

10 March 2011

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Environmental Engineer 2
New York State Department of Environmental Conservation
Division of Environmental Remediation - Region 9
270 Michigan Avenue
Buffalo, New York 14203



RE: Monthly Progress Report – February 2011
Greif, Inc. Facility – Tonawanda, New York
NYSDEC VCP Number V00334-9

***Key Actions
This Period:***

- Performed routine operations and maintenance (O&M) on the Pilot Sub-Slab Depressurization (SSD) system and dense, non-aqueous phase liquid (DNAPL) recovery equipment. Collected and recorded relevant data. Data collected included liquid level measurements in selected Site wells and monitoring points (Table 1), vacuum readings in vacuum monitoring points (Table 2), and treatment system operational data (Table 3). The locations of wells and other monitoring points are presented in Figure 1. A map showing the estimated distribution of vacuum in the sub-slab at the facility on 21 February 2011 is presented in Figure 2.
- Continued evaluation of Pilot SSD System pilot test data and preparation of a report and SSD system design.
- Procurement of subcontractor and coordination pertaining to corrective action for short circuiting and trip hazards on the northern and southern sides of the former varnish pit area.

***Problems/
Resolutions:***

During the 21 February 2011 site visit, additional water accumulation was observed in the system piping associated with suction point locations SP-05 through SP-08. Decreased and fluctuating vacuum readings similar to those during the December 2010 and January 2011 O&M site visits were also observed. To address this issue, ERM briefly isolated the blower vacuum to

discreet sections of the SSD system piping. ERM removed approximately 17-gallons of water from pipes PG-104 and PG-101 using focused blower vacuum to pull water into the system knockout pot. Subsequent to the water removal, fluctuation in vacuum readings at suction points SP-05 through SP-08 ceased and vacuum reading returned to normal values generally consistent with pervious month's readings.

Automated pumps installed during the January 2011 O&M visit were operational. However, a negligible amount of condensate from PG-104 and PG-101 was recovered using these pumps.

Analytical Data Received:

- None.

Documents Submitted:

- Monthly Progress Report for January 2011 dated 10 February 2011.

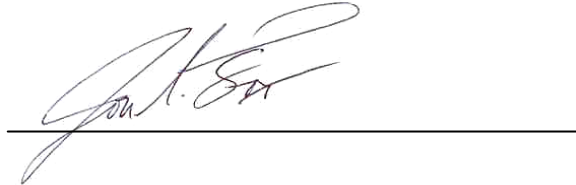
Anticipated Actions - March 2011:

- Routine O&M of the Pilot SSD System and DNAPL recovery equipment and adjustment of extraction and recovery parameters as necessary based on Site data and observations. Monitoring for water accumulation in Pilot SSD System pipes PG-101 and PG-104 will also occur.
- Evaluation of SSD System pilot test data and results and preparation of a final design for the SSD System.
- Perform corrective action for short-circuiting and trip hazards located on the northern and southern sides of the former varnish pit. Work will include removal of concrete and pouring of a new, reinforced 6-inch concrete slab to provide a more effective and permanent seal at the joint between the former varnish pit and the floor.
- Perform a structural engineering evaluation of the proposed excavation in the Former Varnish UST Area and preparation of an excavation plan document.
- Preparations for performance of the remedial soil excavation in the Former Varnish UST Area.

**NYSDEC-
Approved Field
Decisions:**

- None.

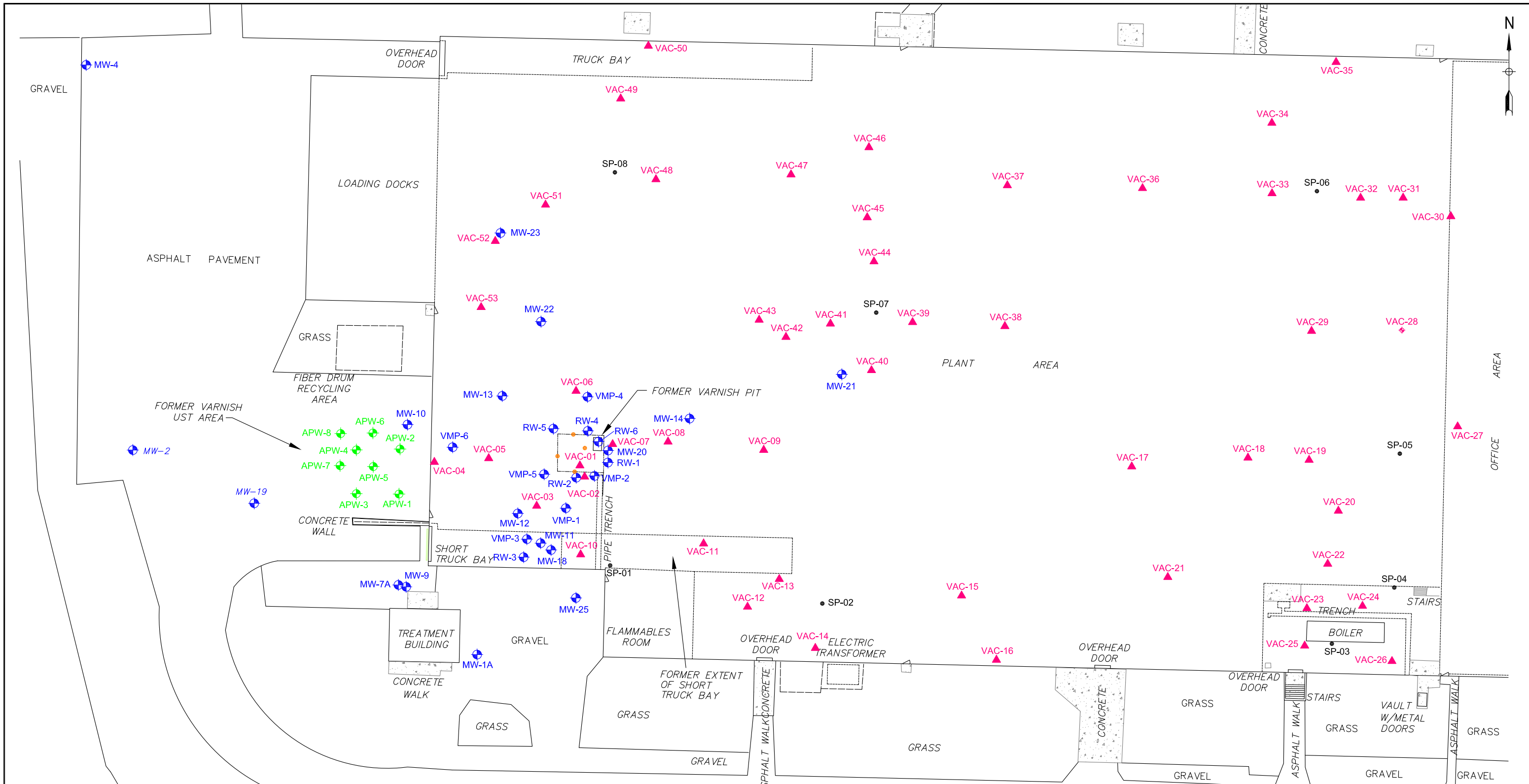
Prepared By:



Jon S. Fox, P.G.
Senior Consultant

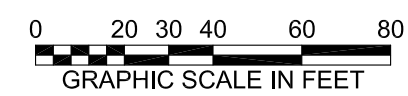
Date: 10 March 2011

Cc: Robert Powell, C.S.P., A.R.M. (Sonoco)
Pete Gruene (Sonoco)
Patrick Wolfe (Greif)
James Charles, Esq. (NYSDEC)
Matt Forcucci (NYSDOH)
Gregory Sutton, P.E. (NYSDEC)
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Ed Hinchey, P.G. (ERM)
John Mohlin, P.E. (ERM)
Rob Sents (ERM)



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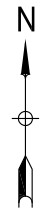
- ▲ Vacuum Monitoring Point Location
- ⊕ Monitoring or Recovery Well Location
- ⊕ Antenna Placement Well
- Suction Point Location
- Horizontal Suction Point Location
- Former Varnish Pit
- ↗ Man Door
- ▣ Concrete Pad



TITLE			
SAMPLE AND MEASUREMENT LOCATIONS GREIF FACILITY-TONAWANDA, NEW YORK NYSDEC VCP NUMBER V00334-9			
PREPARED FOR			
SONOCO PRODUCTS COMPANY			
SCALE		FIGURE	
GRAPHIC		1	
DATE		08-Feb-2011	
DRAWN:	JOB NO.:	FILE NAME:	
EMF	0112477.01	0112477-01-011	

Map Source: Wm. Schutt & Associates, P.C., 37 Central Ave, Lancaster, NY, Survey File: D0135103, WSA Proj: M01351.

Draft

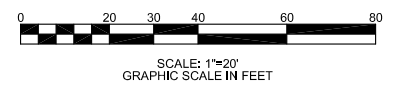


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- Horizontal Suction Point Location
- Vertical Suction Point Location
- ▲ Vacuum Monitoring Point Location (vacuum in " H₂O)
- 0.125
- NM Not Measured
- Estimated Extent of Sub-Floor Vacuum
- Former Varnish Pit
- Man Door
- Concrete Pad

NOTES:

1. " H₂O = inches of water column



TITLE SUBSURFACE VACUUM DISTRIBUTION 21 FEBRUARY 2011 GREIF FACILITY-TONAWANDA, NEW YORK			
PREPARED FOR SONOCO PRODUCTS COMPANY			
Environmental Resources Management	SCALE GRAPHIC	FIGURE 2	
DRAWN: EMF	JOB NO.: 0112477.01	FILE NAME: 0129254-01-001	DATE 07-Mar-2011

Table 1
Summary of Non-Aqueous Phase Liquid Thicknesses in Wells
Greif Facility - Tonawanda, New York
NYSDEC VCP Number V00334-9

WELL	RW-1 (ft.) (DNAPL)	RW-2 (ft.) (DNAPL)	RW-4 (ft.) (DNAPL)	RW-5 (ft.) (LNAPL)	RW-6 (ft.) (DNAPL)	VMP-2 (ft.) (DNAPL)	VMP-5 (ft.) (DNAPL)	MW-20 (ft.) (DNAPL)	MW-23 (ft.) (LNAPL)
Date									
19-May-08	0.00	0.00	0.00	0.00	NI	0.00	HS	0.09	0.14
30-May-08	0.00	0.16	0.00	0.00	NI	0.00	HS	0.03	0.14
16-Jun-08	0.00	0.14	0.00	0.02	NI	0.00	0.02	0.07	0.13
25-Jun-08	0.00	0.16	0.00	0.02	NI	0.00	HS	0.07	0.26
3-Jul-08	0.00	0.16	0.00	0.02	NI	0.00	HS	0.09	0.18
23-Jul-08	0.00	0.16	0.00	0.02	NI	0.00	HS	0.10	0.09
6-Aug-08	0.03	0.16	0.00	0.04	NI	0.00	HS	0.11	0.09
19-Aug-08	0.03	0.16	0.00	0.04	NI	0.00	HS	0.13	0.11
21-Nov-08	HS	0.11	0.00	0.00	NI	0.00	HS	0.22	0.29
17-Dec-08	HS	0.11	0.00	0.00	NI	0.00	HS	0.24	0.29
14-Jan-09	0.00	0.00	0.00	0.00	NI	0.00	0.00	HS	0.13
26-Feb-09	0.00	0.00	0.00	0.00	NI	0.00	0.00	0.01	0.24
12-Mar-09	0.00	0.00	0.00	0.00	NI	0.00	0.00	0.00	0.09
22-Apr-09	0.00	0.00	0.00	0.00	NI	0.00	0.00	0.00	0.11
13-May-09	0.00	0.00	0.00	0.00	NI	0.00	0.00	0.00	0.09
25-Jun-09	NM	0.00	NM	0.00	NI	0.00	0.00	NM	0.12
17-Jul-09	NM	0.00	NM	0.00	NI	0.00	0.00	NM	0.11
27-Aug-09	0.00	0.00	0.00	0.00	NI	0.00	NM	NM	0.09
25-Sep-09	0.00	0.00	0.00	0.00	NM	0.00	NM	0.04	0.11
16-Oct-09	NM	0.00	0.00	0.00	NM	0.00	NM	NM	0.11
19-Nov-09	NM	0.00	NM	NM	NM	0.00	NM	NM	0.21
17-Dec-09	0.00	0.00	NM	NM	NM	0.00	0.00	0.01	0.23
14-Jan-10	0.00	0.00	0.00	NM	NM	0.00	0.00	0.01	0.21
17-Feb-10	0.00	0.00	NM	NM	NM	0.00	0.00	0.01	0.17
18-Mar-10	0.00	0.00	0.00	0.00	NM	0.00	0.00	0.01	0.09
13-Apr-10	0.00	0.00	0.00	0.00	0.49	0.00	0.00	0.01	0.12
18-May-10	0.00	0.00	0.00	0.00	0.53	0.00	NM	0.01	0.08
15-Jun-10	0.00	0.00	0.00	NM	0.01*	0.00	0.00	0.01	0.07
14-Jul-10	0.00	0.00	0.00	0.00	0.04	0.00	0.00	0.00	0.07
13-Aug-10	0.00	NM	0.00	NM	0.08	0.00	0.00	HS	0.10
14-Sep-10	0.00	NM	0.00	NM	0.04	0.00	0.00	NM	0.06
14-Oct-10	0.00	0.00	0.00	0.00	0.05	0.00	0.00	0.01	0.08
22-Nov-10	0.00	0.00	NM	0.00	0.04	0.00	0.00	0.01	0.14
15-Dec-10	0.00	0.00	0.00	NM	0.01	0.00	NM	0.01	0.09
18-Jan-11	0.00	0.00	0.00	NM	HS	0.00	NM	0.02	0.09
21-Feb-11	NM	0.00	0.00	0.00	0.03	0.00	0.00	0.03	0.04

Notes:

All values are reported in feet as measured with an electronic interface probe.

HS - heavy sheen but no measureable thickness.

NM - not measured; was covered with pallets or other surface obstruction.

NI - not installed as of this date.

* - Product level after ERM initiated DNAPL recovery test

Table 2
Summary of Vacuum/Pressure Readings
Greif Inc. Tonawanda, NY
NYSDEC VCP Number V00334-9

Location	Vac-01	Vac-02	Vac-03	Vac-04	Vac-05	Vac-06	Vac-07	Vac-08	Vac-09	Vac-10	Vac-11	Vac-12	Vac-13	Vac-14
Date														
16-Jun-10	0.1175	0.1375	0.1375	0	0.1425	0.1625	0.095	0.0325	0	0.10	0.0950	0	NM	0
14-Jul-10	1.65	1.45	0.47	0	0.68	0.46	0.125	0.0525	0	0.1625	0.16	0	0	0
13-Aug-10	1.3	1.25	0.46	0	0.65	0.45	0.135	0.07	0	0.19	0.175	0	0	NM
14-Sep-10	0.8	NM	0.29	0	0.28	0.195	0.055	0.015	0	NM	0.125	0	0	0
14-Oct-10	0.82	0.84	0.29	0	0.28	0.185	0.05	0.015	0	0.1375	0.12	0	0	NM
22-Nov-10	0.29	2.3	0.49	0	0.35	0.28	0.105	0.0025	0	0.155	0.135	0	NM	NM
16-Dec-10	0.26	2.1	0.42	0	0.2	0.14	0.075	0	0	0.13	0.105	0	0	NM
19-Jan-11	0.77	2	0.41	0	0.24	0.18	0.1	NM	0	0.155	0.125	0	NM	0
21-Feb-11	1.35	1.8	0.4	0	NM	0.17	0.1	0	0	NM	0.12	NM	0	0

Location	Vac-15	Vac-16	Vac-17	Vac-18	Vac-19	Vac-20	Vac-21	Vac-22	Vac-23	Vac-24	Vac-25	Vac-26	Vac-27	Vac-28
Date														
16-Jun-10	0	NM	0.0025	0.25	0.42	0.175	0	0.0075	0	0	0.089	0.020	0.005	0.0175
14-Jul-10	0	0	NM	0.31	0.54	0.205	0	0	NM	NM	NM	NM	0.005	0.01
13-Aug-10	0	0	0.0025	0.31	0.52	NM	0	0	0	0	0.08	0.02	0.005	0.025
14-Sep-10	0	0	0	0.165	0.31	0.075	0	0	0	0	0.08	0.015	0.005	0.005
14-Oct-10	NM	0	0	0.18	0.35	0.105	0	0	0	0	0.08	0.015	0.0025	0.005
22-Nov-10	0	0	0	0.2	0.35	0.1	0	0	0	0	0.08	0.02	0.0025	0.0025
16-Dec-10	0	0	0	0.145	0.29	0.08	0	0	0	0	0.055	0.01	0	0.0025
19-Jan-11	0	0	0	0.15	0.29	0.08	0	0	0	0	0.075	0.02	0	0.0075
21-Feb-11	0.005	0	NM	0.18	0.35	NM	0	0.0125	0	0	0.0675	0.035	0.015	0.01

Location	Vac-29	Vac-30	Vac-31	Vac-32	Vac-33	Vac-34	Vac-35	Vac-36	Vac-37	Vac-38	Vac-39	Vac-40	Vac-41	Vac-42
Date														
16-Jun-10	0.040	0	0	0.040	0.0675	0.0225	NM	0	0.030	NM	0.025	0.0275	0.0525	0.0025
14-Jul-10	NM	NM	NM	NM	0.125	0.0325	0	0	0	NM	0.03	0.0325	NM	0.005
13-Aug-10	0.0725	0	0.0375	0.0875	0.1625	0.05	0	0	0	0	0.05	0.04	0.0875	0.015
14-Sep-10	0.025	0	0.01	0.03	0.06	0.015	0	0	0	0	0.02	0.0075	0.025	0.0025
14-Oct-10	0.025	0	0.005	0.03	0.055	0.01	0	0	0	0	0.01	0.01	0.025	NM
22-Nov-10	0.015	0	0.0025	0.025	0.065	0.01	0	NM	0	0	0.005	NM	0.015	NM
16-Dec-10	0.02	NM	0.005	0.035	0.055	0.015	0	NM	0	0	0.005	NM	0.0125	NM
19-Jan-11	0.02	NM	0.0075	0.03	0.04	0.015	0	0	0	0	0.01	NM	0.0125	NM
21-Feb-11	0.015	0	0.01	0.035	0.0325	NM	NM	0	0	0.0025	0.015	0.01	0.0175	NM

Location	Vac-43	Vac-44	Vac-45	Vac-46	Vac-47	Vac-48	Vac-49	Vac-50	Vac-51	Vac-52	Vac-53
Date											
16-Jun-10	0.0025	0.0425	0.015	0.0125	NM	0.2125	0.0925	0	0.080	0.0125	0.0125
14-Jul-10	0	NM	NM	0.0125	NM	0.21	0.0875	NM	0.8	0.0175	0.0225
13-Aug-10	0	NM	NM	NM	NM	0.22	0.0925	0	0.085	NM	0.0225
14-Sep-10	0	NM	NM	0.0025	NM	0.1275	0.05	0	0.04	0.005	0
14-Oct-10	NM	NM	0	NM	NM	0.11	0.0375	0	0.03	0	0
22-Nov-10	0	NM	0	0	NM	0.135	0.0475	0	0.03	0.0025	0
16-Dec-10	0	0.015	0	0	NM	0.09	0.02	0	NM	0	0
19-Jan-11	0	NM	0	0	NM	0.12	0.035	0	0.03	0.0025	0
21-Feb-11	0	0.0325	0.01	0	0	0.125	0.035	0	0.03	0	0

Notes:

- All vacuum and/or pressure readings are reported in inches of water column ("H2O).
 NM = not measured; was covered with pallets or other surface obstructions

Table 3
Summary of Treatment System Data
Greif Facility - Tonawanda, New York
NYSDEC VCP Number V00334-9
Page 1 of 2

Location Units	Header Vacuum						Header Air Flow					
	PG-101 " H ₂ O	PG-102 " H ₂ O	PG-103 " H ₂ O	PG-104 " H ₂ O	PG-105 " H ₂ O	PG-106 " H ₂ O	PG-101 cfm	PG-102 cfm	PG-103 cfm	PG-104 cfm	PG-105 cfm	PG-106 cfm
Date												
17-Dec-09	NF	-11.5	NM	NF	NF	NF	NF	NM	NM	NF	NF	NF
14-Jan-10	NF	-40	NM	NF	NF	NF	NF	94	NM	NF	NF	NF
17-Feb-10	NF	-4.2	NM	NF	NF	NF	NF	16	NM	NF	NF	NF
18-Mar-10	NF	-1.95	NM	NF	NF	NF	NF	15	NM	NF	NF	NF
13-Apr-10	NF	-2.85	-13.0	NF	NF	NF	NF	73	233	NF	NF	NF
18-May-10	NF	-3.95	-13.0	NF	NF	NF	NF	83	212	NF	NF	NF
15-Jun-10	NF	-2.60	-15.5	NF	NF	NF	NF	65	225	NF	NF	NF
14-Jul-10	NM	-1.75	-4.10	NM	NM	NF	NM	26	75	NM	NM	NF
13-Aug-10	-3.75	-1.30	-3.75	-3.70	-3.75	NF	67	19	73	65	82	NF
14-Sep-10	-3.15	-0.85	-3.25	-3.15	-3.2	NF	68	18	74	65	72	NF
14-Oct-10	-3.45	-0.91	-3.50	-3.45	-3.55	NF	70	32	76	66	72	NF
22-Nov-10	-4.05	-0.30	-4.15	-4.00	-4.2	NF	76	14	80	70	82	NF
16-Dec-10	-4.05	-0.30	-4.05	-3.95	-4.05	NF	70	14	85	75	94	NF
19-Jan-11	-3.55	-0.85	-3.60	-3.55	-3.6	NF	82	39	135	92	164	NF
21-Feb-11	-3.4	-1.55	-3.50	-3.40	-3.5	NF	116	36	105	78	144	NF

Location Key

PG-101 = Suction Pits 05, 06, 07 and 08 (pipe 1 of 2).

PG-102 = interior of former varnish pit.

PG-103 = horizontal suction points through former varnish pit's north, west, and south walls.

PG-104 = Suction Pit 05, 06, 07, and 08 (pipe 2 of 2).

PG-105 = Suction Pit 01 and 02.

PG-106 = not connected.

Notes:

- Vacuum and pressure data are reported in inches of water; negative data represent vacuum; positive data represent pressure.
- Air flow data are based on measured air velocity and are reported in cubic feet per minute.
- NM = not measured
- NF = no flow as the piping associated with these measurement locations was not open/ connected at the time of measurement.

Table 3 (Continued)
Summary of Treatment System Data
Greif Facility - Tonawanda, New York
NYSDEC VCP Number V00334-9
Page 2 of 2

Location Units	Pre-Carbon			Mid-Carbon		Post-Carbon		
	Pressure " H ₂ O	Temp °F	PID ppm	Temp °F	PID ppm	Temp °F	PID ppm	Flow cfm
Date								
17-Dec-09	+10.5	103	0.0	98	0.0	67	0.0	120
14-Jan-10	+7.5	114	46.5	102	18.7	91	13.9	73
17-Feb-10	+9.5	114	0.0	111	0.0	99	0.0	88
18-Mar-10	+9.0	115	0.0	108	0.0	98	0.0	98
13-Apr-10	+9.0	118	4.7	109	2.0	98	1.1	225
18-May-10	+8.5	108	3.0	103	2.2	94	1.7	220
15-Jun-10	+10.0	114	3.3	103	0.0	89	0.0	245
14-Jul-10	+11.0	112	5.2	106	4.1	98	1.9	263
13-Aug-10	+10.5	118	2.6	112	2.0	103	1.3	255
14-Sep-10	+13.0	100	2.2	90	1.1	NM	0.5	461
14-Oct-10	+15.5	104	0.3	104	0.0	NM	0.0	475
22-Nov-10	+15.5	102	0.4	97	0.0	94	0.0	490
16-Dec-10	+15.5	94	15.1	89	11.8	88	3.2	493
19-Jan-11	+16.5	94	1.0	88	1.1	86	0.2	516
21-Feb-11	+16	91	0.7	85	0	84	0	462

Notes:

- Vacuum and pressure data are reported in inches of water; negative data represent vacuum; positive data represent pressure.
- Air flow data are based on measured air velocity and are reported in cubic feet per minute.
- Temperature reported in degrees Fahrenheit.
- PID = photoionization detector reading reported in parts per million.
- NM = not measured