



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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November 4, 2022

Shawn Thomas Wood, VP Operations Manager  
Georgia-Pacific Consumer Operations LLC  
401 NE Adams Street  
Camas, Washington 98607

**Re: Georgia Pacific Camas Draft Remedial Investigation Work Plan Review**

Dear Shawn Thomas Wood:

The Washington State Department of Ecology (Ecology) is working with Georgia Pacific Consumer Operations LLC (GP) to investigate the Georgia Pacific Camas mill site (Site) located in Camas, Washington. This investigation is being performed by GP under Agreed Order No. 18201 (Order) and pursuant to Chapter 70.105D RCW, Model Toxics Control Act.

Under the Order GP was required to prepare and submit a Draft Remedial Investigation Work Plan (RI Work Plan) according to Exhibit B "Scope of Work and Schedule" for the Site. Ecology received the Draft RI Work Plan on January 3, 2022.

Ecology has reviewed the Draft RI Work Plan and considered input received from the Downtown Camas Association Community Advisory Group (DCA) and the Yakama Nation. Based on review of the Draft RI Work Plan, Ecology believes that additional work is needed to adequately define the nature and extent of contamination at the Site.

The Yakama Nation's comments are provided in the attached memorandum dated October 13, 2022 from Roche Mere. Ecology has attached the RI Work Plan with comments highlighted in the document, but brings to attention the following major data gaps:

- Several areas deemed inaccessible by GP appear to be accessible. Please re-evaluate the accessibility of these areas and if still determined inaccessible, provide further explanation. For areas that are inaccessible, include available information that will be used to inform future investigations once accessible.
- A more in-depth look into the site history and history of contamination is necessary. Include a history of pollution control measures that were implemented at the site, including, but not limited to, wastewater and stormwater practices and discharges, air quality emissions and controls, waste management, etc. More information is also needed about potential sources of contamination throughout the entire site.

- Sediments need to be included in the RI Work Plan.
- The current sampling locations and associated constituents need to be expanded to include the full list of constituents of potential concern (COPCs) and needs to use a more comprehensive site-wide systematic sampling approach to properly characterize the extent of contamination. This sampling plan needs to include Lady Island.
- Additional information regarding hazardous waste management (satellite accumulation areas, 90/180-day storage areas, historical accumulation) should be included in the RI Work Plan. Potential COPCs should be identified.

It is important to note that the Quality Assurance Project Plan (QAPP) and Sampling and Analysis Plan (SAP) were not included in this review. Ecology plans to review both the QAPP and the SAP during the next review of the RI Work Plan.

If you have questions about this letter or the attached comments, please contact me at [mady.lyon@ecy.wa.gov](mailto:mady.lyon@ecy.wa.gov) or (360) 628-3250.

Sincerely,

A handwritten signature in cursive script that reads "Mady Lyon".

Mady Lyon  
Industrial Engineer  
Solid Waste Management Program

Enclosures

cc: Matt Tiller  
Caleigh Belkoff  
Elena Ramirez Groszowski  
Rose Longoria