



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 1
5 Post Office Square, Suite 100
Boston, MA 02109-3912

September 23, 2010

BY HAND

Wanda I. Santiago, Regional Hearing Clerk
U.S. Environmental Protection Agency-Region 1
5 Post Office Square, Suite 100
Mail Code ORA18-1
Boston, MA 02109-3912

Re: Cascades Boxboard Group – Connecticut LLC
Docket No. EPCRA-01-2010-0074

Dear Ms. Santiago:

Enclosed are an original and one copy of the Complaint and Certificate of Service for filing with respect to the above-captioned matter.

Kindly file the documents in the usual manner. Thanks very much for your help.

Sincerely,

A handwritten signature in blue ink that reads "Christine M. Foot".

Christine M. Foot
Enforcement Counsel

Enclosures

Cc: Mr. Ghislain Levesque, Mill Manager

RECEIVED
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1

RECEIVED

SEP 23 2010

EPA ORC WS
Office of Regional Hearing Clerk

In the Matter of:)

CASCADES BOXBOARD GROUP)
—CONNECTICUT LLC)
130 Inland Road)
Versailles, CT 06383)

Respondent.)

Docket No. EPCRA-01-2010-0074

**ADMINISTRATIVE COMPLAINT
AND NOTICE OF OPPORTUNITY
FOR HEARING**

I. STATEMENT OF AUTHORITY

The United States Environmental Protection Agency (“EPA”) issues this civil Administrative Complaint and Notice of Opportunity for Hearing (“Complaint”) under the authority of Section 325(c) of Title III of the Superfund Amendments and Reauthorization Act, 42 U.S.C. § 11045(c) (also known as the Emergency Planning and Community Right-to-Know Act of 1986, hereinafter “EPCRA”), and the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties, Issuance of Compliance or Corrective Action Orders, and the Revocation, Termination or Suspension of Permits, 40 C.F.R. Part 22 (“Part 22”). The Complainant, by lawful delegation, is the Legal Enforcement Manager of the Office of Environmental Stewardship, EPA, Region 1.

This Complaint alleges that Cascades Boxboard Group – Connecticut LLC (“Cascades Boxboard” or “Respondent”) violated Sections 312(a) and 313(a) of EPCRA, 42 U.S.C. §§ 11022(a) and 11023(a), and the federal regulations that set out these statutory requirements in greater detail, 40 C.F.R. Parts 370 and 372. This Complaint also provides notice of Respondent’s opportunity to request a hearing on the proposed penalty.

II. STATUTORY AND REGULATORY BASIS

Under Section 312(a) of EPCRA and 40 C.F.R. §§ 370.20 and 370.25, any facility that is required to prepare or have available a material safety data sheet (“MSDS”) for a hazardous chemical under the Occupational Safety and Health Act of 1970 and regulations promulgated thereunder (“OSHA”) must prepare and submit an emergency and hazardous chemical inventory form (“Tier I or Tier II form”) to the local emergency planning committee (“LEPC”), the state emergency response commission (“SERC”), and the local fire department. The Tier I or Tier II form must be submitted annually on or before March 1 and is required to contain information with respect to the preceding calendar year.

Pursuant to Sections 313 and 328 of EPCRA, 42 U.S.C. §§ 11023 and 11048, EPA promulgated the Toxic Chemical Release Reporting: Community Right-to-Know Rule, 40 C.F.R. Part 372. Section 313(a) of EPCRA, 42 U.S.C. § 11023(a), and 40 C.F.R. § 372.22 require owners or operators of a facility falling within the scope of Section 313(b) to submit annually, no later than July 1 of each year, a Toxic Chemical Release Inventory Reporting Form, EPA Form 9350-1 (“Form R”), for each toxic chemical listed under 40 C.F.R. § 372.65 that was manufactured, processed, or otherwise used at the facility during the preceding calendar year in quantities exceeding the toxic chemical thresholds established under Section 313(f) of EPCRA, 42 U.S.C. § 11023(f), and 40 C.F.R. Part 372. Section 313(b) of EPCRA, 42 U.S.C. § 11023(b), and 40 C.F.R. § 372.22 provide that a Form R must be filed by owners or operators of facilities that: have ten (10) or more full-time employees; are in a Standard Industrial Classification code or North American Industry Classification System code set forth in 40 C.F.R. § 372.23; and manufactured, processed, or otherwise used a toxic chemical listed under 40 C.F.R. § 372.65 in a quantity exceeding the established threshold during a calendar year. Each Form R is required to be submitted to the Administrator of EPA and to the state in which the subject facility is located.

Section 325(c) of EPCRA, 42 U.S.C. § 11045(c), as amended by the Debt Collection Improvement Act of 1996, Pub. L. No. 104-134, 110 Stat. 1321 (1996), and EPA's Civil Monetary Penalty Inflation Adjustment Rules, promulgated thereunder at 40 C.F.R. Part 19, provides for the assessment of a civil penalty not to exceed \$32,500 per day for each violation of any requirement of Section 312 or 313 that occurs after March 15, 2004 and before January 13, 2009, and not to exceed \$37,500 per day for each violation of Section 312 or 313 that occurs after January 12, 2009.

III. FACTUAL ALLEGATIONS

1. Respondent is a limited liability corporation incorporated under the laws of the State of Delaware with a principal place of business at 130 Inland Road, Versailles, Connecticut.
2. Respondent's corporate parent is Cascades Canada Inc., a corporation based in Quebec, Canada.
3. Respondent is a "person," as that term is defined by Section 329(7) of EPCRA, 42 U.S.C. § 11049(7), and 40 C.F.R. § 370.2.
4. Respondent purchased a paperboard production facility located at 130 Inland Road, Versailles, Connecticut 06383 ("Facility") from Sprague Paperboard Inc. on or about July 19, 2006. At all times since that purchase and at all times relevant to the violations alleged in this Complaint, Respondent has owned and operated the Facility.
5. Respondent is an owner or operator of a "facility," as that term is defined by Section 329(4) of EPCRA, 42 U.S.C. § 11049(4), and 40 C.F.R. §§ 370.2 and 372.3.
6. The Facility has ten (10) or more "full-time employees," as that term is defined by 40 C.F.R. § 372.3.
7. At all times relevant to the violations cited herein, Respondent stored sulfuric acid, which is a "hazardous chemical," as defined under 29 C.F.R. § 1910.1200(c), and an

“extremely hazardous substance,” as defined in 40 C.F.R. Part 355, in a quantity that exceeds the minimum threshold level set forth in 40 C.F.R. § 370.20(b)(1) at the Facility.

8. At all times relevant to the violations cited herein, Respondent was required, pursuant to OSHA, to prepare or have available a MSDS for sulfuric acid onsite.

9. The Facility is classified in a Standard Industrial Classification code or North American Industry Classification System code set forth in 40 C.F.R. § 372.23.

10. During the calendar years 2006, 2007, and 2008, Respondent manufactured, processed, or otherwise used toxic chemicals listed under 40 C.F.R. § 372.65 in quantities exceeding the established thresholds.

11. The requirements of Sections 312 and 313 of EPCRA, 42 U.S.C. §§ 11022 and 11023, therefore apply to Respondent’s Facility.

12. On September 22, 2008, authorized representatives of EPA inspected the Facility. The purpose of the inspection was to determine Respondent’s compliance with EPCRA Section 312 reporting requirements.

13. Additionally, on March 4, 2010, EPA sent Respondent a letter requesting information about chemicals at the Facility that potentially required the submission of a Form R. EPA received a response letter from Respondent, dated June 16, 2010.

IV. VIOLATIONS

Count I: Failure to File Tier II Form for Sulfuric Acid in Calendar Year 2007

14. Paragraphs 1 through 13 are incorporated by reference as if fully set forth herein.

15. During calendar year 2007, Respondent stored sulfuric acid at the Facility in a quantity that exceeds the minimum threshold level of 500 pounds set forth in 40 C.F.R. § 370.20(b)(1).

16. Respondent was required to prepare and submit a Tier I or Tier II emergency and hazardous chemical inventory form to the SERC, LEPC, and the local fire department with jurisdiction over the Facility in order to report the data required by Section 312(d) of EPCRA, 42 U.S.C. § 11022(d), for calendar year 2007 on or before March 1, 2008.

17. Respondent failed to prepare and submit a Tier I or Tier II form by March 1, 2008 to the SERC, LEPC, and the local fire department, in violation of the reporting requirements of Section 312(a) of EPCRA, 42 U.S.C. § 11022(a), and 40 C.F.R. §§ 370.20 and 370.25.

18. Respondent is therefore subject to an assessment of penalties under Section 325(c)(1) of EPCRA, 42 U.S.C. § 11045(c)(1), and 40 C.F.R. Part 19.

Count II: Failure to File Form R for Vinyl Acetate in Calendar Year 2008

19. Paragraphs 1 through 18 are incorporated by reference as if fully set forth herein.

20. During the calendar year 2008, Respondent manufactured, processed, or otherwise used vinyl acetate, a chemical listed under 40 C.F.R. § 372.65, in a quantity exceeding the established threshold at the Facility. Respondent was therefore required to complete and submit a Form R for this chemical to the Administrator of EPA on or before July 1, 2009.

21. Respondent failed to complete and submit this form to the Administrator of EPA on or before July 1, 2009.

22. Respondent's failure to complete and timely submit this form constitutes a violation of Section 313 of EPCRA and 40 C.F.R. Part 372.

Count III: Failure to File Form R for Chlorine Dioxide in Calendar Year 2007

23. Paragraphs 1 through 22 are incorporated by reference as if fully set forth herein.

24. During the calendar year 2007, Respondent manufactured, processed, or otherwise used chlorine dioxide, a chemical listed under 40 C.F.R. § 372.65, in a quantity exceeding the established threshold at the Facility. Respondent was therefore required to

complete and submit a Form R for this chemical to the Administrator of EPA on or before July 1, 2008.

25. Respondent failed to complete and submit this form to the Administrator of EPA on or before July 1, 2008.

26. Respondent's failure to complete and submit this form was in violation of Section 313 of EPCRA and 40 C.F.R. Part 372.

Count IV: Failure to File Form R for Nitrate Compounds in Calendar Year 2008

27. Paragraphs 1 through 26 are incorporated by reference as if fully set forth herein.

28. During the calendar year 2008, Respondent manufactured, processed, or otherwise used nitrate compounds, a category of chemicals listed under 40 C.F.R. § 372.65, in a quantity exceeding the established threshold at the Facility. Respondent was therefore required to complete and submit a Form R for this chemical to the Administrator of EPA on or before July 1, 2009.

29. Respondent failed to complete and submit this form to the Administrator of EPA on or before July 1, 2009.

30. Respondent's failure to complete and submit this form was in violation of Section 313 of EPCRA and 40 C.F.R. Part 372.

Count V: Failure to File Form R for Nitrate Compounds in Calendar Year 2007

31. Paragraphs 1 through 30 are incorporated by reference as if fully set forth herein.

32. During the calendar year 2007, Respondent manufactured, processed, or otherwise used nitrate compounds, a category of chemicals listed under 40 C.F.R. § 372.65, in a quantity exceeding the established threshold at the Facility. Respondent was therefore required to complete and submit a Form R for this chemical to the Administrator of EPA on or before July 1, 2008.

33. Respondent failed to complete and submit this form to the Administrator of EPA on or before July 1, 2008.

34. Respondent's failure to complete and submit this form was in violation of Section 313 of EPCRA and 40 C.F.R. Part 372.

Count VI: Failure to File Form R for Nitrate Compounds in Calendar Year 2006

35. Paragraphs 1 through 34 are incorporated by reference as if fully set forth herein.

36. During the calendar year 2006, Respondent manufactured, processed, or otherwise used nitrate compounds, a category of chemicals listed under 40 C.F.R. § 372.65, in a quantity exceeding the established threshold at the Facility. Respondent was therefore required to complete and submit a Form R for this chemical to the Administrator of EPA on or before July 1, 2007.

37. Respondent failed to complete and submit this form to the Administrator of EPA on or before July 1, 2007.

38. Respondent's failure to complete and submit this form was in violation of Section 313 of EPCRA and 40 C.F.R. Part 372.

V. Proposed Civil Penalty

Section 325(c) of EPCRA, 42 U.S.C. § 11045(c), and 40 C.F.R. §§ 370.5(b) and 372.18, as amended at 40 C.F.R. Part 19, provide that any person who violates any requirement of Section 312 or Section 313 after March 15, 2004 and before January 13, 2009 shall be liable to the United States for a civil penalty in an amount not to exceed \$32,500 per day for each such violation, and any person who violates any requirement of Section 312 or Section 313 after January 12, 2009 shall be liable to the United States for a civil penalty in an amount not to exceed \$37,500 per day for each such violation.

Failure to report under Section 312 in a timely manner may deprive the community of its right to know about chemicals used or stored near or in the neighborhood that may affect public health and the environment. Failure to report also may prevent comprehensive planning by federal, state, and local authorities to properly prepare for accidental chemical releases, potentially endangering emergency responders and the community at large.

Failure to report under Section 313 in a timely manner may deprive the community of its right to know about chemicals used or stored near or in the neighborhood that may affect public health and the environment, compromise the validity of health studies based on consequently inaccurate databases, and prevent comprehensive planning by federal, state, and local authorities to clean up industrial pollution.

The proposed civil penalty has been determined in accordance with Section 325(c) of EPCRA, 42 U.S.C. § 11045(c). For purposes of determining the amount of any penalty to be assessed, EPA considered the nature, circumstances, extent, and gravity of the violations, and with respect to the Respondent, its ability to pay, prior history of violations, degree of culpability, economic benefit or savings resulting from the violation, and such other matters as justice may require.

Section 312 Penalty Calculation

To develop the proposed penalty for the Section 312 violations alleged in this Complaint, the Complainant has taken into account the particular facts and circumstances of this case with specific reference to EPA's "Enforcement Response Policy for Sections 304, 311 and 312 of the Emergency Planning and Community Right-to-Know Act and Section 103 of the Comprehensive Environmental Response, Compensation and Liability Act" (dated September 30, 1999, as amended through April 6, 2010) ("312 ERP"), a copy of which is enclosed with this Complaint.

This policy provides a rational, consistent, and equitable calculation methodology for applying the penalty factors enumerated above to particular cases.

Pursuant to Part V of the 312 ERP, the first stage of calculating a penalty for a violation requires determination of its “extent” of deviation from the requirements to timely submit reports, and the second stage requires determination of the “gravity” of the violation, based on the amount of the chemical not reported. The extent of the violation alleged in Count I is “Level 1” because Respondent failed to submit the Tier I or Tier II form to the SERC, LEPC, or fire department within thirty (30) calendar days of the reporting deadline. The gravity of the violation alleged in Count I is “Level A” because the amount of the hazardous chemical not reported was greater than ten (10) times the reporting threshold.

Under the 312 ERP, EPA has discretion to select an amount within the range specified in the appropriate matrix box. Respondent’s failure to submit the Tier I or Tier II form was determined to fall at the 75th percentile of the Level 1-A matrix box, based on the circumstances of the violation, resulting in a base penalty of \$30,420.

After consideration of the Respondent’s failure to voluntarily disclose the Section 312 violations, its lack of a history of prior violations, degree of culpability, and the economic benefit of non-compliance, the Complainant proposes no further adjustments to the gravity-based penalty amounts for the Section 312 violation.

Section 313 Penalty Calculation

To develop the proposed penalty for the Section 313 violations alleged in this Complaint, the Complainant has taken into account the particular facts and circumstances of this case with specific reference to EPA’s “Enforcement Response Policy for Section 313 of the Emergency Planning and Community Right-to-Know Act (1986) and Section 6607 of the Pollution Prevention Act (1990)” (dated April 12, 2001, as amended through April 6, 2010) (“313 ERP”),

a copy of which is enclosed with this Complaint. This policy provides a rational, consistent, and equitable calculation methodology for applying the statutory penalty factors enumerated above to particular cases.

The 313 ERP states that a gravity-based penalty should be determined by considering the “circumstance level” and the “extent level” of a violation. The circumstance level of a violation takes into account the seriousness of the violation as it relates to the accuracy and availability of the information to the community, states, and federal government. The extent level of a violation is based upon the quantity of each EPCRA Section 313 chemical manufactured, processed, or otherwise used by the facility, and the size of the business, which is based upon the number of employees and the gross sales of the corporate entity. The ERP also allows other adjustments to the penalty if a violation is voluntarily disclosed, the facility has a prior violation, or the subject chemical has been delisted.

Pursuant to Part V of the 313 ERP, the first stage of calculating a penalty requires the determination of the circumstance level of the violation. Respondent failed to submit one Form R for calendar year 2006 and two Form Rs for calendar year 2007, for chemicals listed under 40 CFR § 372.65 that it manufactured, processed, or otherwise used in quantities exceeding the established threshold, within one year of the July 1 due date. Thus, the applicable circumstance level for Counts III, V, and VI of this Complaint is “Level 1.” For calendar year 2008, Respondent submitted two Form Rs for chemicals listed under 40 CFR § 372.65 that it manufactured, processed, or otherwise used in quantities exceeding the established threshold, less than one year late. The proposed penalty for Counts II and IV were therefore calculated in accordance with the “Level 4” per-day formula for failure to report in a timely manner set forth in the ERP.

The second stage in calculating the proposed penalty requires the determination of the extent level. Based on the information available to EPA at this time, Respondent manufactured, processed, or otherwise used less than ten times the threshold of Section 313 chemicals. In addition, Respondent has more than fifty employees at the Facility and more than ten million dollars in annual total corporate entity sales. Based upon the amount of the Section 313 chemicals used and the size and sales of the corporate entity, the applicable extent level for Counts II, III, IV, V, and VI of this Complaint is "Level B."

In addition to the determination of the applicable circumstance and extent levels for each Section 313 count in this Complaint, Complainant considered other factors which may be used to adjust the penalty amount. In particular, after considering Respondent's failure to voluntarily disclose the violations, its lack of a history of prior violations, and the subject chemicals not having been delisted, Complainant proposes no further adjustments to the gravity-based penalty amount.

Combined Penalty

The proposed penalty as stated in this Complaint was developed based on the best information currently available to the Agency and may be adjusted if the Respondent establishes bona fide issues of ability to pay or other defenses relevant to the appropriate amount of the proposed penalty.

Based upon the violations cited in this Complaint, and taking into account the nature, extent, circumstances, and gravity of these violations, the Complainant proposes that Respondent be assessed a civil penalty in the amount of \$138,866 for the violations alleged in this Complaint. For each violation, the proposed penalty is as follows:

Count I (2007 Tier II – Level 1-A)	\$ 30,420
Count II (2008 Form R, vinyl acetate – Level 4-B, per day)	\$ 21,340
Count III (2007 Form R, chlorine dioxide – Level 1-B).	\$ 21,922
Count IV (2008 Form R, nitrate compounds – Level 4-B, per day). .	\$ 21,340
Count V (2007 Form R, nitrate compounds – Level 1-B)	\$ 21,922
<u>Count VI (2006 Form R, nitrate compounds – Level 1-B)</u>	<u>\$ 21,922</u>
Total:	\$ 138,866

**VI. NOTICE OF OPPORTUNITY TO
REQUEST A HEARING**

In accordance with 40 C.F.R. § 22.14, Respondent has the right to request a formal hearing to contest any material fact set forth in this Complaint or to contest the appropriateness of the proposed penalty. Any such hearing would be conducted in accordance with Part 22, a copy of which is enclosed with this Complaint.

To avoid being found in default, which constitutes an admission of all facts alleged in the Complaint and a waiver of the right to a hearing, and having the above-cited penalty assessed without further proceedings, Respondent must file a written Answer within thirty (30) days of Respondent’s receipt of this Complaint. The Answer must clearly and directly admit, deny, or explain each of the factual allegations contained in this Complaint with regard to which Respondent has any knowledge. If Respondent has no knowledge of a particular fact and so states, the allegation is considered denied. Failure to deny an allegation constitutes an admission. Respondent’s Answer must also state all facts and circumstances, if any, which constitute grounds for a defense and, if desired, must specifically request an administrative hearing. If Respondent denies any material fact or raises any affirmative defense, Respondent will be considered to have requested a hearing. The Answer must be sent to:

Wanda I. Santiago, Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 1
5 Post Office Square, Suite 100
Mail Code ORA18-1
Boston, MA 02109-3912

Respondent should also send a copy of the Answer and all other documents which Respondent files in this action to Christine Foot, the attorney assigned to represent EPA in this matter, at:

Christine Foot, Enforcement Counsel
Office of Environmental Stewardship
U.S. Environmental Protection Agency, Region 1
5 Post Office Square, Suite 100
Mail Code OES04-2
Boston, MA 02109-3912

VII. DEFAULT ORDER

If Respondent fails to file a timely Answer to the Complaint, Respondent may be found to be in default pursuant to 40 C.F.R. § 22.17. For purposes of this action only, default by Respondent constitutes an admission of all facts alleged in the Complaint and a waiver of Respondent's right to contest such factual allegations.

VIII. QUICK RESOLUTION

Under Section 22.18(a) of the Consolidated Rules of Practice, the Respondent has the option of resolving this matter at any time by paying the penalty proposed in this Complaint in full. Payment of the penalty must be made by submitting a bank, cashier's, or certified check payable to "Treasurer, United States of America" to:

U.S. Environmental Protection Agency
Fines and Penalties
Cincinnati Finance Center
P.O. Box 979077
St. Louis, MO 63197-9000

The penalty payment check must reference the title of this proceeding ("In the Matter of Cascades Boxboard Group – Connecticut LLC") and its Docket Number (EPCRA-01-2010-

0074). Copies of the check must also be mailed to the Regional Hearing Clerk and to Christine Foot at the addresses cited above.

If the Respondent pays the proposed penalty in full within thirty (30) days after receiving this Complaint, then the Respondent need not file an Answer to the Complaint. If the Respondent wishes to resolve this matter without having to file an Answer but needs additional time in which to do so, the Respondent may file a written statement with the Regional Hearing Clerk at the address above within thirty (30) days of receiving the Complaint. The written statement must specify that the Respondent agrees to pay the penalty within sixty (60) days of receipt of the Complaint. Failure to make such payment within the sixty (60) days may subject the Respondent to a default action. Upon receipt of payment in full, the Regional Judicial Officer shall issue a final order. Payment by Respondent shall constitute a waiver of Respondent's rights to contest the allegations and to appeal the final order.

IX. INFORMAL SETTLEMENT CONFERENCE

Whether or not Respondent requests a hearing, Respondent may confer informally with Rose Toscano, Environmental Scientist in EPA Region 1's Office of Environmental Stewardship, (617) 918-1861, concerning the facts of the Section 312 allegations or the amount of the proposed penalty, or Christian Rascher, EPCRA Enforcement Coordinator in EPA Region 1's Office of Environmental Stewardship, (617) 918-1834, concerning the facts of the Section 313 allegations or the amount of the proposed penalty. Respondent's attorney is encouraged to contact Christine Foot, Enforcement Counsel, at (617) 918-1333, to discuss the legal matters relating to this Complaint or to arrange an informal settlement conference.

Please note that a request for an informal settlement conference does not enlarge the thirty-day period within which a written Answer must be submitted to avoid default.

Payment of the civil penalty alone does not satisfy Respondent's legal obligation to file complete and accurate emergency and hazardous chemical inventory forms (Tier I or Tier II forms) and toxic chemical release forms (Form R). If Respondent chooses to remit the proposed penalty, it is still under a legal duty to submit complete and accurate forms. Failure or refusal to file such forms may subject Respondent to additional civil penalties of up to \$37,500 per day of violation.

Christine Foot, Enforcement Counsel, at the above address and telephone, has been designated to represent Complainant and is authorized to receive service of process in this action.



Joanna Jerison, Legal Enforcement Manager
Office of Environmental Stewardship
U.S. Environmental Protection Agency, Region 1
5 Post Office Square, Suite 100
Mail Code OES04-2
Boston, MA 02109-3912

Sept. 22, 2010
Date

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I

In the Matter of:)

CASCADES BOXBOARD GROUP)
—CONNECTICUT LLC)
130 Inland Road)
Versailles, CT 06383)

Respondent.)

Docket No. EPCRA-01-2010-0074

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Administrative Complaint and Notice of Opportunity for a Hearing has been sent to the following persons on the date noted below:


Original and One Copy
(Hand-Delivered):

Wanda I. Santiago
Regional Hearing Clerk
U.S. EPA, Region I
5 Post Office Square, Suite 100
Mail Code ORA18-1
Boston, MA 02109-3912

Copy, including 40 C.F.R.
Part 22, 312 ERP, and 313 ERP
(Certified Mail, Return Receipt
Requested):

Ghislain Levesque, General Manager
Cascades Boxboard Group –
Connecticut LLC
130 Inland Road
Versailles, CT 06383

Dated: Sept. 23, 2010


Christine Foot, Enforcement Counsel
Office of Environmental Stewardship
U.S. Environmental Protection Agency, Region 1
5 Post Office Square, Suite 100
Mail Code OES04-2
Boston, MA 02109-3912