CENWS-ODS-ND

MEMORANDUM FOR FILE December 18, 2017

SUBJECT: DMMP TIER 1 ANTIDEGRADATION EVALUATION FOR GEORGIA-PACIFIC CAMAS MILL, CAMAS SLOUGH, COLUMBIA RIVER, WITH UPLAND DISPOSAL ON LADY ISLAND.

1. Introduction. This memorandum documents the Tier 1 (existing information) evaluation by the Dredged Material Management Program (DMMP) agencies (U.S. Army Corps of Engineers, Washington Departments of Ecology and Natural Resources, and the Environmental Protection Agency) of the proposed dredging at the Georgia-Pacific Camas Slough (Figure 1). This evaluation found that dredging in the proposed locations (DMMU 1 - River Bank Pumps and DMMU 2 – PECO Dock), with upland disposal on Lady Island, is not likely to exceed State of Washington antidegradation standards.

2. Project. The mill site is bounded on three sides by the City of Camas. Approximately 180 acres of the mill site lie north of the Camas Slough (an arm of the Columbia River) and are heavily developed. Buildings, tanks, and pavement cover most of the area. Lady Island is situated directly south of the slough and covers some 476 acres. The island is only partially developed, but hosts a dredged materials landfill, the wastewater treatment system, and the Lady Island (limited purpose) Landfill. The project area fills in rapidly largely due to the sediment load from the Washougal River, which empties into the Columbia directly upstream of Lady Island.

   In a letter dated December 1, 2017 (attached), Georgia-Pacific reported that company operations were scaling back, and that annual dredging needs were also greatly reduced. GP Camas has dredged regularly to maintain adequate intake flow for river bank pumps and tug and barge access to loading and unloading facilities. All dredged material is taken upland to nearby Lady Island and placed at the Dredged Materials Landfill operated by the Camas Mill. A solid waste control plan for the GP Camas Mill was most recently updated in 2016 (Chunder and Maxwell 2016).

3. Previous DMMP Testing. A DMMP characterization for four DMMUs resulted in an antidegradation determination in August 2007 (DMMP 2007). Four DMMUs were tested, with dredge prism material compared to post-dredge (Z-layer) material to determine whether there would be a degradation of surface sediment quality subsequent to dredging. DMMUs 1, 2 and 4 passed the anti-degradation evaluation. DMMP 3 did not pass the anti-degradation standard but was dredged anyway and was the subject of a post-violation determination in 2009-2010 (DMMP 2010).

4. Evaluation. The sediment to be exposed by dredging must either meet the State of Washington Sediment Quality Standards (SQS) or the State's Antidegradation standard (Ecology 2013) as outlined by DMMP guidance (DMMP 2008). Previous sampling results, as well as the high sedimentation rate of the location, provide sufficient existing information for determining that the post-dredge surface at the two proposed locations will meet state antidegradation standards without further sediment characterization. Only DMMUs 1 and 2 are the subject of this determination. If dredging in DMMUs 3 or 4 is pursued, completion of additional evaluation and documentation from the DMMP will be required prior to dredging.

   This determination does *not* constitute final agency approval of the project. During the public comment period that follows a public notice, resource agencies will provide input on the overall project. A final

decision will be made after full consideration of agency input, and after an alternatives analysis is done under section 404(b)(1) of the Clean Water Act.

5. References.

DMMP 2007. *Memorandum for Record: DMMP determination on the sediment quality of the exposed sediment surface after dredging to verify compliance with the Washington State antidegradation policy for the Camas Slough, Camas, Washington maintenance dredging project (2003-01135).* August 2007.

DMMP 2008. *DMMP Clarification Paper: Quality of Post-Dredge Sediment Surfaces (Updated).* Prepared by David Fox (USACE), Erika Hoffman (EPA) and Tom Gries (Ecology) for the Dredged Material Management Program, June 2008

DMMP 2010. *Memorandum for Record: DMMP determination of the sediment quality of the exposed sediment surface after unpermitted dredging to verify compliance with the Washington State Antidegradation policy for the Camas Slough, Camas, Washington dredging project (2003-01135).* March 10, 2010.

Ecology 2013. *Sediment Management Standards – Chapter 173-204 WAC*. Washington State Department of Ecology, February 2013.

Chunder and Maxwell 2016. *A Solid Waste Control Plan for the Camas Mill.* Prepared by Sunanda Chunder and Sarah Maxwell, PE for Georgia-Pacific Consumer Projects (Camas) LLC. February 2016.

6. Signatures. This determination was coordinated by the undersigned with Laura Inouye (Department of Ecology), Erika Hoffman (EPA), and Celia Barton (Department of Natural Resources).

signed copy on file in DMMO - Seattle District office

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Date Lauran Cole Warner - Seattle District Corps of Engineers

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DMMO File