

Public Participation in the Georgia-Pacific Mill Site Clean Up Project

Community Advisory Group

Meeting #2 agenda

Thursday, February 10, 2022: 4 – 5:30 p.m.

Online meeting:

<https://us02web.zoom.us/j/84510922987?pwd=aWY5Q0Y0U3UwQzRsaS9EVDVOTjJsUT09>

Meeting ID: 845 1092 2987

Call-in: +1 253 215 8782

Meeting objectives

- Review and approve Community Advisory Group (CAG) Charter
- Review and approve Public Involvement Plan
- Review and discuss the Remedial Investigation Work Plan comment summary
- Discuss next steps

Time	Agenda item	Presenter
4 p.m.	Opening <ul style="list-style-type: none"> • Welcome and introductions • Agenda review • Approve minutes of the Jan. 13, 2022, meeting • General updates 	Will Henderson , Facilitator, MFA CAG members
4:15 p.m.	Review updates to the CAG Charter and Public Involvement Plan	Abbi Russell , Facilitator, MFA CAG members
4:30 p.m.	Review Draft Remedial Investigation (RI) Work Plan <ul style="list-style-type: none"> • Draft RI Work Plan overview • Review and discuss draft RI Work Plan comment summary 	Alan Hughes , Principal Geologist, MFA Emily Hess , Hydrogeologist, MFA Will Henderson , Facilitator, MFA CAG members
4:55 p.m.	Break	All
5:00 p.m.	Review Draft Remedial Investigation (RI) Work Plan (cont.) <ul style="list-style-type: none"> • Review and discuss draft RI Work Plan comment summary • Timeline and next steps 	Alan Hughes , Principal Geologist, MFA Emily Hess , Hydrogeologist, MFA Will Henderson , Facilitator, MFA CAG members
5:25 p.m.	Next steps	Will Henderson , Facilitator, MFA
5:30 p.m.	Adjourn	

Public Participation in the Georgia-Pacific Mill Site Clean Up Project

Community Advisory Group

Community Advisory Group Members	Technical Team
Caroline Mercury, Chair and Downtown Camas Association Past President	Carrie Schulstad, Executive Director, Downtown Camas Association
April Berlin, Community Member	Will Henderson, Maul Foster & Alongi
Marquita Call, Community Member	Emily Hess, Maul Foster & Alongi
Kalani Cox, Community Member	Alan Hughes, Maul Foster & Alongi
Isaac Dizon, Community Member	Makenzie "ZZ" Lundburg, Maul Foster & Alongi
Randal Friedman, Community Member	Abbi Russell, Maul Foster & Alongi
Tim Hein, City of Camas	
Leslie Lewallen, City of Camas	
Mark Nickerson, Community Member	
David Ripp, Port of Camas-Washougal	
Marty Snell, Community Member	
Steve Young, Community Member	

Downtown Camas Association – Public Participation in the Georgia-Pacific Mill Site Clean Up Project



Meeting minutes: Community Advisory Group Meeting #1

Thursday, January 13, 2022 | 4 – 5:30 p.m.

Meeting Attendees

Community Advisory Group (CAG) Members:

- Caroline Mercury, Chair
- Isaac Dizon
- Leslie Lewallen, City of Camas
- Marty Snell
- April Berlin
- Randal Friedman
- David Ripp, Port of Camas-Washougal
- Tim Hein, City of Camas
- Mark Nickerson
- Steve Young

Maul, Foster & Alongi (MFA) Members:

- Alan Hughes
- Will Henderson
- Emily Hess
- Abbi Russell
- ZZ Lundburg

Downtown Camas Association (DCA) Members:

- Carrie Schulstad, Executive Director

Meeting Purpose and Topics:

Meeting objectives included:

- Orient the CAG to the Georgia-Pacific Mill Site Clean Up Project
- Review and approve CAG charter
- Review and discuss Public Involvement Plan
- Discuss next steps
- **Opening:** 4 – 4:15 p.m.
 - Welcome and introductions
 - Agenda review
- **Georgia Pacific Mill Site Clean Up Project:** 4:15 – 4:25 p.m.
 - Project overview
 - Timeline
- **CAG Charter:** 4:25 – 4:55 p.m.
 - Vision

- Goals
- Outcomes
- **Break:** 4:55 – 5:00 p.m.
- **Public Involvement Plan:** 5:00 – 5:25 p.m.
 - Goals
 - Audiences
 - Key messages
 - Timeline
- **Next steps:** 5:25 – 5:30 p.m.
- **Adjourn:** 5:30 p.m.

[The full meeting agenda can be found online.](#)

Meeting Minutes:

Meeting began at 4:00 pm.

MFA staff, DCA and CAG members introduced themselves and reviewed the proposed agenda for the meeting.

General Project Overview: Alan Hughes, MFA, presented the project overview and showed a map of the GP Mill site from the Draft RI workplan map. He went on to explain a general overview of the project starting with a description of the workplan and the reason. The Agreed Order is a formal agreement between GP and the Washington Dept. of Ecology (Ecology) that sets the stage for contamination investigation and clean up. Ecology will act as the regulatory body and oversee each step and the public will have the opportunity to provide input. Ecology is funding a public participation through the DCA to support these efforts.

Hughes explained the project is needed because GP has been operating a large facility and there is potential for contamination. The current scope of the RI focuses in the property boundaries. The focus from the Agreed Order will be GP investigating and collecting samples of soil, sediment, water, or other various media with potential contamination. They compare concentration levels to regulatory criteria for potential human and environmental risk. Timing varies greatly and we are in the early stages of this process. To manage expectations, it is important to note that the range of timeline is quite large and could potentially take a number of years to complete.

CAG Member Steve Young, asked if they would have the opportunity to review the work plan to ensure that known or suspected contamination areas are being evaluated. Hughes responded that the RI work plan is on the Ecology website, they have a table of listed suspected release points.

CAG Member Randal Friedman asked about the investigation's footprint and if it has been finalized. Hughes responded that the RI work plan has identified investigation locations that are limited to inside the property boundary, however more testing will be done to see if that is the extent of contamination has been defined. David Ripp asked for confirmation on if the boundary

will change if there is a quantified need. Hughes confirmed and said that the extent is not defined, the investigation would need to go beyond the current boundary of the proposed investigation, such as in the sediments abutting the property.

CAG Member Issac Dizon asked if by sediment that meant the river. Hughes confirmed that yes, it refers to the slough between the GP mill and Lady Island.

CAG Charter Review: Abbi Russell, MFA, presented the basics of a group charter as well as a public involvement plan (PIP). She explained that the charter gives the group goals, ideals, and outcomes to adhere to and provides structure. She continued to explain that a PIP tells us why we are doing public involvement, who to involve, how we are inclusive and effective ways to talk about the project. It is a living document that changes and grows as the engagement and group does. She expressed that the CAG brings unique knowledge, values and local awareness and will lead the goals, outcome, and vision.

Using a Mural Dashboard, the CAG members discussed the goals, outcome, and vision to be incorporated into the PIP.

Vision: What will the Camas Community be/look like because of this group's work?

CAG Input:

- Ensuring we hear from all members of the community with DEI in mind.
- A key interest would be selecting a vision or visions of the future uses of mill, CRD, or Lady Island property. The vision will drive the methods and endpoints of the clean-up project.
- Community to be comfortable with result in terms of safety and ability to be further developed
- Inform community and viewing the future - plan, vision and layout the highest and best use - understanding what that looks like
- Understanding a range of possibilities - no stone unturned, as we move forward - ability to be adaptive
- Include protective measures and awareness of climate change effects
- Engaging the City of Camas and a partner in clean-up and vision - Layers of involvement
- Enrich the Camas/Wash communities rather than diminish existing – reinvention
- Pride and Connection to our past, the industry of our town - not lose sight of our history
- Economic/ Residential/ Recreation etc - Multi-use space - What can the waterfront of the Columbia be?
- Comprehensive Waterfront Access Opportunity
- Living in harmony with wildlife
- Mill Cleaned-Up to higher level than current use

Goals: What goals do you envision for the CAG? What do you want to accomplish as a group?

CAG Input:

- Translating complex and comprehensive technical information to the layperson (including me).

- Involvement with community
- Include, Connect, Inform
- Resiliency for site and community
- Purpose and People in mind - placemaking in the forefront
- Focus on what people need, want, and require
- Thoughtful about current downtown and future - robust chance to be a part of that, inclusivity, and community building
- Big Picture Benefits & Forward thinking (Puzzle Piece - Ability to be Complimentary to existing land)
- Reflects the range and depth of public response and opinion purposefully

Outcomes: The process will be considered a success if...?

CAG Input:

- Property can accommodate the vision
- Camas as a leader in best practices on the process of transitioning an industrial site to future use
- Community aligned with the result/feel heard, represented and seen
- Camas as a west coast bucket list destination
- Inclusivity in community and stakeholder groups opinions and needs
- Community understands potential
- Education opportunities for environmental
- Tied to downtown
- Compliment community and Washougal
- Everyone is involved, informed and aware

The group took a 5-minute break at 4:57.

Public Participation Plan: MFA staff, CAG and DCA members were split into three break-out rooms to discuss goals, audiences, key messages, and overall timeline.

After 15 minutes, at 5:25 the group reconvened to present their discussions.

Group One: Tim Hein presented for his group. Group one discussed their hopes that the community will be providing as well as receiving information from a variety of sources. They want information to be found at meetings, the farmer's market, and other public places. Everything should also be consistent and connected while appearing online, printed and in other forms. They also noted that it is important for the community to understand that this is a lengthy process and want to ensure that there is a dialogue between all parties.

Group Two: Carrie Schulstad presented for her group. Group two discussed having a variety of options for the public to be engaged. They acknowledged that people will have a range of investments and hope to provide interactive engagement and social opportunities rather than just purely informational. They'd also like to ensure that the whole community knows that the DCA website is a hub for all the information regarding the GP Mill site remediation and future public visioning input. The website should be consistent, thorough, and timely. Regarding audience, the group discussed they want to reach folks from kindergarteners to the elderly. Local School District involvement was also highlighted, as the kids of today will be the ones

reaping the benefits of this project in years to come. The message to the public should be that every voice is important that the DCA wants to highlight that they are listening to all voices to make sure that the needs of the entire community are being relayed to Ecology.

Group Three: Caroline Mercury presented for her group. Group three discussed the need to convey the answers to two questions: “Why should the public care?” and “Why now?” The group acknowledges that there won’t be much to report regarding GP work as the current phase is mostly strategy, planning and testing. Instead, they hope to bring a bit more clarity to the site as far as its history, operations and what’s been going on over the years. Group three also mentioned that they would like to involve the library as they have such a strong connection to the community. They also want to address and incorporate the impact on wildlife and environmental impacts. For the DCA website, they discussed tactics to drive traffic to the site so that folks get used to turning there for information, updates, and announcements. They also highlighted their understanding that no clean up will be happening in this stage of the process and the importance of repeating that to the public.

Next Steps: Will Henderson, MFA, wrapped up the meeting and went over next steps:

- Incorporating notes into the CAG charter
- Incorporating notes into Public Participation Plan
- Next CAG Meeting: February 10th, 2022
 - o They will meet as a group and discuss their reviews of the RI plan and public comments

Meeting adjourned at 5:30 pm.

CONTACT INFORMATION AND RESOURCES

Sign up for email updates and learn more at: www.downtowncamas.com/camaswamillinfo

Email questions and comments to Caroline Mercury, DCA Past President:
camaswamillinfo@downtowncamas.com

Read and review the draft Remedial Investigation Work Plan:
<https://apps.ecology.wa.gov/gsp/Sitepage.aspx?%20csid=15156>

Community Advisory Group Charter

DRAFT – January 25, 2022

Purpose and Responsibilities

The purpose of the Downtown Camas Association Community Advisory Group (CAG) is to facilitate community involvement in the Georgia-Pacific (GP) Mill Site Cleanup planning. Between January 1, 2022, and June 30, 2023, the CAG will:

1. Supervise the work of the DCA's public involvement and technical consultant, Maul Foster & Alongi (MFA).
2. Provide broad community outreach and encourage opportunities for public involvement in the cleanup plan process.
3. With the consultant's assistance, review technical materials and respond to the Washington State Department of Ecology (Ecology) regarding the site investigation, cleanup planning process, findings, and plans.

MFA will support the DCA and the CAG with:

1. CAG meeting operations and facilitation.
2. CAG meeting agendas and minutes.
3. Public engagement related to the Ecology cleanup process milestones and other relevant community events.
4. Review and recommendations for technical documents associated with this process.

Vision

As a result of our entire community's involvement in this process, the mill site will be cleaned up to a level that supports the future uses desired by the community as a whole. It will serve the needs of the community and reflect the sense of pride, enrichment and resilience for which Camas is known. It will be accessible to all: residents and visitors alike.

Goals

1. Inclusive, connective, informative public engagement that translates the process for everyone in accessible and meaningful ways.
2. Informed, community-centric feedback to GP through Ecology.
3. Environmental cleanup plans that reflect the community's needs, wants, and requirements for the future of the mill site and the community at large.
4. Set the stage for future redevelopment that puts purpose and people first, lives in harmony with the natural environment, and provides innovative benefits to the entire region.

Community Advisory Group Charter

Outcomes

The process will be considered a success if:

1. People in every corner of the community are aware of the DCA's project and the Ecology process and know how they can participate.
2. The community feels heard and represented in the cleanup plans and eventual outcome.
3. The property can accommodate the vision of Camas as a growing, thriving, connected and resilient community and a leader in the region.
4. The Camas area is a destination that attracts locals as well as regional visitors.

Structure and Operating Procedures

Members

The following members, except for the chair, were selected through a competitive process and at the discretion of the DCA. The DCA has the sole power to appoint or remove CAG members. Members shall serve during the Ecology Public Participation Grant period, which ends June 30, 2023.

- **Chair:** Caroline Mercury, DCA Past President
- April Berlin, Community Member
- Marquita Call, Community Member
- Kalani Cox, Community Member
- Isaac Dizon, Community Member
- Randal Friedman, Community Member
- Tim Hein, City of Camas
- Leslie Lewallen, City of Camas
- Mark Nickerson, Community Member
- David Ripp, Port of Camas-Washougal
- Marty Snell, Community Member
- Steve Young, Community Member

Meetings

The CAG is expected to meet every other month between January 1, 2022, through June 30, 2023. Meetings will be 90 minutes in duration and held virtually via an open-access platform such as Zoom or Microsoft Teams. The CAG must have a quorum to conduct the business of the group. A quorum is defined in this charter as greater than 50% of the members in attendance in a meeting. For this 12-member group, seven or more members must be present.

All committee meetings will be open to the public. Meetings will be announced and agendas provided via the DCA's project website, www.downtowncamas.com/CamasWaMillInfo, two

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Community Advisory Group Charter

working days in advance of each meeting. Meeting minutes and related documents will also be provided on this website for public access and transparency.

Decision-making will be based on a consensus model that promotes collaboration, cooperation, equality of input, inclusion, and participation. CAG members should:

- Contribute to shared ideas and shape them into decisions that, to the extent possible, reflect the concerns of all members.
- Strive to reach the best possible decision for the entire group rather than competing for personal preferences.
- Afford equal opportunity to other members' ideas and input, and how they may shape a decision.
- Include as much stakeholder input into the decision-making process as possible within the process and CAG scope and timeframe.
- Actively participate and solicit the input and participation of other members, stakeholders, and the community.

Authority and Limitations

The CAG has the following authority under this charter:

1. Oversee the work of MFA within the approved scope of work and Ecology grant agreement with the DCA.
2. Represent the CAG and its work in the community and in public engagement events.
3. As a quorum, provide the CAG's approved comments on technical aspects of the project to Ecology.

CAG members do not have the authority to:

1. Individually direct the DCA or MFA; oversight and direction must be provided by a quorum of committee members.
2. Individually represent the CAG to the news media or in project-related meetings with stakeholders or community partners.
3. Sign documents on behalf of this project or on behalf of the DCA.
4. Incur fees or spend funds as part of this project or on behalf of the DCA.

Communications Protocol

Each CAG member agrees to follow this communications protocol:

- Each member will send communications with MFA staff through Chair Caroline Mercury and DCA Executive Director Carrie Schulstad.

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Community Advisory Group Charter

- Each member is responsible for contacting Chair Mercury and Director Schulstad on any issues that arise.
- Each member is responsible for using agreed-upon, pre-approved key messages when discussing the project in public discussions, such as during community conversations and outreach events.
- **Requests for information from the news media and stakeholders/community partners** will be referred to Chair Mercury as the CAG spokesperson. Chair Mercury will coordinate with DCA Director Schulstad as necessary, depending on the content of the request.
- Abbi Russell or Alan Hughes will serve as the primary MFA points of contact for all project communication.
- Some decisions will require immediate action. MFA staff will contact Chair Mercury and/or DCA Director Schulstad in advance of acting. Chair Mercury/Director Schulstad may contact CAG members or direct MFA to contact CAG members.

Other documents that support this Communications Protocol include:

- MFA scope of work
- Communications and public involvement plan

In signing this Charter, we commit to following these guidelines and supporting this effort with participation and leadership.

Signatures:



Downtown Camas Association – GP Mill Clean Up Public Participation

Communications and public involvement plan

DRAFT – January 25, 2022

Project background

More than a century of industrial activity at the Georgia-Pacific (GP) paper mill in Camas has led to potential contamination in soil, sediments, and groundwater in and around the mill. Contamination could have occurred due to regular operations, spills, or leaks. In August 2021, The Washington State Department of Ecology (Ecology) and GP issued an Agreed Order to investigate potential contamination and evaluate how to clean it up when that becomes necessary. GP will conduct cleanup activities in accordance with Ecology's Toxic Cleanup Program statutes and regulations in a timeframe determined by Ecology. GP has not communicated any plans to stop operations at the mill; it continues to be an active paper mill employing people in Camas.

Through a 2021 Public Participation Grant, the Downtown Camas Association (DCA) will engage and advise the community about this process over the next few years. The DCA's goal is to provide the public with regular opportunities to learn about the investigation and cleanup planning and have input on this process to better inform Ecology of the community's desired outcome. The DCA will engage community members through a variety of communication tools and events to help inform the people about the process and findings. The DCA also hopes to ensure broad feedback to Ecology throughout the investigation and cleanup planning process.

As a part of the public participation process, the DCA has convened a Community Advisory Group (CAG) to get the community involved early in the proposed remedial investigation plan that GP will implement over the coming years. The CAG will convene on a bi-monthly basis and its role is to:

- Supervise the DCA's public involvement consultant's work
- Provide recommendations on community outreach strategies
- Encourage opportunities for public involvement in the cleanup process
- Review technical materials and respond to Ecology and GP regarding the sampling and cleanup planning process, findings, and resulting plans.

Through the CAG's work, the community will have opportunities to see and understand plans for cleanup and provide input on them through public meetings and communications.

Public participation goals

- Reach and engage the entire community generally, and particularly those who may be highly impacted by potential contamination and remediation.



Downtown Camas Association – GP Mill Clean Up Public Participation

Communications and public involvement plan

DRAFT – January 25, 2022

- Meet community members where they are when engaging and informing the public about the cleanup process and overall vision; provide opportunities to engage through a variety of different means and methods.
- Provide technical information in an accessible and approachable way.
- Ensure that the Camas community is invested and feels ownership around decisions relating to the future of the mill site.
- Provide updates to the community on a regular basis to help ensure transparency throughout the cleanup planning process.
- Manage expectations about the length and complexity of this process and when the community can expect to see cleanup activities begin.
- Build a foundation for continued communications and public involvement throughout the multiyear cleanup process.

Audiences

- Cities of Camas and Washougal
- Port of Camas-Washougal
- Camas School District
- Camas Public Library
- Clark County
- Local and state elected officials
 - City councils
 - County council
 - Sen. Ann Rivers
 - Rep. Brandon Vick
 - Rep. Larry Hoff
- Tribes with Usual and Accustomed Lands and/or interest in the site
 - Chinook
 - Cowlitz
 - Grand Ronde
 - Nez Perce
 - Quinault
 - Umatilla



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Communications and public involvement plan

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- Yakama
- Camas and Washougal communities
- Neighboring residents and businesses near the mill
- Local Georgia Pacific contacts
- Interested community leaders/groups
- Community organizations
 - SW WA League of United Latin American Citizens: Diana Perez, roseprez13@gmail.com
 - Pacific Islander Community Association of WA: layla@picawa.org (SW WA Director)
 - Washington State Commission on Asian American Affairs (No SW WA Commissioner)
 - Business associations (e.g., Hispanic Metro Chamber, Camas-Washougal Chamber of Commerce)
 - Environmental organizations
- Homeowners and neighborhood associations
- Columbia River Economic Development Council
- Washington State Department of Transportation
- Regional Transportation Council

Key messages

- The DCA's grant and the CAG's work are to translate technical information and involve the community in the process to plan for future cleanup of the Georgia Pacific (GP) pulp and paper mill site in Camas. Georgia Pacific has not communicated any plans to stop operations at the mill; it continues to be an active paper mill employing people in Camas and continues to be an important part of our local culture and economy.
- More than a century of industrial activity at the mill has led to potential contamination in soil, sediments, and groundwater in and around the mill.
- GP will conduct the cleanup activities in accordance with the Ecology's Toxic Cleanup Program's statutes and regulations. Investigation and cleanup is a lengthy and involved process that will take place over several years.



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Communications and public involvement plan

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- Community involvement is crucial in ensuring that the cleanup and any future redevelopment process takes into consideration the requirements and needs of the Camas community.
- There are many different opportunities to engage with and participate in the cleanup process. Members of the public will be able to attend public meetings and events, receive email notifications, visit the regularly updated project website, and receive updates via mail.
- Camas has been a mill town for many generations. We'll always be a mill town at heart. As our community changes, we have an extraordinary chance to shape our future for generations to come.
- The process will take many years of working together, and we need our entire community to participate with us and be invested in shaping this opportunity and its outcomes.
- The DCA's website, www.downtowncamas.com/CamasWaMillInfo, is your go-to place for information related to this process. Visit the site and watch DCA's Facebook account for updates and event announcements.
- You can also visit Ecology's site for info on the site and process: <https://apps.ecology.wa.gov/gsp/Sitepage.aspx?csid=15156>.

Timeline

- Ecology process milestones
 - **Jan. 7, 2022** – GP submits draft RI Work Plan to Ecology for review
- CAG meetings
 - Every other month starting January 2022
- Public involvement events
 - **Spring 2022 and 2023** – DCA open houses re: process, resources, timeline, public involvement
- Options for community events
 - DCA First Fridays each month
 - City of Camas events
 - **May 7, 2022** – DCA Plant Fair
 - **June 1 – Sept. 28, 2022** – Camas Farmers' Market
 - **June 25, 2022** – DCA Camas Car Show



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Communications and public involvement plan

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- **July 22 – 23, 2022** – Camas-Washougal Chamber Camas Days
- **December 2022** – Port of Camas-Washougal Christmas Ships viewing (if indoors/in person)
- **December 2022** – City of Camas Hometown Holidays
- **2023** – TBD

Tools, timing, and roles

This table outlines tools the DCA and MFA are scoped to provide under the Public Participation Grant and MFA’s scope of work, and general timing. However, public engagement is a fluid endeavor, and this may change as the project progresses. To the extent possible, community engagement will be integrated into DCA’s events and other local events to reduce costs and maximize engagement by meeting the community where they already are.

The CAG has a role with many of these tools, particularly in advising on and attending community events and sharing collateral materials.

Tool	Qty	Timing	Content lead	Implementation lead
CAG meetings	12	Jan. 2022 – June 2023	MFA/DCA	MFA/DCA
Project web page	1	October 2021	MFA/DCA	DCA
News releases	4	Oct. 2021 – June 2023	MFA	DCA
Stakeholder emails	12	Dec. 2021 – June 2023	MFA	DCA
Rack card	1	Early 2022	MFA	DCA
Displays	6	Summer 2022	MFA	DCA
Community events	4	Jan. 2022 – June 2023	Varies	MFA/DCA
Digital or print ads	2	TBD	MFA	DCA
Mailers	2	TBD	MFA	DCA
Fact sheet	1	TBD	MFA	DCA



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Communications and public involvement plan

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Measuring success

Some of the tactics included in this plan can be measured with numbers and some are more qualitative. The plan includes driving traffic to the DCA’s website as a hub of information and recognizes that non-digital tactics—though harder to measure—play an important role in public engagement, too. Both types of tactics provide information that can be reported to Ecology, as stipulated in the grant agreement.

Goals listed below are for the life of the project (January 2022 – June 2023).

Tool	Metrics	Goals	Oversight
Web page	Page views/time on page	5,000 total page views/5-minute average time on page	DCA
Facebook	Engagement	Reach at least 2,250 people with informational posts	DCA
Digital ads	Click through rate	0.09% (industry standard)	DCA/digital firm, if used
Email updates	Open rate/click rate	29% / 2.7% (industry standard)	DCA
Community events	Attendance	Interact with 20% of total attendees	MFA
Public involvement during comment period(s)	Public comments	50 comments per event, submitted via all methods	MFA
Earned media	Amount/tone of coverage	Relatively broad, accurate, positive	DCA

REVIEW COMMENTS

DOCUMENT: Agency Review Draft Remedial Investigation Work Plan, Georgia Pacific Cama Pulp and Paper Mill
 REVIEWER: Community Advisory Group

DATE: February 4, 2022
 PAGE: 1 of 11
 PROJECT NO.: 2091.01.01

Comment No.	PDF Page & Section	Review Comments	CAG Theme
1	General	Existing environmental data and monitoring well logs are not included with the remedial investigation (RI) work plan. - Recommended the existing environmental data be provided as an attachment to the RI work plan as outlined in Exhibit B of the agreed order. In addition, also include well logs for all existing monitoring wells as an attachment to this work plan.	Work Plan Completeness
2	4/313 Table of Contents	There is no Acronyms and Abbreviations page in the document. - Including an Acronyms and Abbreviations page in the work plan may be beneficial to clearly define term use in the report.	General Formatting or Grammar Issue
3	5/313 (Section 1) & 84/313 (Figure 1)	Figure 1 identifies Site location. However, site appears limited to mill property boundary, not the Model Toxics Control Act (MTCOA) 173-340-200 definition of <i>any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, vessel, or aircraft; or any site or area where a hazardous substance, other than a consumer product in consumer use, has been deposited, stored, disposed of, or placed, or otherwise come to be located.</i> - Seems premature to define the extent of the Site with limited characterization. As data is collected for the RI to evaluate the nature and extent of contamination, the boundary of the Site will be defined and may extend beyond the property boundary.	MTCOA Regulations
4	5/313 (Section 1) & 85/313 (Figure 2)	Text indicates Figure 2 shows areas of the Site included in the RI scope of work (including Lady Island); however, extent of Figure 2 doesn't show Lady Island. - Recommend extending the view of Figure 2 to include Lady Island.	General Formatting or Grammar Issue
5	6/313 (Section 1.1)	The work plan and agreed order states that specific areas may be inaccessible and not allow for complete investigation/characterization/cleanup actions to occur at this time. The cleanup actions described shall be deferred for such locations until they become accessible through demolition or lack of activity. - Several references are made in the report about areas being inaccessible due to the density of structures and below-grade features (e.g., basements). Note that there are methods like air knife and limited access drilling rigs that assist with assessment in areas with access limitations. Conducting assessment activities in these areas early on in the RI process will help further the objective of defining the nature and extent of contamination at the Site. - Can a timeline of planned demolition activities anticipated for the Site be included in the work plan to provide an understanding of the assessment timeline.	Extent of Site

Comment No.	PDF Page & Section	Review Comments	CAG Theme
6	7/313 (Section 1.1.2)	<p>A statement is made that this work plan focuses on upland media (e.g., soil and groundwater). Other media (e.g., surface water and sediment) will be considered in the RI process, as appropriate, once upland conditions and associated potential migration pathways to these media are better understood. In addition, soil sampling is proposed for non-soluble chemicals of potential concern (COPCs) and groundwater monitoring is proposed for soluble COPC.</p> <ul style="list-style-type: none"> - As the nature and extent of the COPCs have not been defined for the Site analysis of soil and groundwater should include all COPCs and not segregate based on solubility. For example, per- and polyfluoroalkyl substances (PFAS) are not identified for any analyses in soil. If identified in groundwater, soil samples may help identify potential sources of groundwater impacts. The health and safety plan (HASP) in Appendix A also recognizes that non-soluble compounds may be present in groundwater (e.g., polychlorinated dibenzodioxin and polychlorinated dibenzofuran compounds [dioxins] and polychlorinated biphenyls [PCBs]). - Section 3 describes the potential for historical spills or stormwater discharge to the Camas Slough and Columbia River that may have discharged COPCs. Current national pollutant discharge elimination system monitoring will evaluate current conditions. It is recommended that sediment sampling is completed to evaluate nature and extent of COPCs and wood waste in sediment adjacent to the property. It is unclear from the RI work plan if wood waste could have accumulated in the Camas Slough, and if it has then it the extent should be characterized.¹ - The recommendation is made for deposition of contaminants related to air emissions to be considered during the RI in areas beyond the property boundary, in order to define the nature and extent of the Site. Common contaminants of concern related to air emissions from pulp and paper mills includes multiple COPCs. The dispersion of these contaminants is dependent on many factors, including emission stack heights and weather patterns. Air modeling and surface soil sampling would be beneficial to understand the potential extent of the site beyond the facility boundary. 	Extent of Site
7	13/313 (Section 3.1) 72/313 (Table 1)	<p>Two laboratory buildings were constructed in the 1950s at the Camas Business Center (CBC). These facilities became known as the Central Research Division in 1960. Research involved pesticides, energy production, crop yields, and synthetic pulp production. However, Table 1 (Summary of Operational Areas) does not list pesticides as a chemical of potential concern for the CBC area.</p> <ul style="list-style-type: none"> - Recommend researching types of pesticides researched as well as any other compounds used in these operations that should be COPCs and add those compounds for analyses to proposed sampling matrix for soil and groundwater samples collected in the vicinity of the CBC area. 	Consideration of COPCs

¹ Wood Water Cleanup, Guidance for implementing the cleanup provisions of the Sediment Management Standards, Chapter 173-204 WAC. Prepared by Washington State Department of Ecology. Publication 09-09-044. September 2013.

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8	13/313 (Section 3.1)	<p>The operational history is noted as the following: In 1885, mill operations at the Site were recognized as the first in the Pacific Northwest to produce wood pulp. Following a fire in 1886, the mill was rebuilt 2 years later with two paper machines. By 1906, the mill produced paper bags in the northern portion of the mill known as the Bag Factory. The mill expanded operations and by 1914 became one of the largest paper producers in the world.</p> <ul style="list-style-type: none"> - According to anecdotal information by a former employee, the history should reflect the following: The 1883 mill produced 4 tons per day of newsprint and a crude butcher paper from groundwood and rag stock. It was the first paper mill in the Washington Territory (<i>there were previous mills in what would become Oregon</i>). In 1888, the new mill (after the fire) pulped 2,000 cords of wood, 1,000 tons of straw, and burned 5,000 cords of wood to provide steam to heat the dryer drums. Over time the mill evolved into one of the largest specialty paper mills. At its peak, it could manufacture more than a thousand different grades of paper. 	Operations Accuracy
9	13/313 (Section 3.1)	<p>The work plan discusses the wastewater and stormwater treatment history. However, wastewater and stormwater management or where did it discharged prior to the 1950s when improvements were completed is not included in the work plan.</p> <ul style="list-style-type: none"> - Recommend adding the historical practices to the Work plan and evaluating areas that received historical discharge of wastewater and stormwater for persistent compounds (e.g., dioxins, PCBs, and metals). 	Extent of Site
10	13-17/313 (Section 3.2) Figure 5	<p>This section describes the paper making process.</p> <ul style="list-style-type: none"> - The process described in this section is only the most recent chemical pulping and bleaching process operated at the mill. From its very beginning until the 1960s, the mill produced groundwood pulp from spruce, alder, and cottonwood. Groundwood pulps are bleached with hydrosulfides (dithionates). - In the pulping discussion, this section ignores groundwood pumping. In addition, sulfite pulping was the was the second pulping process used at the mill. The sulfite process burns sulfur to form sulfur dioxide which is bubbled through a solution of lime water or magnesium hydroxide to produce a bisulfite cooking acid. - In the bleaching discussion, for most of its history, the sulfite bleach plant used elemental chlorine as a bleach agent followed by a hypochlorite stage (CH bleach sequence). - In the paper mill discussion, the finish provided to the paper machines contains, in addition to pulp, various additives such as alum, biocides, defoamer, dyes, fillers, pesticides, pigment, polymers, and wet strength agents, depending on the grade. Consider the chemicals that used in this process and evaluate is any should be added to the COPCs. 	Operations Accuracy
11	23/313 (Section 3.5.1.1.2)	<p>This section describes the dock warehouse.</p> <ul style="list-style-type: none"> - Additional information regarding this area is: Beginning in 1889 the mill began the transportation of goods and finished product from docks and warehouses on the Camas Slough. There were also piles of bulk materials such as lime and sulfur. The No. 3 Warehouse (current site of the waste receiving area just south of the railroad mainline), for example, was built on pilings over open water. Materials were moved to and from these warehouses by mule train, electric railroad (until 1982), and ultimately diesel tractor train. Over time much of the area south of the railroad mainline was filled. The potential exists that this was not clean material that was placed as fill and it is recommended for assessment. 	Operations Accuracy

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12	24/313 (Section 3.5.1.1.4) 79/313 Table 6	<p>The former Cat shop, electronic shop, and underground storage tanks included two underground storage tanks. One for gasoline and the other for degreaser solvent. Benzene, toluene, ethylbenzene, and xylenes (BTEX) is included in the analysis at this location.</p> <ul style="list-style-type: none"> - Recommend including analysis for the volatile organic compounds (VOC) suite of compounds as many degreasers contain other compounds such as tetrachloroethene and trichloroethene. Also recommend including metals analysis based on the historical uses in the area and gasoline products. 	Consideration of COPCs
13	27/313 (Section 3.5.2.1.2)	<p>Footnote to this section notes that following spills documented in Appendix A of the agreed order occurred in the Black Liquor area: 10 October 2014, 21 April 2014, 18 September 2012, 26 August 2011, 22 September 2002, 2 August 2001, 15 May 2001, 7 July 2000, 8 May 2000, 7 December 1998, and 22 October 1997.</p> <ul style="list-style-type: none"> - Historic and significant releases at the Site that were reported to Ecology are tabulated in Appendix A of the agreed order. The date of these tabulated spills ranges from 1997 to 2017. Is there documentation of spills that took place at the site prior to 1997 that are considered in this work plan? Considering mill operations at the site commenced circa 1883, there's a century of time where spills likely occurred that are not discussed in this report. Have employee interviews or facility records been reviewed to document spills during this period from the late 1800s to 1997 to inform sampling locations for the RI work plan, to the extent available? - Anecdotal information from former employees that indicate there are known spills and releases beyond those documented in the agreed order and RI work plan. In addition, there are likely unknown spills and releases. Therefore, sampling at the Site until the nature and extent is sufficiently characterized should include all COPCs. 	Completeness of Sampling
14	32/313 (Section 3.5.2.3.2)	<p>This section describes the Sulfite Pulp Bleaching.</p> <ul style="list-style-type: none"> - Chemicals used in this area also includes sodium hypochlorite. 	Operations Accuracy
15	General (Section 3)	<p>Descriptions of the locations used to take delivery, off-loading, handling, and storage of chemicals used in the processes at the facility are limited. Complete description would be beneficial as it relates to potential areas of concern.</p>	Operations Accuracy
16	35/313 (Section 3.5.2.4.3)	<p>This section describes the fuel oil day tank and notes there are no records of spills in this area.</p> <ul style="list-style-type: none"> - Per the public record the largest single oil spill in recent mill history occurred at the No. 1 Day Tank on November 16, 1989. The spill was caused by the failure of a gauge on a fuel oil heater line. When the gauge blew out approximately 2,300 gallons of No. 6 Fuel Oil sprayed beyond containment. Of this total about 5 gallons reached the Camas Slough through a storm drain. Corrective measures following the incident included replacing the failed gauge, improving containment, and connecting the storm drain to the process sewer so that it would receive both primary and secondary treatment. 	Operations Accuracy
17	40/313 (Section 3.5.3.2.1)	<p>This section describes the mill modernization debris area and states there are no known chemicals used for operations in this operational feature.</p> <ul style="list-style-type: none"> - According to anecdotal information from a former employee, prior to the demolition of the No. 3 Warehouse and the construction of the current waste receiving area, this location served as one of the waste receiving locations for the mill (primarily drums and tote bins). 	Operations Accuracy

Comment No.	PDF Page & Section	Review Comments	CAG Theme
18	40/313 (Section 3.5.3.2.1)	<p>During the Mill Modernization Project (1981 to 1984), soil and demolition debris from the former Sulfite Mill and Bag Factory underlie the asphalt cover used for vehicle parking. COPCs associated with debris underlying the asphalt surface include petroleum hydrocarbons, VOCs, semivolatle organic compounds (SVOCs), PCBs, dioxins, PFAS, and metals.</p> <ul style="list-style-type: none"> - Recommend adding hazardous building materials as COPCs if they were not evaluated at the time of demolition. 	Consideration of COPCs
19	41/313 (Section 3.5.3.2.3)	<p>This section describes the buried material area. It is noted that a waste incinerator was present in this area reportedly used to burn paper wastes generated at the mill.</p> <ul style="list-style-type: none"> - According to anecdotal information from a former employee, the incinerator was used to burn slabbed paper and mill trash. Also, non-combustible or poorly combustible solids such as metal, brick, parent rolls of dense or pesticide paper, ash, and other materials were buried. From time-to-time, high water in the Washougal River has exposed buried materials on the riverbank. 	Operations Accuracy
20	45/313 (Section 3.5.3.4.2)	<p>This section describes the effluent pump station area.</p> <ul style="list-style-type: none"> - According to anecdotal information from a former employee, prior to construction of the primary clarifier on Lady Island all mill wastewater (except spent calcium sulfite liquor after 1960) entered the Camas Slough from the Tailrace Sewer or the Blue Creek Outfall (located under the No. 9 Substation). This included spent pulping liquor, brown stock wash water, bleach plant effluent, paper machine wastewater, and boiler ash (both coal and wood ash). Blue Creek was reportedly named for the color created by bag plant press washups. 	Operations Accuracy
21	45/313 (Section 3.5.3.5)	<p>This section describes operational area C5: wooded area and states there are no historical or current operational activities, no known spills, and no known chemical usage in this area.</p> <ul style="list-style-type: none"> - According to anecdotal information from a former employee, during a multiagency environmental inspection, drums of various waste materials were discovered partially buried in the Wooded Area. They had been diverted from the Buried Material Area. The identified drums and the associated soil were excavated and disposed of off-site. However, a comprehensive evaluation of the site was not completed. 	Operations Accuracy
22	48/313 (Section 3.5.4.2)	<p>This section describes operational area D2: dredge spoils area, and notes the dredged materials are owned by the Army Corps of Engineers.</p> <ul style="list-style-type: none"> - Verify what is meant by this ownership. According to anecdotal information from a former employee, the Dredge Spoils Landfill was created to hold maintenance dredging materials excavated from mill- owned (at the time of dredging) underwater land located between the mill proper and Lady Island. This area should be characterized for COPCs. 	Operations Accuracy
23	52-54/313 (Section 4.1)	<p>The RI work plan indicates that the analytical results for soil, groundwater, and surface water will be compared to MTCA Method B cleanup levels and other applicable, relevant, and appropriate requirements as appropriate including ecological receptors.</p> <ul style="list-style-type: none"> - We acknowledge that screening will be to MTCA Method B cleanup levels and that Section 1 states that analytical data will be compared to MTCA cleanup levels for current and <i>planned future land use</i>. 	MTCA Regulations

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24	55/313 (Section 4.2)	<p>Prior to the completion of the 1950s wastewater treatment plant, direct discharge of wastewater and stormwater occurred to the Camas Slough.</p> <ul style="list-style-type: none"> - Recommend evaluating where these direct discharges were directed and handled, as well as including characterization for persistent COPCs. 	Extent of Site
25	58/313 (Section 5)	<p>The work plan focuses on assessing groundwater for soluble COPCs.</p> <ul style="list-style-type: none"> - Recommend assessing all COPCs in groundwater. With little characterization the fate and transport of COPCs in the water-bearing zone is difficult to predict. In addition, with the uncertainty of over a century of operations at the facility, the full extent of spills and releases is likely to be understood. A complete list of COPCs will provide more certainty to the extent of COPCs. 	Consideration of COPCs
26	58/313 (Section 5)	<p>The work plan focuses on assessing shallow soil for insoluble COPCs.</p> <ul style="list-style-type: none"> - Recommend assessing all COPCs to the depth they are present below the anticipated release mechanism (e.g., surface spill, underground storage tank release). In addition, with the uncertainty of over a century of operations at the facility the full extent of spills and releases is likely to be understood. A complete list of COPCs will provide more certainty to the extent of COPCs. 	Consideration of COPCs
27	60/313 (Section 5.3.1)	<p>The target depth for borings to install groundwater wells is 10 below the groundwater table.</p> <ul style="list-style-type: none"> - The COPCs include compounds that in the non-aqueous phase liquid that are lighter than water and float and some that are denser than water and sink. Placement of well screens and groundwater sampling depths should take this into account to allow collection of groundwater representative of COPCs. 	Approach
28	63/313 (Section 5.5)	<p>The statement is made that the agreed order includes sampling and analysis of the following media: seeps, surface and subsurface sediments, and stormwater and catch basin solids. As stated in Section 3.4, routine inspection and/or monitoring of seeps, sediment, and stormwater occurs as part of existing monitoring programs and therefore, no additional sampling of these media is proposed.</p> <ul style="list-style-type: none"> - While recognized that the current programs monitor these media, it is unclear if the programs monitor for all COPCs identified for the site. 	Consideration of Media
29	71/313 (Table 1)	<p>Table 1 provides COPCs associated with various operations areas and features.</p> <ul style="list-style-type: none"> - OA-B2 Powerhouse: Since fuels such as coal and wood were burned in the area the COPCs (chemicals of potential concern) should include PAHs (poly aromatic hydrocarbons). - OA-C2 Buried Material Area. Incinerator ash and miscellaneous inert wastes were buried here. Some suggested COPCs would include asbestos and PAHs. - OA-C3 Car Barn/Paint Shop: This area was used to sandblast equipment before coating. The COPCs should include metals. - OA-C5 Wooded Area: A screening study should be conducted in this area due to the discovery of previous contamination. Suggested COPCs include total petroleum hydrocarbons (TPH), PCBs, and metals. 	Consideration of COPCs

Comment No.	PDF Page & Section	Review Comments	CAG Theme
30	73/313 (Table 2)	<p>Table 2 provides a summary of previous sampling and cleanup activities.</p> <ul style="list-style-type: none"> - Recommend adding data from these previous sampling and cleanup efforts to an appendix of the RI work plan to understand the body of analytical data that already exists for the site, per the agreed order. 	Completeness of the RI Work Plan
31	75/313 (Table 3)	<p>Pesticides misspelled under Wastewater Effluent—Monitored Parameters/Activities as “Petsticides.”</p> <ul style="list-style-type: none"> - Recommend correcting the spelling. 	General Formatting or Grammar Issue
32	76/313 (Table 4)	<p>In Table 4, the table notes the data gap includes presence of soluble COPC(s) in groundwater and presence of insoluble COPC(s) in soil.</p> <ul style="list-style-type: none"> - These terms do not appear to be defined in the work plan, beyond identifying PCBs as an insoluble COPC. Recommend defining these terms so it is known what is considered a soluble COPC for groundwater and insoluble COPC for soil. Furthermore, until the nature and extent of contamination is sufficiently characterized, segregation of soil- and groundwater-specific COPCs by solubility is not recommended. 	Clarification of Term
33	76/313 (Table 4)	<p>In Table 4, there are locations where the proposed scope indicates “visual inspection; surface soil sampling if observed potential spill.”</p> <ul style="list-style-type: none"> - Recommend sampling and analysis be performed in these areas regardless if visual inspection indicates potential spill. With the longevity of use, past spills may no longer be visible. 	Approach
34	80/313 (Table 6)	<p>In Table 6: Note (d) indicates groundwater analysis for PFAS proposed in areas where PFAS was used in operations (Paper Treatment Operational Feature). PFAS analysis may also be proposed for upgradient/downgradient wells.</p> <ul style="list-style-type: none"> - Ecology's PFAS Chemical Action Plan published in November 2021 indicates North American Industry Classification System Codes of industries likely to use PFAS includes paper mills and pulp mills. Recommend sampling all groundwater samples for PFAS for complete characterization of potential PFAS impacts at the site, given site operations being linked to the potential for PFAS chemicals. 	Consideration of COPCs

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35	80/313 (Table 6)	<p>In Table 6: Note (f) indicates groundwater analysis of metals proposed in areas where there are suspected buried materials or where process wastewater contacted bare ground (e.g., at the effluent pump station or former wastewater ditches). Metals analysis will include at least arsenic, lead, and copper at a minimum. Metals analysis may also be proposed for upgradient/downgradient wells. The Lady Island Landfill (LILF) permit includes a specific list of metals for analysis at the existing LILF monitoring wells.</p> <p>Note (g) indicates groundwater analysis of VOCs proposed in areas where fuel oil or solvents were used or stored. VOCs analysis may also be proposed for upgradient/downgradient wells.</p> <p>Note (h) indicates groundwater analysis of SVOCs proposed in areas where there are suspected buried materials. SVOCs analysis may also be proposed for upgradient/downgradient wells.</p> <ul style="list-style-type: none"> - Verify what the complete analyte suite will be for each analyte group. Specifically for metals, verify whether sample analysis will be for total or dissolved (field filtered) metals and if the analyte suite will vary by location. Also, will SVOC and VOC analysis include tentatively identified compounds? For all analytes, please include a table that shows the method reporting limits, per the contracted laboratory, in comparison to applicable screening level values. 	Completeness of Sampling
36	80/313 (Table 6)	<p>In Table 6: Note (l) indicates LILF permit parameters also includes alkalinity, ammonia, biological oxygen demand, bicarbonate, carbonate, chemical oxygen demand, chloride, conductivity, nitrate, sulfate, total dissolved solids, total organic carbon, and dissolved metals. The proposed additional sampling for LILF as part of the RI work plan is limited to PFAS at two of five locations and metals.</p> <ul style="list-style-type: none"> - Because the LILF Permit Parameters and the proposed additional analytes does not include all COPCs of the site, consider adding these. 	Consideration of COPCs
37	80/313 (Table 6)	<p>In Table 6: Note (m) indicates groundwater samples from CBC existing monitoring wells that are being analyzed for VOCs will be analyzed for tetrachloroethylene (PCE), trichloroethylene (TCE), 1,1,1-trichloroethane, 1,1-dichloroethene, and cis-1,2-DCE.</p> <ul style="list-style-type: none"> - Because vinyl chloride is a natural degradation product of chlorinated solvents such as PCE, consider adding it to the VOC suite. 	Consideration of COPCs
38	80/313 (Table 6) 173/313 (Table 1)	<p>In Table 6, only "soluble" chemicals are being analyzed for in groundwater. Therefore, Dioxins and PCBs are excluded. However, Table 1 of the HASP notes that dioxins and PCBs are potential chemicals present in groundwater monitoring samples.</p> <ul style="list-style-type: none"> - Consider adding dioxins and PCBs to groundwater samples given the HASP acknowledges they may be present in groundwater and that the nature and extent of the site has not been sufficiently defined to eliminate COPCs. 	Consideration of COPCs

Comment No.	PDF Page & Section	Review Comments	CAG Theme
39	81/313 (Table 7)	<p>In Table 7: Proposed soil sampling proximal to hydraulic fluid aboveground storage tanks and documented lube oil releases at the First Woodmill and Wood Chip Piles is limited to TPH, BTEX, pH, and PCBs.</p> <p>Proposed soil sampling proximal to documented diesel spill at the Second Woodmill is limited to TPH, BTEX, and pH.</p> <p>Proposed soil sampling proximal to documented diesel release from former diesel aboveground storage tanks at the Riverbank Pump House is limited to TPH, BTEX, and pH.</p> <ul style="list-style-type: none"> - This listing of analyte is not consistent per Ecology Table 830-1. Recommend adding these analytes. 	MTCAs Regulations and Consideration of COPCs
40	81 and 82/313 (Table 7)	<p>Proposed soil sampling proximal to Nos. 1, 2, 5, 6, 8, 9, and 10 Substation states soil samples will be analyzed for TPH, PCBs if visual indications of spills. Proposed sampling matrix shows TPH, BTEX, pH, and PCBs selected for analysis.</p> <ul style="list-style-type: none"> - Recommend sampling shallow soil for analysis regardless of whether there are visual indications of spills. With the longevity of use, past spills may no longer be visible. 	Consideration of COPCs
41	82/313 (Table 7)	<p>Proposed soil sampling for the OA-F1 CBC area is listed as lead only.</p> <ul style="list-style-type: none"> - Fort James Specialty Chemicals manufactured defoamers, DMSO₂, napkin/towel ink, and phenolic compounds. Previous investigations did not appear to evaluate this area, thus a suggested addition to soil sampling at the settling basin would be TPH and SVOCs near the diked (waste storage) area. 	Consideration of COPCs
42	82/313 (Table 7)	<p>Note (b) in Table 7 indicates a minimum of two soil samples will be analyzed from each monitoring well installation and proposed sample location. Additional samples may be collected and analyzed based on field observations.</p> <ul style="list-style-type: none"> - Verify samples will be analyzed regardless of whether there is visual indication of spills. With the longevity of use, past spills may no longer be visible. 	Completeness of Sampling
43	82/313 (Table 7)	<p>In Table 7: Note (f) indicates soil samples proposed in areas where there are suspected buried materials or where process wastewater contacted bare ground (e.g., at the effluent pump station or former wastewater ditches) will be analyzed for metals. Metals analysis will include at least arsenic, lead, and copper at a minimum.</p> <p>Note (g) indicates soil samples proposed in areas where fuel oil or solvents were used or stored will be analyzed for VOCs</p> <p>Note (j) indicates soil samples proposed in areas where there are suspected buried materials will be analyzed for SVOCs.</p> <ul style="list-style-type: none"> - Verify what the complete analyte suite will be for each location (metals in particular, if it varies by location) and each analyte group. For all analytes, please include a table that shows the method reporting limits, per the contracted laboratory, in comparison to applicable screening level values. 	Completeness of Sampling
44	82/313 (Table 7)	<p>In Table 7, there's a note that "Background" is located upgradient and intended to represent background conditions.</p> <ul style="list-style-type: none"> - Verify what it is upgradient of the Site? Without defining the extent of the Site, what is assigned as background may be impacted by air deposition from emissions or other unknown release on the property. Also, why is proposed analyte suite not the same for all three background locations? 	Extent of Site

Comment No.	PDF Page & Section	Review Comments	CAG Theme
45	94/313 (Figure 11)	<p>We understand that this a preliminary conceptual site model and will be refined as the nature and extent is further defined. However, there are some comments we feel are worth mentioning:</p> <ul style="list-style-type: none"> - Recommend adding air emissions as a potential source, which will tie into potential affected media of surface soil, groundwater, sediments and surface water, and additional potential human receptors beyond what is currently shown (e.g., residential and recreational). - The exposure of soil media is greater than what is shown in the conceptual site model. The point of compliance for direct contact is 0 to 15 feet below ground surface. - Inhalation of vapors is listed as a likely insignificant pathway; however, with limited characterization of the nature and extent of COPCs, conclusions on vapor intrusion into buildings is unknown. - In the exposure media section, soils are referred to as "future;" however, impacted soil is a potential exposure pathway to current and future receptors. - Surface water and sediments should also have potential exposure to additional human receptor for recreationists. 	Complete Characterization
46	112/313 (SAP Section 3.6)	<p>For dioxin/furan data validation, there is no mention of the estimated detection limit in this section.</p> <ul style="list-style-type: none"> - Typically, it is preferred that dioxin/furan data is reported to the estimated detection limit rather than the method detection limit. Is it intended that dioxin/furan data will be reported at the estimated detection limit? 	Approach
47	116/313 (SAP Section 4.4.3)	<p>The target depth for monitoring well installation and groundwater sampling depths relative to the groundwater table or confining layers are not defined.</p> <ul style="list-style-type: none"> - The COPCs include compounds that in the non-aqueous phase liquid that are lighter than water and float and some that are denser than water and sink. Placement of well screens and groundwater sampling depths should take this into account to allow collection of groundwater representative of COPCs. 	Complete Characterization
48	129/313 (SAP Section 8.3)	<p>No validation guidance for dioxins identified.</p> <ul style="list-style-type: none"> - Recommend referencing appropriate validation guidelines: EPA. 2020. EPA Superfund contract laboratory program, national functional guidelines for high resolution Superfund methods data review. EPA 542-R-20-007. U.S. Environmental Protection Agency, Office of Superfund Remediation and Technology Innovation. November. 	Approach
49	135/313 (SAP/QAPP Table 2)	<p>Perfluoro Sulfonic Acid (PFOS) and Perfluorooctanoic Acid (PFOA) are listed as analytes for groundwater analysis. The rest of the workplan speaks of PFAS generally without specifying which PFAS compounds.</p> <ul style="list-style-type: none"> - Recommend analyzing for a suite of PFAS analytes (some labs can run about 45 now rather than 2 or 18) to fully characterize PFAS in groundwater. PFOS and PFOA could have broken down into shorter chain PFAS over time and those analytes and impacts would be missed by just analyzing PFOA and PFOS. 	Consideration of COPCs

Comment No.	PDF Page & Section	Review Comments	CAG Theme
50	253/313 (SAP Appendix B)	<p>Appendix B goes into detail describing different PFAS methods, but it is still unclear how many PFAS compounds will be analyzed, and which of the 537 modifications will be used. Appendix B indicates that Department of Defense or National Environmental Laboratory Accreditation Program certified labs <u>should</u> be used for analysis.</p> <p>- Is the intent that these labs "will" be used?</p>	Consideration of COPCs

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