

14 September 2010

Michael Hinton, P.E.  
New York State Department of Environmental Conservation  
Division of Environmental Remediation – Region 9  
270 Michigan Avenue  
Buffalo, New York 14203

RE: Former Varnish Line Tanks Decommissioning Report  
Greif Facility - Tonawanda, New York  
NYSDEC CBS Number 9-000150  
ERM Project Number 0113801



Dear Mr. Hinton:

This report presents a summary of aboveground storage tank (AST) decommissioning activities performed on behalf of Greif, Inc. (Greif) at the Greif Facility located at 2122 Colvin Boulevard in the Town of Tonawanda, Erie County, New York (the Site). Subsequent sections of this report summarize project background, tank decommissioning procedures, and associated waste handling and management activities.

### ***PROJECT BACKGROUND***

Varnishing operations were previously performed at the Site as part of routine manufacturing operations. Two 1000-gallon single-walled steel ASTs located in a vault beneath the varnish line oven were previously used to store varnish for manufacturing operations. These tanks were previously registered with the New York State Department of Conservation (NYSDEC) under Chemical Bulk Storage Number 9-000150. The varnishing operations were subsequently discontinued and the two 1000-gallon ASTs were closed in place in 2002. A business decision was made in 2009 to remove the varnish oven and associated equipment to provide additional space at the Site for manufacturing operations and support activities. At the request of Greif, Environmental Resources Management (ERM) and subcontractor Marcor Remediation, Inc. of Rochester, New York (Marcor) mobilized to the Site on 19 August 2009 to remove these ASTs.

## ***TANK DECOMMISSIONING PROCEDURES***

A 750-gallon single-walled steel AST (hereby referred to as Tank 001) was discovered in the southeast corner of the varnish pit when the varnish pit was entered to commence decommissioning activities of two 1000-gallon ASTs (hereby referred to as Tank 002 and Tank 003). Tank 001 contained liquid determined to be a flammable liquid consistent with used varnish. Tanks 002 and 003 were previously cleaned by Marcor in 2002 and were reportedly unused since that time. Tanks 002 and 003 were checked in August 2009 and found to be empty of liquids. However, dried varnish had accumulated on the varnish pit (i.e., vault) floor beneath Tanks 002 and 003. The following procedures were used at the Site on 19 August and 20 August 2009 during the decommissioning of these tanks.

### **Tank 001**

- All liquids were drained from connecting piping into the tank.
- Connected piping was disconnected from the tank.
- All liquids were removed from the tank.
- Openings in the tank were temporarily plugged.
- The atmosphere of the tank was checked and the tank was rendered free of hazardous vapors through inerting with nitrogen.
- The tank was cut open to facilitate cleaning of the tank's interior.
- Solids were removed from the tank bottom and the interior surface of the tank was cleaned.
- The tank was removed from the vault and cut up as scrap steel.

### **Tanks 002 and 003**

- Connected piping was disconnected from the tanks.
- The atmospheres of the tanks were checked and found to be non-hazardous regarding oxygen content and lower explosive limit.
- The tanks were cut into smaller sections to facilitate removal from the varnish pit.
- Solid varnish was removed from below the tanks and the vault's floor was cleaned.
- The tanks were removed from the vault (varnish pit) and further cut up for recycling as scrap steel.

## ***WASTE HANDLING AND MANAGEMENT***

Scrap steel generated during the decommissioning of the former varnish line ASTs was placed into the facility's metal recycling bins for salvage. Documentation of the cleaning of the ASTs and their designation as scrap steel is presented in Attachment A.

One drum of waste liquid was generated during the decommissioning of the former varnish line ASTs. The waste liquid consisted of used varnish that had accumulated in Tank 001. The estimated volume of waste liquid was 50 gallons. Based on laboratory analytical results and previous waste determinations associated with ongoing investigation and remediation activities in the same area being performed under the NYSDEC's Voluntary Cleanup Program (VCP Site Number V00334-9), the liquid waste was determined by the generator to be a hazardous waste. This waste is listed in Box 9a.1. of the attached Uniform Hazardous Waste Manifest (Attachment B).


Six drums of waste solids were generated during the decommissioning of the former varnish line ASTs. The waste solids consisted predominantly of solidified residual varnish that had accumulated inside Tank 001 and beneath Tanks 002 and 003. Based on previous waste determinations associated with ongoing investigation and remediation activities in the same area, the solid waste was determined by the generator to be a hazardous waste. This waste is listed in Box 9a.2. of the attached Uniform Hazardous Waste Manifest (Attachment B).

The hazardous wastes generated during decommissioning of the former varnish line ASTs were transported from the Site on 5 November 2009. The hazardous waste was transported by Veoila ES Technical Solutions, LLC (USEPA ID Number NJD080631369) and Freehold Cartage, Inc. (USEPA ID Number NJD054126164) to the Veoila ES Technical Solutions Facility located in Middlesex, New Jersey (USEPA ID Number NJD002454544) for disposal. Documentation of the transport and disposal of hazardous waste associated with the decommissioning of the former varnish line ASTs is presented in Attachment B.

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Thank you and please contact me at 315-233-3035 or [jon.fox@erm.com](mailto:jon.fox@erm.com) if you have any questions regarding this report.

Sincerely,

A handwritten signature in black ink, appearing to read "Jon S. Fox". The signature is fluid and cursive, with the first name "Jon" being the most prominent.

Jon S. Fox, P.G.  
Senior Consultant

Attachment A - Scrap Steel Documentation  
Attachment B - Hazardous Waste Documentation

Cc: Patrick Wolfe (Greif)

***ATTACHMENT A***  
***SCRAP STEEL DOCUMENTATION***



**MARCOR**  
 460 Buffalo Road, Ste. 5  
 Rochester, NY 14611-2000

585-247-6955  
 585-247-6852 (FAX)  
 800-388-5933

**Safety Beyond  
 Compliance!**

*copy given to ERM*

Date: 08-21-09

To Whom It May Concern:

The tank(s) listed below have been cleaned and decommissioned in accordance with all applicable local, State and Federal regulations.

<u>Tank</u>	<u>Size</u>	<u>Type</u>	<u>Product Contained</u>	<u>Date Cleaned</u>
1	750 gal	Steel	Varnish	08-19-09
2	1000 gal	Steel	Varnish	08-20-09
3	1000 gal	Steel	Varnish	08-20-09

The above listed tank(s) are classified as scrap steel and are to be handled accordingly.

If you have any questions do not hesitate to contact me at (585) 247-6955.

Sincerely,

*Al Rescori*  
 Al Rescori Operations Manager  
 MARCOR

***ATTACHMENT B***  
***HAZARDOUS WASTE DOCUMENTATION***

147749

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number NYD099340408	2. Page 1 of 1	3. Emergency Response Phone 1-800-388-5933	4. Manifest Tracking Number 003675164 JJK			
5. Generator's Name and Mailing Address Gretl, Inc. 2212 Colvin Blvd. Tonawanda NY 14150 Generator's Phone: 716 836-4200				Generator's Site Address (if different than mailing address)				
6. Transporter 1 Company Name Veolia ES Technical Solutions LLC				U.S. EPA ID Number NJ D080631369				
7. Transporter 2 Company Name Froehde Cartage Inc				U.S. EPA ID Number W5B54126164				
8. Designated Facility Name and Site Address Veolia ES Technical Solutions, L.L.C. 125 Factory Lane Middlesex NJ 08846 Facility's Phone: 732 469-5100				U.S. EPA ID Number NJ D002454544				
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt/Vol	13. Waste Codes		
		No.	Type					
X	1 RQ UN1993, WASTE Flammable Liquids, n.o.s. (Xylene, Ethylbenzene) 3, PGIII (D001, F003, F005)	XX1	DM	XX400	P	D001	F003	F005
X	2 RQ UN1993, WASTE Flammable Liquids, n.o.s. (Xylene, Ethylbenzene) 3, PGIII (D001, F003, F005)	XX6	DM	X2400	P	D001	F003	F005
X	3 RQ NA3082, Hazardous waste, liquid, n.o.s. (D022, D040, F002, F005) 9, PGIII	X14	DM	X7600	P	D022	D040	F002
						F005	U226	B
14. Special Handling Instructions and Additional Information 1) (I, T) ERG#128 Waste Solvents (91294/MARFS) 2) (I, T) ERG#128 Dried Varnish (99313/MARPULF#1) 3) ERG#171 Well Water with Organics (99025/MARCSW) (Also: U228), WTS PO# 34287 NYS DEC VCP # V00334-9								
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/ placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.								
Generator's/Offeror's Printed/Typed Name Patrick Wolfe				Signature Patrick Wolfe		Month Day Year 11 05 09		
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Part of entry/exit: _____ Date leaving U.S.: _____								
17. Transporter Acknowledgment of Receipt of Materials								
Transporter 1 Printed/Typed Name Walter S. Swabe				Signature [Signature]		Month Day Year 11 05 09		
Transporter 2 Printed/Typed Name Wm. Kirchoff				Signature Wm. Kirchoff		Month Day Year 11 05 09		
18. Discrepancy								
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection								
18b. Alternate Facility (or Generator)						Manifest Reference Number: _____ U.S. EPA ID Number _____		
Facility's Phone: _____								
18c. Signature of Alternate Facility (or Generator)						Month Day Year		
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)								
1. H061		2. H061		3. H061		4.		
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a								
Printed/Typed Name Steve Hawk				Signature [Signature]		Month Day Year 11 10 09		