Public Participation Plan

Georgia-Pacific Consumer Operations LLC
401 NE Adams Street, Camas, WA 98607

Facility Site ID: 66765272
Cleanup Site ID: 15156

February 2021
Public Participation Plan

Georgia-Pacific Consumer Operations LLC

Industrial Section
Solid Waste Management Program
Washington State Department of Ecology
Lacey, Washington
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Public Involvement in Contamination Cleanup

The Washington State Department of Ecology (Ecology) developed this public participation plan (plan) in cooperation with Georgia-Pacific Consumer Operations LLC, the party responsible for cleanup costs. The purpose of the plan is to promote meaningful community involvement during cleanup.

The plan describes ways Ecology will inform the public about contamination investigations and cleanup options throughout the cleanup process. Ecology encourages the public to learn about and get involved in decision-making opportunities. This plan identifies how and when the public can get involved during different stages of the investigation and cleanup of contamination.

This plan is for Remedial Investigation of the Georgia-Pacific Consumer Operations Site (Site).

Site contacts

To be included in the site record, comments about the cleanup process must be submitted during comment periods. Questions and informal comments or information about the site’s history are welcome anytime.

Ecology

Industrial Section
300 Desmond Dr Se
Lacey, WA 98503

Shingo Yamazaki, Site Manager
shingo.yamazaki@ecy.wa.gov
360-407-7563

Angie Fritz, Public Involvement Coordinator
angela.fritz@ecy.wa.gov
360-407-7393

Georgia-Pacific Consumer Operations LLC

Georgia-Pacific Consumer Operations LLC
401 NE Adams St
Camas, WA 98607

Matt Tiller, Remediation Manager
matt.tiller@gapac.com
404-652-5243
Public Participation Grants

Grants may be available to neighborhood committees, non-profits, and other groups interested in the site. For contaminated sites, these funds can be used to:

- Hire an expert to help interpret technical information\(^1\)
- Conduct activities that enhance the public’s understanding of, and participation in, the cleanup process

For more information about public participation grants, please contact Lynn Gooding at 360-407-6062 or lynn.gooding@ecy.wa.gov. You may also visit the Public Participation Grant website.\(^2\)

Washington’s Cleanup Laws

Ecology uses the Model Toxics Control Act (MTCA) and accompanying regulations for cleanup activities.

This plan is required under MTCA, a law that passed in 1989. MTCA provides guidelines for contaminated site cleanup in Washington State and sets standards to ensure the cleanup protects human health and the environment.

Model Toxics Control Act (MTCA)

MTCA began as a grassroots citizen’s initiative in 1988, and started the process of systematically cleaning up contaminated sites in Washington. Under MTCA, a current or past property owner or operator may be held responsible for cleaning up contamination on, or coming from, their property to standards that are safe for human health and the environment.

Ecology enacts MTCA and oversees cleanups in the state and issues regulations and guidance governing those cleanups. The regulations are found in Chapter 173-340 Washington Administrative Code (WAC).\(^3\) Ecology investigates reports of property contamination, and if the contamination is seen as a significant threat to human health or the environment, the contaminated property is placed on the Hazardous Sites List, and the cleanup process begins.

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\(^1\) Ecology currently does not have a citizen technical advisor for providing technical assistance to citizens on issues related to the investigation and cleanup of the site.

\(^2\) ecology.wa.gov/About-us/How-we-operate/Grants-loans/Find-a-grant-or-loan/Public-participation-grants

\(^3\) https://fortress.wa.gov/ecy/publications/publications/9406.pdf
Public participation is an important part of cleanup under the MTCA process. Participation needs are assessed at each cleanup site according to the level of public interest and the degree of risk posed by the contamination. Individuals who live near the site, community groups, businesses, government, other organizations, and interested parties have the opportunity to get involved by commenting on the cleanup process.

Under MTCA, the cleanup process generally includes five phases. Each phase includes an opportunity for the public to review and comment on cleanup documents.
Washington’s Formal Cleanup Process

Discovery
- Report potential contamination to Ecology.

Initial Investigation
- Determine if contamination requires further action.

Site Hazard Assessment
- Evaluate potential risk to human health and the environment based on exposure potential and severity of hazard.

Remedial Investigation
- Determine the nature and extent of contamination.
- Determine potential impacts to human health and the environment.

Feasibility Study
- Identify methods to eliminate exposure to contamination on the site.
- Assemble methods into a range of cleanup alternatives.
- Use an environmental benefit vs. cost analysis to choose a preferred alternative.

Cleanup Action Plan
- Describe Ecology’s selected cleanup action, including:
  - Cleanup standards to protect human health and the environment.
  - Schedule of next steps.
  - Requirements for monitoring, operation, and maintenance.

Engineering Design
- Create detailed design and construction documents for the cleanup action.

Clean up the site!
- Complete the cleanup action. Examples of cleanup actions include:
  - Constructing a protective multi-layered capping system.
  - Treating contamination in place.
  - Removing contamination to a hazardous waste landfill.

Monitoring and Site Use Controls
- Monitor and do on-going operations/maintenance.
- Restrict/prohibit activities that could disturb the cleanup.

Reviews and De-listing
- Hold 5-year periodic reviews to ensure cleanup meets standards.
- Remove site from Hazardous Sites List after it meets all cleanup standards and requirements.

Legal Agreements
- Define cleanup steps required after a Site Hazard Assessment.

Interim Actions
- Partially address contamination & may occur any time.

Public Participation
- Encourage community feedback throughout cleanup process.
- Hold public comment periods at key times.

Washington’s Cleanup Law
Model Toxics Control Act (MTCA)

MTCA defines the cleanup process. This public-initiated environmental law directs upland cleanups (on land or in groundwater) and sediment cleanups (in freshwater or marine environments). Ecology enacts MTCA and regulates the cleanup process.
State Environmental Policy Act (SEPA)

The State Environmental Policy Act (SEPA) is followed during review and development of cleanup plans.

Site History

Land use

The Site was first developed in the late 1800s for industrial use. In 1883, a paper mill was constructed on the Site. From the late 1800s until the present day, the Site has been operated for the production of both bleached and unbleached paper products through both chemical and mechanical processes. The chemical kraft pulping portion of the Site was shut down in April of 2018. A non-integrated paper mill is still in operation.

How the site became contaminated

Due to historic land use and industrial practices, soil contamination has been found at the site. This historic contamination occurred due to regular operations, spills, leaks, or other operational issues at the pulp and paper mills at the Site.

Contamination

Due to historic land use and industrial practices, soil is contaminated with:

- Total petroleum hydrocarbons (TPH) from diesel, gasoline, and oil.

Other likely contaminants of soil, groundwater, and/or sediments include:

- Polycyclic aromatic hydrocarbons (PAHs) and carcinogenic PAHs.
- Benzene, toluene, ethylbenzene, and xylenes (BTEX).
- Polychlorinated biphenyls (PCBs).
- Metals (lead and chromium).
- Dioxins and furans.
Cleanup plans

Based on historical industrial practices and the fact that the facility is still conducting operations at the site, Ecology is issuing an Agreed Order requiring a Remedial Investigation of the site to characterize existing contamination at the Site.

Area community

The community surrounding the Georgia-Pacific Consumer Operations Site includes industrial, commercial, residential, and rural zoning classifications. Within a few miles of the Site, there are downtown areas, parks, industries, and homes.

Ecology will reach out to cultural community organizations as part of our outreach and provide information in other languages as appropriate following federal and state guidance. While the non-English language most widely spoken in the Camas area is Spanish, the predominant language spoken in households is English and therefore additional translation will be provided if requested. We strive to make our public participation efforts as inclusive as possible and welcome your input about how to best reach the nearby community and overburdened communities.

The Yakama, Umatilla, Warm Springs, and Nez Perce Tribes are federally recognized tribes that own land and/or rely on resources that could be affected by the contamination. Ecology will ensure that the Tribes will be engaged with any decision-making process for this site and has ample opportunity to be involved throughout the process on a government-to-government basis.

Public Participation Activities

Members of the public may ask questions, submit informal comments, or share site information at any time. Interested parties do not need to wait for a formal public comment period to contact Ecology.

However, to be included in the formal site record, comments about the site investigation, cleanup alternatives, or cleanups must be submitted during formal comment periods. In addition, the public is invited to review site documents before they become final. This is the most direct and influential way to learn more about the site and be involved in the cleanup’s decision-making.

How we share information with the community

During specific stages of the cleanup, Ecology will mail notices about public comment periods to addresses surrounding the site and to our interested parties list, as described below. The mailing list area will vary depending on the type of contamination and where it’s located, but the list will at least include addresses within a 1/4-mile radius of the site and other interested organizations and individuals. These notices will provide general information about the site, contact information for submitting comments, and times and locations of public meetings or hearings or how to request one if not yet scheduled.

Ecology may also develop documents outside of comment periods to keep the community updated on the site’s status. These informational documents will be available online and at document repositories. Print copies may be mailed to the nearby community if we feel the message warrants the associated cost and resources.

Comment period notices and other site announcements may also be posted in various locations throughout the community (for example, local businesses, schools, libraries).

Postal mailing list

Ecology maintains a mailing list that includes addresses contiguous to the site and relevant local, state, and federal government contacts.

These people receive public comment notices when draft documents are available.

We will add additional individuals, organizations, and other interested parties to the mailing list as requested. If you would like to be added to the mailing list for this site, please contact Angie Fritz at 360-407-7393 or angela.fritz@ecy.wa.gov.

Email lists

Ecology maintains an email list to update interested persons about this site. If you would like to be added to the email list for this site, please contact Angie Fritz at 360-407-7393 or angela.fritz@ecy.wa.gov.
Site Register

Public comment periods, events, and other cleanup notices are published in Ecology’s Site Register. To receive the Site Register by email, please contact Sarah Kellington at 360-407-7466 or sarah.kellington@ecy.wa.gov, or subscribe online.

Newspaper display ads or legal notices

We announce public comment periods and events in ads or notices published in the Camas-Washougal Post-Record. We will also publish notice on our Public Input & Events Listing.

Ecology's website and social media platforms

We maintain a website for the Georgia-Pacific Consumer Operation site. The website provides site information, and you may download cleanup documents.

We may also share information about cleanup sites through news releases, our ECOconnect blog, and social media.

Document repositories

During public comment periods, you can find print documents at the following locations:

Camas Public Library
625 NE 4th Ave
Camas, WA 98607
360-834-4692

Washington Department of Ecology
Industrial Section
300 Desmond Drive SE
Lacey, WA 98503
360-407-6916

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5 ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Site-Register-lists-and-data
7 ecology.wa.gov/Events/Search/Listing
8 https://ecology.wa.gov/Regulations-Permits/Permits-certifications/Industrial-facilities-permits/Georgia-Pacific-Camas
9 ecology.wa.gov/About-us/Get-to-know-us/News
Due to COVID-19, documents related to this site may not be available at repositories. If you are unable to view information online at the Ecology website and have questions, please contact Angela Ward at 360-407-6916 or angela.ward@ecy.wa.gov.

If you would like to review or receive copies of documents, you may:

- Submit a request online. 10
- Download a copy of the records request form11 and use it to submit your request by mail to:

  Public Records Officer  
  Washington Department of Ecology  
  P.O. Box 47600  
  Olympia, WA, 98504-7600

If you need help with the options above, please contact Ecology at recordsofficer@ecy.wa.gov or 360-407-6040.

**Signs around the cleanup site**

We may also install signs displaying information about project status, traffic impacts, and health risks around the cleanup site.

**How to share information with us**

At minimum, MTCA requires 30-day public comment periods for draft cleanup documents and 14-day comment periods for SEPA documents. SEPA documents are often made available for public review with other cleanup documents. In that case, we combine the comment periods, and they last at least 30 days. We may hold comment periods longer than 30 days.

We may also identify public concerns and cleanup goals by meeting with and soliciting information from interested community members and organizations. To collaborate with us about this site, please contact Shingo Yamazaki at 360-407-7563 or shingo.yamazaki@ecy.wa.gov.

10 https://ecologywa.govqa.us/WEBAPP/_rs/(S(ruscj5sjnmkzhgptpcck4di))/supporthome.aspx
Public comment periods

Formal 30-day comment periods allow interested members of the public to comment on draft documents, legal agreements, and proposed cleanup actions. If there is significant interest, Ecology may extend the public comment period. When Ecology oversees SEPA determinations, we hold comment periods for at least two weeks and may extend to 30 days or more when other cleanup documents are concurrently available for review.

Following a comment period, we publish all the input we received and respond to significant comments and questions. If the comments result in significant changes to the cleanup documents, then the documents will be revised and re-issued for public review. If the comments do not result in significant changes, then they become final.

Public events

We hold public meetings, workshops, open houses, and public hearings based on community interest. If we have not scheduled a meeting, we will hold one if 10 or more people request it, and this may cause us to extend a public comment period so the meeting occurs during it.

Events are held at locations close to the site that meet Americans with Disabilities Act standards. Public meetings, workshops, open houses, and hearings are always announced in advance using a variety of methods.

Americans with Disabilities Act

To request ADA accommodation for disabilities, or printed materials in a format for the visually impaired, contact the Ecology ADA Coordinator at 360-407-6831 or ecyadacoordinator@ecy.wa.gov, or visit https://ecology.wa.gov/accessibility. People with impaired hearing may call Washington Relay Service at 711. People with speech disability may call TTY at 877-833-6341.

Plan Amendments

Ecology developed this plan following MTCA regulations (WAC 173-340-600). We review it as the cleanup progresses and amend it as necessary. You may suggest amendments to Shingo Yamazaki at 360-407-7563 or shingo.yamazaki@ecy.wa.gov.

This plan includes information for the public regarding opportunities for public involvement and comment.
The outreach activities discussed in this section reflect Ecology’s current plans for keeping the public informed and providing ways for those interested in the site to communicate their concerns and questions to us.

If you feel the planned outreach activities and mechanisms described in this plan are insufficient, or should otherwise be modified, we will work to find solutions. New outreach activities or outreach tools established as a result can be implemented right away, with or without amending this plan.