



STATE OF WASHINGTON  
**DEPARTMENT OF ECOLOGY**

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November 30, 2023

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

**Re: Georgia Pacific Camas 2<sup>nd</sup> 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 first Draft RI Work Plan on January 3, 2022 and provided comments back to GP on November 4, 2022. Ecology received the second draft RI Work Plan on March 31, 2023.

Ecology has reviewed the second 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 second Draft RI Work Plan, Ecology believes that additional revisions to the workplan are needed in order to adequately define the nature and extent of contamination at the Site.

The Yakama Nation's comments are provided in the attached letter dated October 20, 2023. I have listed Ecology's comments below and also attached the RI Work Plan with the same comments highlighted in the document.

1. Section 1, Pg. 1, Footnote 3: Please include a section that describes the demolition work the GP currently has planned for the site. Specific information should include, but is not limited to, the expected date of completion of the demolition work, what was or is planned to be demolished, and a timeline for when the area(s) will be accessible for RI work. The section should also include details on how Ecology will be notified of additional demolition work plans as they are developed.

2. Section 2, Pg. 9: Please add a section that describes the historical use of the area by tribal entities and if cultural resources are expected to be encountered during remedial investigation activities. Please identify any areas with a high probability of archaeological impacts. An Inadvertent Discovery Plan (per RCW 27.44 and RCW 27.53 ) should be completed for the site, if one does not already exist. Please see Ecology's template for the Inadvertent Discoveries of Cultural Resources of Human Remains Plan, which is available on Ecology's website or at the link, <https://apps.ecology.wa.gov/publications/documents/ecy070560.pdf>.
3. Section 2, Pg. 9: It appears that GP or its predecessor's own parcels near the facility that GP has not currently included in the site description. The RI workplan needs to include the complete area to be investigated, as defined by the facility's operational history and associated areas owned and operated by the PLP, predecessor, or related entities. The historical extent of operations and properties associated with the site should be identified.
4. Section 3, Pg. 11: Please add a section that describes the production wells G-P draws process water from. Please identify where the wells are located on a figure.
5. Section 3.5, Pg. 19: The Revised Upland OA RIWP discussion and figures divide the Upland OA into six Site Operational Units (SOUs) but excludes all transportation Rights-of-Way (ROWs) without providing any discussion or rationale. ROWs are part of the site, appear to be unpaved historically (based on aerial photos), contain structures like pipelines and conduit related to the movement of wastes, wastewater, other hazardous substances, and have high potential for historic releases and impacts. The RIWP must include investigation of these areas and discuss any rationale for access issues or exclusion.
6. Section 3.5.2.4.1, Pg. 35: While Ecology understands the need for flexibility in addressing the site as conditions change, Ecology may request that GP evaluate their ability to perform RI activities as those changes occur. Add in the bolded language. "As changes in operations and/or demolition activities allow for safe access in the future **or upon Ecology request**, RI activities will be assessed/proposed."
7. Section 3.5.3.4.2, Pg. 35: Instead of "if the area becomes accessible after potential demolition activities in the future, soil sampling will be considered," please use language in paragraph 1 of section 3.5.2.4.1. "As changes in operations and/or demolition activities allow for safe access in the future or upon Ecology request, RI activities will be assessed/proposed." This language should be used for ALL areas determined to be inaccessible at this time.
8. Section 3.5.4.1.3, Pg. 49: Please address the following comments regarding the ASB:
  - a. While Ecology understands that the ASBs will continue to operate, we do not agree that characterization of the current system is inappropriate. It is also not clear to Ecology how sludge sampling will impact the integrity of the ASB. Please provide additional justification for this statement. Unless otherwise agreed to by Ecology, GP should include sampling of the ASB sludge in the revised workplan.
  - b. The proposed number of wells around Lady Island and the ASBs is not sufficient for proper characterization.

9. Section 4.2, Pg. 61: GP needs to include an explicit statement that justifies whether or not sampling should be conducted based off of historical discharges. Here they say current and future discharges don't warrant sampling, but there is little to no information about how wastewater was discharged before the WWTP. Further, the COPCs for this site may not all be regulated under the NPDES permit. Provide a comparison of the COPC list to previous NPDES applications and applicable WQ standards.
10. Section 4.3, Pg. 62: Ecology doesn't believe the surface and subsurface soil exclusion is applicable. There are portions of wooded area adjacent to and on mill property that are not paved. A description of the riparian habitat/wetlands/buffer zones need to be included in the RI WP to adequately characterize these unpaved areas. Include a list of endangered species that can be found onsite as well.
11. Section 4.3, Pg. 62: This is still a potential exposure pathway with respect to groundwater. While the groundwater may not currently be a source of drinking water, there is nothing preventing that potential use in the future. Therefore, groundwater as a source of drinking water is still a potential exposure pathway. Delete last sentence and replace with "Drinking water pathway will be determined at later stages," or something similar.
12. Section 5, Pg. 64: Similar to comment 5 above, add in language, "or upon Ecology request."
13. Section 5, Pg. 64: Due to the fact that the groundwater is tidally influenced, four quarters of groundwater monitoring data is not enough to adequately characterize the site. Tidal influence and seasonal variability should also be part of the early evaluation to ensure that screened intervals for monitoring wells are appropriate for evaluating impacts to groundwater.
14. Section 5, Pg. 65: Until there is more information about at nature and extent of contamination at the site, Ecology does not agree that any groundwater monitoring can automatically be considered complete. Monitoring of COPCs should not cease until approved in writing by Ecology.
15. Section 5.3.1, Pg. 66: Ecology does not think that the number and density of borings and groundwater monitoring wells is adequate for the potential size of the site, especially with the lack of historical information pre-1990. More borings and monitoring wells need to be added to the RI WP, or, alternatively, GP may propose a gridded sampling approach for the entire site (as it is accessible).
16. Section 5.5, Pg. 70: Add in language similar to, "If a seep is observed, Ecology will be notified and a path forward will be determined."
17. Table 6 – Proposed Groundwater Monitoring: Due to the long operational history and lack of sufficient historical knowledge of all the activities at the site, please sample for all groundwater COPCs at all monitoring wells.
18. Table 7 – Proposed Soil Sampling: Similar to above, please sample for all soil COPCs at all soil sampling sites.
19. Figure 3 – Site Operable Units: Please include a series of figures prior to Figure 3 (Site Operable Units) that document the properties and mill structure throughout the facility's operational history.

- a. Please use information contained in historical aerials or Sanborn maps to identify mill structures and infrastructure, including the following: all structures; areas where chemicals were stored, processed, and used, utilities; and other features relevant to evaluating releases or potential releases that may have occurred at the site.
  - b. Please target the window between 1880 and 1990 in this historical review.
  - c. These figures should have a similar level of detail to the Arcadia Figures prepared for the Black Liquor Basement Release Kraft Mill Building Area (Figure 2) and address both above ground features and below ground utilities at an appropriate scale and in a useful method of display.
20. SAPP/QAPP, Section 4.5, Pg. 13: Additional COPCs mentioned in the RI that aren't listed here include Diphenyl, PAHs, PCE, TCE, 1,1,1-trichloroethane, 1,1-dichloroethene, 1,2-dibromoethane, cis-1,2DCE, MTBE, dimethyl sulfoxide, and Naphthalene. Why are these excluded?
  21. SAPP/QAPP, Section 6, Pg. 21: Additional COPCs mentioned in the RI that aren't listed here include Diphenyl, PAHs, PCE, TCE, 1,1,1-trichloroethane, 1,1-dichloroethene, 1,2-dibromoethane, cis-1,2DCE, MTBE, dimethyl sulfoxide, and Naphthalene. Why are these excluded?
  22. HASP, Pg. iv: This page will need to be updated with new environmental staff. Make sure phone number is updated as well.
  23. Appendix D - Summary of Spills: Please update to include all spills that have occurred on GP property, including the spills occurring during the summer of 2023.

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,



Mady Lyon  
Industrial Engineer  
Solid Waste Management Program

Enclosures

cc: Matt Tiller, G-P  
Spencer Giles, G-P  
Elena Ramirez Groszowski, Yakama Nation Fisheries