



Oregon

Kate Brown, Governor

Department of Environmental Quality

Northwest Region

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TTY 711

October 27, 2021

Jeff Sorensen
Georgia-Pacific Wauna Mill
92326 Taylorville Road
Clatskanie, OR 97016

RE: No Further Action Determination for Georgia Pacific Wauna Mill Waste Drum Removal and Cleanup Action. ECSI #6448

Dear Mr. Sorensen:

The Oregon Department of Environmental Quality (DEQ) has completed its review of the available information for the Georgia Pacific Wauna Mill Waste Drum Removal and Cleanup site (Site), including the closure report entitled *Wauna Mill Buried Drum Investigation and Removal Work Summary Report* dated January 19, 2021. This project summary report was submitted to DEQ by Kennedy Jenks Consultants on your behalf.

DEQ has determined that remedial action to address environmental contamination at the Site is complete, and that no further action is required. This No Further Action Determination is a result of our evaluation and judgment based on the DEQ regulations and the facts as we now understand them including the following, and as more fully described in DEQ's *Georgia Pacific Wauna Mill Drum Site Removal Action, Staff Memorandum in Support of a No Further Action Determination. ECSI #6448*, dated October 20, 2021.

- Past Site Use: 1200-acre Paper Mill, numerous support facilities.
- Cause of Contamination: 170 drums of liquid and solid waste were disposed of on a hillside and buried in soil. Many drums had leaked their liquid contents to Site soils while others remained intact or were empty.
- Site Investigation: Geophysical tools were used to detect buried drums to the extent practical. Some areas could not be surveyed due to vegetation. The total number of buried drums at the Site is considered to be 170.
- Affected Media: Soil, to a maximum depth of approximately 25 feet below ground surface.
- Remedial Actions Taken: Drum discovery, drum contents & liquid removal and characterization, hazardous waste disposal, excavation and offsite disposal of contaminated soil, confirmation soil sampling of final excavation providing analytical data to confirm completed cleanup.
- Contamination left in place: No Site soil containing unacceptable contamination concentrations remains in place. Confirmation sampling of excavated areas indicates complete cleanup to conservative Residential Human Health Receptor Risk-Based Concentrations (DEQ RBC Tables, May 2018 rev.).
- The depth to groundwater at the Site is estimated to be approximately 180 feet below ground surface. The Site elevation is approximately 200 feet above mean sea level. No subsurface investigation work

was performed at the Site to measure depth to groundwater or to sample groundwater. The groundwater flow direction at the Site is inferred to be northeastward, toward lower elevation terrain and the Columbia River.

- Geology: The Site is located within a very large landslide complex. Local landforms include hummocky topography and irregular surface water drainage patterns.
- The distance from the drum remediation site to surface water (the Columbia River) is 0.5 mile to the northeast.
- Complete human and ecological exposure pathways: Confirmation sampling of areas remediated by soil excavation indicates complete cleanup to the Residential Receptor pathway Risk-Based Concentrations (DEQ, 2018). Though this area is not residential, the Residential Receptor Pathway was used as the conservative cleanup goal. No complete exposure pathways remain at the Site following drum removal and removal actions.
- No ecological risk assessment was performed at this site, nor was one requested by DEQ.
- Residual human health risk: No unacceptable soil contamination remains in place. Confirmation sampling of excavated areas indicates cleanup to Residential receptor Risk-Based Concentration Note: DEQ *Background Levels of Metals in Soils for Cleanups* Jan. 25, 2018, lists background concentrations for arsenic in coast range soils to be 12 mg/Kg, which is greater than the DEQ Human Health RBC Tables, May 2018 rev. for the residential pathway
- As this work is a removal action, no public comment period is required, per DEQ *Public Notice and Comment Requirements for Cleanup Sites*, Dec. 7, 2017.

Based on the available information, soil conditions at the Georgia Pacific Wauna Mill drum removal and cleanup action Site are protective of public health and the environment in accordance with Oregon environmental cleanup law, ORS 465.200 et seq. or Oregon Administrative Rules 340. The site requires no further action unless new or previously undisclosed information becomes available, or there are changes in site development or land and water uses, or more contamination is discovered. DEQ will update the Environmental Cleanup Site Information System (ECSI #6448) database to reflect this decision.

This letter only applies to the release(s) discussed above. If any contaminated media is encountered in the future, it must be handled and disposed of in accordance with local, state and federal regulations.

A copy of the Kennedy Jenks Consultants closure report and DEQ's Staff Memo supporting this No Further Action Determination can be viewed at: <https://go.usa.gov/xexeE>

DEQ recommends keeping a copy of all of the documentation associated with this remedial action with the permanent facility records. If you have any questions, please contact Kenneth Thiessen at (503) 229-6015, or via email at Thiessen.Kenneth@deq.state.or.us.

Sincerely,



Northwest Region Cleanup Section

References cited:

Kennedy Jenks Consultants, 2021. *Wauna Mill Buried Drum Investigation and Removal Work Summary Report*. January 19, 2021.

DEQ 2021. *Georgia Pacific Wauna Mill Drum Site Removal Action, Staff Memorandum in Support of a No Further Action Determination*. ECSI #6448. October 19, 2021.

DEQ 2018. *Risk-Based Concentrations for Individual Chemicals*. May 2018 rev.

DEQ 2018. *Background Levels of Metals in Soils for Cleanups*. Jan. 25, 2018.

DEQ 2017. *Public Notice and Comment Requirements for Cleanup Sites*, Dec. 7, 2017.

Attachments:

Figure 1. Vicinity map

Figure 2. Site Layout and Drum Locations

Figure 3. Confirmation Soil Sampling Locations

cc:

Blair Paulik, DEQ NWR

Kenneth Thiessen, DEQ NWR

Deonne Knill, PE, Kennedy Jenks Consultants

Quinn Burke-Anderson, Georgia-Pacific Wauna Mill

ECSI #6448 File