

Your ref: 915200  
Our ref: 12560147

December 16, 2021

Ms. Megan Kuczka  
New York State Department of Environmental Conservation  
Division of Environmental Remediation  
270 Michigan Avenue  
Buffalo, New York 14203

**Former NL Industries Site # C-915200 Revised Errata Sheet for the Site Management Plan**

Dear Ms. Kuczka

The purpose of this errata sheet is to update information in the Site Management Plan (SMP) for the Former NL Industries Site, Site No C-915200 dated October 16, 2009, prepared by Tighe & Bond.

The proposed changes are presented below. Current and forward-looking references to Norampac and Metro Waste were changed as appropriate. Historical references to Norampac and Metro Waste were not changed as they were appropriate for the time.

A P.E. Certification is attached to certify the revisions below.

**Page 1-1, Section 1.1, Paragraph 1**

Current Text

Norampac Industries Inc. entered into a BCA with the NYSDEC to remediate a 7.5-acre property located in in the Village of Depew, Town of Cheektowaga, County of Erie, NYS. This BCA required the Remedial Party, Former N.L. Industries Foundry, to investigate and remediate contaminated media at the site. A figure showing the site location and boundaries of this 7.5-acre Site is provided in Figure 1. The boundaries of the site are more fully described in the metes and bounds site description that is provided within Section 2.1.1.

Revised Text

Norampac Industries Inc. (Norampac), a member of the Cascades Group, entered into a BCA with the NYSDEC in May 2006 to remediate a 7.5-acre property located in the Village of Depew, Town of Cheektowaga, County of Erie, NYS. Norampac changed its name to Cascades Containerboard Packaging Inc. on August 1, 2016. Cascades Containerboard Packaging Inc. was merged into Cascades New York Inc. on December 31, 2016. Cascades New York Inc. was merged into Cascades Holding US Inc. (Cascades) on December 31, 2018. The Site is currently operated as Cascades Recovery Plus. A figure showing the site location and boundaries of this 7.5-acre Site is provided in Figure 1. The boundaries of the site are more fully described in the metes and bounds site description that is provided within Section 2.1.1.

**Page 1-1, Section 1.1, Paragraph 3**

Current Text

This SMP was prepared by Tighe & Bond, on behalf of Norampac, Inc. in accordance with the requirements in NYSDEC DER-10 Technical Guidance for Site Investigation and Remediation and the guidelines provided by

NYSDEC. This SMP addresses the means for implementing the Engineering Controls (ECs) and Institutional Controls (ICs) that are required by the Environmental Easement for the site.

#### Revised Text

This SMP was prepared by Tighe & Bond, on behalf of Norampac, Inc. (now Cascades) in accordance with the requirements in NYSDEC DER-10 Technical Guidance for Site Investigation and Remediation and the guidelines provided by NYSDEC. This SMP addresses the means for implementing the Engineering Controls (ECs) and Institutional Controls (ICs) that are required by the Environmental Easement for the site. GHD prepared this Errata Sheet in 2021 to document SMP revisions reflecting ownership and monitoring frequency changes.

### **Page 2-1, Section 2.1, Paragraph 1**

#### Current Text

The subject property is located at 3241 Walden Avenue in Depew, New York, which is a suburb to the east of Buffalo. The property is situated on the south side of Walden Avenue, approximately 580 feet west of the center line of Transit Road. The property is legally described as Part of Lot 68, Township 11, Range 7 of the Holland Land Company's Survey in the Village of Depew, Town of Cheektowaga, County of Erie. Metro Waste Paper Recovery Inc. (Metro Waste), currently operates a paper recycling facility at the site.

#### Revised Text

The subject property is located at 3241 Walden Avenue in Depew, New York, which is a suburb to the east of Buffalo. The property is situated on the south side of Walden Avenue, approximately 580 feet west of the center line of Transit Road. The property is legally described as Part of Lot 68, Township 11, Range 7 of the Holland Land Company's Survey in the Village of Depew, Town of Cheektowaga, County of Erie. The Site was historically owned/operated by Normapac and Metro Waste Paper Recovery Inc. (Metro Waste). The Site is currently owned by Cascades, with Cascades Recovery Plus operating the paper recycling facility.

### **Page 2-1, Section 2.1, Paragraph 3**

#### Current Text

Metro Waste currently operates paper fiber recycling activities at the site. Operations are primarily limited to the eastern and central sections of the site while the western section of the site consists of vegetated open space and a stormwater detection pond. Paper fiber recycling has been conducted on the site by various companies since 1974.

#### Revised Text

Cascades Recovery Plus currently operates paper fiber recycling activities at the site. Operations are primarily limited to the eastern and central sections of the site while the western section of the site consists of vegetated open space and a stormwater detection pond. Paper fiber recycling has been conducted on the site by various companies since 1974.

### **Page 2-2, Section 2.2.1, Paragraph 2**

#### Current Text

The main plant and office building are estimated to occupy an area of approximately 63,400 ft<sup>2</sup>. The east side of the property is paved with asphalt for employee parking. A truck loading/unloading and trailer parking area are located west of the building. In November 1999, the trucking yard was re-surfaced with new gravel. According to Norampac, approximately 400 tons of gravel was imported to the site in order to provide a minimum cover of approximately 3 inches across the trucking yard. In December 2004, Metro Waste paved the trucking yard to provide a better driving surface for the trucks that entered the property on a daily basis to load and unload shipments. The existing granular surface was considered a sufficient sub-base and was graded prior to installing the asphalt, which consisted of 4.5 inches of binder coat and 1.5 inches of asphalt topcoat. In addition to the asphalt, a new concrete apron, approximately 6 inches thick, was constructed adjacent to the

west side of the building. In addition, the area identified as the former “rail siding” area was also paved with 6-inches of asphalt (4 inches binder coat and 2 inches top coat) on August 15, 2008 as part of the NYSDEC-DD.

#### Revised Text

The main plant and office building are estimated to occupy an area of approximately 63,400 ft<sup>2</sup>. The east side of the property is paved with asphalt for employee parking. A truck loading/unloading and trailer parking area are located west of the building. In November 1999, the trucking yard was resurfaced with new gravel. According to Norampac, approximately 400 tons of gravel was imported to the site in order to provide a minimum cover of approximately 3 inches across the trucking yard. In December 2004, Metro Waste paved the trucking yard to provide a better driving surface for the trucks that entered the property on a daily basis to load and unload shipments. The existing granular surface was considered a sufficient sub-base and was graded prior to installing the asphalt, which consisted of 4.5 inches of binder coat and 1.5 inches of asphalt topcoat. In addition to the asphalt, a new concrete apron, approximately 6 inches thick, was constructed adjacent to the west side of the building. In addition, the area identified as the former “rail siding” area was also paved with 6 inches of asphalt (4 inches binder coat and 2 inches top coat) on August 15, 2008 as part of the NYSDEC-DD. Test pit locations installed in 2009 in the trucking yard as shown on Figure 1 of Appendix A of the SMP were repaved in 2011 to repair settling observed during the site inspection. The areas were repaved to match the existing asphalt pavement.

#### **Page 2-3, Section 2.2.2, Paragraph 1**

##### Current Text

The central section of the property contains the containment cell that was constructed as part of the NYSDEC-DD. This area is now used as a parking area for Metro Waste. The former lagoon and marsh area were also formerly located along the southern side of this section of the site.

##### Revised Text

The central section of the property contains the containment cell that was constructed as part of the NYSDEC-DD. This area is now used as a parking area for Cascades Recovery Plus. The former lagoon and marsh area were also formerly located along the southern side of this section of the site.

#### **Page 5-1, Section 5.2, Bullet 1**

##### Current Text

- Asphalt only: According to the RI/FS, the trucking yard within the eastern section of the site was recently paved in 2004 and is covered by 4.5 inches of sub-base material and 6-inches of asphalt (4.5 binder coat and 1.5 inches top coat). The eastern parking lot was historically paved with asphalt for employee parking. 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) on 8/15/2008.

##### Revised Text

- Asphalt only: According to the RI/FS, the trucking yard within the eastern section of the site was recently paved in 2004 and is covered by 4.5 inches of sub-base material and 6 inches of asphalt (4.5 inches of binder coat and 1.5 inches top coat). The eastern parking lot was historically paved with asphalt for employee parking. 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) on 8/15/2008. Test pit locations installed in the trucking yard in 2009 as shown on Figure 1 of Appendix A of the SMP were repaved in 2011 to repair settling observed during the site inspection. The areas were repaved to match the existing asphalt pavement.

#### **Page 5-2, Section 5.3, Paragraph 1**

##### Current Text

A series of ICs are required by the NYSDEC-DD to: (1) implement, maintain and monitor the ECs; (2) prevent future exposure to remaining contamination by controlling disturbances of the subsurface contamination; and,

(3) limit the use and development of certain portions of the site to industrial uses only. Adherence to these ICs on the site is required by the Environmental Easement and will be implemented under this SMP. These ICs are:

Revised Text

A series of ICs are required by the NYSDEC-DD to: (1) implement, maintain and monitor the ECs; (2) prevent future exposure to remaining contamination by controlling disturbances of the subsurface contamination; and (3) limit the use and development of certain portions of the site to commercial and industrial uses only. Adherence to these ICs on the site is required by the Environmental Easement and will be implemented under this SMP. These ICs are:

**Page 5-3, Section 5.4, Paragraph 3**

Current Text

Any work conducted pursuant to the EWP must also be conducted in accordance with the procedures defined in a HASP and CAMP prepared for the site.

Revised Text

Any work conducted pursuant to the EWP must also be conducted in accordance with the procedures defined in a HASP and CAMP prepared for the site by the contractor conducting the work. The contractor's HASP must, at a minimum, meet the requirements of the example HASP provided as Appendix C, as well as any updated OSHA regulations and current public health requirements (e.g., COVID-19 protocols).

**Page 6-3, Section 6.1.5, Paragraph 5**

Current Text

Inspections of the pond and associated piping will be conducted on a monthly basis for general condition. It is recommended that the inspections be conducted consistently by the same representative so that any changes to the system will be more apparent and noticed. If any unusual conditions or damage to the system is noted by the inspector, (as determined in consultation with the owner's P.E.) corrective actions will be implemented.

Revised Text

Inspections of the pond and associated piping will be conducted on a semi-annual basis for general condition. It is recommended that the inspections be conducted consistently by the same representative so that any changes to the system will be more apparent and noticed. If any unusual conditions or damage to the system is noted by the inspector (as determined in consultation with the owner's P.E.), corrective actions will be implemented.

**Page 6-5, Section 6.3, Table**

Current Table

Organization / Name	Title / Location	Telephone
Owner - Norampac Leon Marineau	Vice President Kingsey Falls, Quebec, Canada	819-363-5702
Metro Waste Representative Tom Derkovitz	Site Manager Depew, NY	716-570-3952
Owner's P.E.	To be defined on a yearly basis	

#### Revised Table

Organization / Name	Title / Location	Telephone
Owner - Cascades Leon Marineau	Vice President Kingsey Falls, Quebec, Canada	819-363-5702
Cascades Recovery Plus Seth Shepherd	Site Manager Depew, NY	716-609-4509
Owner's P.E.	To be defined on a yearly basis	

#### **Page 7-3, Section 7.4.6, Paragraph 1**

##### Current Text

Groundwater samples will be collected annually from each well within the monitoring well network. All collected groundwater samples will be analyzed for Target Compound List VOCs via EPA method SW486-8260B, Target Compound List metals via EPA Method SW486-6020 and EPA Method SW486-7470A, and SVOCs via EPA Method 8270C.

##### Revised Text

Groundwater samples will be collected annually from each well within the monitoring well network. All collected groundwater samples will be analyzed for Target Compound List VOCs via EPA Method SW846-8260, Target Compound List metals via EPA Method SW846-6020 and EPA Method SW846-7470, and SVOCs via EPA Method SW846-8270.

#### **Page 7-4, Section 7.5, Paragraph 1**

##### Current Text

The monitoring well network and site cover systems will be inspected annually as part of monitoring and maintenance program as described in the following sections. As previously mentioned, a copy of the inspection form is included as Appendix E. A plan depicting the locations of the monitoring well network is provided as Figure 6.

##### Revised Text

The monitoring well network and site cover systems will be inspected triennially as part of the monitoring and maintenance program as described in the following sections. As previously mentioned, a copy of the inspection form is included as Appendix E. A plan depicting the locations of the monitoring well network is provided as Figure 6.

#### **Page 7-6, Section 7.7, Last Paragraph**

##### Current Text

A copy of the monitoring reports will be kept into the Metro Waste Coordinator's office at 3241 Walden Avenue. The documentation will be available for onsite consultation only after a request to review the documents is approved by Norampac Industries Inc.

##### Revised Text

A copy of the monitoring reports will be kept in the Cascades Recovery Plus office at 3241 Walden Avenue. The documentation will be available for onsite consultation only after a request to review the documents is approved by Cascades.

#### **Appendix B, Page 1, Section B-1, Paragraph 1**

##### Current Text

At least 15 days prior to the start of any activity that is anticipated to encounter or disturb impacted fill material within the eastern and/or western sections of the site (as identified on Figure 2 of the SMP), the site owner or their representative will notify the NYSDEC. Currently, this notification will be made to:

Mr. Jaspal Walia  
NYSDEC Region 9 Office  
270 Michigan Avenue  
Buffalo, NY 14203  
(716) 851-7220

Revised Text

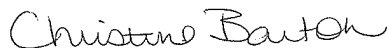
At least 15 days prior to the start of any activity that is anticipated to encounter or disturb impacted fill material within the eastern and/or western sections of the site (as identified on Figure 2 of the SMP), the site owner or their representative will notify the NYSDEC. Currently, this notification will be made to:

Ms. Megan Kuczka  
NYSDEC Region 9 Office  
270 Michigan Avenue  
Buffalo, NY 14203  
(716) 851-7220

Any excavation work conducted at the Site must be done in accordance with current NYSDEC requirements at the time. As of the date of the Errata Sheet, DER-10, the January 2021 NYSDEC Sampling, Analysis, and Assessment of Per- and Polyfluoroalkyl Substances (PFAS) Guidelines, and NYSDOH's current air monitoring procedures will be followed during onsite soil/fill management in addition to the requirements of this Excavation Work Plan.

Please contact the undersigned with any questions.

Regards



**Christine Barton**  
Project Manager

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Copy to: Leon Marineau, Cascades  
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CERTIFICATION STATEMENT I Richard J. Snyder certify that I am currently a [NYS registered professional engineer or Qualified Environmental Professional as in defined in 6 NYCRR Part 375] and that this Site Management Plan was prepared in accordance with all applicable statutes and regulations and in substantial conformance with the DER Technical Guidance for Site Investigation and Remediation (DER-10).



December 13, 2021 DATE