

15 January 2013

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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 – December 2012
Greif, Inc. Facility – Tonawanda, New York
NYSDEC VCP Number V00334-9

***Key Actions
This Period:***

- Held a construction kick-off meeting and initiated New York State Department of Environmental Conservation (NYSDEC)-approved modifications to the Sub-Slab Depressurization (SSD) system including relocation of the treatment system to the mezzanine and installation of new suction points and vacuum monitoring points.
- The SSD System was re-started after the installation of new components was completed.
- Performed routine operations and maintenance (O&M) on the 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 11 December 2012 is presented in Figure 2. Figure 2 shows expanded vacuum beneath the sub-slab as a result of the installation of additional suction points SP-09, SP-10, and SP-11.
- Uncovered monitoring well MW-19 which had been accidentally paved over by Greif's paving contractor during other site work. A groundwater sample was collected and submitted to the project laboratory.

- Collected a waste characterization sample of a plastic tank and piping previously used for remedial activities.

***Problems/
Resolutions:***

- None.

***Analytical Data
Received:***

- An analytical report from the project laboratory for groundwater samples collected in November 2012 during the semiannual groundwater sampling event. A summary of these results is presented in Table 4.

***Documents
Submitted:***

- SSD System Modifications construction kick-off meeting summary handout dated 4 December 2012.
- Monthly Progress Report for November 2012 dated 10 December 2012.

***Anticipated
Actions -
January 2013:***

- Complete SSD System construction activities including installation of a utility hatch in the mezzanine floor and final electrical work.
- Quantitative start-up testing of the SSD System including collection of influent and effluent vapor samples for laboratory analysis.
- Collection of sub-slab, indoor ambient air, and outdoor ambient air samples for additional vapor intrusion evaluation.
- Routine O&M of the SSD System and DNAPL recovery equipment.
- Receipt of laboratory analytical results for groundwater and waste characterization samples.
- Waste characterization activities.

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

- None.

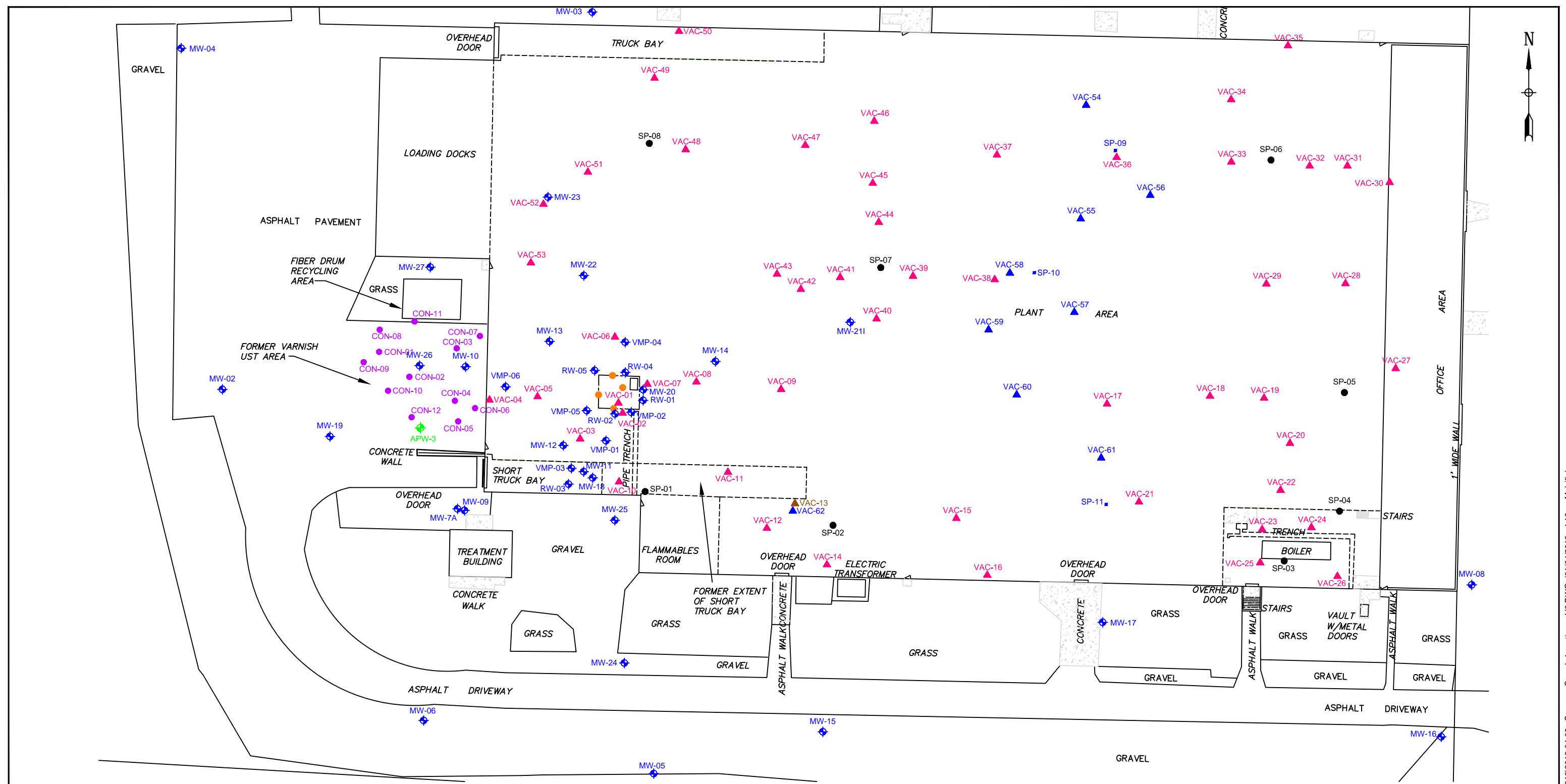
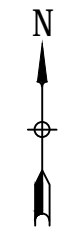
Prepared By:



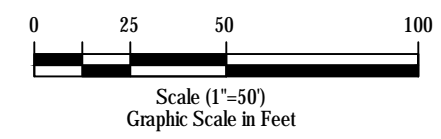
Jon S. Fox, P.G.
Senior Consultant

Date: 15 January 2013

Cc: Larry Pattengill (Sonoco)
Pete Gruene (Sonoco)
Patrick Wolfe (Greif)
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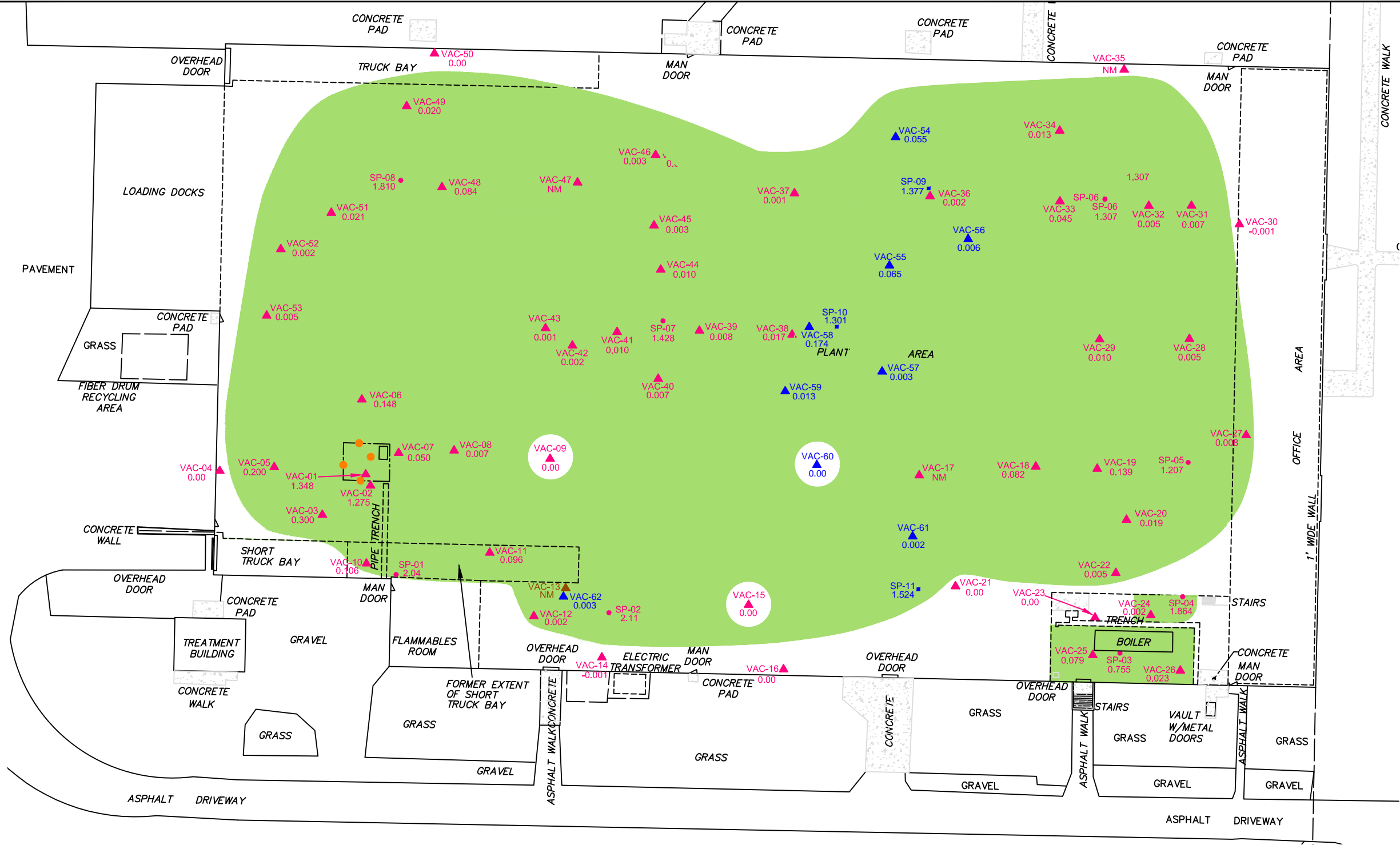


- LEGEND**
- ▲ Vacuum Monitoring Point Location
 - ◆ Monitoring or Recovery Well Location
 - ◆ Antenna Placement Well
 - Vertical Suction Point Location
 - Horizontal Suction Point Location
 - Soil Confirmation Location
 - Former Varnish Pit
 - ⬇ Man Door
 - ▣ Concrete Pad
 - Approximate Suction Point Location
 - ▲ Approximate Vacuum Monitoring Point Location
 - ▲ Removed



TITLE SAMPLE AND MEASUREMENT LOCATIONS GREIF FACILITY-TONAWANDA, NEW YORK NYSDEC VCP NUMBER V00334-9			
PREPARED FOR SONOCO PRODUCTS COMPANY			
Environmental Resources Management		FIGURE 1	
DRAWN BY	SCALE	DATE	JOB NO.
EMF	GRAPHIC	4 January 2013	0129254-01

Map Source: Wm. Schutt & Associates, P.C., 37 Central Ave, Lancaster, NY. Survey File: D/01351/03, WSA Proj.#01351.

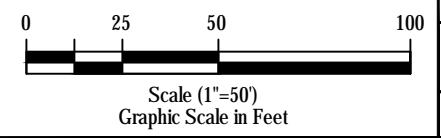


LEGEND

- Horizontal Suction Point Location
- Vertical Suction Point Location
- ▲ Vacuum Monitoring Point Location (vacuum in " H₂O)
- ▲ 0.016
- ▲ NM Not Measured
- Estimated Extent of Sub-Floor Vacuum
- Former Varnish Pit
- Man Door
- Concrete Pad
- Approximate Suction Point Location
- ▲ Approximate Vacuum Monitoring Point Location (vacuum in " H₂O)
- ▲ Removed

NOTES:

1. " H₂O = inches of water column
2. Vacuum Data recorded prior to relocating SSD System to mezzanine.



<p>TITLE</p> <p>SUBSURFACE VACUUM DISTRIBUTION</p> <p>11 DECEMBER 2012</p> <p>GREIF FACILITY-TONAWANDA, NEW YORK</p>			
<p>PREPARED FOR</p> <p>SONOCO PRODUCTS COMPANY</p>			
<p>Environmental Resources Management</p> <p><small>ERM</small></p>		<p>FIGURE</p> <p style="font-size: 24pt;">2</p>	
DRAWN BY	SCALE	DATE	JOB NO.
EMF	GRAPHIC	4 January 2013	0129254.01

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
20-Nov-12	0.00	0.00	0.00	0.00	0.03	0.00	0.00	0.02	HS
19-Dec-12	0.00	0.00	NM	0.00	HS	0.00	0.00	0.03	0.06

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
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
20-Nov-12	1.539	1.498	0.349	0	0.266	0.142	0.057	0.007	0	0.126	0.116	0.002	NM	0
11-Dec-12	1.348	1.275	0.3	0	0.2	0.148	0.05	0.007	0	0.106	0.096	0.002	NM	-0.001

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
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
20-Nov-12	0	0	0.001	0.122	0.207	0.067	-0.001	0.004	0	0.004	0.085	0.025	0.01	0.005
11-Dec-12	0	0	NM	0.082	0.139	0.019	0	0.005	0	0.002	0.079	0.023	0.008	0.005

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	0	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
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
20-Nov-12	0.014	0	0.01	0.008	0.063	0.019	0	0	0	0	0.009	0.009	0.033	0.001
11-Dec-12	0.01	-0.001	0.007	0.005	0.045	0.013	NM	0.002	0.001	0.017	0.008	0.007	0.01	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	Vac-54	Vac-55	Vac-56
Date														
16-Jun-10	0.0025	0.0425	0.015	0.0125	NM	0.2125	0.0925	0	0.080	0.0125	0.0125	NI	NI	NI
14-Jul-10	0	NM	NM	0.0125	NM	0.21	0.0875	NM	0.8	0.0175	0.0225	NI	NI	NI
13-Aug-10	0	NM	NM	NM	NM	0.22	0.0925	0	0.085	NM	0.0225	NI	NI	NI
14-Sep-10	0	NM	NM	0.0025	NM	0.1275	0.05	0	0.04	0.005	0	NI	NI	NI
14-Oct-10	NM	NM	0	NM	NM	0.11	0.0375	0	0.03	0	0	NI	NI	NI
22-Nov-10	0	NM	0	0	NM	0.135	0.0475	0	0.03	0.0025	0	NI	NI	NI
16-Dec-10	0	0.015	0	0	NM	0.09	0.02	0	NM	0	0	NI	NI	NI
19-Jan-11	0	NM	0	0	NM	0.12	0.035	0	0.03	0.0025	0	NI	NI	NI
21-Feb-11	0	0.0325	0.01	0	0	0.125	0.035	0	0.03	0	0	NI	NI	NI
11-Mar-11	0	NM	0.02	NM	0.005	0.16	0.0575	NM	0.05	0.03	0.01	NI	NI	NI
21-Apr-11	0	NM	0	NM	0	0.1375	0.045	NM	0.025	0	0	NI	NI	NI
24-May-11	0	0.03	0.005	NM	0.0075	0.175	0.06	0	0.055	0.005	0.0125	NI	NI	NI
21-Jun-11	NM	NM	0.0175	NM	0.02	0.195	0.0675	0	0.065	0.0175	0.03	NI	NI	NI
21-Jul-11	0.0125	0.0525	0.0375	0.025	0.035	0.235	0.0875	0	0.07	0.02	0.06	NI	NI	NI
29-Aug-11	0	0.0325	NM	NM	NM	0.185	0.07	0	0.06	0.03	0.09	NI	NI	NI
26-Sep-11	0.0075	NM	0.005	NM	0.0125	0.17	0.07	0	0.055	0.175	0.0325	NI	NI	NI
28-Oct-11	0	0.0075	0	NM	0.0075	0.1225	0.03	0	0.03	0	0.0025	NI	NI	NI
18-Nov-11	0	NM	0	0	0	0.09	0.03	0	0.0275	0.005	0.005	NI	NI	NI
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	NI	NI	NI
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	NI	NI	NI
21-Feb-12	0.002	NM	0.003	0.002	0.004	0.114	0.026	0.001	0.026	0.008	0.009	NI	NI	NI
16-Mar-12	NM	0.016	0.008	0.004	0.008	0.124	0.034	0.001	0.032	0.017	0.014	NI	NI	NI
20-Apr-12	0.001	0.014	0.006	0.001	0.003	NM	0.031	0.001	0.03	0.009	0.014	NI	NI	NI
17-May-12	NM	0.01	0.005	0.003	0.006	0.11	0.031	0	0.032	0.005	0.011	NI	NI	NI
20-Jun-12	NM	0.027	0.014	0.009	0.003	0.164	0.06	0	0.054	0.019	0.039	NI	NI	NI
20-Jul-12	NM	0.024	0.002	0.009	0.005	0.151	0.035	0	0.033	0.013	0.032	NI	NI	NI
21-Aug-12	0.003	0.019	0.008	0.003	0.006	0.147	0.045	0	0.044	0.01	0.02	NI	NI	NI
14-Sep-12	NM	0.03	0.013	0.01	NM	0.164	0.061	0	0.059	0.02	0.4	NI	NI	NI
17-Oct-12	0.001	0.014	0.004	0.008	0.004	0.108	0.03	0	0.03	0.004	0.007	NI	NI	NI
20-Nov-12	NM	0.016	0.004	0.009	0.005	0.118	0.033	0	0.037	0.004	0.008	NI	NI	NI
11-Dec-12	0.001	0.01	0.003	0.003	NM	0.084	0.02	0	0.021	0.002	0.005	0.055	0.065	0.006

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

Location	Vac-57	Vac-58	Vac-59	Vac-60	Vac-61	Vac-62
Date						
16-Jun-10	NI	NI	NI	NI	NI	NI
14-Jul-10	NI	NI	NI	NI	NI	NI
13-Aug-10	NI	NI	NI	NI	NI	NI
14-Sep-10	NI	NI	NI	NI	NI	NI
14-Oct-10	NI	NI	NI	NI	NI	NI
22-Nov-10	NI	NI	NI	NI	NI	NI
16-Dec-10	NI	NI	NI	NI	NI	NI
19-Jan-11	NI	NI	NI	NI	NI	NI
21-Feb-11	NI	NI	NI	NI	NI	NI
11-Mar-11	NI	NI	NI	NI	NI	NI
21-Apr-11	NI	NI	NI	NI	NI	NI
24-May-11	NI	NI	NI	NI	NI	NI
21-Jun-11	NI	NI	NI	NI	NI	NI
21-Jul-11	NI	NI	NI	NI	NI	NI
29-Aug-11	NI	NI	NI	NI	NI	NI
26-Sep-11	NI	NI	NI	NI	NI	NI
28-Oct-11	NI	NI	NI	NI	NI	NI
18-Nov-11	NI	NI	NI	NI	NI	NI
22-Dec-11	NI	NI	NI	NI	NI	NI
20-Jan-12	NI	NI	NI	NI	NI	NI
21-Feb-12	NI	NI	NI	NI	NI	NI
16-Mar-12	NI	NI	NI	NI	NI	NI
20-Apr-12	NI	NI	NI	NI	NI	NI
17-May-12	NI	NI	NI	NI	NI	NI
20-Jun-12	NI	NI	NI	NI	NI	NI
20-Jul-12	NI	NI	NI	NI	NI	NI
21-Aug-12	NI	NI	NI	NI	NI	NI
14-Sep-12	NI	NI	NI	NI	NI	NI
17-Oct-12	NI	NI	NI	NI	NI	NI
20-Nov-12	NI	NI	NI	NI	NI	NI
11-Dec-12	0.003	0.174	0.013	0	0.002	0.084

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.
 NI = Not installed.

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
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
20-Nov-12	2.60	1.85	2.70	2.70	2.80	NF	100.92	93.96	79.61	88.74	125.28	NF
11-Dec-12	2.15	1.60	2.25	2.15	2.30	NF	112.23	83.52	107.01	89.61	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
20-Nov-12	32	92	0.0	NM	NM	114	0.0	196.62
11-Dec-12	31	85.2	4.6	NM	NM	118	0.0	212.28

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

TABLE 4
SUMMARY OF UNVALIDATED ANALYTICAL RESULTS RECEIVED IN DECEMBER 2012
GROUND WATER SAMPLING EVENT - NOVEMBER 2012
GREIF FACILITY - TONAWANDA, NEW YORK
NYSDEC VCP NUMBER V00334-9

Sample Designation Collection Date	APW-3 29-Nov-12	MW-1A 27-Nov-12	MW-3 27-Nov-12	MW-12 28-Nov-12	MW-13 28-Nov-12	DUP-01 28-Nov-12	MW-14 28-Nov-12	MW-18 29-Nov-12	MW-19 ----	MW-21I 28-Nov-12	MW-21S 28-Nov-12	NYSDEC Standard
VOCs (µg/L)												
Acetone	----	----	----	----	36	----	11	----	TBS	----	----	50
Benzene	----	----	----	----	6.9	----	.92 J	----	TBS	----	----	1
2-Butanone	----	----	----	----	----	----	----	----	TBS	----	----	5
Chloroethane	----	----	----	----	----	----	----	----	TBS	----	----	5
Chloroform	----	----	----	.69 J	39	.68 J	.69 J	----	TBS	----	----	7
1,1-Dichloroethane	3400	----	----	1100	11000	1100	2700	18	TBS	----	----	5
1,2-Dichloroethane	----	----	----	3.2	110	3.1	----	----	TBS	----	----	0.6
1,1-Dichloroethene	740	----	----	310	15000	320	1600	2.7	TBS	----	----	5
cis-1,2-Dichloroethene	----	----	----	1600	14000	1500	2000	8.7	TBS	----	----	5
trans-1,2-Dichloroethene	----	----	----	35	----	35	25	----	TBS	----	----	5
Ethylbenzene	----	----	----	----	16	----	17	----	TBS	----	----	5
Methylene chloride	----	----	----	----	12 B	----	.48 J B	.95 J	TBS	----	----	5
4-Methyl-2-pentanone	----	----	----	----	12	----	----	----	TBS	----	----	NS
Tetrachloroethene	----	----	----	----	5.4	----	7	----	TBS	----	----	0.7
Toluene	----	----	----	----	13	----	27	----	TBS	----	----	5
1,1,1-Trichloroethane	2700	----	----	310	27000	300	9.5	8.5	TBS	----	----	5
1,1,2-Trichloroethane	----	----	----	----	7.9	----	----	----	TBS	----	----	5
Trichloroethene	----	----	----	430	4900	450	72000	3.2	TBS	----	----	5
1,2,4-Trimethylbenzene	----	----	----	----	18	----	----	----	TBS	----	----	5
Vinyl chloride	----	----	----	59	----	66	8.3	4.5	TBS	----	----	2
Xylene (total)	----	----	----	----	48	----	48	----	TBS	----	----	5
Other (µg/L)												
Dissolved Organic Carbon	4100.0	1300.0	----	2800.0	11200.0	2900.0	1900.0	4700.0	TBS	1200.0	----	NS
Ethane	----	----	----	----	----	----	----	----	TBS	----	----	NS
Ethene	----	----	----	----	28	----	----	----	TBS	----	----	NS
Methane	400	10	1.5 J	48	820	41	1.3 J	25	TBS	1.6 J	----	NS
Sulfate	123000	597000	392000	307000	125000	312000	85200	482000	TBS	114000	81600	250000

NOTES:

All analyte concentrations are reported in micrograms per liter (parts per billion) unless otherwise noted.

---- = Compound was not detected above the laboratory quantitation limit.

Bold = Represents an exceedance of standard.

J = Indicates an estimated value.

NS = Not Specified

B= Compound was found in the blank and sample

TBS= To be sampled. Well was paved over with asphalt and inaccessible at time of sampling.

TABLE 4
SUMMARY OF UNVALIDATED ANALYTICAL RESULTS RECEIVED IN DECEMBER 2012
GROUND WATER SAMPLING EVENT - NOVEMBER 2012
GREIF FACILITY - TONAWANDA, NEW YORK
NYSDEC VCP NUMBER V00334-9

Sample Designation Collection Date	MW-22 29-Nov-12	MW-24 27-Nov-12	MW-25 27-Nov-12	MW-26 29-Nov-12	MW-27 27-Nov-12	RW-5 29-Nov-12	VMP-6 28-Nov-12	NYSDEC Standard
VOCs (µg/L)								
Acetone	----	----	----	----	----	----	----	50
Benzene	----	19 J	----	----	----	1.0 J	8.9 J	1
2-Butanone	----	----	----	----	----	----	----	5
Chloroethane	----	----	----	----	----	99	----	5
Chloroform	----	----	----	----	----	63	----	7
1,1-Dichloroethane	9.4	28	3.4	----	13	19000	24	5
1,2-Dichloroethane	----	----	----	----	----	----	----	0.6
1,1-Dichloroethene	----	12 J	----	----	2	25000	----	5
cis-1,2-Dichloroethene	1.2	4100	14	----	----	110000	----	5
trans-1,2-Dichloroethene	----	25	----	----	----	----	----	5
Ethylbenzene	----	----	----	----	----	62	1300	5
Methylene chloride	----	13 J B	----	----	----	35 B	----	5
4-Methyl-2-pentanone	----	----	----	----	----	70	----	NS
Tetrachloroethene	----	----	----	----	----	3.9	----	0.7
Toluene	----	----	----	----	----	41	----	5
1,1,1-Trichloroethane	----	----	----	1.9 J	2.1	----	----	5
1,1,2-Trichloroethane	----	----	----	----	----	28	----	5
Trichloroethene	32	3500	----	----	3	21000	----	5
1,2,4-Trimethylbenzene	----	----	----	----	----	25	210	5
Vinyl chloride	----	590	23	----	----	150	----	2
Xylene (total)	----	----	----	----	----	270	2400	5
Other (µg/L)								
Dissolved Organic Carbon	1100.0	7600.0	2100.0	2500.0	3800.0	128000.0	14600.0	NS
Ethane	----	48	----	----	----	84	2.4 J	NS
Ethene	----	84	11	----	----	7.1 J	----	NS
Methane	3.6 J	260	140	----	130	24 J	2400	NS
Sulfate	598000	327000	2590000	3640000	154000	305000	----	250000

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