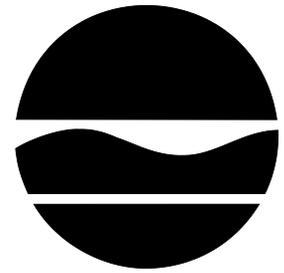


**New York State Department of Environmental Conservation  
Division of Environmental Remediation, Region 9**

270 Michigan Avenue, Buffalo, New York, 14203-2999

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Alexander Grannis  
Commissioner

December 23, 2008

Mr. Robert Powell, CSP  
ARM Sonoco Products Company  
North Second Street, B15  
Hartsville, South Carolina 29550

Dear Mr. Powell:

**Vapor Intrusion Evaluation Report  
Grief Bros. Site  
Town of Tonawanda, Erie County  
V00334-9**

The New York State Department of Environmental Conservation (NYSDEC) and the New York State Department of Health (NYS DOH) have completed review of the Vapor Intrusion Evaluation Report dated October 2008 and have the following comments and concerns that need to be addressed before the report can be approved.

1. **Section 4.0 DECISION MATRICES AND RECOMMENDED ACTIONS** - Add a paragraph or section that describes the potential off-site impact from site related soil vapor. It is apparent that the potential for vapor migration and impact on the apartment buildings to the north is not clearly evaluated and assessed. Shallow groundwater flows in a northerly direction from the site towards the apartments. There are no shallow groundwater wells in this area to assess the potential for vapor migration towards the apartment. Therefore, we are requesting the collection of 2 shallow groundwater samples, one north of MW-3 and one north of MW-4 as close to the northern property line as possible. Temporary well installations are acceptable. The groundwater samples are to be analyzed for the site related compound list as reported in the periodic groundwater sampling events. In addition, two soil vapor samples are to be collected in the same locations as the groundwater samples. The soil vapor samples are to be collected in the same manner as approved in the Vapor Intrusion Work Plan.
2. **Section 4.1 Recommended Actions** - Remove references to the western and eastern halves of the building. The Remedial Action Work Plan being developed will identify the extent of the sub-slab depressurization system (SSD) and the monitoring system

Mr. Robert Powell, CSP  
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required to ensure effective operation. Additional sub-slab vapor sampling in the eastern portion of the building will be performed as a part of the design process for the SSD system. Revise bullet 2 page 4-7 to read that the SSD will provide mitigation of potential vapor intrusion beneath the building.

Please revise the Vapor Intrusion Evaluation Report to reflect these concerns and provide the necessary revised pages for the previously submitted report along with an electronic copy of the final version. If you have any additional questions, please contact me at 716-851-7220.

Sincerely,

Michael J. Hinton, P.E.  
Division of Environmental Remediation

MJHi\dcg  
hinton\powell-dec1.ltr

cc: Mr. Gregory P. Sutton, P.E., Division of Environmental Remediation, Region 9  
Mr. James Charles, Esq. Division of Environmental Enforcement, Buffalo Field Office  
Mr. Matthew Forcucci, New York State Department of Health, Buffalo  
Mr. Richard Fedigan, New York State Department of Health, Albany  
Mr. Peter Gruene, Palmetto Environmental Management Solutions, LLC  
Mr. Jon S. Fox Project Manager, Environmental Resources Management