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MEASURES

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NYS DEPT OF ENVIRONMENTAL CONSERVATION
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*REPORT ON THE
IMPLEMENTATION OF
THE INTERIM REMEDIAL MEASURES*

*AT 3241 WALDEN AVENUE
DEPEW, N.Y.*

JULY 12, 1999 TO JULY 26, 1999

PREPARED BY

NORAMPAC INC.

SEPTEMBER 14, 1999

*Copy sent to
A. English on
9/24/99*

TABLE OF CONTENTS

1.	Introduction	1
1.1	Objectives of the Interim Remedial Measures (IRM).....	1
1.2	Interim Remedial Measures (IRM) Work Plan.....	1
2.	Implementation of the Interim Remedial Measures	2
2.1	Health and Safety training meetings and measures on site, including dust control and air monitoring and decontamination of equipment	2
2.2	Brush and dead tree removal	4
2.3	Digging out area for entrance drive	4
2.4	Debris removal and cleanup	4
2.5	Rough grade of existing material.....	4
2.6	Removal of berms.....	5
2.7	Fence posts setting and fence installation.....	5
2.8	Rough and final grade topsoil.....	5
2.9	Hydro-seeding of topsoil	5
3-	Conclusions	6

LIST OF APPENDICES

1-	Proposed Interim Remedial Measures Work Plan dated June 4, 1999 and prepared by XCG Consultants Ltd.
2-	Schedule of activities during the implementation of the Interim Remedial Measures at 3241 Walden Avenue, Depew, New York
3-	Training Sign-Off Sheets
4-	Air monitoring readings
5-	Topsoil certificate of analysis – Philip Services
6-	Photographs of the site taken by Norampac Inc.

1- INTRODUCTION

1.1 Objectives of the Interim Remedial Measures (IRM)

The Interim Remedial Measures (IRM) Work Plan for the property located at 3241 Walden Avenue in Depew, New York, was prepared by XCG Consultants Ltd., with input from Parsons Engineering Science, Inc., and Norampac Inc. as of June 4, 1999 (see appendix I). It was officially submitted to the New York State Department of Environmental Conservation (NYSDEC) representatives during a meeting held in their Buffalo offices on June 7, 1999. Mr. Martin Doster from the NYSDEC agreed with us that the IRM Work Plan, as elaborated, would be adequate. The site specific Health and Safety Plan, associated with the IRM at the Depew site prepared by XCG on July 9, 1999, was officially sent by courier to the NYSDEC on July 15, 1999, with the initial schedule work plan prepared by Norampac inc.

The IRM consisted of securing the property from public access with chain link fencing, and preventing direct contact with soils in the site central area, by utilizing a soil cover system.

1.2 Interim Remedial Measures (IRM) Work Plan

The IRM, as conducted on the site, can be summarized as follows:

- Move large debris (e.g. concrete slabs) which have been in contact with the impacted fill.
- Remove and offsite disposal of debris which have not been in contact with the impacted areas.
- Cut and offsite disposal of brush, to create a clearing between the trees, and the south property line where the fence can be installed.
- Excavate the surface material situated between the north property line and the curb on Walden Avenue to a depth of approximately 0.15 meters (6 inches) below grade, and move it to the central area.
- Remove berms at the south line of the property in front of the central area and grade them to the central portion of the property to be secured so that there is a slight crown in the middle.
- Cover and grade the central portion of the property with 0.10 – 0.15 meters (4-6 inches) of topsoil and hydro-seed it.
- Install a 1.8 meter (6 feet) high chain-link fence along the north and south property lines, from the existing trucking yard fence towards the west edge of the wooded area. A fence was installed at the west side to connect the north and the south fences, including a pedestrian-gate and a wide truck gate, so that the central area of the site is now totally fenced.
- Carry out continuous air monitoring for particulates upwind, downwind, and within the work area where soil excavation and grading work are ongoing.
- Construct a temporary decontamination pad so the heavy equipment can be washed up there after soil moving activities.
- Inspect and repair the fencing as needed, and maintain the grass cover as needed.

During the implementation of the IRM, Mr. Gerald Pietraszek of the NYSDEC, visited the site four times to monitor the progress and give helpful advice.

2- IMPLEMENTATION OF INTERIM REMEDIAL MEASURES

The implementation of the IRM at the site occurred from July 12, 1999 to July 26, 1999, according to the final schedule of activities (See appendix 2).

The activities during the implementation of the IRM can be summarized as follows:

2.1 Health and Safety training meetings and measures on the site, including dust control air monitoring and decontamination of equipment

Health and Safety training meetings

The site specific health and safety plan associated with the IRM, prepared by XCG Consultants Ltd. (XCG file # 5-997-01-10 and dated July 9, 1999) and submitted to the NYSDEC was provided to the two contractors who were involved in the IRM.

- R & J Staples Grading, 13222 Whitney Road, Holland, NY 14080
- Seneca Fence, 1186 Seneca Street, Buffalo, NY 14210

The workers attended a 45 minute Health and Safety training meeting prior to their first day on the site. The nature of the site and the measures to be taken to protect them from exposure to the contamination were covered by this training.

The workers from R & J Staples Grading attended the Health and Safety training meeting at 8:00 AM on July 12, 1999.

The workers from Seneca Fence attended the Health and Safety meeting at 9:00 AM on July 14, 1999, except for Mr. Henry Kramer, who arrived at the site on July 20, 1999. By this date, the central portion was covered with topsoil. Nevertheless, Mr. Kramer was informed of the nature of the contamination and of the measures taken to protect workers acting on the site and exposed to the contaminated soil. The workers involved in the implementation of the IRM signed the training Sign-Off Sheets (refer to appendix 3).

Health and Safety measures

A Health and Safety station was set up at the entrance of the site allowing access to: respirators, Tyvex coveralls, eyewash solution, health and safety posters and material safety data sheets for the eyewash.

One worker had a full faced beard. Because beards can become contaminated on a contaminated site, the bearded worker had to wash his beard and his hair in the decontamination area every day before leaving the site.

Fortunately, during the period of the IRM activities (July 12 to 26, 1999), there were no health and safety incidents, and no call for the respirators or the eyewash solution.

Each worker involved in the IRM had to wear leather or chemical resistant boots or shoes, and long pants. During the cleanup of the equipment, the workers wore Tyvex coveralls.

Dust control and air monitoring

To control the particulate levels in the ambient air under $150 \mu\text{g}/\text{m}^3$ as outlined in NYSDEC TAGM 4031, an appropriate procedure had been established and followed:

- The water truck operated every day, as needed for water application on the surface, until the grading of topsoil was final and complete.
- Five continuous air monitoring units were available on the site (as shown on figure 1) and operated as needed at all times when the moving of the soil could develop dust. The average dust readings (particulate levels) have always been under $150 \mu\text{g}/\text{m}^3$. Nine (9) of the 270 instantaneous readings (brief spikes) were over this limit without affecting too much the average figures. The air monitoring results are presented in appendix 4.

We can conclude from all the readings that the dust level during the implementation of the IRM was under control.

Decontamination of equipment

Only the water truck, two bulldozers, an earth moving pan and a tractor came into contact with the contaminated soil.

Decontamination was achieved by driving equipment up onto a square pad where it could be cleaned using a high pressure wash.

The bulldozers, the pan and the water truck were cleaned upon completion of the work. However, from time to time, it was necessary for the tractor to move on and off the contamination. The tractor was cleaned with the high pressure wash every time it left the contaminated zone.

It never became necessary for the fence company vehicles to come into contact with the contaminated soil.

When the decontamination area was no longer needed, the area was covered with clean top soil.

Access control on site (plastic safety fence)

Except for the first day, that is July 12, 1999, when the railway property to the south had not yet been fenced off, the area having been exposed to contamination was always fenced with a bright orange, plastic safety fence. Portions of this

safety fence were taken off each day to permit work. The last job done every evening was to replace the safety fence for the night. Less safety fence was used as the permanent fence was installed, but safety fence was used until the very end of the job.

2.2 Brush and dead tree removal

During the first three days, brush and dead trees were removed thus creating a clearing between the trees and the south property line where the fence was installed.

2.3 Digging out area for entrance drive

On the second day of the IRM application, the contractor dug out an area for an entrance drive. Soft soil had to be removed to a depth of 0.7 to 0.8 meter and brought in the central portion of the property. This entrance drive was constructed with broken concrete rubble and steel bars coming from the concrete blocks sitting on the site. The rubble was covered with crusher run gravel delivered from offsite. The entrance way was constructed to fully support loaded dump trucks. The option to use that pit for concrete and steel rubble was chosen since whether this rubble was contaminated or not by lead or other metal from the site had not yet been determined.

2.4 Debris removal and cleanup

Debris were essentially considered in two categories:

- Concrete, some of which containing steel
- Litter

The concrete blocks and rubble were broken up and buried beneath the new entrance way for future disposal. As mentioned before, the rubble was covered with crusher run gravel.

All debris, except litter, were left on the site.

The litter, which consists of plastic or paper bags, pop cans, bottles and drink cups, was gathered into three garbage bags and disposed to a sanitary landfill.

The railway ties were left on the railway property.

Old tires left on the trucks parking lot will soon be disposed of to an authorized site.

2.5 Rough grade of existing material

On Wednesday, July 14, 1999, a bulldozer was used to excavate the surface material located between the north property line and the curb on Walden Avenue, to a depth of approximately 0.15 meter (6 inches) below grade, and to move it to the central portion. The entire surface of the central portion of the property was graded off with a slight crown in the middle.

2.6 Removal of berms

The berms along the south borderline of the property were graded off to the site central portion. As mentioned before, to be secured, the grading of the central portion was done so that there was a slight crown in the middle.

2.7 Fence post setting and fence installation

Seneca Fence installed the posts by driving them into the ground. Therefore no auger was utilized. The corner posts were made stronger by Z bracing, thus joining the posts in either direction from the corner. Some soil excavated by hand tools for the main gate posts was all carried to the decontamination area and later covered with topsoil.

The fence and gate installation were realized after the grading of topsoil.

2.8 Rough and final grade topsoil

The central portion surrounded by the new fence and the section situated between the north property line and the curb on Walden Avenue was graded off with 0.10 – 0.15 meters (4 – 5 inches) of topsoil. Bulldozers were able to push the topsoil very successfully.

The top soil was brown while the existing soil was gray, thus simplifying the task when visually monitoring the progress, and insuring the complete covering of the contaminated soil. More than 1,300 cubic meters (1700 cubic yards) of topsoil were spread out on the existing soil after grading.

Three samples of topsoil taken on July 15, 1999 were analyzed by Philip Services and the analytical results for metals, including mercury and BTEX are presented in appendix 5.

2.9 Hydro-seeding of top soil

The hydro-seeding of top soil was completed within six hours on July 21, 1999, using 8000 gallons of hydro-seeding solution on 7435 m² (80 000 square feet). The surface hydro-seeded included some wooden area and the driveway approach. The conditions for driving on the site were ideal and the hydro-seeding did not damage the prepared surface of topsoil at the site.

3- CONCLUSIONS

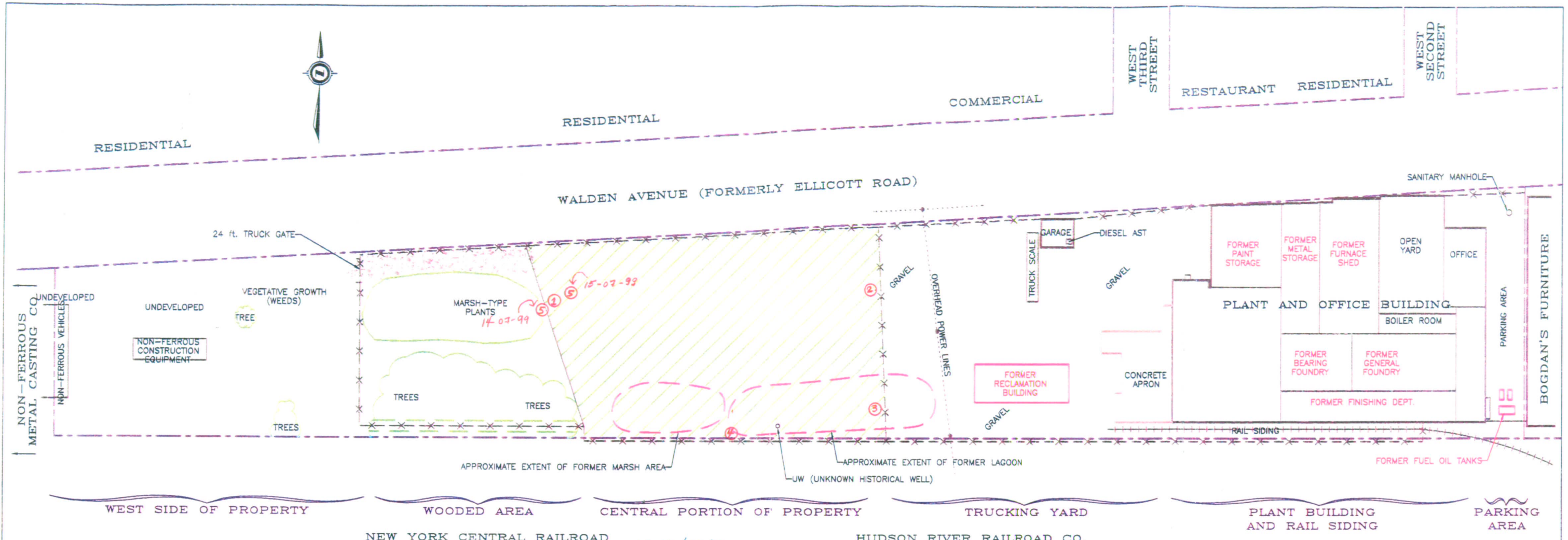
From July 12, to July 26, 1999, the IRM was successfully implemented by Norampac Inc. through contractors. The site has been fenced and covered with topsoil and hydroseeds, the actual exposure to contamination becomes negligible. The access at the site is controlled, and no dust from contaminated soil can be transported offsite. We already know from the phase 2 Environmental Site assessment (conducted by XCG Consultants Ltd.: Limited Phase 2 ESA, February 10, 1999, and Additional Phase 2 ESA, May 18, 1999) that the contamination on the site does not migrate offsite because the contaminated soil is sitting on a clay layered material.

An inspection was conducted at the site on July 27, 1999 by Norampac Inc. and N.L. Industries, Inc. (Highland Environmental Management) representatives. The NYSDEC representatives were aware of the completion of the IRM.

Since July 27, 1999, the site has been sprayed with water three times to insure the rapidly growing of grass and to protect the topsoil layer.

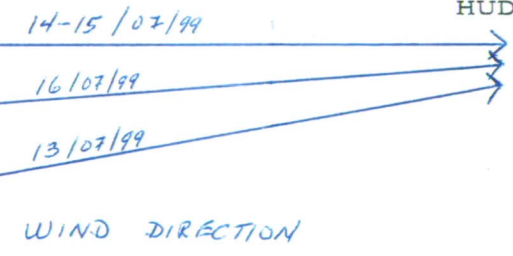
On September 9, 1999, the site was inspected by Norampac inc. The vegetation is well installed on the central portion of the property which has been covered with topsoil, confirming the completion of the IRM with success.

Norampac/Depew/rapport final 2



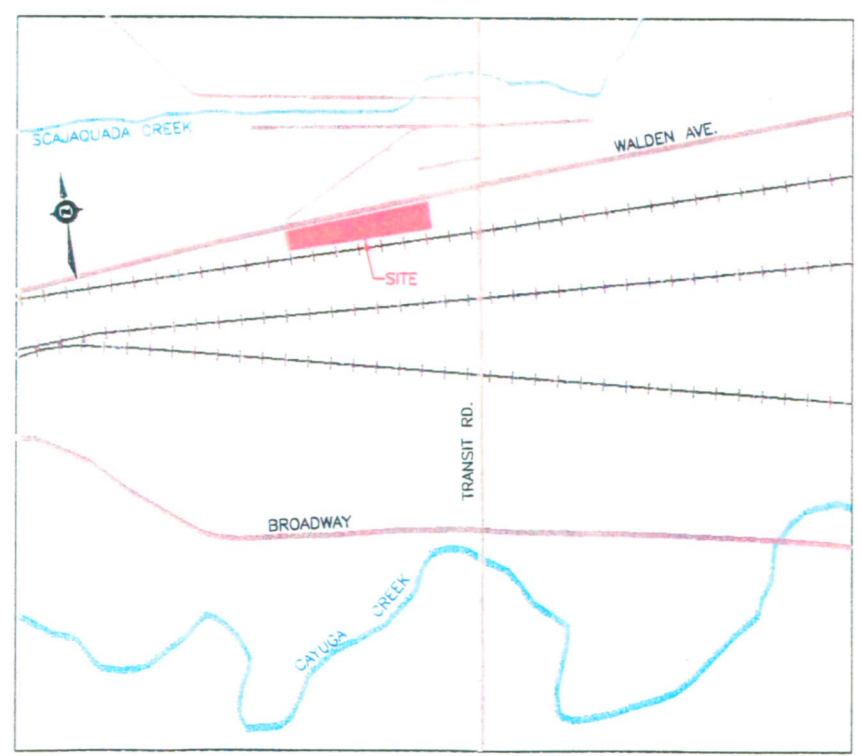
WEST SIDE OF PROPERTY WOODED AREA CENTRAL PORTION OF PROPERTY TRUCKING YARD PLANT BUILDING AND RAIL SIDING PARKING AREA

NEW YORK CENTRAL RAILROAD HUDSON RIVER RAILROAD CO.

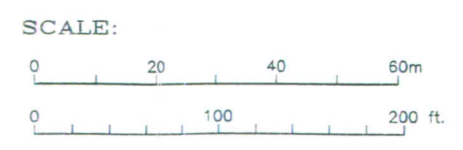


① AIR MONITORING UNITS LOCATION

- LEGEND:
- — — — — PROPERTY BOUNDARY
 - X - - - X - FENCE
 - ▨ EARTH COVER AND GRASSED AREA
 - — — — — CLEARING THROUGH BRUSH TO ALLOW FENCE
 - ⊕ MAKE A GRAVEL ROADWAY



KEYMAP (not to scale)



INTERIM REMEDIAL MEASURE PLAN
COMPLETED BY NORAMPAC INC
AUGUST 31, 1999

DRAWING REFERENCE: Based on survey drawing by Norampac, Inc. (Millard & McKay)
NOTE: Locations of buildings, underground utilities, etc. are for reference only and should not be relied upon for detail design, excavation, or construction purposes.

(file: 5997\01\WALDEND6.DWG)

SITE PLAN		
PROPOSED INTERIM REMEDIAL MEASURE PLAN		
3241 WALDEN AVE.		
DEPEW, NEW YORK		
XCG XCG CONSULTANTS LTD.		
DATE	JOB NO.	FIGURE NO.
JUNE, 1999	5997-01.06	1

ANNEX 1



ENVIRONMENTAL
ENGINEERING
SPECIALISTS

June 4, 1999

XCG File #5-997-01-06

Mr. Martin L. Doster, P.E.
New York State Department of
Environmental Conservation
Regional Hazardous Waste Remediation
270 Michigan Avenue
Buffalo, New York
14203-2999

SENT BY FAX: (716)851-7220

Re: **Proposed Interim Remedial Measure Work Plan**
3241 Walden Avenue, Depew, New York

Dear Mr. Doster:

XCG Consultants Ltd. (XCG) is pleased to provide the New York State Department of Environmental Conservation (NYSDEC) the following proposed Interim Remedial Measure (IRM) work plan for the property located at 3241 Walden Avenue in Depew, New York. The proposed IRM was prepared by XCG, with input from Parsons Engineering Science, Inc. and Norampac, Inc. (Norampac). This proposed plan consists of temporarily securing the property from public access with chain-link fencing, and preventing direct contact with soils in the central area of the site utilizing a soil cover system. These actions are intended to be interim measures only, to provide public health and safety protection. Norampac's ultimate goal is to enter into a Voluntary Clean-up Program. After the implementation of the IRM, XCG and Norampac will review remedial alternatives and develop a preferred Remedial Action Plan (RAP). In addition, Norampac will continue its discussions with the former owners of the property to assist in the clean-up process.

BACKGROUND

The site is situated on the south side of Walden Avenue, approximately 178.1 metres (584.42 feet) west of the centre line of Transit Road. The size of the property is approximately 3.04 hectares (7.5 acres), of which approximately the east half is developed (see Figure 1). This developed area consists of one main building, an adjacent rail siding to the south, a gravel covered trucking yard to the west of the building, and an asphalt paved parking area at the east side of the property. The trucking yard contains a garage and weigh scale at the north end, and is surrounded by a chain-link fence. The vacant portion of the site to the west

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of the trucking yard consists of two distinct areas. The central portion of the property extends from the chain-link fence to the west edge of the wooded area and is essentially barren. The west portion of the property extends from the wooded area to the west property line. This area is also vacant, with some parked vehicles and heavy equipment from the adjacent neighbour to the west, and contains some vegetation (i.e. sporadic amount of grass and weeds).

The fill throughout the property consists of varying materials (silty sand, sandy silt, sand and gravel, silty clay, and construction debris) much of which has been mixed with waste containing heavy metals. The fill depth was encountered between approximately 0.6 and 1.8 metres (2 to 6 feet). The site is relatively flat while the general surrounding area slopes towards the south. Water level measurements in monitoring wells installed on-site suggests that the shallow groundwater flows towards the northwest.

Three environmental investigations have been conducted on the subject property, by XCG, at the request of Norampac, Inc.. Details of these studies are provided in the following reports:

- XCG Consultants Ltd., "Draft Report, Limited Phase 2 Environmental Site Assessment, 3241 Walden Avenue, Depew, New York," dated February 10, 1998.
- XCG Consultants Ltd., "Draft Report, Additional Phase 2 Environmental Site Assessment, 3241 Walden Avenue, Depew, New York," dated May 18, 1998.
- XCG Consultants Ltd., "Draft Report, Limited Phase 1 Environmental Site Assessment, 3241 Walden Avenue, Depew, New York," dated May 31, 1999.

Historical industrial activities conducted on-site consisted of brass foundry operations. Buffalo Brass Company started the foundry operations in 1892 and sold it to Magnus Metal Company in 1899. During the early 1900s, Empire Smelting Company also occupied a portion of the subject property. In 1936, Magnus Metal Company conveyed the property to National Lead Company, which later changed its name to NL Industries, Inc. (NL). NL sold the property in 1974 to Anglo-Recycling Corporation (Anglo). Anglo immediately conveyed the property to the Erie County Industrial Development Agency (ECIDA) and signed a lease agreement until 1986. Anglo operated a paper fibre recycling facility under various name changes, and ultimately became Domtar Industrial Inc. (Domtar).

XCG's Phase 2 Environmental Site Assessments (ESAs) indicate that elevated concentrations of select metals, including lead, were detected in the fill zone at the central portion of the property, trucking yard, rail siding, and the east side of the property (i.e. paved parking area). Some residual petroleum impacts were also detected along the south side of the property, from the rail siding to the east, to the former lagoon to the west. The concentrations of metals at the west side of the property were much lower, with some isolated subsurface locations containing elevated metals concentrations.



IRM WORK PLAN

The proposed IRM focuses on temporarily securing the central portion of the property from public access and preventing direct contact with soil in that area (see Figure 1), until a RAP is developed. Although elevated metals have impacted the fill material in the trucking yard and rail siding, interim measures are not considered necessary as these areas are currently surrounded by a chain-link fence, and both areas are currently covered by a layer of crushed rock. Interim measures are also not proposed at the east side of the property as the impacted fill is covered by asphalt. Although some isolated subsurface locations containing elevated metals concentrations are present at the west side of the property, the focus of the IRM is to temporarily secure the most heavily impacted areas, which are not currently protected, specifically the central portion of the property.

The proposed IRM is summarized as follows:

1. Move large debris (e.g. concrete slabs) that has been in contact with impacted fill to the central area. This debris will either be cleaned and removed from the site or buried underneath the temporary topsoil cover. If it is buried, it will be managed with the impacted soil in the RAP. If buried, the locations of debris piles will be measured to a solid reference point (e.g. existing fence post).
2. Remove and off-site disposal of debris that has not been in contact with the impacted areas. For example, there are tubes of nylon mesh, approximately 3.6 metres (12 feet) long and 0.25 metres (10 inches) in diameter, located in the wooded area.
3. Cut and off-site disposal of brush, creating a clearing between the trees, and the south property line in which to install the fence.
4. Excavate the surficial material situated between the north property line and the curb on Walden Avenue, to a depth of approximately 0.15 metres (6 inches) below grade, and move it the central area. Norampac will obtain approval from the municipal authorities before conducting work on this portion of the road allowance.
5. Grade a portion of the area to be secured (see Figure 1) such that there is a slight crown in the middle.
6. Cover and grade the central portion of the property with 0.15 metres (6 inches) of topsoil, and hydroseed. The imported topsoil will be deposited at a designated area at the perimeter, such that the dump trucks do not have to enter the work zone.
7. Install a 1.8 metre (6 feet) high chain-link fence along the south and north property lines, from the existing trucking yard fence westwards to the west edge of the wooded area. A fence will be installed at the west side to connect the north and south fences. Further, a 1.2 metre (4 feet) wide man-gate and a 7.3 metre (24 feet) wide truck gate will be installed for future access into the secured area.



- 8. Carry out continuous air monitoring for particulates upwind, downwind, and within the work area as some soil excavation and grading work will be conducted. Dust suppression techniques (e.g. spraying of water) will be employed if particulate levels exceed a specified value (e.g. 150 $\mu\text{g}/\text{m}^3$) above the upwind levels. XCG and Norampac will consult with the NYSDEC on the acceptable particulate level.
- 9. Construct a temporary decontamination pad on which to wash the heavy equipment upon completion of the earth moving activities. The design of the decontamination pad will be selected to ensure the protection of the environment and the public.
- 10. Inspect and repair the fencing as needed, and maintain the grass cover, as needed.

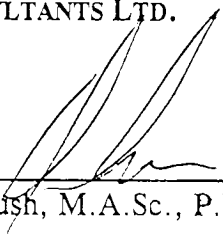
As mentioned previously, this proposed IRM is only a temporary measure to protect the public health and safety, until a RAP is developed. We trust the NYSDEC will approve of this proposed IRM plan.

If you have any questions, please do not hesitate to contact the undersigned or Norampac representatives.


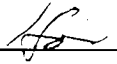
Yours truly,

XCG CONSULTANTS LTD.


PARSONS ENGINEERING SCIENCE, INC.



Richard J. Rush, M.A.Sc., P.Eng., CEA
Partner

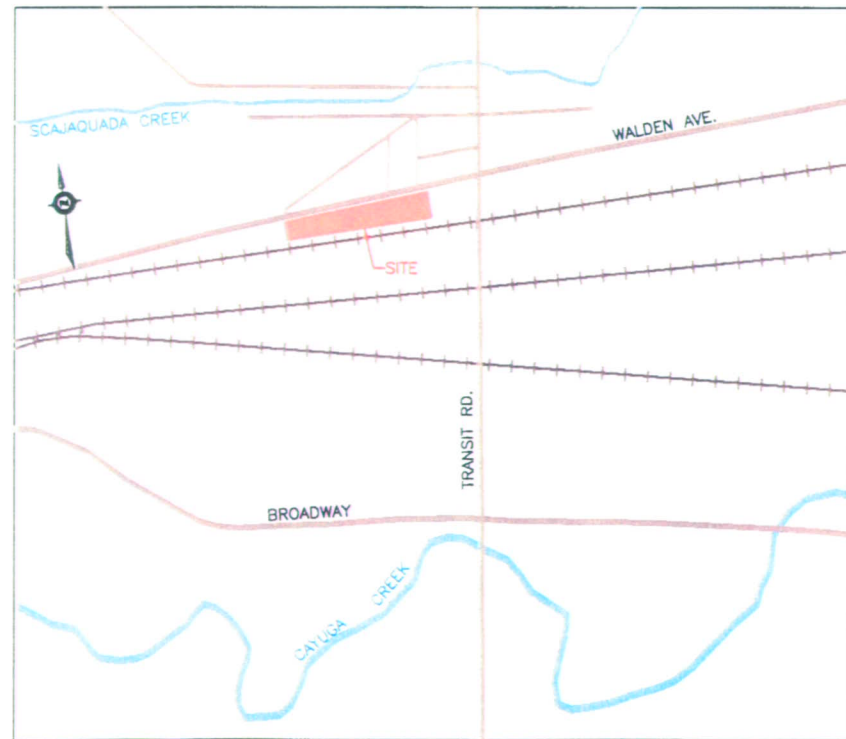
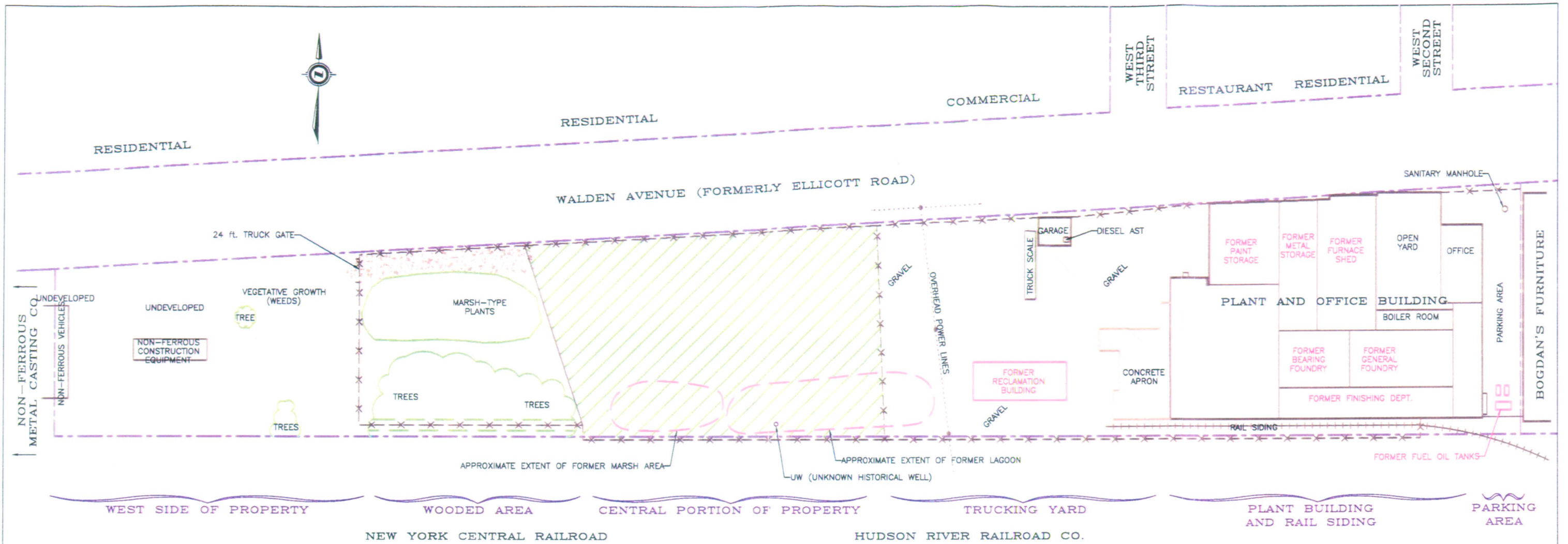



Mark Raybuck
Principal Geologist



Basil Wong, M.Eng., P.Eng.
Project Manager



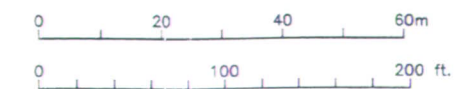


KEYMAP (not to scale)

LEGEND:

- — — — — PROPERTY BOUNDARY
- x-x-x-x- FENCE
- ▨ EARTH COVER AND GRASSED AREA
- — — — — CLEARING THROUGH BRUSH TO ALLOW FENCE
- — — — — MAKE A GRAVEL ROADWAY

SCALE:



SITE PLAN		
PROPOSED INTERIM REMEDIAL MEASURE PLAN		
3241 WALDEN AVE.		
DEPEW, NEW YORK		
XCG XCG CONSULTANTS LTD.		
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JUNE, 1999	5997-01.06	1

DRAWING REFERENCE: Based on survey drawing by Norampac, Inc. (Millard & McKay)

NOTE: Locations of buildings, underground utilities, etc. are for reference only and should not be relied upon for detail design, excavation, or construction purposes.

(file: 5997\01\WALDEN06.DWG)

ANNEX 2

**SCHEDULE OF ACTIVITIES DURING THE IMPLEMENTATION
OF INTERIM REMEDIAL MEASURES AT THE SITE LOCATED AT
3241 Walden Avenue, Depew, New York**

Monday, July 12, 1999:

- Health and safety training meeting for Robert Staples Group;
- Surround two sides of site with plastic fence;
- Start removal of brush and dead trees;
- Start clearing for fence line;
- Evaluation of site conditions - dry;
- Water truck on site, increase size of holes to allow application of more water.

Tuesday, July 13, 1999:

- Monitoring air in three locations;
- Continue brush and dead tree removal;
- Continue clearing for fence line;
- Removal of berms along south side for fence line;
- Dig out area for entrance drive;
- Use entrance dig out as a pit to deposit debris in;
- Surround three sides of site with plastic safety fence;
- Water truck in use as needed.

Wednesday, July 14, 1999

- Health and safety training meeting for Seneca Fence Group;
- Monitor air in five locations;
- Continue brush and dead tree removal;
- Continue clearing for fence line;
- Continue collecting debris to go to entrance pit;
- Continue work covering debris and forming entrance;
- Apply crusher run to entrance, cut off protruding rebar;
- Start fence post setting;
- Rough grade of existing material, including the surface material along Walden Avenue;
- Surround three sides of site with plastic safety fence;
- Water truck in use as needed.

Thursday, July 15, 1999

- Monitor air in five locations;
- Continue fence post setting;
- Receive and distribute 90 loads of top soil;
- Rough grade top soil;
- Final grade top soil;
- Surround three sides of site with plastic safety fence;
- Water truck in use as needed.

Friday, July 16, 1999

- Monitor air in three locations;
- Continue fence post setting;
- Start attaching fencing to posts;
- Rake out top soil to remove rocks and roots;
- Receive one final load of top soil for former decontamination area;
- Cover decontamination area;
- Discontinue air monitoring;
- Surround three sides of site with plastic safety fence.

Saturday, July 17, 1999 - Sunday July 18, 1999

- Fence post setting (weekend);
- Attach fencing to posts;
- Safety fence remains in place, out side of new steel fence.

Monday, July 19, 1999

- Fence post cutting at Seneca Plant;
- No site activity on this day.

Tuesday, July 20, 1999

- Continue fence post setting;
- Continue attaching fencing to posts;
- Health and safety training meeting with an additional Seneca Fence employee, Henry Kramer, not previously on site;
- Remove 80 % of plastic safety fence;
- Remove a bulldozer and water truck from site;
- Enclose end of site with plastic safety fence where steel fence not complete.

Wednesday, July 21, 1999

- Hydroseed; 8000 gallons over 6 hours on 80 000 square feet;
- Temporary fence remained in place;
- No other activity besides hydroseeding.

Thursday, July 22, 1999

- No activity at site.

Friday, July 23, 1999

- Complete all of the fencing except gates;
- Temporary fence remains due to no gates.

Monday, July 26, 1999

- Gates installed;
- Temporary plastic safety fence removed.

ANNEX 3

**R&J STAPLES
GRADING**

13222 Whitney Road
Holland NY 14080

July 12, 1999

Mr. Paul Stokes-Rees
Norampac Industries Inc.
752 Sherbrooke Street West
Montréal, Québec
H3A 1G1

Re : Works to be performed at 3241 Walden Avenue, Depew (the "Site")

Sir:

By this letter, R & J Staples ("Staples") recognizes that the Site, owned by Norampac Industries Inc. ("Norampac"), is impacted by very well documented historical heavy metal contamination derived from previous foundry operations at the Site and that its services are retained in order to conduct certain interim remedial measures required by the NYSDEC in order to protect public health. Attached hereto as **Schedule A** is a copy of the Order on Consent issued by the NYSDEC to Norampac requiring that Norampac performs certain works which are more precisely described in the Interim Remedial Measure Work Plan that includes the Daily Schedule of Works to be performed, these documents being attached hereto respectively as **Schedules B** and **C** (the "Works").

By this letter, Staples also recognizes its responsibility as regards the safety of its representatives that will perform the Works.

Moreover, Staples hereby recognizes that:

- reinforced care is required so that Staples' representatives follow the procedures described in the Health and Safety Plan attached hereto as **Schedule D** which will govern health, safety and hygiene before, during and after the Works;
- the existing material present on the Site must be handled in a manner to prevent its inhalation or ingestion;
- the Works will be preceded by training meeting given by XCG Consultants Ltd. and Norampac and by a review of the Health and Safety Plan prepared by XCG Consultants Ltd.;

- Staples' representatives will be required to sign a personal acknowledgement form attesting their understanding of the Health and Safety Plan;
- the procedures and guidelines in the Health and Safety Plan must be adhered to by Staples and Staples' representatives; and
- Norampac will provide an OSHA poster to be posted at the Site.

Finally, Staples does hereby irrevocably release, remise, quit claim and forever discharge Norampac, its shareholders, predecessors, successors, assigns, officers, agents, directors, employees, associates, servants and insurers (hereinafter the "Releases") of, from and against any and all manner of actions, causes of action, suits, proceedings, liabilities, debts, sums of money, obligations, duties, dues, accounts, interests, covenants, contracts, claims, damages and demands whatsoever which Staples or Staples' representatives can, shall or may hereafter have against the Releases by any act, cause, matter or thing whatsoever arising from, out of, or in connection with the performance of the Works.

By this letter, Norampac recognizes that Staples, in being contracted to perform the Works, will not, in any manner, become liable for the existence of the contamination on the Site nor become a responsible party in future environmental cleanup or remediation of the Site.

Is you are in agreement with the content of this letter, please sign and return its enclosed duplicate to the undersigned.

Best regards,

Robert Staples

Encl.

RECEIVED AND AGREED AS OF JULY __, 1999.

NORAMPAC INDUSTRIES INC.

Per: _____
Paul Stokes-Rees

We the undersigned have received a copy of the Site Specific Health and Safety Plan for the Interim Remedial Measures at Metro Waste Paper Recovery (Norampac, Inc.) 3241 Walden Avenue, Depew, New York.

By signing below, we understand the contents of the plan and will assist in ensuring that the work will be conducted safely and incident free. We will assist the on-site health and safety representative in maintaining this rule for all parties coming into contact with the work zone.

Mark A Egnor
Print Name and Title

Mark A Egnor
Signature

7/12/99
Date

ROBERT M STARKES
Print Name and Title

Robert M Starkes
Signature

7/12/99
Date

PAUL STOKES-REES
Print Name and Title

Paul Stokes-Rees
Signature

Jul 12, 99
Date

Jack Binstz
Print Name and Title

Jack Binstz
Signature

7/12/99
Date

Don Gier
Print Name and Title

Don Gier
Signature

7-12-99
Date

CHAS MARCHITTE
Print Name and Title

Chas Marchitte
Signature

7-12-99
Date

Print Name and Title

Signature

Date

Print Name and Title

Signature

Date

Print Name and Title

Signature

Date

SENECA FENCE
1186 SENECA STREET
BUFFALO, NEW YORK 14210

July 12, 1999

Mr. Paul Stokes-Rees
Norampac Industries Inc.
752 Sherbrooke Street West
Montréal, Québec
H3A 1G1

Re : Works to be performed at 3241 Walden Avenue, Depew (the "Site")

Sir:

By this letter, Seneca Fence ("Seneca") recognizes that the Site, owned by Norampac Industries Inc. ("Norampac"), is impacted by very well documented historical heavy metal contamination derived from previous foundry operations at the Site and that its services are retained in order to conduct certain interim remedial measures required by the NYSDEC in order to protect public health. Attached hereto as **Schedule A** is a copy of the Order on Consent issued by the NYSDEC to Norampac requiring that Norampac performs certain works which are more precisely described in the Interim Remedial Measure Work Plan that includes the Daily Schedule of Works to be performed, these documents being attached hereto respectively as **Schedules B** and **C** (the "Works").

By this letter, Seneca also recognizes its responsibility as regards the safety of its representatives that will perform the Works.

Moreover, Seneca hereby recognizes that:

- reinforced care is required so that Seneca's representatives follow the procedures described in the Health and Safety Plan attached hereto as **Schedule D** which will govern health, safety and hygiene before, during and after the Works;
- the existing material present on the Site must be handled in a manner to prevent its inhalation or ingestion;
- the Works will be preceded by training meeting given by XCG Consultants Ltd. and Norampac and by a review of the Health and Safety Plan prepared by XCG Consultants Ltd.;

- Seneca's representatives will be required to sign a personal acknowledgement form attesting their understanding of the Health and Safety Plan;
- the procedures and guidelines in the Health and Safety Plan must be adhered to by Seneca and Seneca's representatives; and
- Norampac will provide an OSHA poster to be posted at the Site.

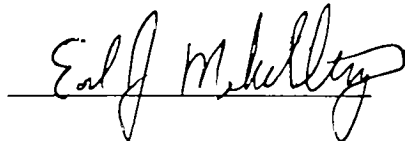
Finally, Seneca does hereby irrevocably release, remise, quit claim and forever discharge Norampac, its shareholders, predecessors, successors, assigns, officers, agents, directors, employees, associates, servants and insurers (hereinafter the "Releases") of, from and against any and all manner of actions, causes of action, suits, proceedings, liabilities, debts, sums of money, obligations, duties, dues, accounts, interests, covenants, contracts, claims, damages and demands whatsoever which Seneca or Seneca's representatives can, shall or may hereafter have against the Releases by any act, cause, matter or thing whatsoever arising from, out of, or in connection with the performance of the Works.

By this letter, Norampac recognizes that Seneca, in being contracted to perform the Works, will not, in any manner, become liable for the existence of the contamination on the Site nor become a responsible party in future environmental cleanup or remediation of the Site.

Is you are in agreement with the content of this letter, please sign and return its enclosed duplicate to the undersigned.

Best regards,

Per:

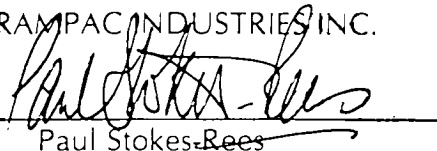


Encl.

RECEIVED AND AGREED AS OF JULY 14, 1999.

NORAMPAC INDUSTRIES INC.

Per:


Paul Stokes-Rees

We the undersigned have received a copy of the Site Specific Health and Safety Plan for the Interim Remedial Measures at Metro Waste Paper Recovery (Norampac, Inc.) 3241 Walden Avenue, Depew, New York.

By signing below, we understand the contents of the plan and will assist in ensuring that the work will be conducted safely and incident free. We will assist the on-site health and safety representative in maintaining this rule for all parties coming into contact with the work zone.

<u>LEONARD LEMANSKI - FENCE</u> Print Name and Title	<u>Leonard Lemanski</u> Signature	<u>7/14/99</u> Date
<u>EARL S. McVELBURK</u> Print Name and Title	<u>Earl S. McVeilburk</u> Signature	<u>7-14/99</u> Date
<u>James S. Greiner</u> Print Name and Title	<u>James S. Greiner</u> Signature	<u>7-14-99</u> Date
_____ Print Name and Title	_____ Signature	_____ Date
_____ Print Name and Title	_____ Signature	_____ Date
_____ Print Name and Title	_____ Signature	_____ Date
_____ Print Name and Title	_____ Signature	_____ Date
_____ Print Name and Title	_____ Signature	_____ Date
_____ Print Name and Title	_____ Signature	_____ Date

ANNEX 4

**IMPLEMENTATION OF INTERIM PREMEDIAL MEASURES AT THE SITE LOCATED AT
3241 WALDEN AVENUE, DEPEW, NEW YORK – JULY 13 TO 16, 1999
CONTINUOUS AIR MONITORING – PARTICULATES LEVELS**

Date	Time	Wind information	Air monitoring units		Particulate levels		Comments
			Number	Location	Instantaneous $\mu\text{g}/\text{m}^3$	Average $\mu\text{g}/\text{m}^3$	
07/13	8:10	Up wind	1			15.0	
	8:25	Up wind	1			15.1	
	8:32	Up wind	1			16.8	
	8:44	Up wind	1			15.7	
	8:57	Up wind	1			20.3	
	9:52	Up wind	1			17.3	
	10:02	Up wind	1			16.5	
	10:34	Up wind	1			16.1	
	11:25	Up wind	1			15.4	
	11:42	Up wind	1			15.3	
	12:11	Up wind	1			15.2	
	12:30	Up wind	1			15.1	
	1:29	Up wind	1			15.7	
	1:42	Up wind	1			15.9	
	2:59	Up wind	1		9.9	15.7	
	3:37	Up wind	1		166.0	16.1	
	3:39	Up wind	1		16.8	16.2	
	5:30	Up wind	1		17.7	15.8	
07/13	9:45	Downwind	2			17.0	
	10:00	Downwind	2			17.8	
	10:35	Downwind	2			15.4	
	11:27	Downwind	2			19.8	
	11:32	Downwind	2			22.3	
	11:55	Downwind			28.5	22.4	
	12:00	Downwind			385.1	23.0	
	12:01	Downwind			4.9	22.9	Twelve fast observations at lunch break – very brief spikes occurred from 11.55 to 12.085
	12:02	Downwind			61.0	23.1	
	12:03	Downwind			10.3	23.1	
	12:035	Downwind			10.0	23.1	
	12:04	Downwind			53.2	23.2	

**IMPLEMENTATION OF INTERIM PREMEDIAL MEASURES AT THE SITE LOCATED AT
3241 WALDEN AVENUE, DEPEW, NEW YORK – JULY 13 TO 16, 1999
CONTINUOUS AIR MONITORING – PARTICULATES LEVELS**

Date	Time	Wind information	Air monitoring units		Particulate levels		Comments
			Number	Location	Instantaneous µg/m ³	Average µg/m ³	
07/13	12:045	Downwind	2		11.4	23.3	
	12:05	Downwind	2		182.5	23.9	
	12:07	Downwind	2		137.3	25.6	
	12:08	Downwind	2		299.3	25.6	
	12:085	Downwind	2		14.6	25.6	
	12:32	Downwind	2		0.7	27.0	
	1:25	Downwind	2		11.3	25.1	
	1:25	Downwind	2		35.9	25.1	
	1:26	Downwind	2		10.8	25.1	
	1:27	Downwind	2		55.8	25.2	
	1:38	Downwind	2		10.4	25.4	
	1:40	Downwind	2		8.6	25.8	
	2:57	Downwind	2		10.0	23.1	
	3:405	Downwind	2		69.6	22.3	
	3:50	Downwind	2		51.3	22.1	
	3:51	Downwind	2		6.1	21.1	
	5:10	Downwind	2		8.1	20.0	
07/13	12:37	Downwind	3		13.3	20.4	
	12:52	Downwind	3		22.6	17.2	
	12:53	Downwind	3		18.0	17.1	
	12:54	Downwind	3		29.1	17.3	
	12:55	Downwind	3		40.0	17.4	
	1:20	Downwind	3		13.3	17.4	
	1:21	Downwind	3		14.7	17.4	
	1:35	Downwind	3		15.0	22.2	
	2:55	Downwind	3		16.5	21.5	
	3:25	Downwind	3		27.0	21.0	
	3:30	Downwind	3		19.5	21.0	
	4:23	Downwind	3		38.9	23.7	A look at fluctuations within a minute. A bulldozer is running within 1 meter of the air monitoring unit.
4:23	Downwind	3		50.6	23.7		
4:23	Downwind	3		100.1	23.7		
4:23	Downwind	3		24.6	23.7		

**IMPLEMENTATION OF INTERIM PREMEDIAL MEASURES AT THE SITE LOCATED AT
3241 WALDEN AVENUE, DEPEW, NEW YORK – JULY 13 TO 16, 1999
CONTINUOUS AIR MONITORING – PARTICULATES LEVELS**

Date	Time	Wind information	Air monitoring units		Particulate levels		Comments
			Number	Location	Instantaneous µg/m ³	Average µg/m ³	
07/14	8:47	Upwind	1		12.3	19.1	
	9:05	Upwind	1		10.7	20.7	
	9:20	Upwind	1		16.3	20.9	
	9:40	Upwind	1		15.8	22.2	
	9:55	Upwind	1		16.1	23.4	
	10:10	Upwind	1		31.5	40.6	
	10:30	Upwind	1		271.7	47.7	
	11:00	Upwind	1		41.7	38.9	
	11:15	Upwind	1		14.7	42.8	Originally the background was around
	11:30	Upwind	1		20.3	31.5	20 – 23 µg/m ³
	11:45	Upwind	1		18.0	24.3	
	12:00	Upwind	1		56.5	59.7	
	12:15	Upwind	1		19.2	85.7	At noon, the air monitoring unit No. 5
	12:30	Upwind	1		20.1	70.2	was placed in the same area of unit
	12:45	Upwind	1		18.1	68.2	No. 1, but slightly further away from
	1:00	Upwind	1		23.1	59.6	work to try getting a better
	1:18	Upwind	1		26.1	56.1	background. The readings are
	1:49	Upwind	1		57.8	55.9	presented in the pages coming.
	2:35	Upwind	1		25.9	60.1	
	2:50	Upwind	1		24.6	64.1	
	3:05	Upwind	1		35.6	63.1	
	3:20	Upwind	1		28.6	64.1	
	3:35	Upwind	1		24.1	64.0	
	3:50	Upwind	1		24.0	64.0	
	4:05	Upwind	1		31.1	72.6	
07/14	8:35	Downwind	2		13.5	16.1	
	9:01	Downwind	2		24.5	19.9	
	9:16	Downwind	2		15.1	23.5	
	9:33	Downwind	2		15.1	23.1	
	9:50	Downwind	2		19.2	24.1	
	10:03	Downwind	2		15.6	25.7	

**IMPLEMENTATION OF INTERIM PREMEDIAL MEASURES AT THE SITE LOCATED AT
3241 WALDEN AVENUE, DEPEW, NEW YORK – JULY 13 TO 16, 1999
CONTINUOUS AIR MONITORING – PARTICULATES LEVELS**

Date	Time	Wind information	Air monitoring units		Particulate levels		Comments
			Number	Location	Instantaneous µg/m ³	Average µg/m ³	
07/14	10:18	Downwind	2		45.6	25.7	
	11:03	Downwind	2		13.7	24.7	
	11:18	Downwind	2		15.4	23.9	
	11:31	Downwind	2		20.3	23.5	
	11:46	Downwind	2		19.4	23.8	
	12:01	Downwind	2		20.0	25.0	
	12:17	Downwind	2		24.1	24.9	
	12:31	Downwind	2		20.4	24.6	
	12:45	Downwind	2		20.1	23.6	
	1:01	Downwind	2		17.8	24.4	
	1:21	Downwind	2		15.9	24.7	
	2:12	Downwind	2		16.1	25.2	
	2:40	Downwind	2		19.5	24.9	
	3:00	Downwind	2		17.9	26.2	
	3:18	Downwind	2		17.8	26.1	
	3:36	Downwind	2		17.5	26.1	
	3:51	Downwind	2		19.9	26.8	
	4:06	Downwind	2		18.7	26.8	
07/14	8:26	Downwind	3		10.2	10.9	
	9:00	Downwind	3		312.2	27.5	
	9:15	Downwind	3		16.2	36.3	
	9:30	Downwind	3		14.0	34.0	
	9:45	Downwind	3		24.9	36.0	
	10:00	Downwind	3		21.2	36.5	
	10:17	Downwind	3		17.5	35.2	
	11:02	Downwind	3		24.7	31.6	
	11:18	Downwind	3		19.3	30.6	
	11:32	Downwind	3		21.3	30.1	
	11:47	Downwind	3		93.9	29.9	
	12:05	Downwind	3		21.0	30.4	
	12:17	Downwind	3		20.6	30.2	
	12:31	Downwind	3		24.6	25.9	

**IMPLEMENTATION OF INTERIM PREMEDIAL MEASURES AT THE SITE LOCATED AT
3241 WALDEN AVENUE, DEPEW, NEW YORK – JULY 13 TO 16, 1999
CONTINUOUS AIR MONITORING – PARTICULATES LEVELS**

Date	Time	Wind information	Air monitoring units		Particulate levels		Comments
			Number	Location	Instantaneous $\mu\text{g}/\text{m}^3$	Average $\mu\text{g}/\text{m}^3$	
07/14	12:46	Downwind	3		22.1	23.9	
	1:04	Downwind	3		25.7	29.5	
	1:23	Downwind	3		24.8	29.2	
	2:13	Downwind	3		26.4	29.3	
	2:47	Downwind	3		26.5	29.4	
	3:05	Downwind	3		25.8	30.4	
	3:20	Downwind	3		20.2	29.4	
	3:37	Downwind	3		21.7	29.6	
	3:55	Downwind	3		29.5	31.9	
	4:10	Downwind	3		27.3	33.3	
07/14	10:14	Downwind	4		14.6	20.1	
	11:01	Downwind	4		16.7	24.0	
	11:19	Downwind	4		20.3	24.9	Centre berm area along railway tracks on south side
	11:32	Downwind	4		22.4	24.9	
	11:48	Downwind	4		22.6	24.9	
	12:05	Downwind	4		22.7	27.2	
	12:19	Downwind	4		20.1	27.1	
	12:32	Downwind	4		22.3	27.1	
	12:47	Downwind	4		22.1	26.7	
	1:05	Downwind	4		25.4	27.9	
	1:25	Downwind	4		21.6	28.1	
	2:15	Downwind	4		21.9	28.6	
	2:48	Downwind	4		21.9	28.3	
	3:05	Downwind	4		26.8	31.9	
	3:20	Downwind	4		23.1	31.9	
	3:38	Downwind	4		22.9	31.5	
	3:56	Downwind	4		29.1	32.3	
	4:10	Downwind	4		26.2	32.2	

**IMPLEMENTATION OF INTERIM PREMEDIAL MEASURES AT THE SITE LOCATED AT
3241 WALDEN AVENUE, DEPEW, NEW YORK – JULY 13 TO 16, 1999
CONTINUOUS AIR MONITORING – PARTICULATES LEVELS**

Date	Time	Wind information	Air monitoring units		Particulate levels		Comments
			Number	Location	Instantaneous $\mu\text{g}/\text{m}^3$	Average $\mu\text{g}/\text{m}^3$	
07/14	12:00	Upwind	5		27.0	27.0	Trial to find a new background between woods and marsh plant area, a bit further from activities, yet same immediate area as unit No. 1
	12:15	Upwind	5		21.6	23.9	
	12:32	Upwind	5		19.9	22.7	
	12:48	Upwind	5		19.9	22.7	
	1:05	Upwind	5		19.9	28.9	
	1:27	Upwind	5		23.7	27.4	
	2:17	Upwind	5		117.1	26.8	
	2:50	Upwind	5		21.7	26.8	
	3:05	Upwind	5		22.2	25.1	
	3:20	Upwind	5		19.9	25.3	
	3:39	Upwind	5		19.0	25.3	
	3:56	Upwind	5		19.5	25.3	
	4:10	Upwind	5		24.5	25.8	
07/15	8:43	Upwind	1		31.6	29.6	Marsh plant area usually the background
	8:49	Upwind	1		31.0	29.8	
	9:34	Upwind	1		25.2	30.2	
	9:49	Upwind	1		21.7	31.0	
	10:05	Upwind	1		26.9	29.9	
	10:28	Upwind	1		21.2	29.9	
	10:45	Upwind	1		22.1	32.4	
	10:51	Upwind	1		32.4	32.5	
	11:06	Upwind	1		22.1	31.5	
	11:38	Upwind	1		46.3	34.7	
	12:00	Upwind	1		38.1	35.2	
	12:25	Upwind	1		31.9	35.1	
	12:45	Upwind	1		45.6	36.1	
	1:00	Upwind	1		32.6	35.9	
	1:15	Upwind	1		36.5	36.0	
2:04	Upwind	1		62.9	39.0		
2:20	Upwind	1		46.8	38.9		
3:18	Upwind	1		54.2	41.2		
4:03	Upwind	1		62.2	43.4		

**IMPLEMENTATION OF INTERIM PREMEDIAL MEASURES AT THE SITE LOCATED AT
3241 WALDEN AVENUE, DEPEW, NEW YORK - JULY 13 TO 16, 1999
CONTINUOUS AIR MONITORING - PARTICULATES LEVELS**

Date	Time	Wind information	Air monitoring units		Particulate levels		Comments
			Number	Location	Instantaneous $\mu\text{g}/\text{m}^3$	Average $\mu\text{g}/\text{m}^3$	
07/15	4:44	Upwind	1		73.2	45.7	
	5:15	Upwind	1		76.0	47.2	
	6:30	Upwind	1		107.2	53.2	
07/15	8:35	Downwind	2		27.8	28.3	
	9:09	Downwind	2		30.0	33.1	
	9:24	Downwind	2		29.1	35.9	
	9:47	Downwind	2		27.1	34.8	
	10:06	Downwind	2		26.5	34.1	
	10:30	Downwind	2		40.1	36.7	
	10:45	Downwind	2		37.8	39.8	
	11:00	Downwind	2		31.5	40.1	
	11:24	Downwind	2		39.8	40.9	
	11:47	Downwind	2		81.0	42.3	
	12:20	Downwind	2		55.0	43.3	
	12:45	Downwind	2		43.6	45.4	
	1:00	Downwind	2		38.9	44.1	
	1:15	Downwind	2		39.5	43.4	
	1:54	Downwind	2		64.3	47.5	
	2:21	Downwind	2		42.5	49.4	
	3:09	Downwind	2		77.0	51.3	
	4:15	Downwind	2		70.3	56.0	
	4:50	Downwind	2		64.6	57.5	
	5:205	Downwind	2		159.0	58.7	2 bulldozers passing by, wind 20 MPH from west monitor directly downwind
	6:18	Downwind	2		177.0	64.7	
07/15	8:31	Downwind	3		26.8	28.9	
	9:07	Downwind	3		30.9	30.4	
	9:27	Downwind	3		28.7	31.5	
	9:48	Downwind	3		30.7	32.3	
	10:07	Downwind	3		27.1	32.0	
	10:30	Downwind	3		31.7	32.9	
	10:45	Downwind	3		45.1	37.4	
	11:05	Downwind	3		43.1	43.2	

**IMPLEMENTATION OF INTERIM PREMEDIAL MEASURES AT THE SITE LOCATED AT
3241 WALDEN AVENUE, DEPEW, NEW YORK – JULY 13 TO 16, 1999
CONTINUOUS AIR MONITORING – PARTICULATES LEVELS**

Date	Time	Wind information	Air monitoring units		Particulate levels		Comments
			Number	Location	Instantaneous $\mu\text{g}/\text{m}^3$	Average $\mu\text{g}/\text{m}^3$	
07/15	8:31	Downwind	3		26.8	28.9	
	9:07	Downwind	3		30.9	30.4	
	9:27	Downwind	3		28.7	31.5	
	9:48	Downwind	3		30.7	32.3	
	10:07	Downwind	3		27.1	32.0	
	10:30	Downwind	3		31.7	32.9	
	10:45	Downwind	3		45.1	37.4	
	11:05	Downwind	3		43.1	43.2	
	11:26	Downwind	3		71.3	43.5	
	11:50	Downwind	3		45.6	46.7	
	12:22	Downwind	3		49.1	47.7	
	12:46	Downwind	3		45.5	48.1	
	1:00	Downwind	3		47.2	48.1	
	1:15	Downwind	3		34.6	47.5	
	1:55	Downwind	3		62.8	53.0	
	2:22	Downwind	3		45.9	51.0	
	3:15	Downwind	3		75.9	52.1	<ul style="list-style-type: none"> • The soil is wet, but bulldozer is working in immediate area • Trains passing and wind has picket up from 20 to 25 MPH
	4:09	Downwind	3		74.1	55.6	
	4:50	Downwind	3		73.9	58.5	
	5:22	Downwind	3		90.3	60.2	
	5:25	Downwind	3		123.3	60.2	
	6:20	Downwind	3		119.8	66.2	
07/15	8:38	Downwind	4		29.6	33.7	
	9:25	Downwind	4		34.9	34.2	
	9:48	Downwind	4		30.2	34.9	
	10:08	Downwind	4		30.2	34.6	
	10:27	Downwind	4		43.0	36.7	
	10:46	Downwind	4		41.5	41.5	
	11:05	Downwind	4		41.5	46.6	
	11:32	Downwind	4		64.8	47.4	Topsoil bring pushed in 20-25 meters upwind from this monitor
	11:55	Downwind	4		53.6	48.5	
	12:22	Downwind	4		48.3	49.1	

**IMPLEMENTATION OF INTERIM PREMEDIAL MEASURES AT THE SITE LOCATED AT
3241 WALDEN AVENUE, DEPEW, NEW YORK – JULY 13 TO 16, 1999
CONTINUOUS AIR MONITORING – PARTICULATES LEVELS**

Date	Time	Wind information	Air monitoring units		Particulate levels		Comments
			Number	Location	Instantaneous $\mu\text{g}/\text{m}^3$	Average $\mu\text{g}/\text{m}^3$	
07/15	12:46	Downwind	4		45.7	49.4	
	1:00	Downwind	4		39.5	49.0	
	1:15	Downwind	4		36.4	48.5	
	1:57	Downwind	4		71.1	50.8	Railway dusty – dry conditions there
	2:25	Downwind	4		43.1	52.1	
	3:14	Downwind	4		66.0	52.8	Coal train – open carts passing
	4:07	Downwind	4		405.2	55.5	Wind gusts and train passing
	4:51	Downwind	4		83.6	57.8	
	5:30	Downwind	4		104.3	59.9	
07/15	8:41	Upwind	5		25.8	78.5	These readings on July 15 will have more to do with topsoil dust than contaminated soil.
	9:32	Upwind	5		134.9	80.8	
	9:47	Upwind	5		22.4	79.3	
	10:03	Upwind	5		29.4	75.3	
	10:27	Upwind	5		29.2	75.6	
	10:47	Upwind	5		86.3	78.1	West of work area monitor immediately south of drop off on July 15
	11:06	Upwind	5		19.6	81.4	
	11:21	Upwind	5		64.1	81.8	
	11:35	Upwind	5		38.9	84.6	
	12:00	Upwind	5		41.9	85.6	
	12:25	Upwind	5		55.1	84.9	
	12:45	Upwind	5		60.1	84.1	
	1:00	Upwind	5		70.1	82.1	
	1:15	Upwind	5		52.5	82.7	
	1:59.5	Upwind	5		108.6	93.1	
	2:20	Upwind	5		132.0	94.1	
	3:16	Upwind	5		68.2	96.6	
07/16	10:15	Upwind	1		80.5	92.9	There was no work going on this area
	11:11	Upwind	1		79.7	87.1	
	12:15	Upwind	1		99.7	87.2	It was a hot and dry day and the wind was strong and gusty.
	1:40	Upwind	1		127.9	88.9	
	2:04	Upwind	1		103.7	89.5	
	3:04	Upwind	1		119.1	89.5	

**IMPLEMENTATION OF INTERIM PREMEDIAL MEASURES AT THE SITE LOCATED AT
3241 WALDEN AVENUE, DEPEW, NEW YORK – JULY 13 TO 16, 1999
CONTINUOUS AIR MONITORING – PARTICULATES LEVELS**

Date	Time	Wind information	Air monitoring units		Particulate levels		Comments
			Number	Location	Instantaneous $\mu\text{g}/\text{m}^3$	Average $\mu\text{g}/\text{m}^3$	
07/16	10:02	Downwind	3		106.9	122.8	Hot day with gusty wind. Tractor raking out roots and stones from topsoil during this period.
	11:07	Downwind	3		155.1	119.9	
	12:35	Downwind	3		120.6	123.9	
	1:45	Downwind	3		115.7	128.7	
	1:52	Downwind	3		118.7	128.5	
	2:49	Downwind	3		98.4	127.5	
	3:10	Downwind	3		113.8	127.6	
	10:00	Upwind	5		124.0	133.9	
11:05	Upwind	5		125.1	126.1		
12:30	Upwind	5		116.5	123.9		
1:46	Upwind	5		124.7	125.0		
1:48	Upwind	5		140.1	125.1		
1:50	Upwind	5		193.8	125.4		
2:47	Upwind	5		107.5	133.4		
3:15	Upwind	5		117.8	136.9		

Norampac/Depew/rapport final tableau

ANNEX 5



Certificate of Analysis

CLIENT INFORMATION

Attention: Basil Wong
Client Name: XCG Consultants Ltd.
Project: 5-997-01
Project Desc:

Address: 1 Port St, East
Suite 201
Mississauga, Ontario
L5G 4N1

Fax Number: 905 891-2554

Phone Number: 905 891-2400

LABORATORY INFORMATION

Contact: Ada Blythe, B.Sc., C.Chem.
Project: AN981300
Date Received: 99/08/03
Date Reported: 99/08/11

Submission No.: 9H0037
Sample No.: 041595-041598

NOTES:

'*' = not analysed 'L' = less than Method Detection Limit (MDL) 'NA' = no data available
LOQ can be determined for all analytes by multiplying the appropriate MDL X 3.33
All organic data is blank corrected except for PCDD/F, Hi-Res MS and CLP volatile analytes.
Solids data is based on dry weight except for biota analytes.
Organic analyses are not corrected for extraction recovery standards except for isotope
dilution methods, (i.e. CARB 429 PAH, all PCDD/F and DBD/DBF analyses)

Methods used by PASC are based upon those found in 'Standard Methods for the Examination of Water and Wastewater', Nineteenth Edition. Other methods are based on the principles of MISA or EPA methodologies. New York State: ELAP Identification Number 10756.

All work recorded herein has been done in accordance with normal professional standards using accepted testing methodologies, quality assurance and quality control procedures except where otherwise agreed to by the client and testing company in writing. Any and all use of these test results shall be limited to the actual cost of the pertinent analysis done. There is no other warranty expressed or implied. Your samples will be retained at PASC for a period of three weeks from receipt of data or as per contract.

COMMENTS:

*Spiking levels are not high enough above native levels in sample to determine recoveries.
(2) Non-typical Hydrocarbon Pattern

Certified by:

Page 1





Component	Client ID:		Method	Method	Method	Bottle	Bottle
	MDL	Units	Blank	Blank	Blank	#1	#1
			041595 99	041595 99	041595 99	041596 99	041596 99
			99/07/15	99/07/15	99/07/15	99/07/15	99/07/15
			M. Spike	MS % Rec.	Duplicate		
Mercury	0.04	mg/kg	<	1.0	100	0.060	0.050
Aluminum	3	mg/kg	<	200	100	9800	9900
Barium	0.1	"	<	110	110	76	74
Beryllium	0.1	"	<	52	100	0.6	0.5
Cadmium	0.2	"	<	51	100	0.7	0.3
Calcium	20	"	25	1100	100	6300	6600
Chromium	0.4	"	<	110	110	13	12
Cobalt	1	"	<	110	110	5.0	5.0
Copper	0.6	"	1.8	110	100	17	16
Iron	1	"	<	1300	110	16000	16000
Lead	2	"	<	110	110	91	89
Magnesium	5	"	<	1100	100	3400	3600
Manganese	0.5	"	<	100	100	220	230
Molybdenum	1	"	<	51	100	1.0	<
Nickel	1	"	<	53	110	12	13
Phosphorus	6	"	<	510	100	660	640
Potassium	100	"	<	1000	100	840	860
Silver	1.0	"	<	52	100	<	<
Sodium	10	"	<	1000	100	47	50
Thallium	6	"	<	100	110	<	<
Vanadium	0.5	"	<	52	100	20	20
Zinc	0.5	"	6.1	210	100	96	98
Benzene	0.001	mg/kg	<	0.22	88	0.004	-
Toluene	0.002	"	<	0.23	90	0.024	-
Ethylbenzene	0.002	"	<	0.23	93	0.011	-
m&p-Xylene	0.004	"	<	0.49	98	0.007	-
o-Xylene	0.002	"	<	0.24	94	0.002	-
Surrogate Recoveries		%					
d4-1,2-Dichloroethane			90	105	105	85	-
d8-Toluene			103	103	103	110	-
Bromofluorobenzene			101	106	106	96	-
Extractable Petroleum Hydrocarbons	10	mg/kg	<	470	94	<	-
Surrogate Recoveries		%					
1-Chlorooctadecane			77	100	100	79	-

1200
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 .0006 .06
 1.5
 5.5
 1.2

PASC - Certificate of Analysis

Component	MDL	Units	Client ID:	Bottle #1	Bottle #1	Bottle #2	Bottle #3
			Lab No.:	041596 99	041596 99	041597 99	041598 99
			Date Sampled:	99/07/15	99/07/15	99/07/15	99/07/15
			M. Spike	MS % Rec.			
Mercury	0.04	mg/kg	1.2	110	<	0.040	
Aluminum	3	mg/kg	12000	NA*	9100	10000	
Barium	0.1	"	180	110	57	66	
Beryllium	0.1	"	53	110	0.5	0.6	
Cadmium	0.2	"	51	100	0.5	0.5	
Calcium	20	"	7200	74	4200	4200	
Chromium	0.4	"	120	110	11	12	
Cobalt	1	"	110	100	4.0	5.0	
Copper	0.6	"	120	100	13	12	
Iron	1	"	17000	140	14000	16000	
Lead	2	"	190	96	34	31	
Magnesium	5	"	4600	100	2700	2900	
Manganese	0.5	"	340	110	230	210	
Molybdenum	1	"	47	93	<	<	
Nickel	1	"	63	100	10	12	
Phosphorus	6	"	1100	96	570	670	
Potassium	100	"	2000	110	550	770	
Silver	1.0	"	49	98	<	<	
Sodium	10	"	1100	100	36	47	
Thallium	6	"	100	100	<	<	
Vanadium	0.5	"	73	110	19	20	
Zinc	0.5	"	310	110	74	77	
Benzene	0.001	mg/kg	-	-	0.001	<	
Toluene	0.002	"	-	-	0.003	0.002	
Ethylbenzene	0.002	"	-	-	<	<	
m&p-Xylene	0.004	"	-	-	<	<	
o-Xylene	0.002	"	-	-	<	<	
Surrogate Recoveries		%					
d4-1,2-Dichloroethane			-	-	82	81	
d8-Toluene			-	-	108	108	
Bromofluorobenzene			-	-	97	94	
						(2)	
Extractable Petroleum Hydrocarbons	10	mg/kg	-	-	<	10	
Surrogate Recoveries		%					
1-Chlorooctadecane			-	-	77	71	

Batch Code:	0806IIA1	0810IIA3
Mercury	041595 99	041596 99
	041596 99	
	041597 99	
	041598 99	
Run Date:	99/08/06	99/08/10
Date of Sample Prep:	99/08/06	99/08/10

Batch Code:	0806HSB1
Aluminum	041595 99
	041596 99
	041597 99
	041598 99
Run Date:	99/08/06
Date of Sample Prep:	99/08/06

Batch Code:	0810SM01
Benzene	041595 99
	041596 99
	041597 99
	041598 99
Run Date:	99/08/10
Date of Sample Prep:	99/08/10

Batch Code:	0804RT02
Extractable Petroleum Hydrocarbons	041595 99
	041596 99
	041597 99
	041598 99
Run Date:	99/08/05
Date of Sample Prep:	99/08/04

ANNEX 6

IMPLEMENTATION OF INTERIM REMEDIAL MEASURES
At the site located at 3241 Walden Avenue, Depew, New York



Spraying the site before activity on site, July 13, 1999



Initial grading of contaminated soil, July 13, 1999

IMPLEMENTATION OF INTERIM REMEDIAL MEASURES
At the site located at 3241 Walden Avenue, Depew, New York



Debris deposit in the entrance excavation, July 13, 1999



Air monitoring unit upwind of activities, July 14, 1999

IMPLEMENTATION OF INTERIM REMEDIAL MEASURES
At the site located at 3241 Walden Avenue, Depew, New York



Clearance in forest for fence, July 15, 1999



Receiving topsoil and water sprayed on the contaminated soil

IMPLEMENTATION OF INTERIM REMEDIAL MEASURES
At the site located at 3241 Walden Avenue, Depew, New York



Grading topsoil over contaminated soil, July 15, 1999



Water being applied to new topsoil, July 15, 1999

IMPLEMENTATION OF INTERIM REMEDIAL MEASURES
At the site located at 3241 Walden Avenue, Depew, New York



*Topsoil receiving area at new entrance
Water truck in operation, July 15, 1999*



*Topsoil receiving, July 15, 1999
Note how the lot is kept moist by the water truck*

IMPLEMENTATION OF INTERIM REMEDIAL MEASURES
At the site located at 3241 Walden Avenue, Depew, New York



Two bulldozers and a Pan moving the topsoil from the new entrance at north west going toward the south-east corner, July 15, 1999



*Rough graded topsoil end of July 15, 1999
Water truck still in operation*

IMPLEMENTATION OF INTERIM REMEDIAL MEASURES
At the site located at 3241 Walden Avenue, Depew, New York



*After rake out of new topsoil
Safety fence in place, July 16, 1999*



*After rake out of new topsoil
Safety fence reinstalled because new fence is not complete, July 16, 1999*

IMPLEMENTATION OF INTERIM REMEDIAL MEASURES
At the site located at 3241 Walden Avenue, Depew, New York



Rake out of topsoil and installation of fence, July 16, 1999



*Repair to old end fence
Installation of new fence, July 20, 1999*

IMPLEMENTATION OF INTERIM REMEDIAL MEASURES
At the site located at 3241 Walden Avenue, Depew, New York



Hydroseeding equipment in operation, July 22, 1999

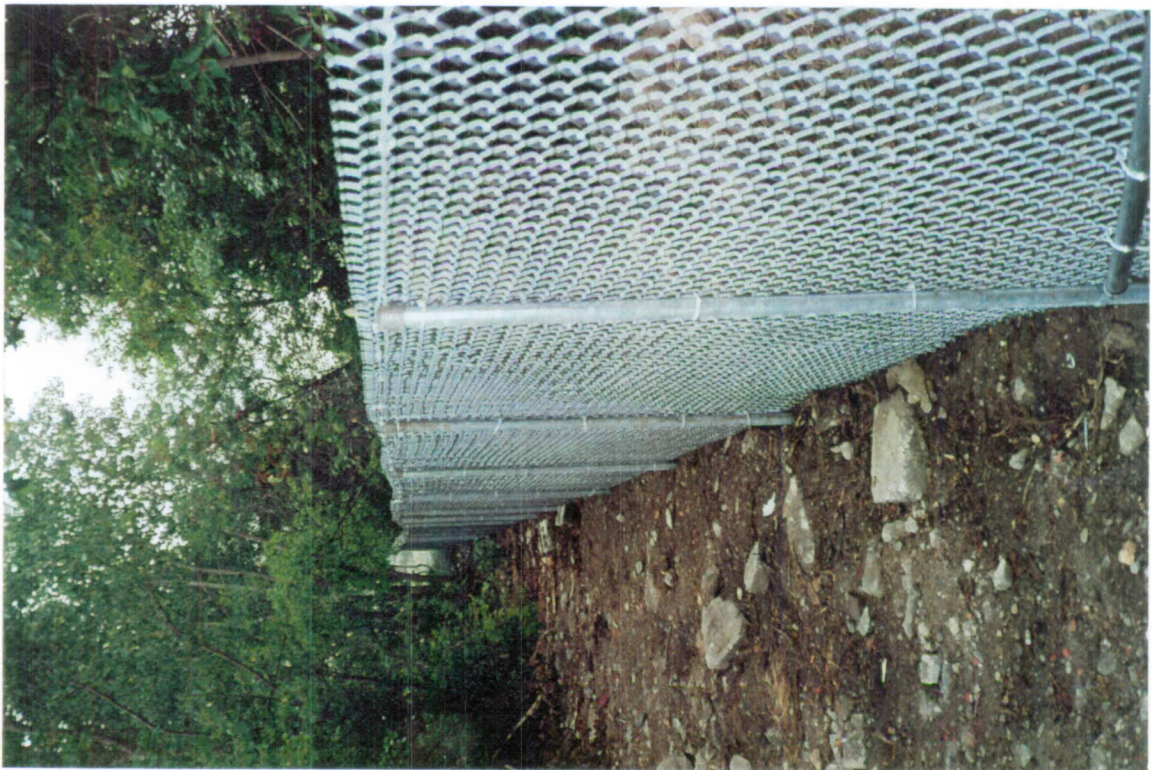


Topsoil surface hydroseeded, July 22, 1999

IMPLEMENTATION OF INTERIM REMEDIAL MEASURES
At the site located at 3241 Walden Avenue, Depew, New York



New fence across west end of work area, July 23, 1999



New fence through woods running parallel to the south side of property, July 23, 1999