

December 14, 2018

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

Dear Mr. Sadowski:

**Re: 2018 Periodic Review Report
Former Mill No. 2
NYSDEC Site Number 932150
4400 Royal Avenue
Niagara Falls, NY 14303**

Pursuant to the Site Management Plan – Former Mill No. 2 (Greenpac) , Niagara Falls, New York (SMP) dated June 2012, this correspondence provides the 2018 Periodic Review Report (PRR) for the Greenpac Mills Facility (Former Mill No. 2) located in Niagara Falls, New York (Site Number 932150). This PRR and Institutional Controls/Engineering Controls (IC/EC) Certification represent activities for the last 5 years leading up to December 2018.

If you need anything further, I can be reached at (716) 525-4327.

Michelle Hamm

A handwritten signature in black ink that reads "Michelle Hamm". The signature is written in a cursive style and is followed by a long horizontal line that extends to the right.

Technical Services Supervisor
Greenpac Mills
4400 Royal Avenue
Niagara Falls, NY 143003
Michelle_hamm@cascades.com

Periodic Review Report

Former Mill No. 2 Site

Greenpac Mill, LLC

4400 Royal Avenue

Niagara Falls, New York

NYSDEC BCP Site Number C932150

December 2018

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

- a) The institutional control employed at this Site (Environmental Easement) is unchanged from the date the control was put in place, or last approved by the Department;*
- b) Nothing has occurred that would impair the ability of the control to protect human health and the environment except as indicated in Section 5.0 of this report entitled "Deviations from the Site Management Plan";*
- c) Nothing has occurred that would constitute a violation or failure to comply with any Site Management Plan for this control except as indicated in Section 5.0 of this report entitled "Deviations from the Site Management Plan";*
- d) 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;*
- e) Use of the Site is compliant with the Environmental Easement.*
- f) The information presented in this report is accurate and complete.*
- g) I certify that all information and statements in this certification form 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.*

Michelle Hamm – Technical Services Supervisor Greenpac Mill, LLC



Michelle Hamm

12-14-18

Date

SITE HISTORY

Buildings, facilities, and operations associated with the Former Mill No. 2 historically housed paper manufacturing, finishing, and packaging operations of finished goods. The facility was originally constructed in the 1920s and was expanded several times. The northern part of the Site included a five story warehouse building (Building 10) and the on-Site Wastewater Treatment Plant (WWTP). Historic plant drawings indicate that Building 10 was apparently constructed in 1936 and the WWTP was originally constructed in 1940 with additions and improvements being constructed during ensuing years. Paper manufacturing, finishing, and packaging operations continued at the Site until the Former Mill No. 2 became inactive in 1982.

Greenpac entered into a BCA with the NYSDEC in 2010 to address the significant environmental, legal, and financial barriers that hinder redevelopment of the Site. Former Mill No. 2 structures have been demolished to allow construction of the new, state-of-the-art fiberboard. This BCA required the Remedial Party, Greenpac, to investigate and remediate contaminated media at the Site. Greenpac then did perform all remediation work, and received the NYDEC Brownfield cleanup program Certification of completion, which is included as Appendix

SUMMARY OF REMEDIAL ACTIONS

Between July 2011 and March 2012, and consistent with the NYSDEC approved Soil Excavation IRM Work Plan (ERM, 2011c) and the approved Addendum to the Soil Excavation IRM Work Plan (ERM, 2011e), a Track 2 cleanup was implemented that achieved the Industrial Soil Cleanup Objectives (SCOs) for the top 15-feet of soil, or to the top of bedrock, whichever is shallower, with the exceptions noted below.

The Site was remediated in accordance with the following NYSDEC approved Work Plans:

- Interim Remedial Measure Work Plan – Demolition of Mill No. 2 (C&S, 2010b);
- IRM Work Plan for Demolition of Building No. 10 and the WWTP (ERM, 2011b);
- Soil Excavation IRM Work Plan (ERM, 2011c); and
- Addendum to the Soil Excavation Work Plan (ERM, 2011d).

The following is a summary of the Remedial Actions performed at the Site:

1. Excavation of soil/fill exceeding Industrial SCOs, and Site-specific screening criteria, to a depth of 15 feet or bedrock, whichever was shallower;
2. Demolition of the Former Mill No. 2, Building 10, and the two southernmost tanks for the WWTP.
3. Execution and recording of an Environmental Easement to restrict land use, as well as to prohibit use of ground water underlying

the Site without treatment rendering it safe for intended use.

4. Development and implementation of the SMP for long term management of remaining contamination as required by the Environmental Easement, which includes plans for: (1) ICs, (2) inspections and sampling, and (3) reporting.

Remedial excavation activities were substantially complete on 31 December 2011. Demolition activities were substantially completed in February 2012.

Remedial actions can be found in the last PRR submitted to the department in 2013.

ENGINEERING CONTROL SYSTEMS

There are no engineering controls required for this Site.

INSTITUTIONAL CONTROLS

A series of ICs was required by the Decision Document (NYSDEC, 2012b) to:

(1) prevent future exposure to remaining contamination by controlling disturbances of the subsurface contamination; and, (2) limit the use and development of the Site to industrial uses only. Adherence to these ICs on the Site is required by the Environmental Easement and is implemented under the SMP. These ICs include:

- compliance with the Environmental Easement and the SMP by the Grantor and the Grantor's successors and assigns; and
- data and information pertinent to Site management must be reported at the frequency and in a manner defined in the SMP.

ICs identified in the Environmental Easement may not be discontinued without an amendment to or extinguishment of the Environmental Easement.

The Site has a series of ICs in the form of Site restrictions. Adherence to these ICs is required by the Environmental Easement. Restrictions that apply to the Site include:

- the property may only be used for industrial use provided that the long-term ICs included in this SMP are employed;
- the property may not be used for a different level of use, such as unrestricted, residential, restricted residential, or commercial use without additional remediation and amendment of the Environmental Easement, as approved by the NYSDEC;
- all future activities on the property that will disturb soil must be conducted in accordance with the SMP;
- the use of groundwater underlying the Site is prohibited without treatment rendering it safe for the intended use;
- vegetable gardens and farming on the property are prohibited;
- the Site owner or remedial party will submit to NYSDEC a written statement that certifies, under penalty of perjury, that: (1) land use

and ground water restrictions employed at the Controlled Property are unchanged from the previous certification or that any changes to the restrictions were approved by the NYSDEC; and, (2) nothing has occurred that impairs the ability of the controls to protect human health and environment or that constitute a violation or failure to comply with the SMP. NYSDEC retains the right to access the Site at any time in order to evaluate the continued maintenance of any and all controls. This certification shall be submitted annually, or an alternate period of time that NYSDEC may allow and will be made by an expert that the NYSDEC finds acceptable.

Overall Conclusions and Recommendations

Greenpac has remained in compliance with all components of the soil management plan. No activity was completed during the reporting period that involved the disturbance of the soil. Groundwater wells located on the adjacent property (site No. 932110) also show compliance with water quality standards.

We do not anticipate any changes in the future so it is recommended to keep the PRR reporting periods the same.



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. C932150			
Site Name Former Mill No. 2			
Site Address: 4400 Royal Avenue	Zip Code: 14303		
City/Town: Niagara Falls			
County: Niagara			
Site Acreage: 18.520			
Reporting Period: November 15, 2013 to November 15, 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? 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? YES NO
(The Qualitative Exposure Assessment must be certified every five years)

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. C932150

Box 3

Description of Institutional Controls

<u>Parcel</u>	<u>Owner</u>	<u>Institutional Control</u>
160.05-2-5.1	Greenpac Mill, LLC	Ground Water Use Restriction Landuse Restriction Site Management Plan IC/EC Plan
160.09-1-3	Greenpac Mill, LLC	Ground Water Use Restriction Landuse Restriction Site Management Plan IC/EC Plan
160.09-1-5	Greenpac Mill, LLC	Ground Water Use Restriction Landuse Restriction Site Management Plan IC/EC Plan
700.00-41-2	Greenpac Mill, LLC	Ground Water Use Restriction Landuse Restriction Site Management Plan IC/EC Plan

Box 4

Description of Engineering Controls

None Required

Not Applicable/No EC's

Box 5

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. C932150

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 Michelle Hamm at 4400 Royal Ave Niagara Falls, NY 14303
print name print business address

am certifying as Designated Representative (Owner or Remedial Party)

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

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

12-14-18
Date

Appendix F - Site-Wide Inspection Form
Former Mill No. 2
Niagara Falls, New York
NYSDEC BCP Site No. C932150

Item #	Inspection Item	Yes	No	Inspector Comments	Notes
1	Has a change of ownership occurred?		✓		NYSDEC must be informed 60 days in advance
2	Has there been any change in Site use?		✓		Current Site use is industrial.
3	Have any soil disturbance activities occurred in the past year?		✓		Documentation shall be provided as required by the Excavation Work Plan (Appendix C)
4	Are any soil disturbance activities planned at this time?		✓		NYSDEC must be informed 15 days in advance of any soil disturbance activities
5	Is ground water underlying the Site being used?		✓		Use of Site ground water is prohibited without treatment rendering it safe for intended use. Use of groundwater from the off-Site Norampac well is allowable for process and cooling purposes only.
6	Are there any vegetable gardens or farming at the Site?		✓		These activities are prohibited.
7	Is there any activity that will or may tend to interfere with the completed remedy or the continued ability to implement institutional controls?		✓		

Name of Inspector:

Michelle Hamm

Signature of Inspector:

Michelle Hamm

Date of Inspection:

11-30-18

Date of Last Inspection:

~~9-16-17~~ 9-16-17

Required Date of Next Inspection (add 12 months to current inspection date):

12-30-19

Identify expected inspector for next inspection:

Michelle Hamm

Additional comments or drawings:

Appendix F - Site-Wide Inspection Form
Former Mill No. 2
Niagara Falls, New York
NYSDEC BCP Site No. C932150

Item #	Inspection Item	Yes	No	Inspector Comments	Notes
1	Has a change of ownership occurred?		✓		NYSDEC must be informed 60 days in advance
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6	Are there any vegetable gardens or farming at the Site?		✓		These activities are prohibited.
7	Is there any activity that will or may tend to interfere with the completed remedy or the continued ability to implement institutional controls?		✓		

Name of Inspector:
Michelle Hamm

Signature of Inspector:
Michelle Hamm

Date of Inspection:
9-16-17

Date of Last Inspection:
10-14-16

Required Date of Next Inspection (add 12 months to current inspection date):
9-16-18

Identify expected inspector for next inspection:
Michelle Hamm

Additional comments or drawings:

Appendix F - Site-Wide Inspection Form
Former Mill No. 2
Niagara Falls, New York
NYSDEC BCP Site No. C932150

Item #	Inspection Item	Yes	No	Inspector Comments	Notes
1	Has a change of ownership occurred?		✓		NYSDEC must be informed 60 days in advance
2	Has there been any change in Site use?		✓		Current Site use is industrial.
3	Have any soil disturbance activities occurred in the past year?		✓		Documentation shall be provided as required by the Excavation Work Plan (Appendix C)
4	Are any soil disturbance activities planned at this time?		✓		NYSDEC must be informed 15 days in advance of any soil disturbance activities
5	Is ground water underlying the Site being used?		✓		Use of Site ground water is prohibited without treatment rendering it safe for intended use. Use of groundwater from the off-Site Norampac well is allowable for process and cooling purposes only.
6	Are there any vegetable gardens or farming at the Site?		✓		These activities are prohibited.
7	Is there any activity that will or may tend to interfere with the completed remedy or the continued ability to implement institutional controls?		✓		

Name of Inspector:
Michelle Hamm

Signature of Inspector:
Michelle Hamm

Date of Inspection:
10-14-16

Date of Last Inspection:

Required Date of Next Inspection (add 12 months to current inspection date):
11-14-16

Identify expected inspector for next inspection:

Additional comments or drawings:

NYSDEC BROWNFIELD CLEANUP PROGRAM (BCP)
CERTIFICATE OF COMPLETION

CERTIFICATE HOLDER(S):

Name	Address
Greenpac Mill, LLC.	4400 Royal Ave, Niagara Falls, NY 14303

BROWNFIELD CLEANUP AGREEMENT:

Application Approval: 3/24/10 **Agreement Execution:** 4/6/10 **Agreement Index No.:** Index C932150-03-10

Application Approval Amendment: 7/8/10 **Agreement Execution Amendment:** 7/8/10

Application Approval Amendment: 1/21/11 **Agreement Execution Amendment:** 1/21/11

Application Approval Amendment: 12/14/11 **Agreement Execution Amendment:** 12/14/11

SITE INFORMATION

Site No.: C932150 **Site Name:** Former Mill No. 2

Site Owner: Greenpac Mill LLC.

Street Address: 4400 Royal Avenue

Municipality: Niagara Falls **County:** Niagara **DEC Region:** 9

Site Size: 18.520 Acres

Tax Map Identification Number(s): 160.05-2-5.1, 160.09-1-3, 160.09-1-5, 700.00-41-2

Percentage of site located in an EnZone: 100 %

A description of the property subject to this Certificate is attached as Exhibit A and a site survey is attached as Exhibit B.

CERTIFICATE ISSUANCE

This Certificate of Completion, hereinafter referred to as the "Certificate," is issued pursuant to Article 27, Title 14 of the New York State Environmental Conservation Law ("ECL").

This Certificate has been issued upon satisfaction of the Commissioner, following review by the Department of the final engineering report and data submitted pursuant to the Brownfield Site Cleanup Agreement, as well as any other relevant information regarding the Site, that the applicable remediation requirements set forth in the ECL have been or will be achieved in accordance with the time frames, if any, established in the remedial work plan.

The remedial program for the Site has achieved a cleanup level that would be consistent with the following categories of uses (actual site use is subject to local zoning requirements):

Allowable Uses under the BCP: Industrial

Cleanup Track: Track 2: Restricted use with generic soil cleanup objectives

Tax Credit Provisions for Entities Taxable Under Article 9, 9-A, 32, and 33:

Site Preparation and On-Site Groundwater Remediation Credit Component Rate is 27%.

Tangible Property Credit Component Rate is 20 %.

Tax Credit Provisions for Entities Taxable Under Article 22 & S Corporations:

Site Preparation and On-Site Groundwater Remediation Credit Component Rate is 27%.

Tangible Property Credit Component Rate is 18 %.

The Remedial Program includes use restrictions or reliance on the long term employment of institutional or engineering controls which are contained in the approved Site Management Plan and an Environmental Easement granted pursuant to ECL Article 71, Title 36 which has been duly recorded in the Recording Office for Niagara County as Instrument 2012-11402.

LIABILITY LIMITATION

Upon issuance of this Certificate of Completion, and subject to the terms and conditions set forth herein, the Certificate holder(s) shall be entitled to the liability limitation provided in ECL Section 27-1421. The liability limitation shall run with the land, extending to the Certificate holder's successors or assigns through acquisition of title to the Site and to a person who develops or otherwise occupies the Site, subject to certain limitations as set forth in ECL Section 27-1421. The liability limitation shall be subject to all rights reserved to the State by ECL Section 27-1421.2 and any other applicable provision of law.

CERTIFICATE TRANSFERABILITY

This Certificate may be transferred to the Certificate holder's successors or assigns upon transfer or sale of the Site as provided by ECL Section 27-1419.5 and 6NYCRR Part 375-1.9.

CERTIFICATE MODIFICATION/REVOCATION

This Certificate of Completion may be modified or revoked by the Commissioner following notice and an opportunity for a hearing in accordance with ECL Section 27-1419 and 6NYCRR Part 375-1.9(e) upon a finding that:

(1) either the Applicant or the Applicant's successors or assigns have failed to comply with the terms and conditions of the Brownfield Site Cleanup Agreement;

(2) the Applicant made a misrepresentation of a material fact tending to demonstrate that it was qualified as a Volunteer;

(3) either the Applicant or the Applicant's successors or assigns made a misrepresentation of a material fact tending to demonstrate that the cleanup levels identified in the Brownfield Site Cleanup Agreement were reached;

(4) there is good cause for such modification or revocation;

(5) either the Applicant or the Applicant's successors or assigns failed to manage the controls or monitoring in full compliance with the terms of the remedial program;

(6) the terms and conditions of the environmental easement have been intentionally violated or found to be not protective or enforceable.

The Certificate holder(s) (including its successors or assigns) shall have thirty (30) days within which to cure any deficiency or to seek a hearing. If the deficiency is not cured or a request for a hearing received within such 30-day period, the Certificate shall be deemed modified or vacated on the 31st day after the Department's notice.

Joseph J. Martens
Commissioner
New York State Department of Environmental Conservation

By:



Robert W. Schick, P.E., Acting Director
Division of Environmental Remediation

Date: June 29, 2012

**NOTICE OF CERTIFICATE OF COMPLETION
Brownfield Cleanup Program
6 NYCRR Part 375-1.9(d)**

ORIGINAL FILED

JUL 19 2012

Former Mill No. 2, Site ID No. C932150
4400 Royal Ave, Niagara Falls NY 14303
City of Niagara Falls, Niagara County,

WAYNE F. JAGOW
NIAGARA COUNTY CLERK

Tax Map Identification Numbers: 160.05-2-5.1, 160.09-1-3, 160.09-1-5 and 700.00-41-2

PLEASE TAKE NOTICE, the New York State Department of Environmental Conservation (Department) has issued a Certificate of Completion (Certificate) pursuant to Article 27, Title 14 of the New York State Environmental Conservation Law (ECL) to Greenpac Mill, LLC for a parcel approximately 18.52 acres located at the 4400 Royal Ave in the City of Niagara Falls, Niagara County.

PLEASE TAKE NOTICE, the Certificate was issued upon satisfaction of the Commissioner, following review by the Department of the final engineering report and data submitted pursuant to the Brownfield Site Cleanup Agreement, as well as any other relevant information regarding the Site, that the remediation requirements set forth in ECL Article 27, Title 14 have been or will be achieved in accordance with the time frames, if any, established in the remedial work plan.

PLEASE TAKE NOTICE, the remedial program for the Site has achieved a cleanup level that would be consistent with the following categories of uses (actual site use is subject to local zoning requirements):

- Residential Use, as set forth in 6 NYCRR 375-1.8(g)(2)i.
- Restricted Residential Use, as set forth in 6 NYCRR 375-1.8(g)(2)ii.
- Commercial Use, as set forth in 6 NYCRR 375-1.8(g)(2)iii.
- Industrial Use, as set forth in 6 NYCRR 375-1.8(g)(2)iv.

PLEASE TAKE NOTICE, since the remedial program relies upon use restrictions or the long term employment of institutional or engineering controls; such institutional or engineering controls are contained in an Environmental Easement granted pursuant to ECL Article 71, Title 36 which has been duly recorded in the Recording Office for Niagara County as Instrument 2012-11402.

PLEASE TAKE NOTICE, the Environmental Easement requires that the approved site management plan (SMP) for this property be adhered to. The SMP, which may be amended from time to time, may include sampling, monitoring, and/or operating a treatment system on the property, providing certified reports to the NYSDEC, and generally provides for the management of any and all plans and limitations on the property. A copy of the SMP is available upon request by writing to the Department's Division of Environmental Remediation, Site Control Section, 625 Broadway, Albany, New York 12233.

PLEASE TAKE NOTICE, provided that the Environmental Easement, SMP and Certificate are complied with, the Certificate holder(s) shall be entitled to the liability limitation provided in ECL Section 27-1421. The liability limitation shall run with the land, extending to the Certificate holder's successors or assigns through acquisition of title to the Site and to a person who develops or otherwise occupies the Site, subject to certain limitations as set forth in ECL Section 27-1421. The liability limitation shall be subject to all rights reserved to the State by ECL Section 27-1421.2 and any other applicable provision of law.

PLEASE TAKE NOTICE, the Certificate may entitle the Certificate holder(s) to tax credits in accordance with Tax Law Sections 21, 22 and 23.

PLEASE TAKE NOTICE, any change of use of the site, as defined in 6 NYCRR 375, must be preceded by notice to the Department in accordance with 6 NYCRR 375-1.11(d). A transfer of any or all of the property constitutes a change of use.

Former Mill No. 2, Site #C93215
4400 Royal Ave, Niagara Falls NY 14303

PLEASE TAKE NOTICE, the Certificate may be only be transferred to the Certificate holder's successors or assigns upon transfer or sale of the Site as provided by ECL Section 27-1419.5 and 6 NYCRR Part 375-1.9. Failure to comply with the regulatory requirements for transfer **WILL** bar the successors and assigns from the benefits of the Certificate.

PLEASE TAKE NOTICE, the Certificate may be modified or revoked by the Commissioner as set forth in the applicable regulations.

PLEASE TAKE NOTICE, the Certificate may be revoked if the Environmental Easement as implemented, if applicable, is not protective or enforceable.

PLEASE TAKE NOTICE, a copy of the Certificate can be reviewed at the NYSDEC's Region 9 Office located at 270 Michigan Ave, Buffalo, NY 14203 or by contacting the Regional Environmental Remediation Engineer.

WHEREFORE, the undersigned has signed this Notice of Certificate

Ms. Lucie-Claude Lalonde

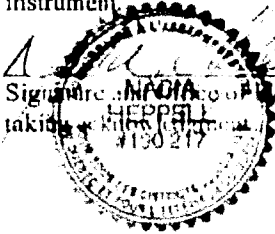
By: [Signature]

Title: Secretary

Date: July 12 2012

STATE OF NEW YORK) SS:
COUNTY OF)

On the 12 day of July, in the year 2012, before me, the undersigned, personally appeared Lucie-Claude Lalonde personally known to me or proved to me on the basis of satisfactory evidence to be the individual(s) whose name is (are) subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their capacity(ies), and that by his/her/their signature(s) on the instrument, the individual(s), or the person upon behalf of which the individual(s) acted, executed the instrument.

[Signature]
Signature of Lucie-Claude Lalonde individual
Notary Public
Notary Seal: 

Please record and return to:
Ms. Lucie-Claude Lalonde
Greenpac Mill, LLC
1601 rue Parent
Saint Bruno Quebec J3V 6R7

12/03/09