5.0   |
| AMPHOTERIC FLUOROALKYLAMIDE DERIVATIVES | ---        | 1.0 - 5.0   |
| PERFLUOROALKYL SULFONATE SALTS          | ---        | 0.5 - 1.5   |

NOTE:

ALKYL SULFATE SALTS is a Trade Secret. Refer to section 15 for further information.

AMPHOTERIC FLUOROALKYLAMIDE DERIVATIVES is a Trade Secret. Refer to section 15 for further information.

PERFLUOROALKYL SULFONATE SALTS is a Trade Secret. Refer to section 15 for further information.



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### 3 Hazards Identification

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#### Critical Hazards

Inhalation may cause; Central Nervous System Depression: signs/symptoms can include headache, dizziness, drowsiness, incoordination, slowed reaction time, slurred speech, giddiness and unconsciousness.

See Sections 7 and 11 for further information.

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### 4 First Aid Measures

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#### Instructions for Eye Contact:

Immediately flush eyes with large amounts of water. Get immediate medical attention.

#### Instructions for Skin Contact:

Flush skin with large amounts of water. If irritation persists, get medical attention.

#### Instructions for Inhalation:

If signs/symptoms occur, remove person to fresh air. If signs/symptoms continue, call a physician.

#### Instructions for Ingestion:

Drink two glasses of water. Call a physician.

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### 5 Fire Fighting Measures

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Flash point: None (Setaflash)

Lower Explosive Limit(%): Not applicable.

Upper Explosive Limit(%): Not applicable.

Autoignition temperature: Not applicable.

#### Suitable Extinguishing Media:

Product is a fire-extinguishing agent.

#### Exposure Hazards during Fire:

No data available.

#### Combustion Products from Fire:

None known.

#### Fire Fighting Procedures:

Not applicable

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### 6 Accidental Release Measures

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#### Personal Precautions:

No data available.

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**Spill Response:**

Observe precautions from other sections. Cover with absorbent material. Collect spilled material. Place in a closed container.

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**7 Handling and Storage**

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**Storage Requirements:**

Store in a cool place. Keep container dry.

**Incompatible Materials:**

Store away from heat. Store out of direct sunlight.

**Ventilation:**

Keep container in well-ventilated area.

**Use Instructions:**

Keep container tightly closed.

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**8 Exposure Controls/Personal Protection**

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**Personal Protection**

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**Eye Protection:**

Avoid eye contact with vapour, spray, or mist. Wear vented goggles.

**Hand Protection:**

Wear appropriate gloves when handling this material. A pair of gloves made from the following material(s) are recommended: butyl rubber;

**Skin Protection:**

Avoid skin contact.

**Respiratory Protection:**

Avoid breathing of vapors, mists or spray. Select one of the following NIOSH approved respirators based on airborne concentration of contaminants: Half-mask organic vapour respirator with dust/mist prefilter;

**Ingestion (Prevention):**

Do not eat, drink or smoke when using this product. Wash exposed areas thoroughly with soap and water. Wash hands after handling and before eating.

**Recommended Ventilation:**

Use with adequate dilution ventilation.

---

**Ingredient Exposure Data**

---

## WATER (7732-18-5)

Specific Ingredient Data: Not applicable.

## ETHANOL, 2-(2-BUTOXYETHOXY)- (112-34-5)

LD50 (rat, oral): 5660 mg/kg

CMRG TWA Exposure Limit: 35 ppm

## ALKYL SULFATE SALTS

Specific Ingredient Data: No data available.

## AMPHOTERIC FLUOROALKYLAMIDE DERIVATIVES

Specific Ingredient Data: No data available.

## PERFLUOROALKYL SULFONATE SALTS

Specific Ingredient Data: No data available.

---

9 Physical and Chemical Properties

---

|                                |                              |
|--------------------------------|------------------------------|
| Physical form, Color, Odour:   | liquid; clear; amber;        |
| Odour Threshold:               | No data available.           |
| pH:                            | Approx. 8.50                 |
| Boiling point/boiling range:   | 100.00 C (Initial)           |
| Melting point/melting range:   | Not applicable.              |
| Vapour pressure:               | Approx. 30.4000 mmHg at 20 C |
| Water Solubility:              | Miscible.                    |
| Partition coefficient (K o/w): | No data available.           |
| Specific gravity:              | Approx. 1.010 Water=1        |
| Vapour density:                | Approx. 0.62 Air=1 at 20 C   |
| Volatile organic compounds:    | Unknown                      |
| Evaporation rate:              | < 1.00 BuOAc=1               |
| Viscosity:                     | Unknown                      |

---

10 Stability and Reactivity

---

## Conditions to Avoid:

None known.

## Materials to Avoid:

Not applicable.

## Hazardous Decomposition:

Carbon monoxide and carbon dioxide; Hydrogen fluoride; Thermal decomposition of usage concentrations does not present a hazard.

## Stability and Reactivity:

Stable. Hazardous polymerization will not occur.

---

## 11 Toxicological Information

---

### Effects from Eye Contact:

Mild Eye Irritation: signs/symptoms can include redness, swelling, pain, and tearing.

### Effects from Skin Contact:

Mild Skin Irritation (after prolonged or repeated contact): signs/symptoms can include redness, swelling, and itching.

Prolonged or repeated exposure may cause: May be absorbed through the skin in harmful amounts.

### Effects from Inhalation:

Single overexposure, above recommended guidelines, may cause:

Central Nervous System Depression: signs/symptoms can include headache, dizziness, drowsiness, incoordination, slowed reaction time, slurred speech, giddiness and unconsciousness. Irritation (upper respiratory): signs/symptoms can include soreness of the nose and throat, coughing and sneezing.

Prolonged or repeated overexposure, above recommended guidelines, may cause: Kidney Effects: signs/symptoms can include reduced urine volume, blood in urine and back pain. Liver Effects: signs/symptoms can include yellow skin(jaundice) and tenderness of upper abdomen.

### Effects from Ingestion:

Ingestion is not a likely route of exposure to this product.

### Sensitization Information:

No data available.

### Carcinogenicity:

No data available.

### Mutagenicity:

No data available.

### Reproductive Effects:

No data available.

### Other Effects & Information:

A 3M Product Toxicity Summary Sheet is available.

---

## 12 Ecological Information

---

### Ecotoxicity Data:

No data available.

### Other Effects and Information:

Chemical Oxygen Demand (COD): 0.42 g/g 5 Day Biological Oxygen Demand (BOD-5): 0.21 g/g 14-Day Biochemical Demand (BOD20): 0.42 g/g

---

---

### 13 Disposal Considerations

---

**Product as Sold:**

No data available.

**Product Packaging:**

No data available.

**Special Instructions:**

Discharge spent solutions and small quantities (less than 5 gal. (19 L)) to a wastewater treatment system. Reduce discharge rate if foaming occurs.

Incinerate in an industrial or commercial facility in the presence of a combustible material. Combustion products will include HF.

Disposal alternative: Dispose of completely absorbed waste product in a facility permitted to accept chemical wastes.

---

### 14 Transportation Information

---

**Transportation of Dangerous Goods**

---

**TDG Classification:**

Non-Regulated Material.

**International Dangerous Goods Classification**

---

**IMO Class:**

No data available.

**ICAO Class:**

No data available.

---

### 15 Regulatory Information

---

**WHMIS Classification:**

D2B

**HMIRC Registry Number:**

1003-001

**Filing Date:**

November 14, 1988

**NOTE:**

This product has been classified in accordance with the hazard criteria of the Controlled Products Regulations (CPR) and the MSDS contains all the information required by the CPR.

---

### 16 Other Information

---

**Reason for Reissue:**

Formulation revision.

The information on this data sheet represents our current data and

FC-206 LIGHT WATER BRAND AQUEOUS FILM FORMING FOAM

---

7

best opinion as to the proper use in handling of this product under normal conditions. Any use of the product which is not in conformance with this data sheet or which involves using the product in combination with any other product or any other process is the responsibility of the user.

**Taylor, Sheree L.**

---

**From:** Joe Minor [jminor@cogeco.ca]  
**Sent:** August 26, 2012 11:53 AM  
**To:** clerk@hamilton.ca  
**Subject:** PFOS: Transport Canada Annex 5, partA  
**Attachments:** Annex5A.pdf

> To: The Mayor and All Members of Council c/o the Clerk  
>  
> Please include this communication in the next official (publicly  
> accessible) information package for Hamilton City Council.  
>  
> This attachment contains supplemental information (Annex 5, part A)  
> from the Minister of Transport.  
>  
> Thanks,  
>  
> Joe Minor  
>

**ANNEX 5  
RPIC POSTER  
AND  
PRESENTATION ON  
EVALUATION OF GROUNDWATER TRANSPORT  
OF PERFLURINATED CHEMICALS AT A  
FORMER FIRE-FIGHTING TRAINING AREA**







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global environmental solutions

# Evaluation of Groundwater Transport of Perfluorinated Chemicals at a Former Fire-Fighting Training Area

Lindsay Paterson – SLR Consulting (Canada) Ltd.

Ian Mitchell – SLR Consulting (Canada) Ltd.

Ian Chatwell – Transport Canada

Raman Birk - PWGSC

# Overview

- Introduction to AFFF and PFCs
- Physical-Chemical Properties/Partitioning
- Groundwater Investigations
- Analytical Modeling



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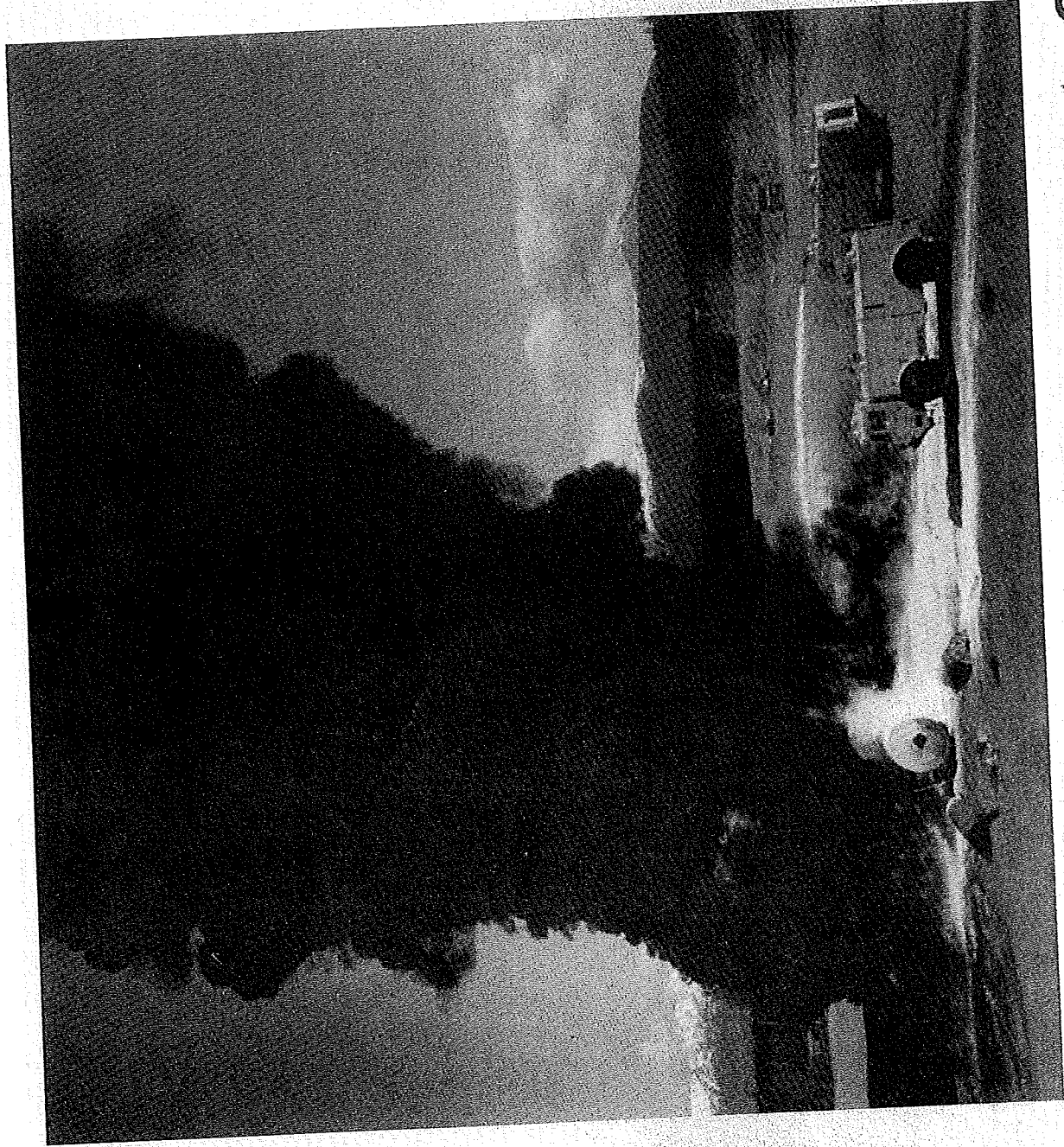


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# Acronyms

- AFFF – aqueous film-forming foam
- PFC – perfluorinated chemical
- PFSA – perfluorosulfonate
- PFCA – perfluorocarboxylate
- FTS – fluorotelomer sulfonate

# Acronyms (continued)

- PFOS – perfluorooctane sulfonate
- PFHxS – perfluorohexane sulfonate
- PFBS – perfluorobutane sulfonate
- PFNA – perfluorononanoate
- PFOA – perfluorooctanoate
- PFHpA – perfluoroheptanoate
- PFHxA – perfluorohexanoate
- PFPeA - perfluoropentanoate
- PFBA - perfluorobutanoate

# AFFF

- 1981 Transport Canada Guidelines:
  - 680 L AFFF annually for 1<sup>st</sup> year firefighter
  - 340 L AFFF annually for other firefighters
- Current guidelines do not specify AFFF training quantities
- PFC content in AFFF estimated to range from 0.5 % (Hekster et al, Vecitis et al) to 16% (Paul et al)



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# Types of PFCs in AFFF

- Perfluorosulfonates (PFSAs): fully fluorinated carbon chains with sulfonate end group (e.g. PFOS)
- Perfluorocarboxylates (PFCAs): fully fluorinated carbon chains with carboxylate end group (e.g. PFOA)
- Fluorotelomer Sulfonates (FTS): fully fluorinated carbon chain connected to alkyl chain with sulfonate end group (e.g. 6:2 FTS)



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# Properties – PFASs/PFCAs

- Generally in ionized form
- Solubility decreases and sorption increases with increasing chain length
- PFASs more sorptive than PFCAs
- Non-volatile
- Can sorb to organic carbon, soil particles, iron oxides
- No evidence of biodegradation, photolysis



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# Groundwater Investigations



**Taylor, Sheree L.**

---

**From:** Joe Minor [jminor@cogeco.ca]  
**Sent:** August 26, 2012 11:56 AM  
**To:** clerk@hamilton.ca  
**Subject:** PFOS: Transport Canada Annex 5, partB  
**Attachments:** Annex5B.pdf

Please include this communication in the next official (publicly accessible) information package for Hamilton City Council.

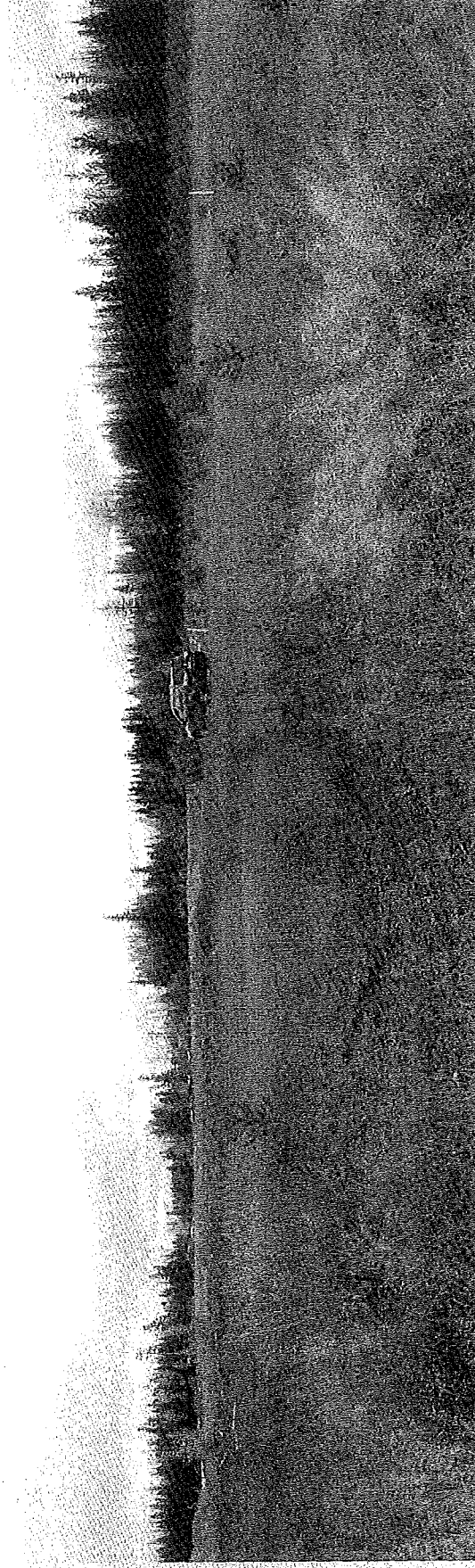
This attachment contains supplemental information (Annex 5, part B) from the Minister of Transport.

Thanks,

Joe Minor

# Groundwater Investigations

- Initial groundwater testing: 2006
- Groundwater delineation: 2008-2011
- Groundwater modeling: 2008-2011



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# Groundwater Targets

## Drinking Water Protection

- PFOS – 0.3 ug/L (Health Canada)
- PFOA – 0.7 ug/L (Health Canada)
- PFBS – 7 ug/L (Minnesota Dept. of Health)
- PFBA – 7 ug/L (Minnesota Dept. of Health)

## Aquatic Life Protection

- PFOS – 50 ug/L (SLR derived value based on direct exposure)



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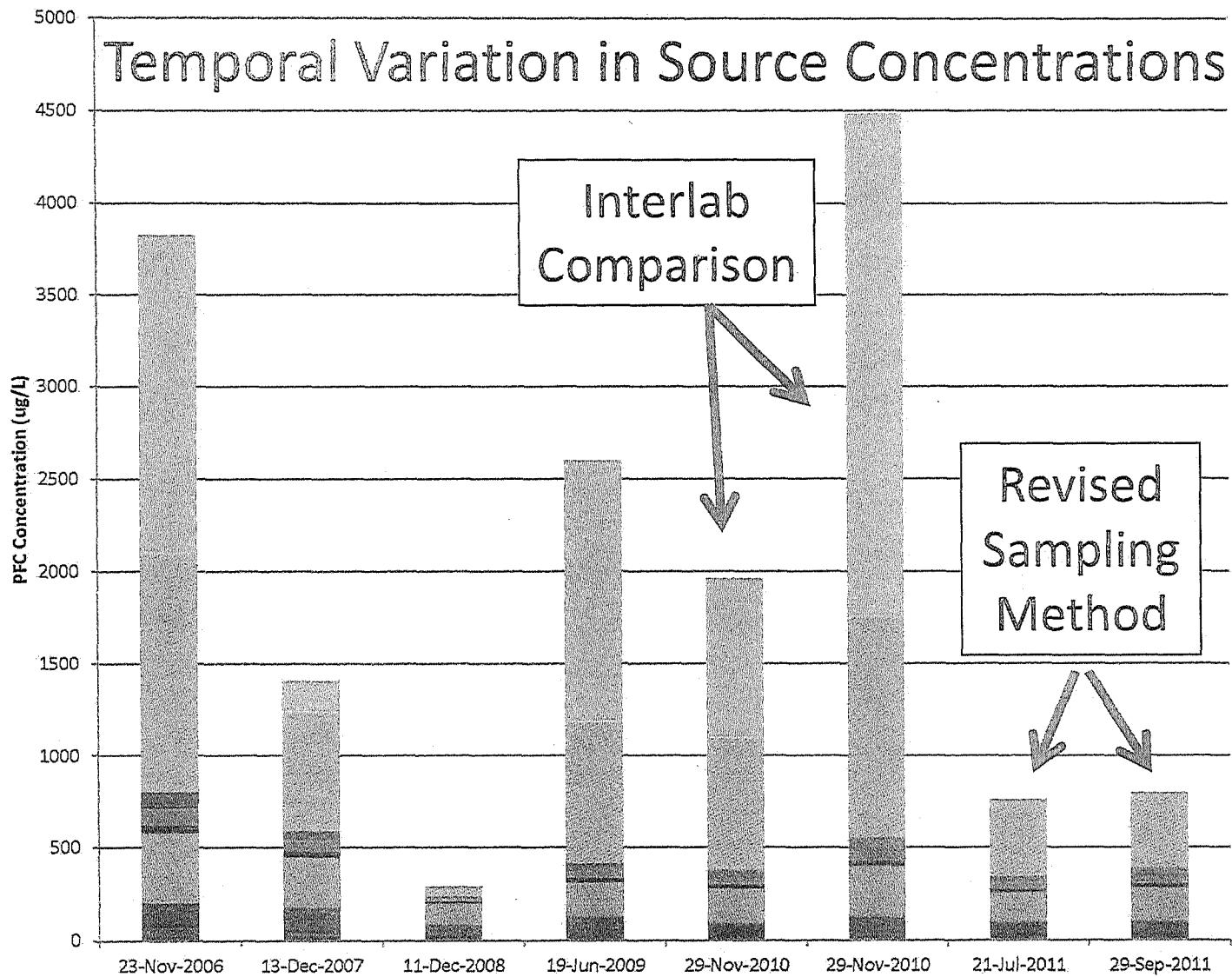
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- PFOS
- PFHxS
- PFBS
- PFNA
- PFOA
- PFHpA
- PFHxA
- PFPeA
- PFBA



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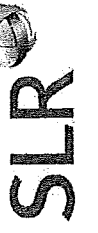
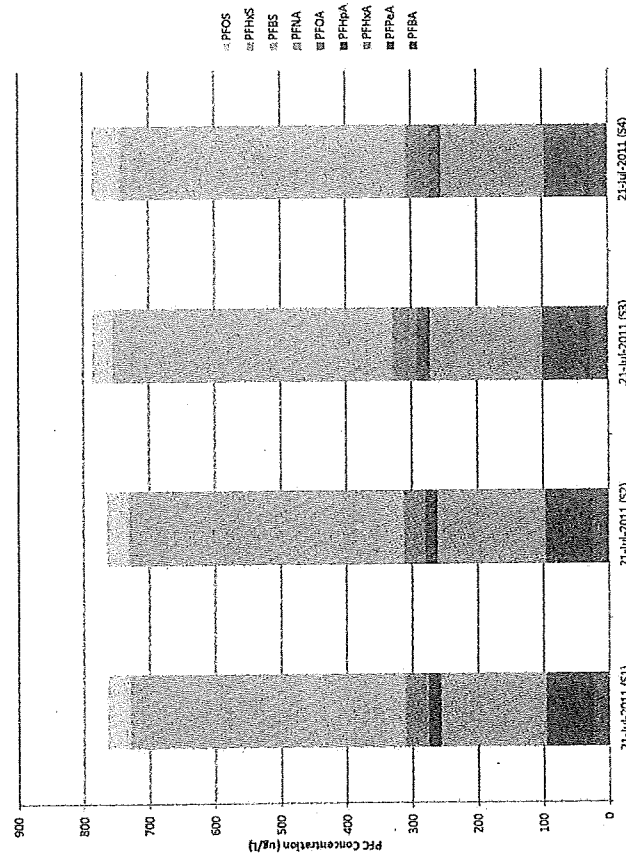
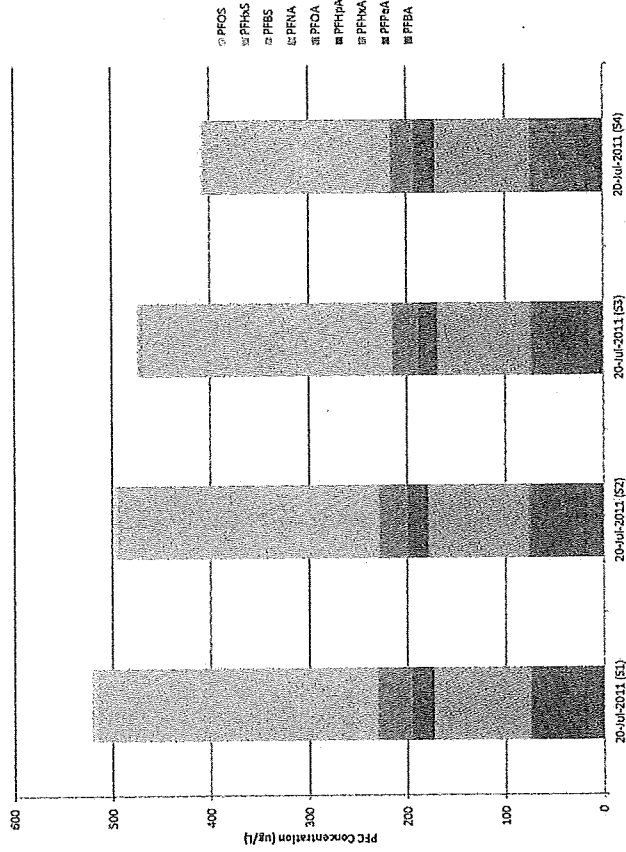


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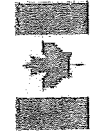


# Bailer Sampling Study



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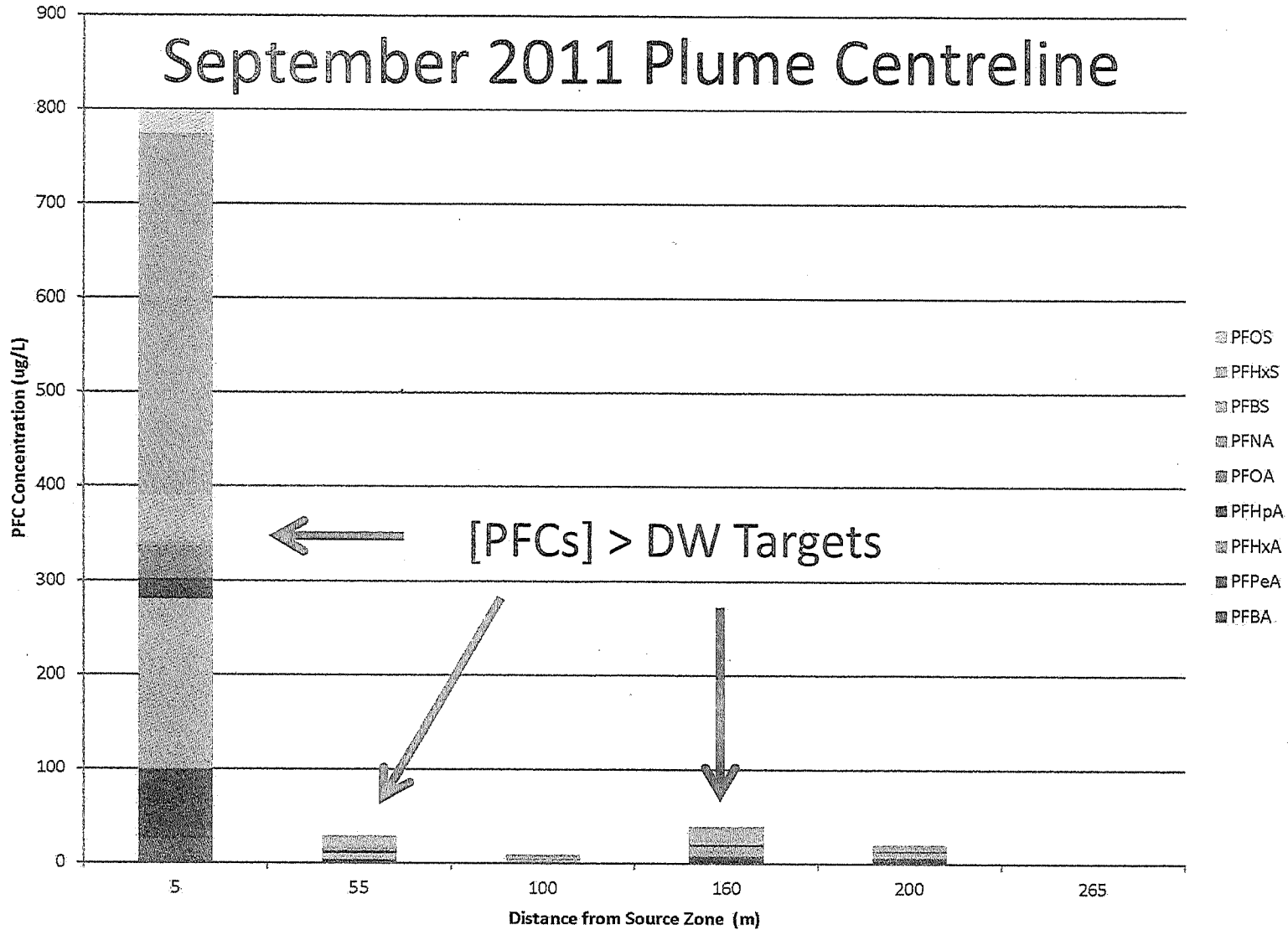


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# September 2011 Plume Centreline



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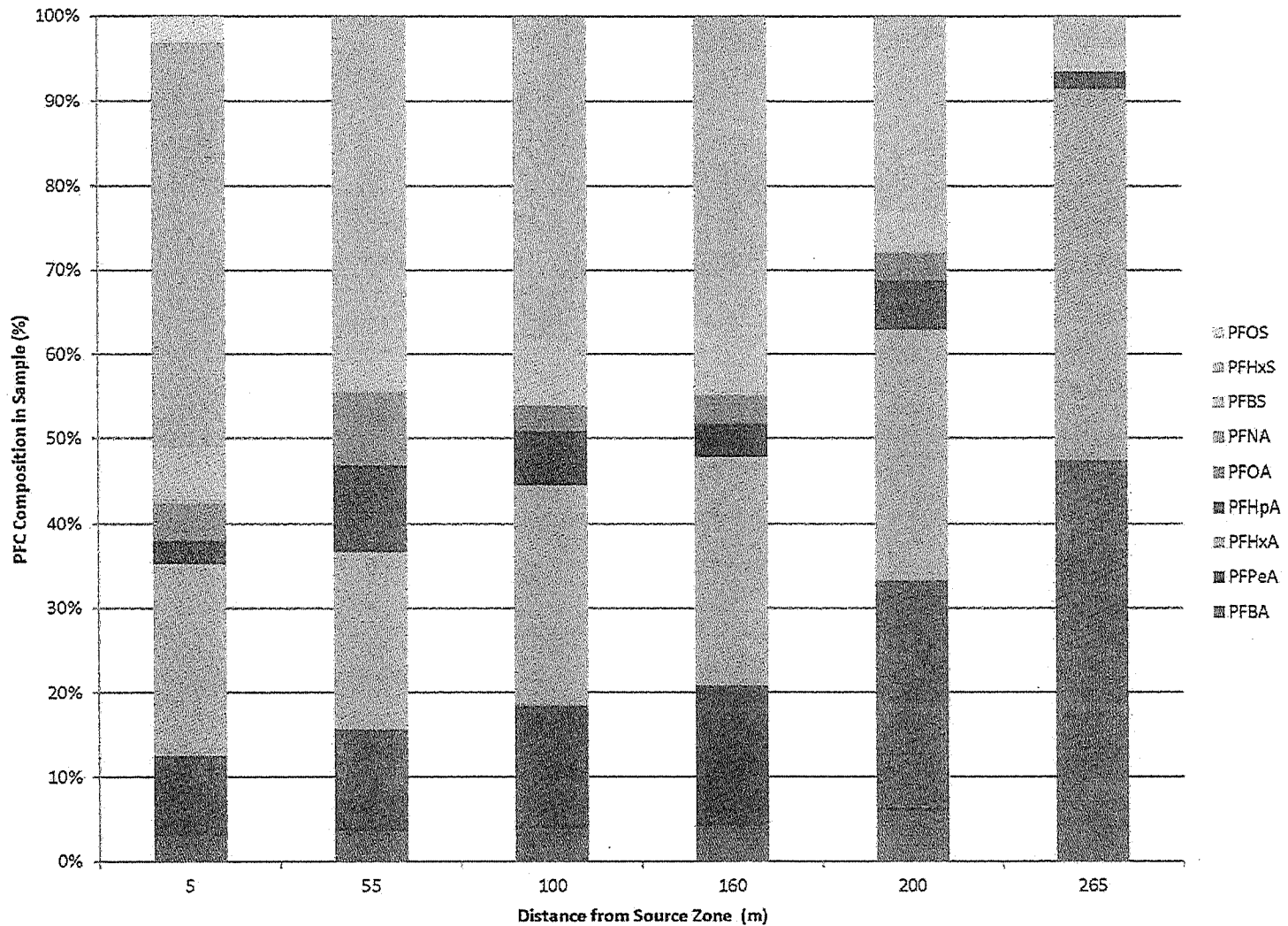
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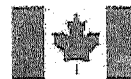


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# PFC Groundwater Modeling

- EPA BIOSCREEN (no biodegradation)
- $K_{oc}$  values estimated from Higgins and Luthy (2006)
- Results used to locate delineation wells, to estimate the current extent of the plumes and to predict the arrival date of the plume at specified down-gradient locations



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# Conclusions

- Near source PFHxS and PFOS groundwater data collected prior to 2011 may not be reliable due to stratification effects
- Bailer sampling provides consistent results throughout the water column
- PFCAs are more mobile than PFSAs and should be considered in hydrogeological evaluations
- PFC plumes will be more extensive than other contaminant plumes associated with fire training areas (i.e. hydrocarbons) and will likely be the risk-management driver at the site



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# References

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- Paul, A.G., K.C. Jones and A.J. Sweetman, 2009. A First Global Production, Emission, and Environmental Inventory for Perfluorooctane Sulfonate. *Environmental Science and Technology* 43: 386-392.
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# Contact Information

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**Taylor, Sheree L.**

---

**From:** Joe Minor [jminor@cogeco.ca]  
**Sent:** August 26, 2012 11:57 AM  
**To:** clerk@hamilton.ca  
**Subject:** Re: PFOS: Transport Canada Annex 5, parts 6 and 7A  
**Attachments:** Annex6and7A.pdf

Please include this communication in the next official (publicly accessible) information package for Hamilton City Council.

This attachment contains supplemental information (Annex 6 and 7A) from the Minister of Transport.

Thanks,

Joe Minor

**ANNEX 6**  
**LIST OF SITES WITH CONFIRMED PRESENCE OF**  
**PERFLUOROOCTANE SULFONATE (PFOS)**

**Sites with Confirmed Presence of  
Perfluorooctane Sulfonate (PFOS)**

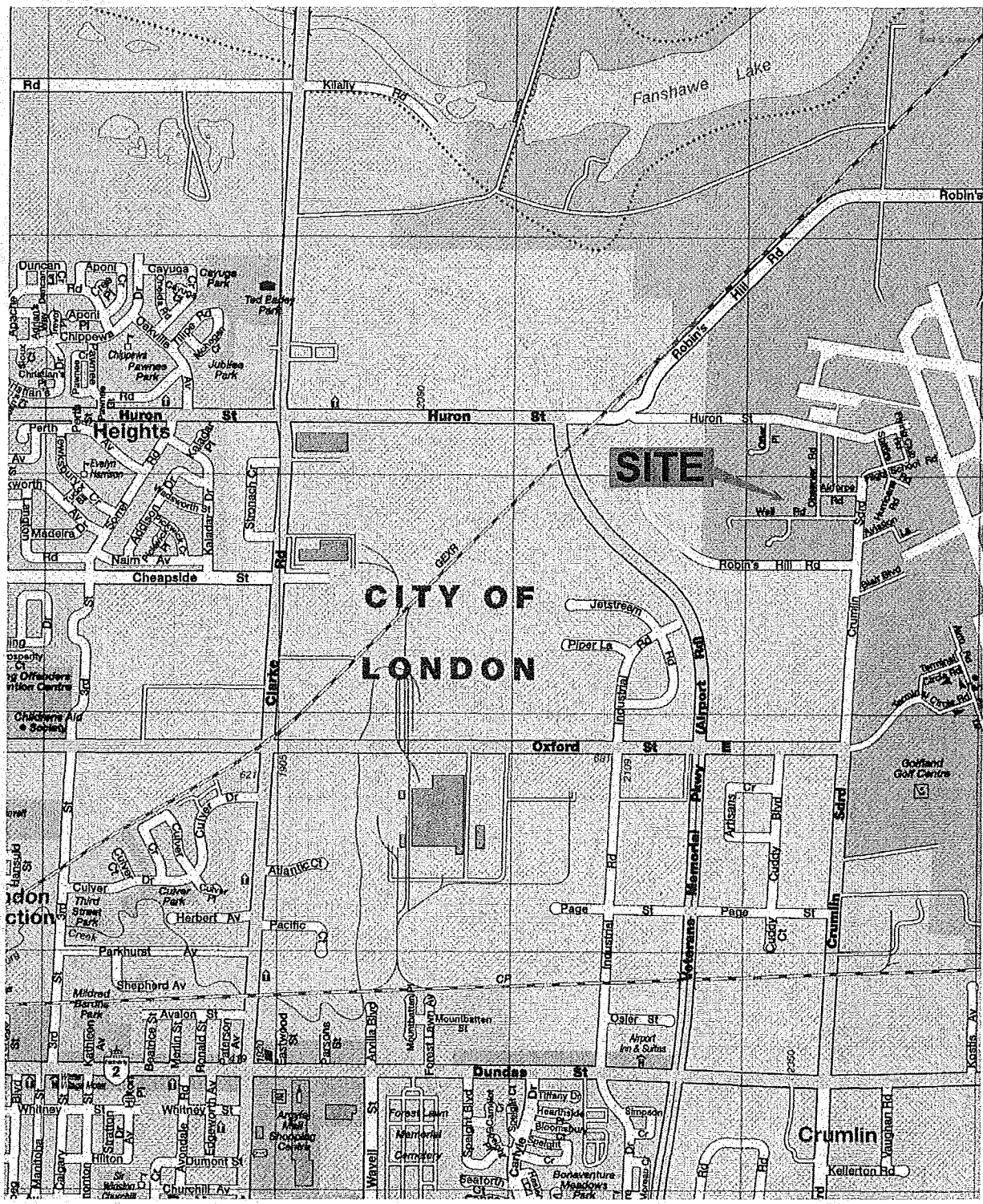
| <b>Province</b> | <b>Airport Name</b> |
|-----------------|---------------------|
| BC              | Prince George       |
| BC              | Victoria            |
| BC              | Campbell River      |
| BC              | Williams Lake       |
| BC              | Abbotsford          |
| BC              | Sandspit            |
| NU              | Cambridge Bay       |
| MB              | Winnipeg            |
| YT              | Watson Lake         |
| ON              | London              |
| ON              | Ottawa              |
| ON              | Thunder Bay         |
| ON              | Sault Ste. Marie    |
| ON              | Hamilton            |
| NB              | Fredericton         |
| NS              | Halifax             |
| NL              | St. John's          |
| NT              | Inuvik              |



*ENVIRONMENTAL PETITION # 332*

**ANNEX 7**  
**PFOS DATA – LONDON AIRPORT**

**SITE LOCATION**  
FORMER FIREFIGHTER TRAINING AREAS  
LONDON INTERNATIONAL AIRPORT  
LONDON, ONTARIO



NOTE: DRAWING TAKEN FROM MAPART  
WESTERN ONTARIO ATLAS, 2008 EDITION PAGE 106.

|           |            |             |
|-----------|------------|-------------|
| PROJECT # | CB485.00   |             |
| DATE      | MARCH 2011 |             |
| DRAWN     | PBR        | CHECKED GLL |
| DRAWING # | FIGURE 1   |             |



**LEGEND**

| STANDARD                         | Parameter | UGL |
|----------------------------------|-----------|-----|
| PFOS Perfluoro-1-octanesulfonate | PFOS      | 0.3 |
|                                  | PFOA      | 0.3 |
|                                  | PFOA      | 0.3 |

● BOREHOLE  
 ⊕ MONITORING WELL  
 ⊗ PREVIOUS SAMPLE LOCATION  
 ○ EXCEEDS GUIDELINE  
 ◐ ESTIMATED EXTENT OF CONTAMINATION

0 20m 40m  
(APPROXIMATE)

NOTE: CREATED FROM FIELD OBSERVATIONS AND MEASUREMENTS

|           |            |
|-----------|------------|
| PROJECT # | CB485.00   |
| SCALE     | AS SHOWN   |
| DATE      | MARCH 2011 |
| DRAWN     | PBR        |
| CHECKED   | GLL        |
| DRAWING # | FIGURE 7   |

**TABLE 5 SOIL ANALYTICAL RESULTS - PFOS AND PFOA**  
**Former Firefighting Training Areas**  
**London International Airport, London, Ontario**

| Terrapex Sample Name                          | Units    | WILLIAMS LAKE<br>RISK-BASED<br>CRITERIA <sup>1</sup> | MDL <sup>2</sup> | MW213-3   | BH217-3   | BH218-2   | Lab Blank<br>Laboratory<br>Replicate |
|---|----------|--|------------------|-----------|-----------|-----------|--------------------------------------|
| Sampling Date                                 | -        | -  | -                | 22-Sep-10 | 21-Sep-10 | 21-Sep-10 | 29-Sep-10                            |
| Sample Depth                                  | m bg     | -  | -                | 1.5 - 2.1 | 1.5 - 2.1 | 0.8 - 1.4 | -                                    |
| CSV Reading (Gastechtor- Methane Elimination) | see note | ns   | ns               | 10 ppm    | 95 ppm    | 10 ppm    | -                                    |
| CSV Reading (Photoionization Detector)        | see note | ns   | ns               | 0.9 ppm   | 18.8 ppm  | 2.2 ppm   | -                                    |
| PFOS  | µg/g     | 1.3  | 0.0967           | 0.109     | 0.48      | 0.00137   | < 0.0002                             |
| PFOA  | µg/g     | ns   | 0.193            | 0.00102   | 0.00193   | 0.028     | < 0.0001                             |

<sup>1</sup> Site Specific Risk Based Remediation Target developed to protect human health (1999)

<sup>2</sup> Minimum Detectable Limit

PFOS Perfluoro-1-octanesulfonate

PFOA Perfluoro-n-octanoic acid

ns No standard or Criteria (as applicable)

m bg Metres below grade

CSV Reading Combustible soil vapour reading (ppm or % LEL)

ppm Parts per million (by volume)

% LEL Percent of the lower explosive limit

µg/g Micrograms per gram

**BOLD** Exceeds Williams Lake Risk-Based Criteria

**TABLE 10 WATER ANALYTICAL RESULTS - PFOS AND PFOA**  
**Former Firefighting Training Areas**  
**London International Airport, London, Ontario**

| Terrapex Sample Name                          | Units    | MDoH GUIDELINE <sup>1</sup> | WILLIAMS LAKE RISK-BASED CRITERIA <sup>2</sup> | MDL <sup>3</sup> | MW204       | MW205       | MW206       | MW207     | MW208        |
|---|----------|-----------------------------|--|------------------|-------------|-------------|-------------|-----------|--------------|
| Sampling Date                                 | -        | -                           | -  | -                | 29-Sep-10   | 29-Sep-10   | 29-Sep-10   | 30-Sep-10 | 30-Sep-10    |
| Monitoring Well Depth                         | -        | -                           | -  | -                |             |             |             |           |              |
| Sample Location                               | m bg     | -                           | -  | -                | MW204       | MW205       | MW206       | MW207     | MW208        |
| CSV Reading (Gastechtor- Methane Elimination) | see note | ns                          | ns   | ns               | 100 ppm     | 290 ppm     | 30% LEL     | 10 ppm    | 10% LEL      |
| CSV Reading (Photoionization Detector)        | see note | ns                          | ns   | ns               | 0.2 ppm     | 0.0 ppm     | 0.0 ppm     | 0.0 ppm   | 0.0 ppm      |
| PFOS  | µg/L     | 0.3                         | 0.4  | 0.002            | <b>2.28</b> | <b>2.63</b> | <b>1.95</b> | 0.113     | <b>0.463</b> |
| PFOA  | µg/L     | 0.3                         | -  | 0.001            | 0.127       | 0.247       | 0.162       | 0.0694    | 0.18         |

<sup>1</sup> Minnesota Department of Health *Health Based Rules and Guidelines for Groundwater* (2009)

<sup>2</sup> Site Specific Risk Based Remediation Target developed to protect human health (1999)

<sup>3</sup> Minimum Detectable Limit

PFOS Perfluoro-1-octanesulfonate

PFOA Perfluoro-n-octanoic acid

ns No standard or Criteria (as applicable)

m bg Metres below grade

CSV Reading Combustible soil vapour reading (ppm or % LEL)

ppm Parts per million (by volume)

% LEL Percent of the lower explosive limit

µg/g Micrograms per gram

**BOLD** Exceeds MDoH Guideline

**VALUE** Exceeds Williams Lake Risk-Based Criteria

TABLE 10 WATER ANALYTICAL RESULTS - PFOS AND PFOA  
Former Firefighting Training Areas  
London International Airport, London, Ontario

(CONTINUED)

| Terrapex Sample Name                          |          | MDoH<br>GUIDELINE <sup>1</sup> | WILLIAMS LAKE<br>RISK-BASED<br>CRITERIA <sup>2</sup> | MDL <sup>3</sup> | MW209        | MW210        | MW211     | MW213       | MW215     |
|---|----------|--------------------------------|--|------------------|--------------|--------------|-----------|-------------|-----------|
|   | Units    |                                |  |                  |              |              |           |             |           |
| Sampling Date                                 | -        | -                              | -  | -                | 30-Sep-10    | 30-Sep-10    | 30-Sep-10 | 30-Sep-10   | 30-Sep-10 |
| Monitoring Well Depth                         | -        | -                              | -  | -                |              |              |           |             |           |
| Sample Location                               | m bg     | -                              | -  | -                | MW209        | MW210        | MW211     | MW213       | MW215     |
| CSV Reading (Gastechtor- Methane Elimination) | see note | ns                             | ns   | ns               | 350 ppm      | 40 ppm       | 290 ppm   | 300 ppm     | 10 ppm    |
| CSV Reading (Photoionization Detector)        | see note | ns                             | ns   | ns               | 0.1 ppm      | 0.0 ppm      | 0.0 ppm   | 0.1 ppm     | 0.0 ppm   |
| PFOS  | µg/L     | 0.3                            | 0.4  | 0.002            | <b>0.967</b> | <b>3.93</b>  | 0.169     | <b>20.4</b> | 0.105     |
| PFOA  | µg/L     | 0.3                            | -  | 0.001            | <b>0.313</b> | <b>0.736</b> | 0.0758    | <b>1.12</b> | 0.0872    |

<sup>1</sup> Minnesota Department of Health *Health Based Rules and Guidelines for Groundwater* (2009)

<sup>2</sup> Site Specific Risk Based Remediation Target developed to protect human health (1999)

<sup>3</sup> Minimum Detectable Limit

PFOS Perfluoro-1-octanesulfonate

PFOA Perfluoro-n-octanoic acid

ns No standard or Criteria (as applicable)

m bg Metres below grade

CSV Reading Combustible soil vapour reading (ppm or % LEL)

ppm Parts per million (by volume)

% LEL Percent of the lower explosive limit

µg/g Micrograms per gram

**BOLD** Exceeds MDoH Guideline

**VALUE** Exceeds Williams Lake Risk-Based Criteria

**Taylor, Sheree L.**

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**From:** Joe Minor [jminor@cogeco.ca]  
**Sent:** August 26, 2012 12:00 PM  
**To:** clerk@hamilton.ca  
**Subject:** PFOS: Transport Canada Annex 7B  
**Attachments:** Annex7B.pdf

Please include this communication in the next official (publicly accessible) information package for Hamilton City Council.

This attachment contains supplemental information (Annex 7, part B) from the Minister of Transport.

Thanks,

Joe Minor

TABLE 10 WATER ANALYTICAL RESULTS - PFOS AND PFOA  
Former Firefighting Training Areas  
London International Airport, London, Ontario

(CONTINUED)

| Terrapex Sample Name                          | Units    | MDoH GUIDELINE <sup>1</sup> | WILLIAMS LAKE RISK-BASED CRITERIA <sup>2</sup> | MDL <sup>3</sup> | MW216     | MW219        | MW220 Field Duplicate of MW219 | Field Blank1 | Trip Blank1 |
|---|----------|-----------------------------|--|------------------|-----------|--------------|--------------------------------|--------------|-------------|
| Sampling Date                                 | -        | -                           | -  | -                | 30-Sep-10 | 30-Sep-10    | 30-Sep-10                      | 30-Sep-10    | 30-Sep-10   |
| Monitoring Well Depth                         | -        | -                           | -  | -                |           |              |                                |              |             |
| Sample Location                               | m bg     | -                           | -  | -                | MW216     | MW219        | MW220                          | Field Blank1 | Trip Blank1 |
| CSV Reading (Gastechtor- Methane Elimination) | see note | ns                          | ns   | ns               | 190 ppm   | 40 ppm       | 40 ppm                         | -            | -           |
| CSV Reading (Photoionization Detector)        | see note | ns                          | ns   | ns               | 0.2 ppm   | 0.0 ppm      | 0.0 ppm                        | -            | -           |
| PFOS  | µg/L     | 0.3                         | 0.4  | 0.002            | 0.018     | <b>5.91</b>  | <b>6.59</b>                    | < 0.002      | < 0.00202   |
| PFOA  | µg/L     | 0.3                         | -  | 0.001            | 0.0415    | <b>0.656</b> | <b>0.634</b>                   | < 0.001      | < 0.00101   |

<sup>1</sup> Minnesota Department of Health *Health Based Rules and Guidelines for Groundwater* (2009)

<sup>2</sup> Site Specific Risk Based Remediation Target developed to protect human health (1999)

<sup>3</sup> Minimum Detectable Limit

PFOS Perfluoro-1-octanesulfonate

PFOA Perfluoro-n-octanoic acid

ns No standard or Criteria (as applicable)

m bg Metres below grade

CSV Reading Combustible soil vapour reading (ppm or % LEL)

ppm Parts per million (by volume)

% LEL Percent of the lower explosive limit

µg/g Micrograms per gram

**BOLD** Exceeds MDoH Guideline

**VALUE** Exceeds Williams Lake Risk-Based Criteria



TABLE 10 WATER ANALYTICAL RESULTS - PFOS AND PFOA  
Former Firefighting Training Areas  
London International Airport, London, Ontario

(CONTINUED)

| Terrapex Sample Name                          | Units    | MDoH<br>GUIDELINE <sup>1</sup> | WILLIAMS LAKE<br>RISK-BASED<br>CRITERIA <sup>2</sup> | MDL <sup>3</sup> | Lab Blank<br>Laboratory<br>Replicate | MW106    | MW109        | MW301    | MW302    |
|---|----------|--------------------------------|--|------------------|--------------------------------------|----------|--------------|----------|----------|
| Sampling Date                                 | -        | -                              | -  | -                | 6-Oct-10                             | 2-Dec-10 | 2-Dec-10     | 2-Dec-10 | 2-Dec-10 |
| Monitoring Well Depth                         | -        | -                              | -  | -                |                                      |          |              | 3.7 m    | 4.6 m    |
| Sample Location                               | m bg     | -                              | -  | -                | Lab Blank                            | MW106    | MW109        | MW301    | MW302    |
| CSV Reading (Gastechtor- Methane Elimination) | see note | ns                             | ns   | ns               | -                                    | 90 ppm   | 10 ppm       | 140 ppm  | 150 ppm  |
| CSV Reading (Photoionization Detector)        | see note | ns                             | ns   | ns               | -                                    | 0.0 ppm  | 0.0 ppm      | 0.1 ppm  | 0.2 ppm  |
| PFOS  | µg/L     | 0.3                            | 0.4  | 0.002            | < 0.002                              | 0.0097   | 0.265        | 0.0314   | 0.0545   |
| PFOA  | µg/L     | 0.3                            | -  | 0.001            | < 0.001                              | 0.0630   | <b>0.988</b> | 0.0449   | 0.132    |

<sup>1</sup> Minnesota Department of Health *Health Based Rules and Guidelines for Groundwater* (2009)

<sup>2</sup> Site Specific Risk Based Remediation Target developed to protect human health (1999)

<sup>3</sup> Minimum Detectable Limit

PFOS Perfluoro-1-octanesulfonate

PFOA Perfluoro-n-octanoic acid

ns No standard or Criteria (as applicable).

m bg Metres below grade

CSV Reading Combustible soil vapour reading (ppm or % LEL)

ppm Parts per million (by volume)

% LEL Percent of the lower explosive limit

µg/g Micrograms per gram

**BOLD** Exceeds MDoH Guideline

**VALUE** Exceeds Williams Lake Risk-Based Criteria

TABLE 10 WATER ANALYTICAL RESULTS - PFOS AND PFOA  
Former Firefighting Training Areas  
London International Airport, London, Ontario

(CONTINUED)

| Terrapex Sample Name                          | Units    | MDoH GUIDELINE <sup>1</sup> | WILLIAMS LAKE RISK-BASED CRITERIA <sup>2</sup> | MDL <sup>3</sup> | MW303    | MW304    | MW305    | MW306    | MW307    |
|---|----------|-----------------------------|--|------------------|----------|----------|----------|----------|----------|
| Sampling Date                                 | -        | -                           | -  | -                | 2-Dec-10 | 2-Dec-10 | 2-Dec-10 | 2-Dec-10 | 2-Dec-10 |
| Monitoring Well Depth                         | -        | -                           | -  | -                | 3.1 m    | 3.7 m    | 10.1 m   | 6.1 m    | 3.7 m    |
| Sample Location                               | m bg     | -                           | -  | -                | MW303    | MW304    | MW305    | MW306    | MW307    |
| CSV Reading (Gastechtor- Methane Elimination) | see note | ns                          | ns   | ns               | 5% LEL   | 12% LEL  | 5 ppm    | <5 ppm   | <5 ppm   |
| CSV Reading (Photoionization Detector)        | see note | ns                          | ns   | ns               | 0.3 ppm  | 0.0 ppm  | 2.1 ppm  | 0.0 ppm  | 0.0 ppm  |
| PFOS  | µg/L     | 0.3                         | 0.4  | 0.002            | 0.0453   | 0.0052   | 0.0279   | -        | 0.0088   |
| PFOA  | µg/L     | 0.3                         | -  | 0.001            | 0.0171   | 0.0070   | 0.0046   | -        | 0.0091   |

<sup>1</sup> Minnesota Department of Health *Health Based Rules and Guidelines for Groundwater* (2009)

<sup>2</sup> Site Specific Risk Based Remediation Target developed to protect human health (1999)

<sup>3</sup> Minimum Detectable Limit

PFOS Perfluoro-1-octanesulfonate

PFOA Perfluoro-n-octanoic acid

ns No standard or Criteria (as applicable)

m bg Metres below grade

CSV Reading Combustible soil vapour reading (ppm or % LEL)

ppm Parts per million (by volume)

% LEL Percent of the lower explosive limit

µg/g Micrograms per gram

**VALUE** Exceeds MDoH Guideline

**VALUE** Exceeds Williams Lake Risk-Based Criteria

TABLE 10 WATER ANALYTICAL RESULTS - PFOS AND PFOA  
Former Firefighting Training Areas  
London International Airport, London, Ontario

(CONTINUED)

| Terrapex Sample Name                          | Units    | MDoH GUIDELINE <sup>1</sup> | WILLIAMS LAKE RISK-BASED CRITERIA <sup>2</sup> | MDL <sup>3</sup> | MW308        | MW309       | MW310 Field Duplicate of MW309 | MW311 Field Blank | Trip Blank |
|---|----------|-----------------------------|--|------------------|--------------|-------------|--------------------------------|-------------------|------------|
| Sampling Date                                 | -        | -                           | -  | -                | 2-Dec-10     | 2-Dec-10    | 2-Dec-10                       | 2-Dec-10          | 2-Dec-10   |
| Monitoring Well Depth                         | -        | -                           | -  | -                | 10.1 m       | 6.1 m       | -                              | -                 | -          |
| Sample Location                               | m bg     | -                           | -  | -                | MW308        | MW309       | MW309                          | Field Blank       | Trip Blank |
| CSV Reading (Gastechtor- Methane Elimination) | see note | ns                          | ns   | ns               | 7% LEL       | 8% LEL      | 8% LEL                         | -                 | -          |
| CSV Reading (Photoionization Detector)        | see note | ns                          | ns   | ns               | 108.5 ppm    | 368.2 ppm   | 368.2 ppm                      | -                 | -          |
| PFOS  | µg/L     | 0.3                         | 0.4  | 0.002            | <b>0.322</b> | 0.146       | 0.142                          | <0.000991         | 0.00287    |
| PFOA  | µg/L     | 0.3                         | -  | 0.001            | <b>2.06</b>  | <b>3.46</b> | <b>3.21</b>                    | <0.00198          | <0.000997  |

<sup>1</sup> Minnesota Department of Health *Health Based Rules and Guidelines for Groundwater* (2009)

<sup>2</sup> Site Specific Risk Based Remediation Target developed to protect human health (1999)

<sup>3</sup> Minimum Detectable Limit

PFOS Perfluoro-1-octanesulfonate

PFOA Perfluoro-n-octanoic acid

ns No standard or Criteria (as applicable)

m bg Metres below grade

CSV Reading Combustible soil vapour reading (ppm or % LEL)

ppm Parts per million (by volume)

% LEL Percent of the lower explosive limit

µg/g Micrograms per gram

**BOLD** Exceeds MDoH Guideline

**VALUE** Exceeds Williams Lake Risk-Based Criteria

TABLE 10 WATER ANALYTICAL RESULTS - PFOS AND PFOA  
Former Firefighting Training Areas  
London International Airport, London, Ontario

(CONTINUED)

| Terrapex Sample Name                          | Units    | MDoH<br>GUIDELINE <sup>1</sup> | WILLIAMS LAKE<br>RISK-BASED<br>CRITERIA <sup>2</sup> | MDL <sup>3</sup> | Lab Blank<br>Laboratory<br>Replicate |
|---|----------|--------------------------------|--|------------------|--------------------------------------|
| Sampling Date                                 | -        | -                              | -  | -                | -                                    |
| Monitoring Well Depth                         | -        | -                              | -  | -                | -                                    |
| Sample Location                               | m bg     | -                              | -  | -                | Lab Blank                            |
| CSV Reading (Gastechtor- Methane Elimination) | see note | ns                             | ns   | ns               | -                                    |
| CSV Reading (Photoionization Detector)        | see note | ns                             | ns   | ns               | -                                    |
| PFOS  | µg/L     | 0.3                            | 0.4  | 0.002            | < 0.001                              |
| PFOA  | µg/L     | 0.3                            | -  | 0.001            | < 0.002                              |

<sup>1</sup> Minnesota Department of Health *Health Based Rules and Guidelines for Groundwater* (2009)

<sup>2</sup> Site Specific Risk Based Remediation Target developed to protect human health (1999)

<sup>3</sup> Minimum Detectable Limit

PFOS Perfluoro-1-octanesulfonate

PFOA Perfluoro-n-octanoic acid

ns No standard or Criteria (as applicable)

m bg Metres below grade

CSV Reading Combustible soil vapour reading (ppm or % LEL)

ppm Parts per million (by volume)

% LEL Percent of the lower explosive limit

µg/g Micrograms per gram

**BOLD** Exceeds MDoH Guideline

**VALUE** Exceeds Williams Lake Risk-Based Criteria

TABLE IV

**ANALYTICAL RESULTS FOR PERFLUROCTANESULFONIC ACID AND ITS SALTS IN BOREHOLE SOIL SAMPLES**

Phase III Environmental Site Assessment  
Former Fire Training Area 2  
London Airport  
London, Ontario

| RESULTS <sup>1</sup>        |            |                  |            |               |            |            |                  |                       |
|-----------------------------|------------|------------------|------------|---------------|------------|------------|------------------|-----------------------|
| Sample Identification:      | BH-101-2B  | BH-102-2B        | BH-103-1C  | BH-103-1C DUP | BH-104-1D  | BH-105-2A  | BH-106-1B        | WILLIAMS              |
| Sample Date:                | 05-Jan-10  | 05-Jan-10        | 05-Jan-10  | 05-Jan-10     | 06-Jan-10  | 05-Jan-10  | 06-Jan-10        | LAKE RISK             |
| Sample Depth <sup>2</sup> : | 2.4 to 2.9 | 1.8 to 2.6       | 0.9 to 1.3 | 0.9 to 1.3    | 1.2 to 1.5 | 1.5 to 1.8 | 0.8 to 1.5       | BASED                 |
| Sample Description:         | SAND       | GRAVEL<br>SAND & | SILT       | SILT          | SAND       | SILTY SAND | SAND             | TARGET <sup>1,3</sup> |
| <u>PARAMETER</u>            |            |                  |            |               |            |            |                  |                       |
| Perfluoro-1-Octanesulfonate | 76         | 250              | <u>130</u> | <u>99</u>     | 400        | 210        | 960              | 1300                  |
| Perfluoro-n-Octanoic Acid   | <2.5       | 2.6              | <u>40</u>  | <u>22</u>     | 6.7        | 7.7        | 7.1              | -                     |
| RESULTS <sup>1</sup>        |            |                  |            |               |            |            |                  |                       |
| Sample Identification:      | BH-107-2B  | BH-108-2B        | BH-109-1C  | BH-110-1C     | BH-113-2A  | BH-114-2A  | BH-115-3B        | WILLIAMS              |
| Sample Date:                | 06-Jan-10  | 06-Jan-10        | 06-Jan-10  | 07-Jan-10     | 07-Jan-10  | 07-Jan-10  | 08-Jan-10        | LAKE RISK             |
| Sample Depth <sup>2</sup> : | 2.0 to 2.3 | 1.8 to 2.3       | 0.8 to 1.5 | 1.0 to 1.5    | 1.5 to 2.3 | 1.5 to 2.3 | 3.7 to 4.3       | BASED                 |
| Sample Description:         | GRAVEL     | GRAVEL<br>SAND & | SAND       | SILTY SAND    | SAND       | SAND       | GRAVEL<br>SAND & | TARGET <sup>1,3</sup> |
| <u>PARAMETER</u>            |            |                  |            |               |            |            |                  |                       |
| Perfluoro-1-Octanesulfonate | 58         | 70               | 220        | 35            | 50         | 41         | <25              | 1300                  |
| Perfluoro-n-Octanoic Acid   | <2.5       | <2.5             | 3.6        | <2.5          | <2.5       | <2.5       | <2.5             | -                     |

- NOTES:
1. All values shown as micrograms per kilogram (ug/kg) unless otherwise noted.
  2. All depths are expressed as metres below ground surface (mbgs).
  3. Value derived from 1999 site specific risk assessment as the most stringent target to protect ecological health. For guidance only.
  4. "<" indicates concentration is below the laboratory detection limit.
  5. Values in **bold** greater than the risk based soil target developed for the Williams Lake Airport.
  6. BH-103-1C DUP and BH-116-1C DUP are duplicates of BH-103-1C and BH-116-1C, respectively. Samples with an unacceptable Relative Percent Difference (RPD) are double underlined.
  7. Table to be read in conjunction with accompanying report.

## ANALYTICAL RESULTS FOR PERFLUROCTANESULFONIC ACID AND ITS SALTS IN BOREHOLE SOIL SAMPLES

Phase III Environmental Site Assessment  
Former Fire Training Area 1  
London Airport  
London, Ontario

|                             | RESULTS <sup>1</sup> |               |            |            |   |
|-----------------------------|----------------------|---------------|------------|------------|---|
| Sample Identification:      | BH-116-1C            | BH-116-1C DUP | BH-117-2A  | BH-118-2A  | WILLIAMS<br>LAKE RISK<br>BASED<br>TARGET <sup>1,3</sup> |
| Sample Date:                | 08-Jan-10            | 08-Jan-10     | 08-Jan-10  | 08-Jan-10  |   |
| Sample Depth <sup>2</sup> : | 0.8 to 1.4           | 0.8 to 1.4    | 1.5 to 2.3 | 1.5 to 2.3 |   |
| Sample Description:         | sand FILL            | sand FILL     | SAND       | SAND       |   |
| <u>PARAMETER</u>            |                      |               |            |            |   |
| Perfluoro-1-Octanesulfonate | <25                  | <25           | <25        | <25        | 1300  |
| Perfluoro-n-Octanoic Acid   | <2.5                 | <2.5          | <2.5       | <2.5       | -   |

## NOTES:

1. All values shown as micrograms per kilogram (ug/kg) unless otherwise noted.
2. All depths are expressed as metres below ground surface (mbgs).
3. Value derived from 1999 site specific risk assessment as the most stringent target to protect ecological health. For guidance only.
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6. BH-103-1C DUP and BH-116-1C DUP are duplicates of BH-103-1C and BH-116-1C, respectively. Samples with an unacceptable Relative Percent Difference (RPD) are double underlined.
7. Table to be read in conjunction with accompanying report.

Prepared by: LJJ  
Checked by: BG/DM/SFL

TABLE IX

**ANALYTICAL RESULTS FOR PERFLUOROCTANESULFONIC ACID AND ITS SALTS IN GROUNDWATER SAMPLES**

Phase III Environmental Site Assessment  
Former Fire Training Area 1  
London Airport  
London, Ontario

| PARAMETER                          | RESULTS <sup>1</sup>   |                  |                  |                  |                  | MDoH HEALTH GUIDELINES <sup>1,2</sup> | WILLIAMS LAKE RISK BASED TARGET <sup>1,3</sup> |        |
|------------------------------------|------------------------|------------------|------------------|------------------|------------------|---------------------------------------|--|--------|
|                                    | Sample Identification: | L1               | MW1              | L5               | L6               |                                       |  | L24    |
|                                    | Sample Location:       | Area 1           | Dup L1           | Area 1           | Area 1           |                                       |  | Area 1 |
|                                    | Sampling Date:         | <u>20-Nov-09</u> | <u>20-Nov-09</u> | <u>20-Nov-09</u> | <u>20-Nov-09</u> | <u>20-Nov-09</u>                      |  |        |
| Perfluoro-1-Octanesulfonate (PFOS) |                        | <5               | <5               | <5               | <5               | <5                                    | 0.3  |        |
| Perfluoro-n-Octanoic Acid (PFOA)   |                        | <0.5             | <0.5             | <0.5             | <0.5             | <0.5                                  | 0.3  |        |

| PARAMETER                          | RESULTS <sup>1</sup>   |                  |                  |                  | MDoH HEALTH GUIDELINES <sup>1,2</sup> | WILLIAMS LAKE RISK BASED TARGET <sup>1,3</sup> |        |
|------------------------------------|------------------------|------------------|------------------|------------------|---------------------------------------|--|--------|
|                                    | Sample Identification: | L25              | L26              | MW-117           |                                       |  | MW-118 |
|                                    | Sample Location:       | Area 1           | Area 1           | Area 1           |                                       |  | Area 1 |
|                                    | Sampling Date:         | <u>20-Nov-09</u> | <u>19-Nov-09</u> | <u>15-Jan-10</u> | <u>15-Jan-10</u>                      |  |        |
| Perfluoro-1-Octanesulfonate (PFOS) |                        | <5               | <5               | 0.228            | 0.120                                 | 0.3  | 0.4    |
| Perfluoro-n-Octanoic Acid (PFOA)   |                        | <0.5             | <0.5             | 0.0452           | 0.0887                                | 0.3  | -      |

- NOTES: 1. All values shown as micrograms per litre (ug/L) unless otherwise noted.  
 2. Minnesota Department of Health guidelines for potable groundwater. For guidance only.  
 3. Value derived from 1999 site specific risk assessment as the most stringent target to protect human health. For guidance only.  
 4. "<" indicates concentration is below the laboratory detection limit.  
 5. Values in **bold** greater than the MDoH Guideline. Values in *italics* greater than the risk based soil target developed for the Williams Lake Airport.  
 6. Duplicate Analysis (MW1, MW2, MW-202), samples with an unacceptable RPD are double underlined.  
 7. Samples shaded were analyzed by AXYS and required dilution. Due to much lower values than other wells analyzed for PFOS and PFOA in Area 2, results are suspect.  
 8. Table to be read in conjunction with accompanying report.

## ANALYTICAL RESULTS FOR PERFLUROCTANESULFONIC ACID AND ITS SALTS IN GROUNDWATER SAMPLES

| Phase III Environmental Site Assessment<br>Former Fire Training Area 2<br>London Airport<br>London, Ontario |                      |           |              |           |              |                           |                       |  |
|---|----------------------|-----------|--------------|-----------|--------------|---------------------------|-----------------------|--|
|   | RESULTS <sup>1</sup> |           |              |           |              |                           |                       |  |
| Sample Identification:  | L10                  | L11       | L14          | MW2       | MW-101       | MDoH                      | WILLIAMS              |  |
| Sample Location:  | Area 2               | Area 2    | Area 2       | Dup L14   | Area 2       | HEALTH                    | LAKE RISK             |  |
| Sampling Date:  | 20-Nov-09            | 20-Nov-09 | 20-Nov-09    | 20-Nov-09 | 15-Jan-10    | GUIDELINES <sup>1,2</sup> | BASED                 |  |
|   |                      |           |              |           |              |                           | TARGET <sup>1,3</sup> |  |
| <b>PARAMETER</b>  |                      |           |              |           |              |                           |                       |  |
| Perfluoro-1-Octanesulfonate (PFOS)  | 130                  | 51        | 120          | 110       | <u>0.423</u> | 0.3                       | 0.4                   |  |
| Perfluoro-n-Octanoic Acid (PFOA)  | 14                   | 4.3       | 4.3          | 4.2       | <u>0.435</u> | 0.3                       | -                     |  |
|   |                      |           |              |           |              |                           |                       |  |
|   | RESULTS <sup>1</sup> |           |              |           |              |                           |                       |  |
| Sample Identification:  | MW-202               | MW-105    | MW-106       | MW-108    | MW-109       | MDoH                      | WILLIAMS              |  |
| Sample Location:  | Dup MW-101           | Area 2    | Area 2       | Area 2    | Area 2       | HEALTH                    | LAKE RISK             |  |
| Sampling Date:  | 15-Jan-10            | 15-Jan-10 | 15-Jan-10    | 15-Jan-10 | 15-Jan-10    | GUIDELINES <sup>1,2</sup> | BASED                 |  |
|   |                      |           |              |           |              |                           | TARGET <sup>1,3</sup> |  |
| <b>PARAMETER</b>  |                      |           |              |           |              |                           |                       |  |
| Perfluoro-1-Octanesulfonate (PFOS)  | <u>0.768</u>         | 94        | <5           | 49        | <5           | 0.3                       | 0.4                   |  |
| Perfluoro-n-Octanoic Acid (PFOA)  | <u>0.448</u>         | 3.5       | <0.5         | 3         | <0.5         | 0.3                       | -                     |  |
|   |                      |           |              |           |              |                           |                       |  |
|   | RESULTS <sup>1</sup> |           |              |           |              |                           |                       |  |
| Sample Identification:  | MW-110               | MW-113    | MW-114       | MW-115    |              | MDoH                      | WILLIAMS              |  |
| Sample Location:  | Area 2               | Area 2    | Area 2       | Area 2    |              | HEALTH                    | LAKE RISK             |  |
| Sampling Date:  | 15-Jan-10            | 15-Jan-10 | 15-Jan-10    | 15-Jan-10 |              | GUIDELINES <sup>1,2</sup> | BASED                 |  |
|   |                      |           |              |           |              |                           | TARGET <sup>1,3</sup> |  |
| <b>PARAMETER</b>  |                      |           |              |           |              |                           |                       |  |
| Perfluoro-1-Octanesulfonate (PFOS)  | <u>0.400</u>         | 26        | <u>0.466</u> | <5        |              | 0.3                       | 0.4                   |  |
| Perfluoro-n-Octanoic Acid (PFOA)  | <u>0.350</u>         | 0.8       | <u>0.863</u> | <0.5      |              | 0.3                       | -                     |  |

- NOTES: 1. All values shown as micrograms per litre (ug/L) unless otherwise noted.  
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 3. Value derived from 1999 site specific risk assessment as the most stringent target to protect human health. For guidance only.  
 4. "<" indicates concentration is below the laboratory detection limit.  
 5. Values in **bold** greater than the MDoH Guideline. Values in *italics* greater than the risk based soil target developed for the Williams Lake Airport.  
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Prepared by: LJJ