



September 21, 2018

Reference No. 11153515

Mr. David Szymanski
New York State Department of Environmental Conservation
270 Michigan Avenue
Buffalo, New York 14203-2999

Dear Mr. Szymanski:

**Re: Annual Periodic Review
Former NL Industries Site No. C915200**

GHD Consulting Services, Inc. (GHD), on behalf of Cascades Containerboard Packaging, A Division of Cascades Canada ULC, is submitting the attached Institutional and Engineering Controls Certification Form for the Former NL Industries Site (Site) in Depew, New York. In addition, the annual Periodic Review Report (PRR) is provided under separate cover.

Please contact me at 716/856-2142 should you have any questions or require additional information.

Sincerely,

GHD

A handwritten signature in black ink that reads "Katherine B. Galanti". The signature is written in a cursive, flowing style.

Katherine B. Galanti

KBG/CMB/ck/1

Encl.

cc: L. Marineau, Cascades
R. Snyder, GHD
C. Barton, GHD



Enclosure 2
NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
 Site Management Periodic Review Report Notice
 Institutional and Engineering Controls Certification Form



	Site Details	Box 1
Site No.	C915200	
Site Name Former NL Industries Foundry		
Site Address: 3241 Walden Avenue Zip Code: 14043		
City/Town: Cheektowaga		
County: Erie		
Site Acreage: 7.5		
Reporting Period: August 31, 2017 to August 31, 2018		
		YES NO
1. Is the information above correct?		<input checked="" type="checkbox"/> <input type="checkbox"/>
If NO, include handwritten above or on a separate sheet.		
2. Has some or all of the site property been sold, subdivided, merged, or undergone a tax map amendment during this Reporting Period?		<input type="checkbox"/> <input checked="" type="checkbox"/>
3. Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))?		<input type="checkbox"/> <input checked="" type="checkbox"/>
4. Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period?		<input type="checkbox"/> <input checked="" type="checkbox"/>
If you answered YES to questions 2 thru 4, include documentation or evidence that documentation has been previously submitted with this certification form.		
5. Is the site currently undergoing development?		<input type="checkbox"/> <input checked="" type="checkbox"/>
		Box 2
		YES NO
6. Is the current site use consistent with the use(s) listed below? Commercial and Industrial		<input checked="" type="checkbox"/> <input type="checkbox"/>
7. Are all ICs/ECs in place and functioning as designed?		<input checked="" type="checkbox"/> <input type="checkbox"/>
IF THE ANSWER TO EITHER QUESTION 6 OR 7 IS NO, sign and date below and DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.		
A Corrective Measures Work Plan must be submitted along with this form to address these issues.		
_____ Signature of Owner, Remedial Party or Designated Representative		_____ Date

Box 2A

YES NO

8. Has any new information revealed that assumptions made in the Qualitative Exposure Assessment regarding offsite contamination are no longer valid?

YES NO

If you answered YES to question 8, include documentation or evidence that documentation has been previously submitted with this certification form.

9. Are the assumptions in the Qualitative Exposure Assessment still valid? (The Qualitative Exposure Assessment must be certified every five years)

YES NO

If you answered NO to question 9, the Periodic Review Report must include an updated Qualitative Exposure Assessment based on the new assumptions.

SITE NO. C915200

Box 3

Description of Institutional Controls

<u>Parcel</u>	<u>Owner</u>	<u>Institutional Control</u>
104.09-5-1	Cascades, Inc.	Ground Water Use Restriction Soil Management Plan Landuse Restriction Monitoring Plan Site Management Plan O&M Plan IC/EC Plan

[For details- see Section 5 in the Site Management Plan, dated October 16, 2009] Environmental Easement is included in the FER in Appendix E. The Easement was recorded with the Erie County Clerk on 12/1/2009.

- (i) Prohibition of groundwater use.
- (ii) Restrictions on property use.
- (iii) Maintenance of cover on the containment cell.
- (iv) Maintenance of asphalt cover over trucking yard, eastern parking lot, and rail siding areas.
- (v) Maintenance of concrete cover in the building and apron areas.

Box 4

Description of Engineering Controls

<u>Parcel</u>	<u>Engineering Control</u>
104.09-5-1	Cover System Fencing/Access Control

Periodic Review Report (PRR) Certification Statements

1. I certify by checking "YES" below that:

a) the Periodic Review report and all attachments were prepared under the direction of, and reviewed by, the party making the certification;

b) to the best of my knowledge and belief, the work and conclusions described in this certification are in accordance with the requirements of the site remedial program, and generally accepted engineering practices; and the information presented is accurate and complete.

YES NO

2. If this site has an IC/EC Plan (or equivalent as required in the Decision Document), for each Institutional or Engineering control listed in Boxes 3 and/or 4, I certify by checking "YES" below that all of the following statements are true:

(a) the Institutional Control and/or Engineering Control(s) employed at this site is unchanged since the date that the Control was put in-place, or was last approved by the Department;

(b) nothing has occurred that would impair the ability of such Control, to protect public health and the environment;

(c) access to the site will continue to be provided to the Department, to evaluate the remedy, including access to evaluate the continued maintenance of this Control;

(d) nothing has occurred that would constitute a violation or failure to comply with the Site Management Plan for this Control; and

(e) if a financial assurance mechanism is required by the oversight document for the site, the mechanism remains valid and sufficient for its intended purpose established in the document.

YES NO

**IF THE ANSWER TO QUESTION 2 IS NO, sign and date below and
DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.**

A Corrective Measures Work Plan must be submitted along with this form to address these issues.

Signature of Owner, Remedial Party or Designated Representative

Date

IC CERTIFICATIONS
SITE NO. C915200

Box 6

SITE OWNER OR DESIGNATED REPRESENTATIVE SIGNATURE

I certify that all information and statements in Boxes 1, 2, and 3 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

I Richard J. Snyder, P.E. at GAD Consulting Services, Inc.
print name 2055 Niagara Falls Blvd Suite 3 Niagara Falls NY
print business address 14304

am certifying as Owners Representative (Owner or Remedial Party)

for the Site named in the Site Details Section of this form.


Signature of Owner, Remedial Party, or Designated Representative
Rendering Certification

September 12, 2018
Date

IC/EC CERTIFICATIONS

Box 7

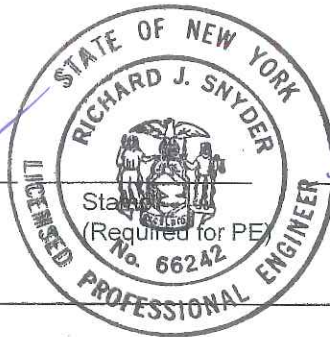
Professional Engineer Signature

I certify that all information in Boxes 4 and 5 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

I Richard J. Snyder GHD Consulting Services Inc
print name at 205T Niagara Falls Blvd, Suite 3 Niagara Falls, NY
print business address 14304

am certifying as a Professional Engineer for the Owner
(Owner or Remedial Party)


Signature of Professional Engineer, for the Owner or Remedial Party, Rendering Certification



September 12, 2018
Date



2018 Periodic Review Report

Former NL Industries Site
NYSDEC Site No. C915200
3241 Walden Avenue
Depew, New York

Cascades Containerboard Packaging, A Division of Cascades Canada ULC

GHD | 285 Delaware Avenue Suite 500 Buffalo New York 14202
11153515 | Report No 1 | September 30 2018



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1. Introduction

The former NL Industries facility (Site) is located at 3241 Walden Avenue in Depew, New York (Figure 1.1). The property and facility are currently owned and operated by Cascades, Inc. Remediation of the Site was completed in 2008 under the oversight of the New York State Department of Environmental Conservation (NYSDEC) in accordance with Brownfield Cleanup Agreement (BCA) Index #B9-0554-98-12, Site #C-915200. A Site Management Plan (SMP) was developed upon completion of the remedial construction to ensure implementation and management of the institutional controls (ICs) and engineering controls (ECs) in place at the Site. This Periodic Review Report (PRR) is being prepared to certify that site management activities are being conducted in accordance with the SMP.

The final remedial alternative for the Site, as described in the SMP dated October 2009, included the following components:

1. Excavation of impacted soils from the western section of the Site and consolidation within a containment cell constructed within the central portion of the Site.
2. Capping of the containment cell with imported clean fill, geo-synthetic clay liner (GCL), and soil/vegetative or asphalt cover.
3. Construction of a GCL and soil cover system on all non-paved areas of the containment cell (i.e., side slopes).
4. Construction of a GCL and asphalt cover system on all paved areas of the containment cell.
5. Execution and recording of an Environmental Easement to restrict land use and prevent future exposure to remaining impacted materials for the central and eastern portions of the Site.
6. Development and implementation of a SMP for long-term management of the ECs/ICs at the Site.

The SMP, designed to serve as a work plan for Site monitoring and maintenance, was prepared and approved by NYSDEC in December 2009.

This report presents the results of the Site inspection conducted in May 2018, and recordkeeping conducted through September 2018. Note that the groundwater monitoring is not required this year as it is being conducted on a triennial basis in accordance with the NYSDEC letter dated October 18, 2016. The report is organized as follows:

- Section 1 – Introduction: The background and brief remedial history of the Site.
- Section 2 – Engineering and Institutional Controls: The ECs/ICs for this Site are described.
- Section 3 – Inspections and Maintenance Activities: Activities performed during the current reporting period and their results.
- Section 4 – Conclusions and Recommendations: Conclusions and recommendations based upon the data and results of the current monitoring period.



2. Engineering and Institutional Controls

Engineering controls are required to protect human health and the environment because impacted fill is still present below various structures at the Site. Figure 2.1 shows the Site layout, and Figure 2.2 shows the various EC systems in place at the Site.

2.1 Engineering Controls (ECs)

The purpose of the EC systems is to eliminate the potential for human contact with fill material, prevent percolation of precipitation through the impacted fill, and eliminate the potential for contaminated runoff from the Site. The EC systems in place at the Site consist of the following:

- **Asphalt Only**: The trucking yard within the eastern section of the Site was paved in 2004 and is covered by 4.5 inches of sub-base material and 6 inches of asphalt (4.5 inches binder coat and 1.5 inches top coat). The eastern parking lot was historically paved with asphalt for employee parking, and was repaved in August 2011. In addition, the area identified as the “rail siding area” was paved with 6 inches of asphalt (4 inches binder coat and 2 inches top coat) in August 2008.
- **Building and Apron Concrete**: The concrete floor of the existing building and exterior concrete pads/aprons are believed to be a minimum of 6 inches in thickness.
- **GCL and Soil**: All non-paved areas (side slopes) of the containment cell are covered by approximately 12 inches of clean soil underlain by a GCL covering with a 6-inch sand layer between the GCL and impacted fill. All exposed environmentally clean soil/fill has been hydro-seeded as an erosion control methodology.
- **GCL and Asphalt**: All paved areas of the central section containment cell are covered by 6 inches of asphalt (4 inches binder coat and 2 inches top coat) underlain by 12 inches of clean fill, followed by a GCL covering with a 6-inch sand layer between the GCL and the impacted fill.

2.2 Institutional Controls (ICs)

The purpose of the ICs is to:

- Implement, maintain, and monitor the ECs.
- Prevent future exposure to remaining on-Site contamination by controlling disturbance of the subsurface contamination.
- Limit the use and development of portions of the Site to industrial uses only.

The ICs that have been established for the Site must be:

- In compliance with the Environmental Easement and the SMP by the Grantor (currently Norampac, Inc.) and the Grantor’s successors and assigns.
- Operated and maintained as specified in the SMP.
- Inspected at a frequency and in a manner defined in the SMP.



Data and information pertinent to management of the Site must be reported at the frequency and in a manner defined in the SMP.

Adherence to the ICs is required by the Environmental Easement. The ICs may not be discontinued without an amendment to or extinguishment of the Environmental Easement.

In addition, the Site has a series of ICs in the form of site restrictions as required by the Environmental Easement. Site restrictions that apply to the Site are:

- The central and eastern portions of the property may only be used for commercial/industrial purposes provided that the long-term ECs/ICs included in the SMP are employed.
- The central and eastern portions of the property may not be used for a higher level of use, such as unrestricted or restricted residential use without additional remediation and amendment of the Environmental Easement, as approved by the NYSDEC.
- All future activities on the property that will disturb remaining impacted material must be conducted in accordance with the SMP.
- The Site owner or remedial party will submit to the NYSDEC a written statement that certifies, under penalty of perjury, that: (1) controls employed at the Site are unchanged from the previous certification or that any changes to the controls were approved by the NYSDEC; and, (2) nothing has occurred that impairs the ability of the controls to protect public health and environment or that constitute a violation or failure to comply with the SMP.
- The groundwater beneath the central and eastern sections of the property may not be used for potable or non-potable purposes.

3. Inspections and Maintenance Activities

A comprehensive Site-wide inspection is required to be conducted annually, as specified in the SMP. The intent of the annual inspection is to determine whether:

- The ECs continue to perform as designed
- The ECs continue to be protective of human health and the environment
- The Site is operated and maintained in compliance with the SMP and Environmental Easement
- The remedial performance criteria have been achieved
- Sampling and analysis of appropriate media were conducted
- Site records are complete and current
- Changes to the remedial systems or monitoring are needed

The inspection was performed by GHD personnel in accordance with the requirements of the SMP.

The annual comprehensive Site inspection was conducted on May 24, 2018. The following sections discuss the findings of the 2018 inspection. The completed Site Inspection Form is provided as Appendix A to this report.



3.1 Asphalt-Only Cover System

The three areas of asphalt-only cover consist of the Trucking Yard (west of the main building), Parking Lot (east of the main building), and Former Rail Siding (south of the main building) as shown on Figure 2.2. The areas of asphalt only cover were visually inspected for cracks and deterioration.

3.1.1 Trucking Yard

The asphalt surface in the trucking yard generally appeared in satisfactory condition. Some minor surficial cracking is present; however, these cracks do not impact the integrity or effectiveness of the cover. Larger cracks (greater than 0.25 inch in width) that were sealed in 2015 remain in good condition. Sealing of minor cracks identified in 2017 was completed as part of routine maintenance to prevent further deterioration. The test pit locations excavated in 2009 were repaved in 2011 and remain in good condition. Photos of the trucking yard are provided in Appendix B.

3.1.2 Parking Lot

The Parking Lot was repaved in 2011 and is generally free of cracks and deterioration. Photos of the pavement are provided in Appendix B.

3.1.3 Former Rail Siding

The asphalt cover on the Former Rail Siding was generally free of cracks and deterioration and appeared in good condition, although the presence of staged inventory within the area inhibited full inspection. Photos of the pavement are provided in Appendix B.

3.1.4 Corrective Action

No corrective action is necessary for the asphalt-only cover system at this time.

3.2 Building and Apron Cover System

The building floor slab and apron concrete were visually inspected for cracks and deterioration. Shallow cracks are present on some areas of the apron; however, these cracks do not penetrate the full thickness of the apron slab and do not impact the effectiveness of the cover. These areas will be addressed as part of routine maintenance. Damaged areas identified in 2015 were patched with asphalt and tar sealant and remain in generally good condition. The building and apron cover system has not deteriorated significantly from 2017. Photos of the concrete are provided in Appendix B.

No corrective action is necessary for the building and apron concrete cover system at this time.

3.3 GCL and Soil Cover System

The GCL and soil cover system was visually inspected as part of the annual comprehensive Site inspection. No areas of subsidence, erosion, or exposed GCL were observed. At the time of the inspection, the grass was approximately 2 to 4 inches in length and was regularly maintained throughout the year. Photos of the GCL and soil cover are provided in Appendix B.



Corrective action is not necessary for the GCL and soil cover system at this time.

The GCL and asphalt cover system was visually inspected as part of the annual comprehensive Site inspection. No areas of subsidence or exposed GCL were observed. Minor surface indentations caused by tractor-trailer supports were noted in the asphalt, consistent with past years. The indentations were approximately 0.25 to 0.5 inch in depth, but do not affect the integrity of the cap. Photos of the GCL and asphalt cover are provided in Appendix B.

No corrective action is necessary for the GCL and asphalt cover system at this time.

3.4 Retention Pond

The retention pond was inspected as part of the annual comprehensive Site inspection. Approximately 12 inches of standing water was present in the center of the pond, as the water level was below the invert of the outflow pipe. Although vegetation was cut in 2015, significant plant growth is present within the pond, primarily invasive phragmites. No other debris was observed and the outlet pipes are open. No evidence of erosion was observed along the banks of the pond.

No corrective action is necessary with regard to vegetation growth within the pond.

A gate was installed at the southeast corner of the pond fence enclosure in June 2011 to allow access for mowing and maintenance. The gate is locked to prevent unauthorized access. Photos of the retention pond are provided in Appendix B.

3.5 Fencing

The fencing was inspected as part of the annual comprehensive site inspection. Two areas of observed damage to fence posts and rails on the south fence in 2017 have been repaired. The fence north of the Site along Walden Avenue was constructed with braided wire rather than a top support pole. At the time of the inspection, the wire provided sufficient support for the fence. Photos of the fencing are provided in Appendix B.

No corrective action is necessary with regard to site fencing at this time.

3.6 Vegetative Cover

The vegetative cover was inspected as part of the annual comprehensive site inspection. No areas of distressed vegetation, invasive species, or woody growth were observed. Photos of the vegetative cover are provided in Appendix B.

No corrective action is necessary with regard to the vegetative cover at this time.

4. Groundwater Monitoring

The 2016 PRR included a recommendation to reduce the frequency of groundwater monitoring from annual to triennial. The NYSDEC agreed with the recommendation in a letter to Cascades, Inc. dated October 18, 2016. The next groundwater sampling event will be in 2019.



5. Conclusions and Recommendations

The annual inspection and monitoring activities performed during this reporting period found that:

- Monitoring wells at the Site are in good condition.
- The asphalt-only cover system is generally in good condition with continued routine maintenance.
- Areas of the building and apron concrete cover system that were patched with asphalt and tar in 2015 remain in generally good condition. No corrective measures are required at this time.
- The GCL and soil, and GCL and asphalt cover systems are generally in good condition with no deficiencies noted.
- Fencing is in good condition.

Based on these observations, it is concluded that the remedial action continues to be effective.

6. Certification

For each institutional or engineering control identified for the site, I certify that all of the following statements are true:

- The inspection of the Site to confirm the effectiveness of the institutional and engineering controls required by the remedial program was performed under my direction.
- Except as indicated in this report, the institutional controls and/or engineering controls employed at this Site are unchanged from the date the control was put in place, or last approved by the Department.
- Nothing has occurred that would impair the ability of the control to protect the public health and environment.
- Nothing has occurred that would constitute a violation or failure to comply with the SMP for this control.
- Access to the site will continue to be provided to the Department to evaluate the remedy, including access to evaluate the continued maintenance of this control.
- Use of the Site is compliant with the environmental easement.



- The engineering control systems are performing as designed and are effective.
- To the best of my knowledge and belief, the work and conclusions described in this certification are in accordance with the requirements of the Site remedial program.
- The information presented in this report is accurate and complete.

Richard J. Snyder, P.E.
GHD Consulting Services, Inc.
135 Raritan Center Parkway, Suite 5
Edison, New Jersey 08837-3265

Signature: _____

Date: _____

September 12, 2018



Appendices

Appendix A Site Inspection Form

Site Inspection Form

Former N.L. Industries
 3241 Walden Avenue
 Depew, NY

Page 1 of 5

Name of Inspector: Christine Barton
 Date of Inspection: 5/24/18

The purpose of this inspection is to monitor the overall integrity of the containment cell, the site wide paving and the building foundation. Please take photographs from all four sides of the containment cell cap, as well as the asphalt pavement and building foundation to document the existing conditions of the consolidated soil area, erosion control technologies in place, and the immediate surrounding area each week. Please fill out the following inspection items. If at any time impacted fill material has been exposed, please notify the Project Manager listed in the SMP immediately.

Monitoring Well Network

Condition of Monitoring Wells

	Good	Fair	Needs Repair	Details
MW-101	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>Visual inspection only</u>
MW-102	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>Groundwater sampling</u>
MW-103	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>is not required for this</u>
MW-104	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>reporting period</u>
MW-105	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
MW-106	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
MW-99-01	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____

Asphalt Only Cover System

Are there any obvious areas of damage to the asphalt in the trucking yard?

YES NO If yes, please describe Crack sealing based on
2017 inspection can be seen. No significant
changes from 2017

Site Inspection Form

Former N.L. Industries
3241 Walden Avenue
Depew, NY

Page 2 of 5

Asphalt Only Cover System

Are there any obvious areas of damage to the asphalt in the parking lot?

YES NO If yes, please describe No significant
changes from 2017.

Are there any obvious areas of damage to the asphalt in the former rail siding area?

YES NO If yes, please describe same as 2017.

Building and Apron Concrete Cover System

Are there any obvious areas of damage to the building's foundations?

YES NO If yes, please describe _____

Are there any obvious areas of damage to any concrete pads?

YES NO If yes, please describe minor cracking. Evidence
of crack sealing based on 2017 inspection can
be seen. No significant changes from 2017.

GCL and Soil Cover System

Are there any signs of soil run-off or erosion on the sides of the containment cell?

YES NO If yes, please describe _____

Site Inspection Form

Former N.L. Industries
3241 Walden Avenue
Depew, NY

Page 3 of 5

GCL and Soil Cover System

Are there any areas of exposed GCL?

YES NO If yes, please describe _____

Has the grass appeared to have been mowed at a regular basis during the previous growing season?

YES NO If yes, please describe _____

Are there any woody types plants growing within the this Cover System?

YES NO If yes, please describe _____

GCL and Asphalt Cover System

Are there any obvious areas of damage to the asphalt within this cover system?

YES NO If yes, please describe _____

Are there any obvious signs of cracking within this cover system?

YES NO If yes, please describe _____

Site Inspection Form

Former N.L. Industries
3241 Walden Avenue
Depew, NY

Page 4 of 5

Pond

Is there standing water in the retention pond?

YES NO If yes, approximately how much? approx 1'

Is there any debris within the retention pond?

YES NO If yes, please describe _____

Is the inlet and outlet of the retention pond free of debris?

YES NO If no, please describe _____

Is there any sign of erosion along the banks of the retention pond?

YES NO If yes, please describe _____

Vegetatives

Is there any sign of distress, disease or die off of the vegetatives associated with the cover systems?

YES NO If yes, please describe _____

Site Inspection Form

Former N.L. Industries
3241 Walden Avenue
Depew, NY

Page 5 of 5

Fencing

Is there signs of damage to the fencing around the retention pond or within the area of the environmental easement?

YES NO If yes, describe location and extent of damage

Is there signs of frost heaving within the supports of the fencing?

YES NO If yes, please describe _____

Is the chain link still attached to support poles at all locations around the retention pond or within the area of the environmental easement?

YES NO If no, please describe _____

Is there any sign of erosion along the banks of the retention pond?

YES NO If yes, please describe _____

Please describe any changes to the overall area since the last inspection

Appendix B Photographs



Photo 1 – Parking lot looking west along north side of office.



Photo 2 – Parking lot looking south.



Photo 3 – Former rail siding looking east.



Photo 4 – Building Apron Concrete System (north end of building) looking east.



Photo 5 – Building Apron Concrete System (south end of building) looking east.



Photo 6 – Trucking Yard looking south-southwest.



Photo 7 – Trucking Yard looking north.



Photo 8 – GCL and Soil Cover System looking west along north slope.



Photo 9 – GCL and Soil Cover System looking south along west slope.



Photo 10 – GCL and Soil Cover System looking west along south slope.



Photo 11 – Looking southwest across retention pond.



Photo 12 – GCL and Asphalt Cover System looking northeast across cap.