

15 November 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 - October 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 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 sampling and monitoring points are presented in Figure 1. A map showing the estimated distribution of vacuum beneath the floor slab on 17 October 2012 is presented in Figure 2.
- Measured and adjusted the pH of water previously removed from the Former Varnish Underground Storage Tank (UST) excavation to an acceptable level for on-Site disposal to the ground surface as approved by the New York State Department of Environmental Conservation (NYSDEC).
- ERM observed 0.3-foot of red dye previously used at the Site for fluorescent dye tracing in vacuum monitoring point VMP-2. The dye was removed from VMP-2 and will be handled and managed with other hazardous waste liquids generated at the Site.
- Planning, preparation, and subcontractor procurement for construction of NYSDEC-approved modifications to the SSD System.

***Problems/
Resolutions:***

- None.

***Analytical Data
Received:***

- None.

***Documents
Submitted:***

- Monthly Progress Report for September 2012 dated 10 October 2012.

***Anticipated
Actions -
November 2012:***

- Receive a response from the NYSDEC regarding the exception description submitted by Greif to the NYSDEC for use in preparation of the environmental deed restriction.
- Routine O&M of the SSD System and DNAPL recovery equipment.
- Complete subcontractor procurement for construction of NYSDEC-approved modifications to the SSD System and movement of the equipment inside the Greif facility to the mezzanine level and initiate remedial construction work. A kick-off meeting is tentatively scheduled for 4 December 2012.
- Off-site transport and disposal of three 55-gallon drums of hazardous waste from the treatment building.

***NYSDEC-
Approved Field
Decisions:***

- On-Site disposal of water previously removed from the Former Varnish UST excavation to the ground surface after adjustment of pH to an acceptable level as confirmed in the field through use of a calibrated pH meter. Additionally, the water was previously analyzed for volatile organic compounds (VOCs) at a New York State Department of Health-approved environmental laboratory. VOCs were not detected in the sample at concentrations above applicable NYSDEC ambient groundwater effluent limitations as listed in the NYSDEC Division of Water Technical and Operations Guidance Series Memorandum Number 1.1.1.

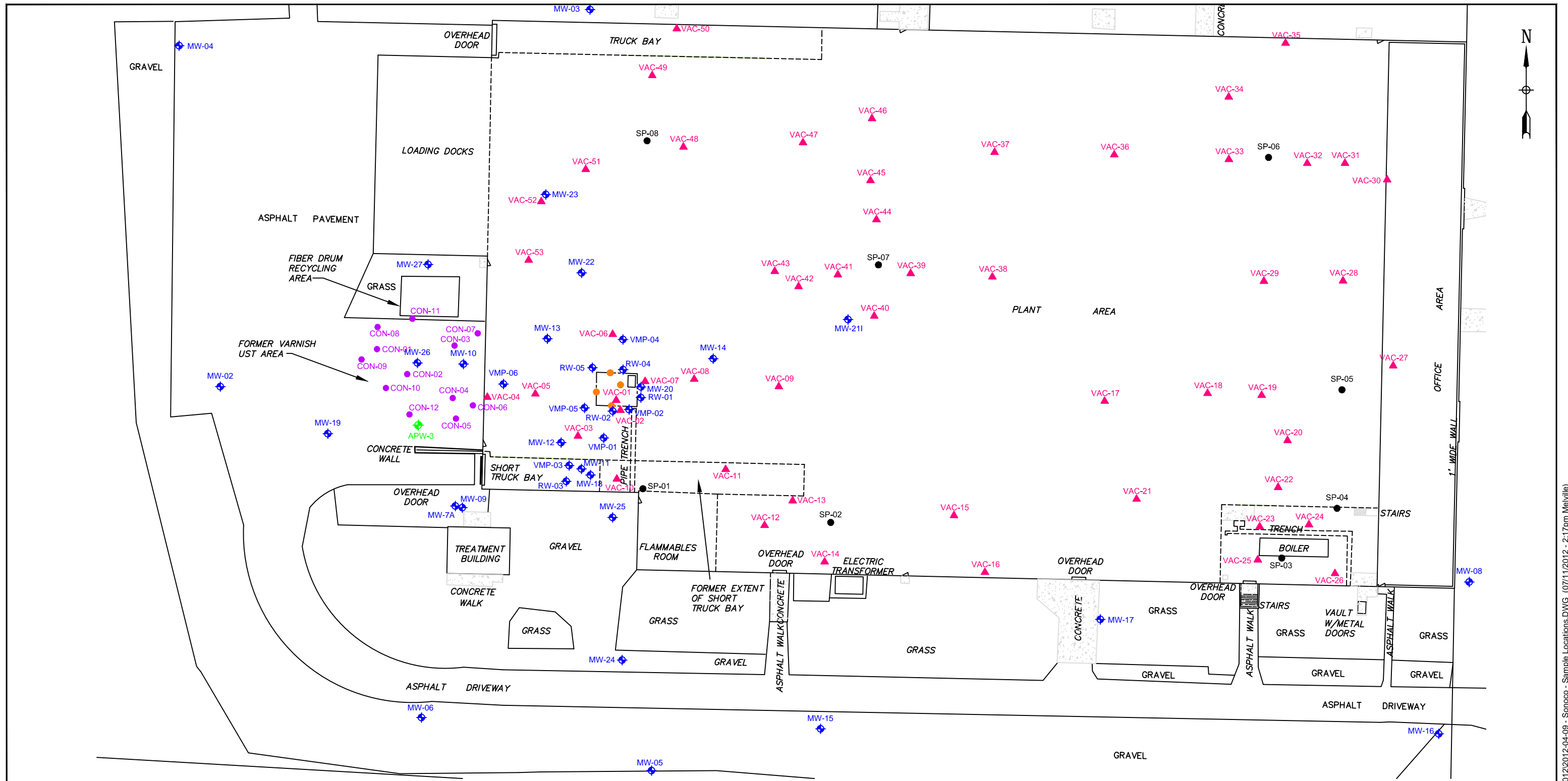
Prepared By:



Jon S. Fox, P.G.
Senior Consultant

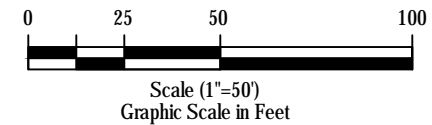
Date: 15 November 2012

Cc: Mike Sunderland (Sonoco)
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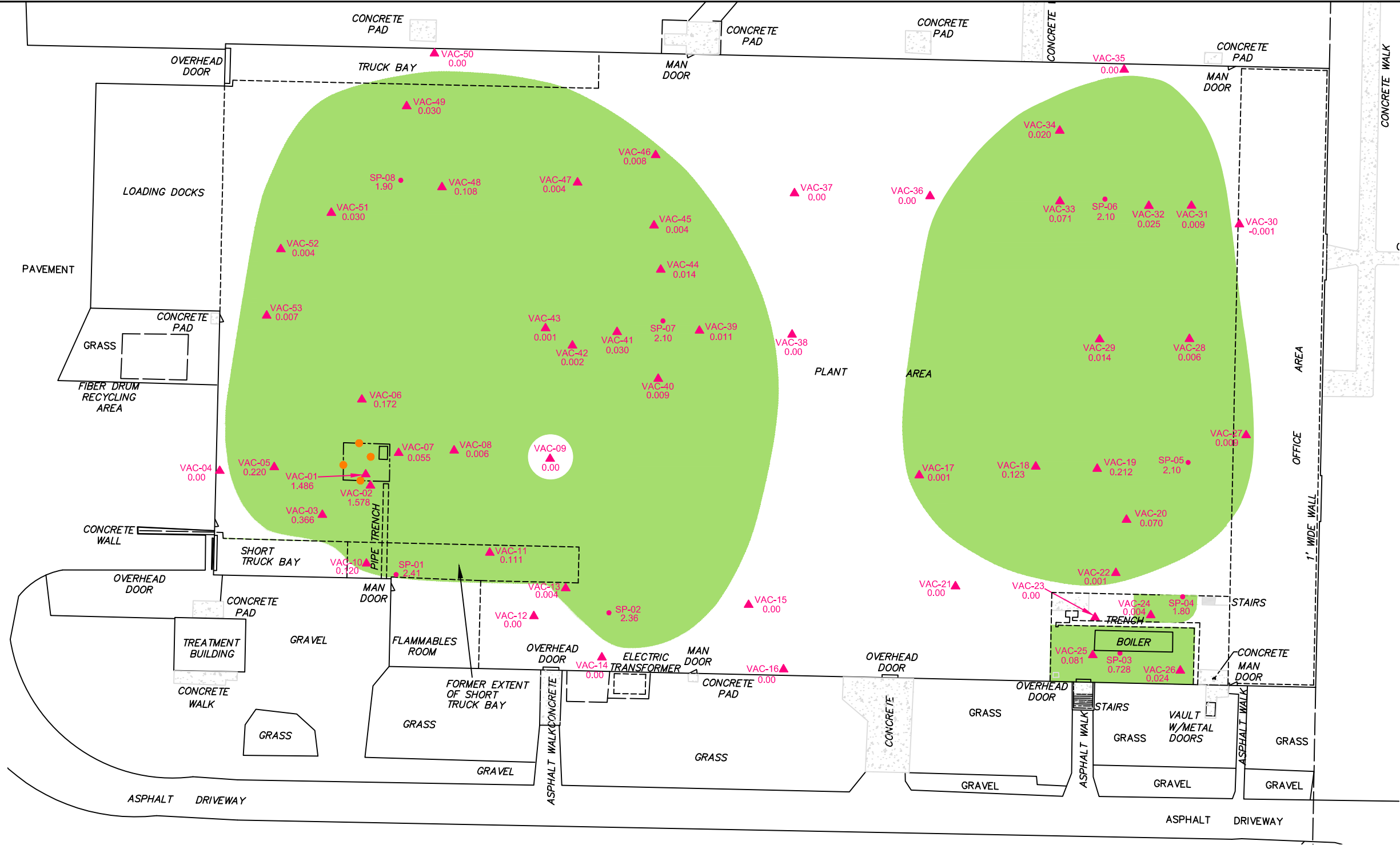


LEGEND

- ▲ 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

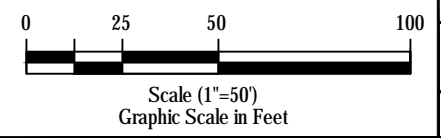


TITLE SAMPLE AND MEASUREMENT LOCATIONS GREIF FACILITY-TONAWANDA, NEW YORK NYSDEC VCP NUMBER V00334-9			
PREPARED FOR SONOCO PRODUCTS COMPANY			
Environmental Resources Management <small>ERM</small>			FIGURE 1
DRAWN BY	SCALE	DATE	JOB NO.
EMF	GRAPHIC	11-Jul-2012	0129254-01



- 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 17 October 2012 GREIF FACILITY-TONAWANDA, NEW YORK			
PREPARED FOR SONOCO PRODUCTS COMPANY			
Environmental Resources Management			
DRAWN BY	SCALE	DATE	JOB NO.
EMF	GRAPHIC	02 November 2012	0129254.01
			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
20-Apr-12	0.00	0.00	NM	NM	HS	0.00	0.00	0.02	0.02
17-May-12	0.00	0.00	0.00	0.00	1.06	0.00	0.00	0.01	0.03
20-Jun-12	0.00	0.00	0.00	0.00	HS	0.00	0.00	0.01	0.04
20-Jul-12	NM	0.00	NM	0.00	HS	0.00	0.00	NM	0.02
21-Aug-12	0.00	0.00	0.00	0.00	0.11	0.00	0.00	0.12	0.19
14-Sept-12	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.10	0.09
17-Oct-12	0.00	0.00	0.00	0.00	0.11	0.00	NM	0.14	0.09

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	0.103	0	0	0.155	0.135	0	0	0
24-May-11	2.15	2.05	0.47	0	0.35	0.28	0.133	0.028	0	0.163	0.15	0	NM	0
21-Jun-11	2.05	2.1	0.46	0	0.45	0.4	0.165	0.058	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	0.178	0.16	0	0.003	0
28-Oct-11	1	1.6	0.33	0	0.213	0.195	0.093	0.005	0	0.113	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
20-Apr-12	1.81	NM	0.844	0.001	0.241	NM	0.057	0.007	0	0.104	0.1	0.002	0.003	0
17-May-12	1.421	1.364	0.306	0	0.265	0.185	0.059	0.01	0.01	NM	0.01	0.001	0.006	NM
20-Jun-12	1.783	1.861	0.439	0	0.247	0.375	0.107	0.038	0.002	NM	0.161	0.002	0.009	0
20-Jul-12	1.621	1.781	0.439	0	0.247	0.331	0.048	0.035	0	NM	0.1	0.001	0.007	0
21-Aug-12	1.591	1.846	0.436	0	0.241	0.242	0.092	NM	0	0.145	0.145	0.002	0.007	0.003
14-Sep-12	2.06	2.43	0.618	0	0.57	0.441	0.139	0.047	0.002	0.204	0.167	0.002	0.008	0
17-Oct-12	1.486	1.578	0.366	0	0.22	0.172	0.055	0.006	0	0.12	0.111	0	0.004	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	0.003
19-Jan-11	0	0	0	0.15	0.29	0.08	0	0	0	0	0.075	0.02	0	0.008
21-Feb-11	0.005	0	NM	0.18	0.35	NM	0	0.013	0	0	0.068	0.035	0.015	0.01
11-Mar-11	0	0	0	0.188	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	0.033	0.01	0.013
24-May-11	0	0	0	0.215	0.36	0.148	0	0	0	0	0.078	0.03	0.015	0.018
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	0.018	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	0.023	0.018	0.02
26-Sep-11	0	0	NM	0.205	0.32	0.12	0.003	0	0	0	0.073	0.025	0.018	0.018
28-Oct-11	0	0	0	0.15	0.24	0.053	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	0.008	0	0	0.085	0.028	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	0.015	0.256	0.085	-0.001	0.005	0	0	0.061	0.023	0.014	0.009
20-Apr-12	0	0	0.001	0.141	0.202	0.051	0	0.003	0	0	0.075	0.001	0.017	0.014
17-May-12	0	0	0.001	0.131	0.007	0.062	0	0	0	0.001	0.079	0.022	0.017	0.006
20-Jun-12	0	0	0.001	0.128	0.16	0.003	0	0.003	0	0.004	0.098	0	0.022	0.017
20-Jul-12	0	0	0.004	0.105	0.201	0.083	0	0.001	0	0.003	0.093	0.029	0.016	0.013
21-Aug-12	0	0	0.003	0.131	0.171	0.072	0	0	0	0.004	0.091	0.026	0.012	0.009
14-Sep-12	0	0	0.007	NM	NM	NM	0	0.009	0	0.004	0.093	0.023	0.015	0.015
17-Oct-12	0	0	0.001	0.123	0.212	0.07	0	0.001	0	0.004	0.081	0.024	0.009	0.006

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	0.013	NM
19-Jan-11	0.02	NM	0.008	0.03	0.04	0.015	0	0	0	0	0.01	NM	0.013	NM
21-Feb-11	0.015	0	0.01	0.035	0.033	NM	NM	0	0	0.003	0.015	0.01	0.018	NM
11-Mar-11	0.02	0	0.02	0.043	0.063	0.03	0	0	0	0	0.023	0.02	0.02	NM
21-Apr-11	0.018	0	0.01	0.035	0.06	NM	NM	0	0	0	0.01	0.005	0.013	0
24-May-11	0.033	0	0.023	0.053	0.075	NM	NM	0	0	NM	0.013	NM	0.035	0
21-Jun-11	0.04	0	0.03	0.075	0.11	0.04	NM	0	0	0	0	0.023	0.043	0
21-Jul-11	0.055	0	0.05	0.103	0.17	0.06	0	0.013	0	0	0.033	0.035	0.08	0.008
29-Aug-11	0.038	0	0.033	0.07	0.13	0.038	0	0	0	0	NM	0.02	0.035	0.05
26-Sep-11	0.045	0	0.03	0.06	0.118	0.035	0	0	NM	0	0	NM	NM	0.01
28-Oct-11	NM	0	0.008	0.038	0.078	0.078	NM	0	0	0	0.008	0.005	0.01	NM
18-Nov-11	NM	0	0.01	0.033	0.065	0.018	NM	0	0	0	0.008	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
20-Apr-12	0.019	0.007	0.015	0.035	0.021	0	0	0	0	0	0.689	0.119	0.001	NM
17-May-12	0.004	0.005	0.008	0.025	0.071	0.016	NM	0.001	0	0	0.001	0.01	0.009	NM
20-Jun-12	0.027	0	0.008	0.073	0.135	0.038	NM	0.004	0	0.001	NM	0.016	0.03	0.033
20-Jul-12	0.022	0.001	0.023	NM	0.102	0.026	NM	0.001	0	0.001	0.012	0.016	0.019	NM
21-Aug-12	0.019	0	0.016	0.037	0.091	0.025	NM	0.001	0	0	0.001	0.013	0.002	0.001
14-Sep-12	0.032	0	0.013	0.064	0.138	0.037	0	0.002	0	0	0.013	0.017	0.032	0.004
17-Oct-12	0.014	-0.001	0.009	0.025	0.071	0.02	0	0	0	0	0.011	0.009	0.03	0.002

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	0.003	0
21-Feb-11	0	0.033	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	0.058	NM	0.05	0.03	0.01
21-Apr-11	0	NM	0	NM	0	0.138	0.045	NM	0.025	0	0
24-May-11	0	0.03	0.005	NM	0.008	0.175	0.06	0	0.055	0.005	0.013
21-Jun-11	NM	NM	0.018	NM	0.02	0.195	0.068	0	0.065	0.018	0.03
21-Jul-11	0.013	0.053	0.038	0.025	0.035	0.235	0.088	0	0.07	0.02	0.06
29-Aug-11	0	0.033	NM	NM	NM	0.185	0.07	0	0.06	0.03	0.09
26-Sep-11	0.008	NM	0.005	NM	0.013	0.17	0.07	0	0.055	0.175	0.033
28-Oct-11	0	0.008	0	NM	0.008	0.123	0.03	0	0.03	0	0.003
18-Nov-11	0	NM	0	0	0	0.09	0.03	0	0.028	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
20-Apr-12	0.001	0.014	0.006	0.001	0.003	NM	0.031	0.001	0.03	0.009	0.014
17-May-12	NM	0.01	0.005	0.003	0.006	0.11	0.031	0	0.032	0.005	0.011
20-Jun-12	NM	0.027	0.014	0.009	0.003	0.164	0.06	0	0.054	0.019	0.039
20-Jul-12	NM	0.024	0.002	0.009	0.005	0.151	0.035	0	0.033	0.013	0.032
21-Aug-12	0.003	0.019	0.008	0.003	0.006	0.147	0.045	0	0.044	0.01	0.02
14-Sep-12	NM	0.03	0.013	0.01	NM	0.164	0.061	0	0.059	0.02	0.4
17-Oct-12	0.001	0.014	0.004	0.008	0.004	0.108	0.03	0	0.03	0.004	0.007

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	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
20-Apr-12	2.00	1.90	2.20	2.10	2.20	NF	127.89	79.61	129.63	63.95	107.88	NF
17-May-12	2.25	1.60	2.30	2.20	2.30	NF	96.57	113.10	75.69	64.82	80.04	NF
12-Jun-12	2.45	2.00	2.30	2.50	2.50	NF	159.21	106.14	120.06	139.20	103.53	NF
20-Jul-12	2.40	1.80	2.50	2.40	2.45	NF	125.28	93.96	110.49	104.40	111.36	NF
21-Aug-12	2.80	1.90	2.85	2.80	2.85	NF	32.71	30.45	44.81	83.52	67.86	NF
14-Sep-12	3.60	2.45	3.65	3.55	3.60	NF	55.68	32.45	49.59	25.14	47.42	NF
17-Oct-12	2.60	1.70	2.65	2.60	2.70	NF	92.22	91.35	98.31	90.48	120.93	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
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
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
20-Apr-12	44	107	2.3	89	2.5	112	0.8	134.85
17-May-12	48	124	2.2	87	0.9	112	1.5	159.21
20-Jun-12	48	134	2.1	89	1.3	114	0.7	167.91
20-Jul-12	48	139	2.7	NM	2.4	120	1.4	147.03
21-Aug-12	NM	NM	NM	NM	NM	120	0.6	53.94
14-Sep-12	NM	NM	NM	NM	1.1	114	0.2	93.09
17-Oct-12	27	69	2.1	NM	NM	106	0.0	217.5

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