

15 October 2013

Michael J. Hinton, P.E.
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 - September 2013
Greif, Inc. Facility - Tonawanda, New York
NYSDEC VCP Number V00334-9

***Key Actions
This Period:***

- Performed routine bi-monthly operations and maintenance (O&M) on the Sub-Slab Depressurization (SSD) System. Data collected this month includes product level measurements (Table 1), vacuum readings in vacuum monitoring points (Table 2), and treatment system operational data (Table 3). The locations of sampling and monitoring points have been updated and are presented in Figure 1. The estimated distribution of vacuum beneath the main building's floor slab on 25 September 2013 is presented in Figure 2.
- Upgraded the SSD System's telemetry and communications equipment.
- Provided oversight for partial filling by Greif of the remedial trench located near the former varnish pit for expansion of the rubber gasket oven. The trench contains some active SSD System piping.
- Preparation of a Draft Site Management Plan (SMP).

***Changes/
Problems/
Resolutions:***

- None.

***Analytical
Data Received:***

- None.

***Documents
Submitted:***

- Monthly Progress Report for August 2013 dated 10 September 2013.

Anticipated Actions - October 2013:

- ERM received the final proof of filing and recorded Deed Restriction from the NYSDEC .
- Upgraded the power supply for SSD System telecommunications equipment.
- Preparation of the Site Management Plan.
- Preparation of the Final Engineering Report.

NYSDEC-Approved Field Decisions:

- None.

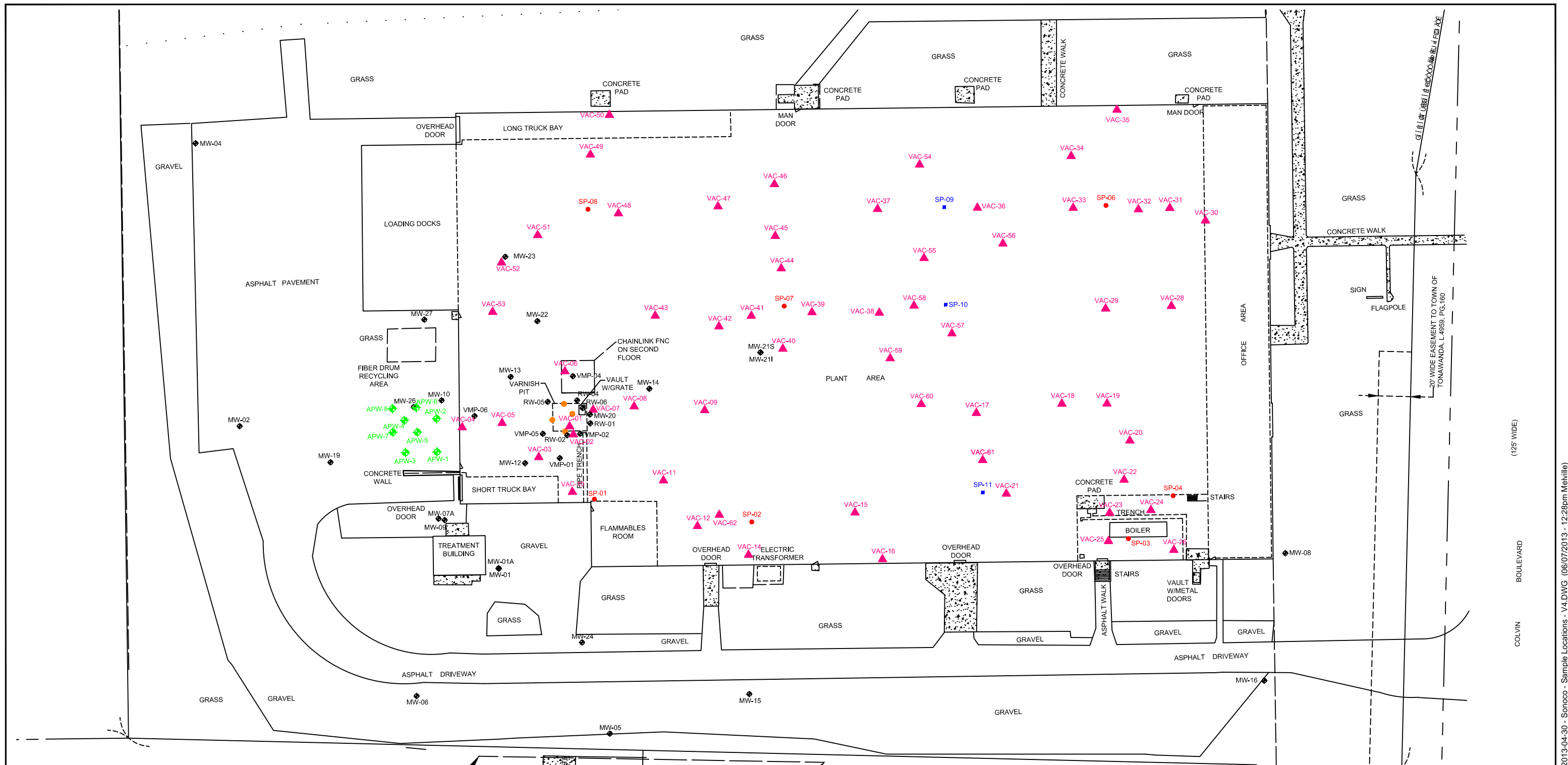
Prepared By:



Jon S. Fox, P.G.
Principal Consultant

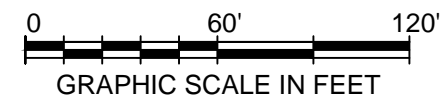
Date: 15 October 2013

Cc: Larry Pattengill (Sonoco)
Pete Gruene (Sonoco)
Patrick Wolfe (Greif)
George Frazer (Greif)
Gregory Sutton, P.E. (NYSDEC)
Patrick Foster, Esq. (NYSDEC)
Matt Forcucci (NYSDOH)
A. Joseph White (NYSDEC)
John Kuhn (ERM)
John Mohlin, P.E. (ERM)



LEGEND

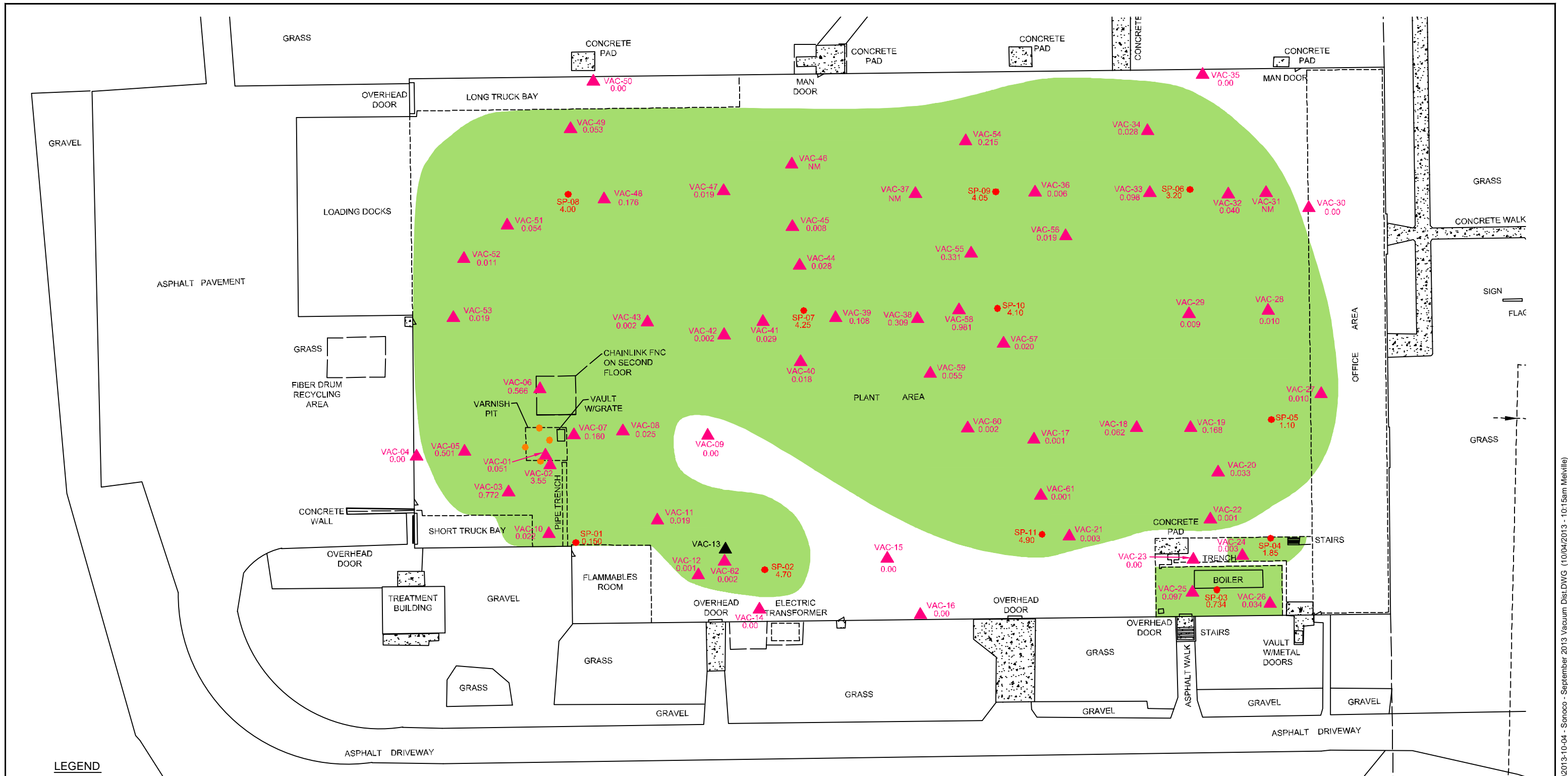
- Horizontal Suction Point Location
- Vertical Suction Point Location
- ▲ Vacuum Monitoring Point Location
- ◆ Aetna Placement Well
- ◆ Monitoring Well Location
- Suction Point Location
- Former Varnish Pit
- Man Door
- Concrete Pad



TITLE
**SAMPLE AND MEASUREMENT LOCATIONS
 GREIF FACILITY-TONAWANDA, NEW YORK
 NYSDEC VCP NUMBER V00334-9**

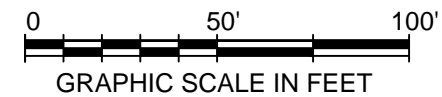
PREPARED FOR
SONOCO PRODUCTS COMPANY

Environmental Resources Management		FIGURE 1
DRAWN BY EMF	SCALE GRAPHIC	
DATE 07 JUNE 2013	JOB NO. 0194591.06	



- 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
 - ▲ Removed
 - ▲ Man Door
 - Concrete Pad

NOTES:
 1. " H₂O = inches of water column



TITLE SUBSURFACE VACUUM DISTRIBUTION 25 SEPTEMBER 2013 GREIF FACILITY-TONAWANDA, NEW YORK			
PREPARED FOR SONOCO PRODUCTS COMPANY			
Environmental Resources Management <small>ERM</small>			
DRAWN BY EMF	SCALE GRAPHIC	DATE 04 OCTOBER 2013	JOB NO. 0194591.04
			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
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
24-Jan-13	0.00	0.00	0.00	0.00	HS	0.00	0.00	0.03	0.09
22-Feb-13	NM	NM	NM	NM	NM	NM	NM	NM	NM
25-Mar-13	0.00	0.00	NM	NM	0.04	0.00	0.00	0.04	HS
3-May-13	0.00	0.00	0.00	0.00	0.02	0.00	0.00	0.02	0.00
31-Jul-13	0.00	0.00	NM	NM	HS	0.00	0.00	0.04	0.03
25-Sept-13	0.00	0.00	0.00	0.00	HS	0.00	0.00	0.06	HS

Notes:

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

HS - heavy sheen but no measureable thickness.

NM - not measured

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
24-Jan-13	0.009	1.957	0.454	0	0.281	0.173	0.08	0.009	0	0.023	0.022	0.004	NM	0
22-Feb-13	0.024	1.99	0.457	0	0.311	0.2	0.077	0.01	0	0.025	0.018	0.002	NM	0
25-Mar-13	0.022	1.985	0.375	0	0.331	0.207	0.071	0.006	0	NM	0.015	0	NM	0
3-May-13	0.02	2.38	0.558	0.001	0.538	0.35	0.109	0.026	0	NM	0.017	0.001	NM	0
31-Jul-13	0.059	3.9	0.983	0	0.942	0.691	0.253	0.083	0	NM	0.024	0.001	NM	0
25-Sep-13	0.051	3.550	0.772	0.00	0.501	0.566	0.16	0.025	0.00	0.022	0.019	0.001	NM	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
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
24-Jan-13	0	-0.001	0.003	0.067	0.114	0.038	0	0.011	0	0.002	0.081	0.026	0.007	0.006
22-Feb-13	0	0	0.001	0.065	0.111	0.037	0	0.009	0	0.001	0.078	0.027	0.009	0.004
25-Mar-13	0	0	0.002	0.065	0.108	0.034	0.001	0.007	0	0.001	0.083	0.025	0.01	0.004
3-May-13	0	0	0.001	0.074	0.111	NM	0.002	0	0	0.002	0.094	0.028	0.014	0.006
31-Jul-13	0	0	0.003	0.096	0.155	0.05	0.009	-0.003	0	0.004	0.099	0.034	0.016	0.009
25-Sep-13	0	0	0.001	0.062	0.168	0.033	0.003	0.001	0	0.003	0.097	0.034	0.01	0.01

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
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
24-Jan-13	0.009	-0.003	0.012	0.032	0.066	0.017	-0.003	0.007	0.004	0.053	0.013	0.015	0.019	0.004
22-Feb-13	0.007	0	0.01	0.031	0.067	0.019	-0.01	0.007	0.005	0.066	0.015	0.015	0.017	0.001
25-Mar-13	0.007	-0.001	0.009	0.025	0.069	0.018	-0.002	0.006	0.004	0.051	0.014	0.01	0.006	0.001
3-May-13	0.01	0	0.02	0.046	0.101	0.029	0	0.025	0.017	0.144	0.017	0.018	0.032	NM
31-Jul-13	0.021	0.001	NM	NM	0.191	0.048	0	0.047	0.026	0.312	0.024	0.034	0.061	0.01
25-Sep-13	0.009	0	NM	0.04	0.098	0.028	0	0.006	NM	0.309	0.108	0.018	0.029	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
24-Jan-13	0.001	0.02	0.009	0.006	0.007	0.147	0.044	0.002	0.04	0.01	0.008	0.158	0.178	0.012
22-Feb-13	0.001	0.016	0.005	0.008	0.008	0.134	0.04	0	0.037	0.007	0.01	0.156	0.186	0.011
25-Mar-13	0.002	0.007	0.005	0.004	NM	0.136	0.037	0	0.038	0.007	0.009	0.153	0.176	0.015
3-May-13	0.004	0.027	0.01	0.009	0.01	0.172	0.059	0	0.055	0.015	0.027	0.236	0.265	0.028
31-Jul-13	0.01	NM	0.021	0.018	0.027	0.248	0.096	0	0.092	0.028	0.061	0.399	0.503	0.066
25-Sep-13	0.002	0.028	0.008	NM	0.019	0.176	0.053	0	0.054	0.011	0.019	0.215	0.331	0.019

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
24-Jan-13	0.011	0.557	0.036	0.002	0.001	0.005
22-Feb-13	0.012	0.63	0.035	0.001	0	0.008
25-Mar-13	0.011	0.627	0.034	0.001	0.001	NM
3-May-13	0.04	0.951	0.043	0.001	0.001	0
31-Jul-13	0.121	1.607	0.094	0.008	0.006	0.003
25-Sep-13	0.02	0.981	0.055	0.002	0.001	0.002

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 1

Location Units	Header Vacuum			Header Air Flow			Effluent			
	MAN-1 " H ₂ O	MAN-2 " H ₂ O	MAN-3 " H ₂ O	MAN-1 cfm	MAN-2 cfm	MAN-3 cfm	Pressure " H ₂ O	Temp °F	PID ppm	Flow cfm
Date										
24-Jan-13	3.55	3.6	3.35	297.92	162.68	370.44	0.789	118	0.0	417.48
22-Feb-13	3.4	3.4	3.3	252.84	147	299.88	0.794	120	0.0	295.96
25-Mar-13	3	3.2	3.1	241.08	148.96	319.48	0.67	118	0.0	386.12
3-May-13	5	4	3.7	239.12	137.2	299.88	0.75	121	0.0	366.52
31-Jul-13	5	5	5	278.32	193.06	362.6	1.228	111	0.1	464.52
25-Sep-13	4.9	4.9	4.7	282.24	170.52	399.84	0.727	109	0.1	509.6

Location Key

MAN-1 = Suction Pits 01, 02, interior former varnish pit, and horizontal suction points through former varnish pit's north, west, and south walls.

MAN-2 = Suction Pits 05 and 11.

MAN-3 = Suction Pits 06, 07, 08, 09, and 10

Notes:

- Vacuum and pressure data is reported in inches of water.
- Air flow data is based on measured air velocity and is reported in cubic feet per minute.
- Temperature data is reported in degrees fahrenheit.