

MEMORANDUM FOR RECORD

8 January 2013

SUBJECT: DMMP RECENCY DETERMINATION AND ANTIDegradation EVALUATION ON THE SEDIMENT QUALITY OF THE PROPOSED POST-DREDGE SEDIMENT SURFACE TO VERIFY COMPLIANCE WITH THE WASHINGTON STATE ANTIDegradation POLICY FOR THE GEORGIA PACIFIC CAMAS MILL (NWS-2003-01135-CRS).

1. **Project.** This memorandum reflects the consensus determination of 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) regarding the quality of the sediment surface remaining after maintenance dredging of the Georgia Pacific Camas Slough. This memo addresses an amendment request, dated September 14, 2012, for deeper dredging than originally permitted in the area of DMMU 1. All material will be disposed upland.
2. **Background.** A DMMP suitability determination was issued on August 2, 2007 for the suitability of post dredge surfaces subsequent to dredging of the project as originally defined. The exposed surface described for the original project was for dredging and overdepth up to -1.5 ft Mean Sea Level.

The original SDM evaluated the quality of the proposed post-dredge surface following dredging and upland disposal. As part of this original evaluation, the surface below the proposed dredge prism in one out of four DMMUs (DMMU 3) was found to have contamination that violated the state antidegradation policies in the state Sediment Management Standards. To prevent degradation of surface sediments, DMMU 3 was not permitted for dredging. Though GP Camas Slough had decided not to dredge DMMU 3 to avoid exposure of failed sediments, the DMMU was dredged anyway, resulting in a permit violation.

As part of the response to this violation, GP was required to conduct a post-dredge survey of the exposed surface to determine whether anti-degradation had actually occurred. The results of this survey supported a memo dated 10 March 2010. By the time post-dredge characterization had occurred, the surface sediments did not violate state antidegradation standards, most likely due to high sedimentation rates in the area.

3. **Antidegradation determination.** In previous testing, the area of DMMU 1 exhibited no contamination in either the dredge prism or z-samples. The proposed deepening is spatially removed from the area previously found violating state anti-degradation standards and has been shown to have much coarser sediment. It has not previously been dredged to the proposed depth. There have been no known spill events or changed conditions in the project area since the original antidegradation determination was issued. Due to the conditions of the site and evidence of previous testing, the DMMP agencies have determined that there is no reason-to-believe that state antidegradation standards will be violated by dredging to the deeper proposed depth.

Please note that this determination is for the area of DMMU 1 only, as described in previous documentation and requested in the referenced permit modification request.

4. References:

DMMP, 2007. 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). Prepared by the Army Corps of Engineers for the DMMP agencies, August 2, 2007.

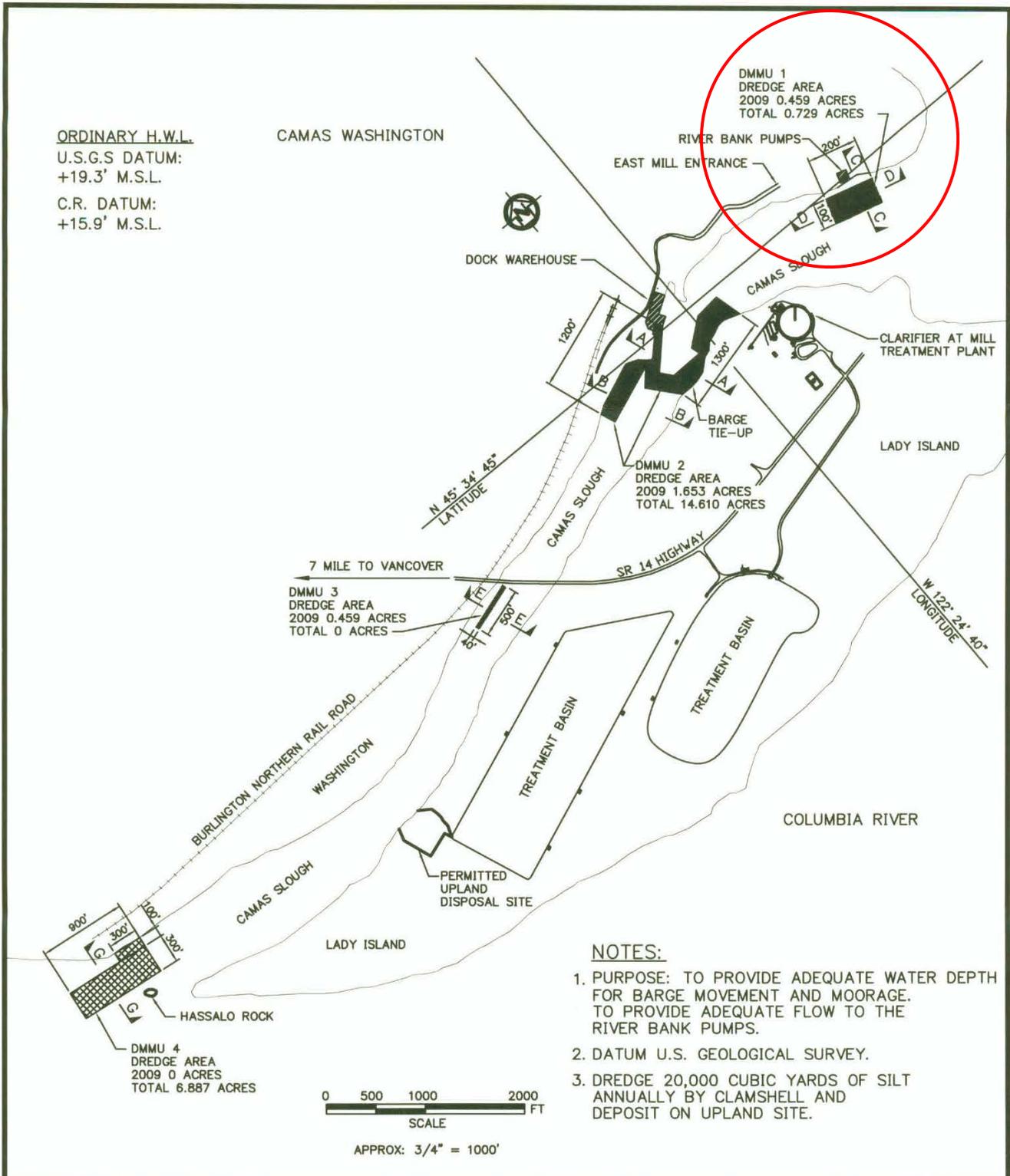
DMMP, 2010. DMMP Determination on the Sediment Quality of the Exposed Sediment Surface after Unpermitted Dredging to Verify Compliance with the Washington State Antidegradation Policy for the Camas Slough, Camas, Washington Dredging Project (2003-01135). Prepared by the Army Corps of Engineers for the DMMP agencies, March 10, 2010.

Lauran Warner
Dredged Material Management Office

A handwritten signature in black ink, appearing to read 'Lauran Warner', with a long horizontal flourish extending to the right.

Copies furnished:

Laura Inouye, Ecology
Celia Barton, DNR
Erika Hoffman, EPA
Steve Manlow, Corps Regulatory
DMMO file



REF. DWGS	NO	REVISION	2009 MAINTENANCE DREDGING AREA SHEET 1 OF 2			
SKLO-38919			SCALE AS NOTED	Georgia-Pacific CAMAS MILL Camas, Washington		
			WO -	DSGN <i>S. Young</i>	DWN <i>B. Favens</i>	DATE 03/09/09 APVD
EWO -	IP/AR/ACCT. 0116	DEPT. ENV	SECT. -	SUB-SECT. -	SKLO-38918	REV. 0

Figure 1. Project dredging areas. Change in dredging depth is in DMMU 1 (circled in red.)