

16 April 2012

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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 – March 2012
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 sampling and monitoring points are presented in Figure 1. A map showing the estimated distribution of vacuum beneath the floor slab on 16 March 2012 is presented in Figure 2.
- Technical assistance and review of Site information for incorporation into a deed restriction currently under preparation by Greif and the NYSDEC's consultant.

***Problems/
Resolutions:***

- Water was observed inside SSD system piping while isolating headers PG-101 and PG-104. The water appears to be due to condensation where vapors are being cooled at one or more points inside SSD system piping. The most likely location for the cooling is the section of piping between the main building and the treatment building. ERM will evaluate options to address the water accumulation during upcoming modifications to the SSD System.

Analytical Data Received: • None.

Documents Submitted: • Monthly Progress Report for February 2012 dated 26 March 2012.

Anticipated Actions – April 2012:

- Received NYSDEC comment/ approval on proposed SSD system modifications on 4 April 2012.
- 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.
- Collection of ground water samples from selected monitoring wells for ground water monitoring and the evaluation of natural attenuation processes. Samples will be collected from the following monitoring wells using low-flow/minimal drawdown sampling procedures:

Shallow Ground Water

- APW-3;
- MW-12;
- MW-13;
- MW-14;
- MW-19;
- MW-21S;
- MW-24;
- MW-25;
- MW-26;
- MW-27;
- RW-5; and
- VMP-6.

Intermediate Ground Water

- MW-1A;
- MW-3;
- MW-18;
- MW-21I; and
- MW-22.

Dissolved oxygen, oxidation-reduction potential, conductivity, temperature, and pH will be measured in the field using calibrated meters to facilitate evaluation of natural attenuation processes. Ground water samples will be analyzed at an approved environmental laboratory for Site-specific volatile organic compounds (VOCs) and the following parameters useful for the evaluation of natural attenuation processes:

- methane, ethane, and ethene;
 - sulfate; and
 - dissolved organic carbon.
-
- Preparation of a deed restriction for the Site.
 - None.

**NYSDEC-
Approved Field
Decisions:**

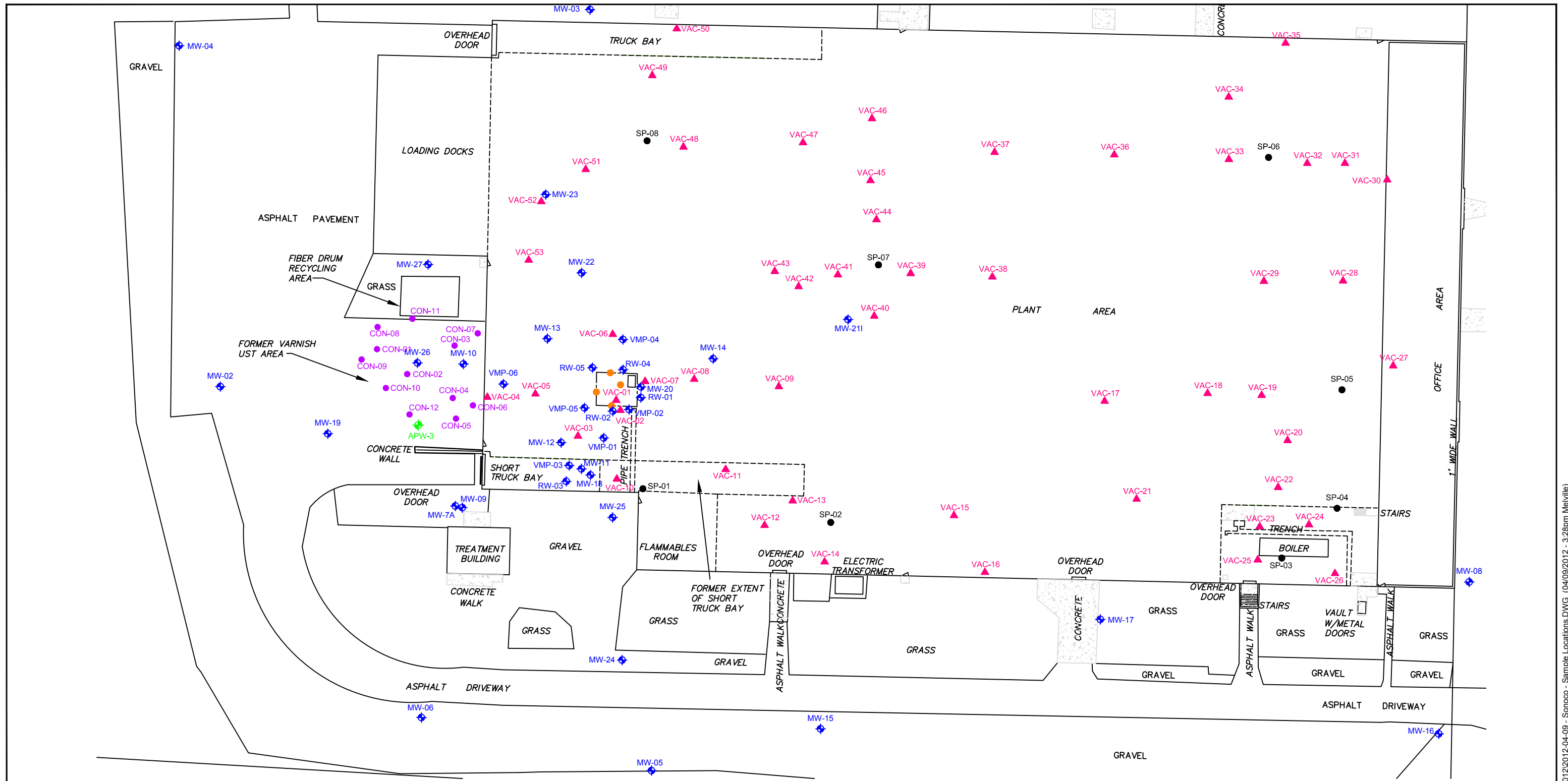
Prepared By:



Jon S. Fox, P.G.
Senior Consultant

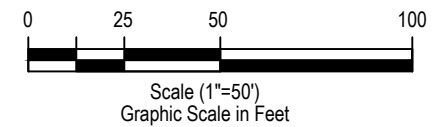
Date: 16 April 2012

Cc: Pete Gruene (Sonoco)
Mike Sunderland (Sonoco)
Patrick Wolfe (Greif)
Gregory Sutton, P.E. (NYSDEC)
James Charles, Esq. (NYSDEC)
Matt Forcucci (NYSDOH)
A. Joseph White (NYSDEC)
John Kuhn (ERM)
John Mohlin, P.E. (ERM)

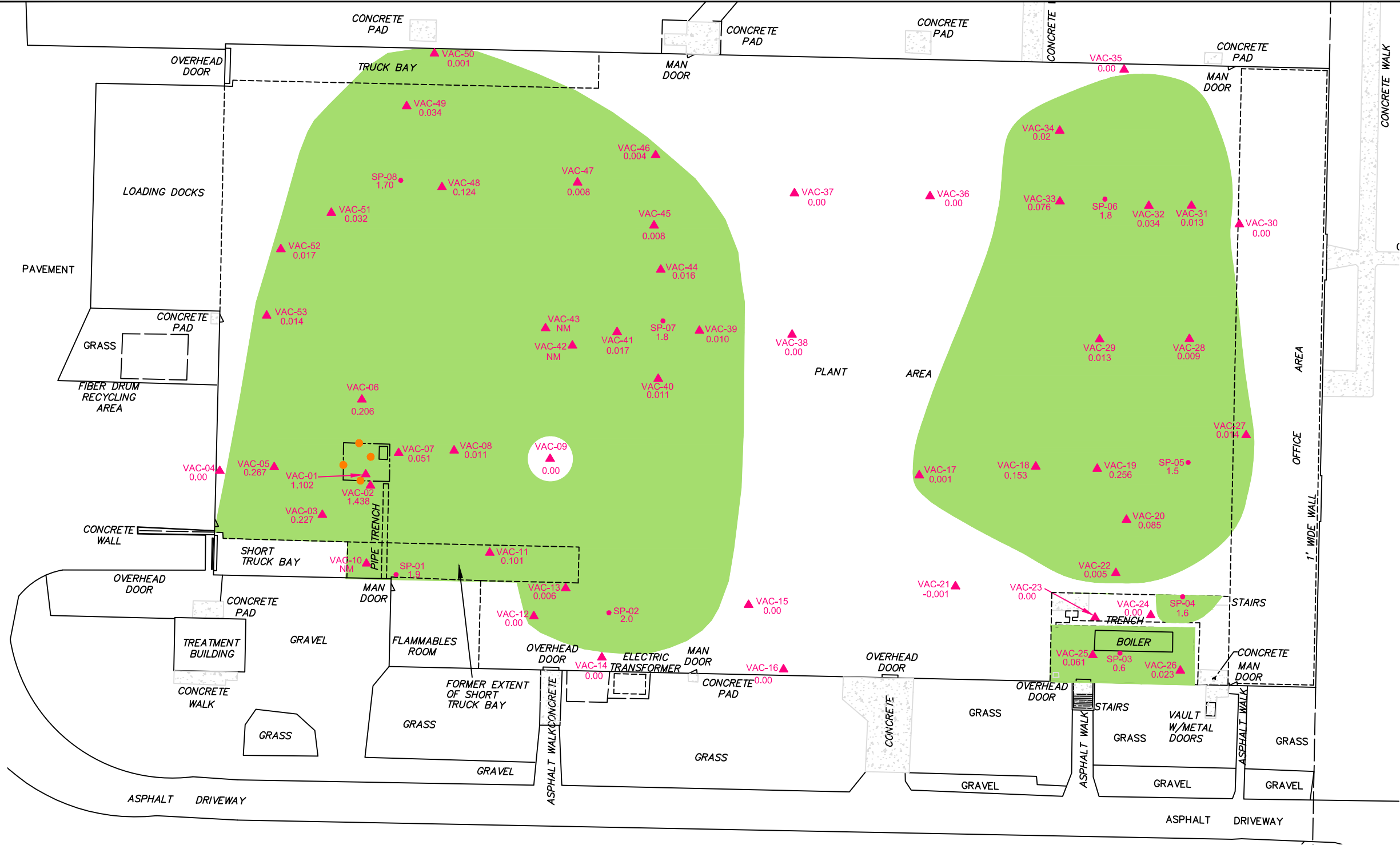


LEGEND

- ▲ Vacuum Monitoring Point Location
- ◆ Monitoring or Recovery Well Location
- ◆ Antenna Placement Well
- Vertical Suction Point Location
- Horizontal Suction Point Location
- Soil Confirmation Location
- ▭ Former Varnish Pit
- ▭ Man Door
- ▭ Concrete Pad



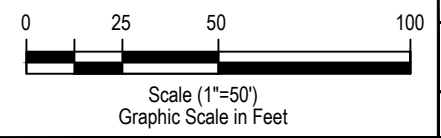
TITLE SAMPLE AND MEASUREMENT LOCATIONS GREIF FACILITY-TONAWANDA, NEW YORK NYSDEC VCP NUMBER V00334-9			
PREPARED FOR SONOCO PRODUCTS COMPANY			
		FIGURE 1	
DRAWN BY	SCALE	DATE	JOB NO.
EMF	GRAPHIC	09-Apr-2012	0129254-01



LEGEND

- Horizontal Suction Point Location
- Vertical Suction Point Location
- ▲ Vacuum Monitoring Point Location (vacuum in " H₂O)
- 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 16 MARCH 2012 GREIF FACILITY-TONAWANDA, NEW YORK			
PREPARED FOR			
SONOCO PRODUCTS COMPANY			
Environmental Resources Management			
DRAWN BY	SCALE	DATE	JOB NO.
EMF	GRAPHIC	10 April 2012	0129254.01
			FIGURE 2

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
11-Mar-11	0.00	0.00	0.00	0.00	0.21	0.00	0.00	0.04	0.03
21-Apr-11	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.04
24-May-11	0.00	0.00	0.00	NM	0.15	0.3	0.00	0.1	0.1
21-June-11	0.00	0.00	0.00	0.00	0.1	0.00	0.00	0.03	0.08
21-July-11	0.00	0.00	0.00	NM	HS	0.00	0.00	0.01	0.06
29-Aug-11	0.00	0.00	0.00	0.00	0.06	0.00	0.00	0.00	HS
26-Sept-11	0.00	NM	0.00	0.00	0.10	0.00	NM	0.04	HS
28-Oct-11	0.00	0.00	NM	0.00	0.03	0.00	0.00	0.02	HS
18-Nov-11	0.00	0.00	NM	NM	HS	0.00	0.00	0.01	0.04
22-Dec-11	0.00	0.00	NM	NM	0.03	0.00	0.00	0.02	0.06
20-Jan-12	0.00	0.00	0.00	0.00	HS	0.00	0.00	0.02	HS
21-Feb-12	0.00	0.00	0.00	0.00	HS	0.00	0.00	0.03	HS
16-Mar-12	0.00	0.00	0.00	0.00	HS	0.00	0.00	HS	0.15

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 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
11-Mar-11	1.8	2.25	0.5	0	NM	0.22	NM	0.01	0	NM	0.12	0	0	NM
21-Apr-11	1.35	2	0.45	0	0.25	0.2	0.1025	0	0	0.155	0.135	0	0	0
24-May-11	2.15	2.05	0.47	0	0.35	0.28	0.1325	0.0275	0	0.1625	0.15	0	NM	0
21-Jun-11	2.05	2.1	0.46	0	0.45	0.4	0.165	0.0575	0	0.19	0.18	0	NM	0
21-Jul-11	2.55	2.25	0.46	0	0.62	0.55	0.2	0.1	0	0.21	0.21	0	0	0
29-Aug-11	2.3	2.2	0.44	0	0.48	0.4	0.155	0.055	0	0.15	0.145	0	0	0
26-Sep-11	1.3	NM	0.46	0	0.44	0.36	0.155	0.06	0	0.1775	0.16	0	0.0025	0
28-Oct-11	1	1.6	0.33	0	0.2125	0.195	0.0925	0.005	0	0.1125	0.1	0	0	0
18-Nov-11	NM	1.3	0.28	0	0.135	0.13	0.06	0.005	0	0.1	0.09	0	0	0
22-Dec-11	1.58	1.464	0.343	0	0.245	0.171	0.069	0.008	0	0.114	0.097	0.002	0.006	0
20-Jan-12	1.395	1.432	0.315	0	0.249	0.174	0.067	0.008	0	0.108	0.094	0.005	0.01	0
21-Feb-12	1.464	1.22	0.244	0	0.179	0.128	0.041	0.004	0	0.102	0.09	0.001	0.003	0
16-Mar-12	1.102	1.438	0.227	0	0.267	0.206	0.051	0.011	0	NM	0.101	0	0.006	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
11-Mar-11	0	0	0	0.1875	0.34	0.12	0	0	0	0	0.08	0.025	0.01	0.02
21-Apr-11	0	0	0	0.18	0.32	0.105	0	0.01	0	0	0.08	0.0325	0.01	0.0125
24-May-11	0	0	0	0.215	0.36	0.1475	0	0	0	0	0.0775	0.03	0.015	0.0175
21-Jun-11	0	0	NM	0.23	0.39	0.16	0	0	0	0	0.085	0.03	0.02	0.02
21-Jul-11	0	0	NM	0.24	0.39	0.17	0	0.0175	0	0	0.1	0.025	0.02	0.035
29-Aug-11	0	0	NM	0.21	0.32	0.12	0	0	0	0	0.09	0.0225	0.0175	0.02
26-Sep-11	0	0	NM	0.205	0.32	0.12	0.0025	0	0	0	0.0725	0.025	0.0175	0.0175
28-Oct-11	0	0	0	0.15	0.24	0.0525	0	0	0	0	0.08	0.03	0.01	0.01
18-Nov-11	0	0	0	0.14	0.21	0.06	0	0.0075	0	0	0.085	0.0275	0.015	0.015
22-Dec-11	0	0	0.003	0.138	0.227	0.06	0	0.01	0	0.003	0.083	0.024	0.012	0.009
20-Jan-12	0	0	0.001	0.135	0.222	0.064	0	0.01	0	0	0.078	0.022	0.01	0.007
21-Feb-12	0	0	0.001	0.105	0.186	0.045	-0.001	0.006	0	0	0.077	0.021	0.01	0.004
16-Mar-12	0	0	0.001	0.0153	0.256	0.085	-0.001	0.005	0	0	0.061	0.023	0.014	0.009

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

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
11-Mar-11	0.02	0	0.02	0.0425	0.0625	0.03	0	0	0	0	0.0225	0.02	0.02	NM
21-Apr-11	0.0175	0	0.01	0.035	0.06	NM	NM	0	0	0	0.01	0.005	0.0125	0
24-May-11	0.0325	0	0.0225	0.0525	0.075	NM	NM	0	0	NM	0.0125	NM	0.035	0
21-Jun-11	0.04	0	0.03	0.075	0.11	0.04	NM	0	0	0	0	0.0225	0.0425	0
21-Jul-11	0.055	0	0.05	0.1025	0.17	0.06	0	0.0125	0	0	0.0325	0.035	0.08	0.0075
29-Aug-11	0.0375	0	0.0325	0.07	0.13	0.0375	0	0	0	0	NM	0.02	0.035	0.05
26-Sep-11	0.045	0	0.03	0.06	0.1175	0.035	0	0	NM	0	0	NM	NM	0.01
28-Oct-11	NM	0	0.0075	0.0375	0.0775	0.0775	NM	0	0	0	0.0075	0.005	0.01	NM
18-Nov-11	NM	0	0.01	0.0325	0.065	0.0175	NM	0	0	0	0.0075	0	0.01	NM
22-Dec-11	0.014	0.005	0.012	0.032	0.077	0.021	0	0	0	0	0.008	0.011	0.014	0.001
20-Jan-12	0.011	-0.003	0.012	0.032	0.064	0.018	0	0	0	0	0.007	0.008	0.012	0.001
21-Feb-12	0.009	-0.002	0.007	0.023	0.054	0.016	NM	0	0	0	0.006	0.007	0.009	NM
16-Mar-12	0.013	0	0.013	0.034	0.076	0.02	0	0	0	0	0.01	0.011	0.017	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
11-Mar-11	0	NM	0.02	NM	0.005	0.16	0.0575	NM	0.05	0.03	0.01
21-Apr-11	0	NM	0	NM	0	0.1375	0.045	NM	0.025	0	0
24-May-11	0	0.03	0.005	NM	0.0075	0.175	0.06	0	0.055	0.005	0.0125
21-Jun-11	NM	NM	0.0175	NM	0.02	0.195	0.0675	0	0.065	0.0175	0.03
21-Jul-11	0.0125	0.0525	0.0375	0.025	0.035	0.235	0.0875	0	0.07	0.02	0.06
29-Aug-11	0	0.0325	NM	NM	NM	0.185	0.07	0	0.06	0.03	0.09
26-Sep-11	0.0075	NM	0.005	NM	0.0125	0.17	0.07	0	0.055	0.175	0.0325
28-Oct-11	0	0.0075	0	NM	0.0075	0.1225	0.03	0	0.03	0	0.0025
18-Nov-11	0	NM	0	0	0	0.09	0.03	0	0.0275	0.005	0.005
22-Dec-11	0.001	0.014	0.001	0.004	0.005	0.131	0.036	0.001	0.034	0.009	0.01
20-Jan-12	0.001	0.012	0.004	0.004	0.006	0.131	0.037	0.001	0.031	0.007	0.007
21-Feb-12	0.002	NM	0.003	0.002	0.004	0.114	0.026	0.001	0.026	0.008	0.009
16-Mar-12	NM	0.016	0.008	0.004	0.008	0.124	0.034	0.001	0.032	0.017	0.014

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
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Location	Header Vacuum						Header Air Flow					
	PG-101	PG-102	PG-103	PG-104	PG-105	PG-106	PG-101	PG-102	PG-103	PG-104	PG-105	PG-106
Units	" H ₂ O	" H ₂ O	" H ₂ O	" H ₂ O	" H ₂ O	" H ₂ O	cfm	cfm	cfm	cfm	cfm	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
11-Mar-11	3.35	2.00	3.35	3.35	3.4	NF	98	73	65	76	141	NF
21-Apr-11	3.1	1.65	3.10	3.05	3.15	NF	97	84	103	106	170	NF
24-May-11	3.0	2.60	3.10	3.00	3.10	NF	89.61	53.94	89.61	71.34	87.87	NF
21-Jun-11	3.0	2.70	3.00	3.00	3.10	NF	115.71	90.48	106.14	87.87	96.57	NF
21-Jul-11	3.1	2.80	3.20	3.10	3.10	NF	113.97	87.00	100.92	80.48	140.07	NF
29-Aug-11	3.00	2.90	3.00	3.00	3.00	NF	106.14	69.60	93.09	75.17	100.31	NF
26-Sep-11	2.90	1.40	2.90	2.90	2.90	NF	95.70	63.95	105.27	90.48	127.02	NF
28-Oct-11	2.70	1.20	2.80	2.70	2.80	NF	63.51	39.67	101.79	86.13	114.84	NF
18-Nov-11	2.50	1.00	2.50	2.40	2.50	NF	73.08	55.68	107.88	72.65	115.71	NF
22-Dec-11	2.40	1.80	2.50	2.40	2.40	NF	63.95	52.20	62.21	72.65	72.65	NF
20-Jan-12	2.40	1.60	2.40	2.55	2.50	NF	99.18	74.39	92.22	74.39	108.75	NF
21-Feb-12	2.30	1.70	2.40	2.30	2.40	NF	93.09	83.96	90.48	86.13	100.92	NF
16-Mar-12	2.20	1.20	2.20	2.20	2.20	NF	140.94	99.18	139.20	72.65	166.17	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.
- 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
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Location	Pre-Carbon			Mid-Carbon		Post-Carbon		Flow
	Pressure	Temp	PID	Temp	PID	Temp	PID	
Units	" H ₂ O	°F	ppm	°F	ppm	°F	ppm	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
11-Mar-11	15.5	97	189	91	69.2	91	5.7	522
21-Apr-11	22.5	98	1.1	NM	0	97	0	220
24-May-11	28.5	111	6.3	NM	1.5	104	0	202.71
21-Jun-11	30	127	4.4	NM	0.7	112	0.1	181.83
21-Jul-11	41	137	0.0	NM	0.0	120	0.0	175.74
29-Aug-11	39	132	5.3	NM	0.0	121	0.0	176.61
26-Sep-11	46	132	1.1	NM	1.0	116	0.0	172.26
28-Oct-11	46	116	7	NM	4.6	99	0.0	186.18
18-Nov-11	46	124	3.4	NM	1.0	114	0.0	178.35
22-Dec-11	46	116	0.2	NM	0.0	118	0.0	185.31
20-Jan-12	44	114	0.00	80.1	0.0	112	0.0	180.96
21-Feb-12	45	118	6.4	88	0	115	0.0	181.83
16-Mar-12	44	124	2.2	91	1.4	114	0.5	154.86

Notes:

- Vacuum and pressure data are reported in inches of water.
- 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