

VOLUNTARY CLEANUP PROGRAM DECISION DOCUMENT

Grief Bros.Site
Town of Tonawanda, Erie County New York
Site No. V-00334-9
January 2010

Statement of Purpose and Basis

This Voluntary Cleanup Program (BCP) Decision Document presents the remedy identified by the Department of Environmental Conservation (Department) for the Grief Bros. site.

Description of the Site

This site (see Figure 1) includes a one-story industrial building located on approximately 25 acres in a mixed industrial and residential area in the Town of Tonawanda, Erie County. The site is located on Colvin Blvd approximately one-quarter mile south of I-290. This site is an active manufacturing facility that Greif Bros. acquired from Sonoco in 1998 and continued the manufacture of fiber drums. The surrounding parcels are used for a mixed commercial, recreational and residential uses. To the north of the site is vacant land once used as a railroad siding and residential apartments. To the east, directly across the street from the site on Colvin Blvd are single family residential homes. To the south is a commercial office buildings and a local park with sport fields and to the west is a business park and railroad sidings. Operations began on this site in 1948, the facility was used to produce fiber drums, some with metal lids and rims. Use of metal lids and rims was discontinued in 1995. Environmental investigations of the site were initially performed in connection with the purchase of the site by Greif Bros. A Phase II site investigation was performed in April 1998 and followed up by a Phase III investigation in December 1998. Metal de-greasing and varnishing operations for the lids and rims led to releases of contaminants. Soils and groundwater are contaminated with VOCs, primarily TCE and 1,1,1-TCA. SVOCs and TPH have also been found. Significant amounts of DNAPL has been found under the building slab in the former varnish pit area (Figure 2). Grief Bros and the former owner Sonoco entered into a Voluntary Cleanup Agreement to investigate and remediate the site. A remedial investigation was conducted in 2001 followed by a data gap investigation in December 2002. IRMs have been implemented to address soil contamination and to remove DNAPL from the subsurface. In the fall of 2005, an IRM to remove grossly affected soil in the former drum storage area was implemented. Approximately 1767 tons of contaminated soil was removed and disposed off site. Soil confirmation sampling indicated that the remaining soil meets the Part 375 SCO for commercial use. Also approximately 1600 gallons of DNAPL has been removed from the environment since August 2005 thru a DNAPL removal IRM system. Operation of the DNAPL recovery system and low-vac vapor recovery enhancement is continuing. A Soil vapor assessment study has also been completed and a report submitted to the Department in October 2008. Former varnish pit removal IRM began in August 2009. An additional 120 gallons of DNAPL was removed from below the pit floor as part of the varnish pit removal project. The Varnish Pit Removal IRM was completed in October 2009,

completion report to be submitted. A RAWP/Design was submitted 10/20/2009 and is currently under review.

Nature of Contamination

Contamination was identified by the Remedial Investigation of this site , which represents a threat to public health and the environment, requiring a remedial program for the site to address the contamination identified below. Investigations have determined that soil and groundwater contamination is present on site. The main contaminant is TCE with its associated breakdown products. DNAPL has also been found in the area of the former varnish pit located inside the building.

The soil and groundwater contamination is limited to the plant property. There are no indications of any off-site migration of site related contaminants.

Soil

(exceed Part 375 Commercial SCOs)

VOCs	Maximum Detection
Trichloroethene	4,000,000 ug/kg
1,2,4-Trimethylbenzene	1,100,000 ug/kg
Xylenes (total)	2,900,000 ug/kg
SVOCs	
Benzo(a)pyrene	2900 ug/kg
Inorganic	
Nickel	31.8 mg/kg

Groundwater

(exceed Class GA Standard)

VOCs	Maximum Detection
Benzene	620 ug/l
Chloroethane	530 ug/l
Chloroform	190 ug/l
1,1-Dichloroethane	8,300 ug/l
1,2-Dichloroethane	960 ug/l
1,1-Dichloroethene	25,000 ug/l
1,2-Dichloroethene (total)	3,000 ug/l
Ethylbenzene	2100 ug/l
Methylene Chloride	19 ug/l
Tetrachloroethene	71 ug/l
Toluene	8,200 ug/l
1,1,1-Trichloroethane	220,000 ug/l

1,1,2-Trichloroethene	150 ug/l
Trichloroethene	210,000 ug/l
1,2,4-Trimethylbenzene	1,200 ug/l
Vinyl Chloride	550 ug/l
Xylenes (total)	9,100 ug/l

Extent of Contamination

Source areas/Waste disposal - Soil and groundwater contamination including DNAPL resulted from the operation of the former varnish pit inside the building, associated former underground storage tanks and a drum storage area.

Surface soil - Surface soil in the former drum storage area was contaminated with VOCs and SVOCs .

Subsurface soil - Sub-surface soil in the former varnish pit area, UST area and drum storage area contaminated with VOCs and SVOCs .

Groundwater- VOC groundwater contamination and DNAPL is present in the former varnish pit and UST area. Groundwater contamination is limited to the building footprint, no offsite groundwater contamination identified.

Sediment -No sediment contamination was identified on site

Surface water - No surface water was present on site

The proposed remedy will address subsurface soil contamination due to VOC and SVOC contamination in the former varnish pit and UST area (See Figure 2). Previous IRM’s have removed 1767 tons of surface and subsurface soil contamination in the drum storage area as well as removing approx 1600 gallons of DNAPL from the varnish pit area (See Figure 2).

Description of the Remedy

Based on the results of the Focused Feasibility Study and the criteria identified for evaluation of alternatives, the NYSDEC has selected a remedy for this VCP site. The components of the remedy set forth in the Remedial Work Plan and shown on the attached Figure #2, are as follows:

1. In-Situ thermal treatment of former Varnish UST soil,
2. Preparation and Implementation of a Site Management Plan including an environmental easement to restrict site use to commercial,
3. Sub-Slab de-pressurization of building,
4. Low Vacuum enhancement of DNAPL recovery,
5. Monitored Natural Attenuation of groundwater, and
6. IRMs of the former drum storage area, DNAPL and Varnish Pit removal - **Completed**

Public Review and Comment

This Decision Document and the Remedial Action Work Plan for the site were provided to the interested public for review and comment for a 45 day period which closed on January 4, 2010 . In addition a notice was published in the Environmental Notice Bulletin on November 18, 2009. Comments should be sent to the project manager, Michael J. Hinton P.E., at the following address:

New York State Department of Environmental Conservation
270 Michigan Ave
Buffalo, New York 14203
Phone 716-851-7220

Several comments were received (4) via email from nearby residents and adjacent business'. No formal written comments were received. Replies via email were provided to the commentors that appeared to satisfy their concerns.

The Decision Document is available on line at <http://www.dec.state.ny.gov/chemical/37554.html> and is also available along with the Remedial Work Plan and all other site related documents at the following document repositories:

NYSDEC
270 Michigan Ave
Buffalo, New York 14203
(716) 851-7220 (by appointment)

Tonwanda Public Library
160 Delaware Rd
Kenmore, New York 14217
(716) 873-2842

Declaration

The selected remedy is protective of human health and the environment for the project identified by the Voluntary Cleanup Agreement for the site. It complies with State and Federal requirements that are legally applicable or relevant and appropriate to the remedial action and will allow for the identified use of the site.

13 JAN 2010

Date



Director

Remedial Bureau E

Division of Environmental Remediation