May 23, 2019 Reference No. 11109628

Mr. Joshua Vaccaro
New York State Department of Environmental Conservation
270 Michigan Avenue
Buffalo, NY 14203-2999

Dear Mr. Vaccaro:

Re: Revised Site Management Plan Table 4.2 - Annual Sampling
Cascades Containerboard Packaging Inc. - Frontier Site (formerly Norampac)
NYSDEC Site Number No. 932110

In response to the New York State Department of Environmental Conservation's (NYSDEC's) request, GHD is submitting the attached revised Table 4.2 of the Site Management Plan (SMP) - Frontier Chemical Site (dated April 23, 2014) on behalf of Cascades Containerboard Packaging Inc. (Cascades), who is the current owner and operator of the former Frontier Chemical Site.

As requested by the NYSDEC in a letter to Cascades dated November 22, 2017, Cascades completed a sampling program at its site in Niagara Falls, New York on January 23, 2018. The sampling program was competed as part of a statewide evaluation of perfluorinated chemicals (PFCs) and their occurrence in water supplies. As part of the sampling program, groundwater samples were collected from five site wells and analyzed for PFCs. The results of the sampling program were provided to the NYSDEC in a letter report dated February 21, 2018.

Based on the results of the January 2018 sampling program, the NYSDEC requested that PFCs and 1,4-dioxane be added to the groundwater quality monitoring program described in Section 4.4.1 of the SMP. PFCs and 1,4-dioxane would be sampled from the five approved wells on an annual basis. A subsequent round of PFC and 1,4-dioxane sampling was completed as part of the semiannual groundwater sampling event, which was conducted from September 28 through October 4, 2018. The next round of PFC and 1,4-dioxane sampling will be conducted as part of the October 2019 semiannual sampling event.

As part of the NYSDEC's request that PFCs and 1,4-dioxane be added to the annual sampling program, the NYSDEC also requested that Table 4.2 (Site-Specific Groundwater Quality Parameters) of the SMP be revised to include the PFC suite as well as 1,4-dioxane. Subsequent discussions with the NYSDEC indicated that the entire SMP does not need to be revised and that only Table 4.2 needed to be modified to include the PFCs analyte list as well as 1,4-dioxane.

GHD
2055 Niagara Falls Boulevard Niagara Falls New York 14304 USA
T 716 297 6150 **F** 716 297 2265 **W** www.ghd.com

REGISTERED COMPANY FOR ISO 9001 ENGINEERING DESIGN

The modified Table 4.2-Site-Specific Groundwater Quality Parameters is attached. Please add this revised table to your copy of the 2014 SMP. Should there be any questions, please do not hesitate to contact myself at 716-205-1975 or Michelle Hamm of Cascades at 716-490-0595.

Sincerely,

GHD



Shaun McEvoy

SM/adh/1

Encl.

cc: Glenn May, NYSDEC
Michelle Hamm, Cascades
Richard Snyder, GHD

Table 4.2

Site-Specific Groundwater Quality Parameters
Frontier Chemical Site
Niagara Falls, New York

Parameters

1,1-Dichloroethane
1,2,4-Trichlorobenzene
1,2-Dichlorobenzene
1,3-Dichlorobenzene
1,4-Dichlorobenzene
Acetone
Benzene
Chlorobenzene
cis-1,2-Dichloroethene
Tetrachloroethene
Toluene
Trichloroethene
Vinyl Chloride
Monochlorotoluene
Per-fluorinated chemicals (PFCs) - 21 PFCs, including perfluorooctanoate (PFOA) and perfluorooctane sulfonate (PFOS)
1,4-dioxane

Inorganics
Arsenic
Iron
Potassium
Sodium
Total Phenol