

DIVISION OF AIR AND WATER QUALITY

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May 16, 2003

Mr. Brian Brown
Alcan Alaska Timber Corporation
111 Stedman Street, Suite 100
Ketchikan, AK 99901

Re: Tongass Narrows Ship LTF
Authorization Number AK-G70-1052

Certified Mail # 7000 0520 0017 6843 4197
Return Receipt Requested

Dear Mr. Brown:

The Department has issued the enclosed written authorization to Alcan Alaska Timber Corporation for discharge of bark and wood debris at the Tongass Narrows Ship Log Transfer Facility (LTF) under the terms and conditions of the "Post-1985" wastewater disposal general permit for LTFs, number AK-G70-1052, valid through March 21, 2005.

This authorization is based on evaluation of Alcan Alaska Timber Corporation's Notice of Intent and other information by the Departments of Environmental Conservation, Fish and Game, and Natural Resources, in accordance with the factors listed on page four of the Department's August 24, 1999, Certificate of Reasonable Assurance for the General Permit. The authorization includes a Zone of Deposit (18 AAC 70.210) for the accumulation of bark and wood debris on the ocean bottom within the LTF project area. The authorization does not include rafting or storage of logs in water less than 40 feet deep at Mean Lower Low Water.

You are reminded that Alcan Alaska Timber Corporation must meet operational and reporting requirements in order to discharge under this authorization, in accordance with the general permit and the Certificate of Reasonable Assurance. Failure to comply with operational and reporting requirements may be cause for revocation of this authorization. An annual report is required in accordance with the General Permit. An annual bark monitoring dive survey is required for an LTF that transfers 15 mmbf or more during the life of the permit and that holds logs in water depths less than 60 feet at MLLW.

Please contact me (465-5276; Dave_Sturdevant@envircon.state.ak.us) if you have questions concerning this authorization or operational and reporting requirements. Thank you for your support and cooperation as we implement this permit program for Log Transfer Facilities.

Sincerely,

Dave Sturdevant
LTF Program Manager

Enclosures

cc: Jim Cariello, DFG
Chris Landis, DNR
Bob Robichaud, EPA

This authorization effectuates various requirements of the General Permit, with respect to Best Management Practices, a Pollution Prevention Plan, a Quality Assurance Project Plan, annual reporting, bark monitoring and reporting, oil sheen monitoring and reporting, retention of records, noncompliance reporting, a Remediation Plan, and other matters. Failure to comply with operational, reporting, and other requirements of the General Permit may be cause for revocation of this authorization.

A SHORE-BASED LOG TRANSFER FACILITY MUST KEEP A COPY OF THIS AUTHORIZATION AT THE LOG TRANSFER FACILITY WHERE THE DISCHARGE TAKES PLACE. AN OFF-SHORE LOG TRANSFER FACILITY OR OFF-SHORE LOG STORAGE AREA MUST KEEP A COPY OF THIS AUTHORIZATION AT THE NEAREST ADMINISTRATIVE OR FIELD OFFICE MANAGING LOG TRANSFER OPERATIONS.

Chris Foley, Chief
Forest Practices Program

Date

DECISION DOCUMENT
Alaska Department of Environmental Conservation
Forest Practices Program
May 16, 2003

LTF General Permit
Tongass Narrows Ship LTF
Alcan Alaska Timber Corporation
Authorization No. AK-G70-1052

Alcan Alaska Timber Corporation has submitted a Notice of Intent requesting authorization to discharge bark and wood debris at the Tongass Narrows Ship Log Transfer Facility (LTF) under the State's "Post-1985" General Permit for Log Transfer Facilities, AK-G70-1052 ("General Permit"). The location is the mouth of Ward Cove on Revillagigedo Island, approximately 5 miles northwest of Ketchikan, Alaska.

This Decision Document presents the Department's findings concerning regulatory requirements with respect to the requested authorization.

Antidegradation Policy

The Antidegradation Policy of the Alaska Water Quality Standards (18 AAC 70.015) states that existing water uses and the level of water quality necessary to protect existing uses must be maintained and protected. ADEC may allow reduction of water quality only after finding that five specific criteria are met. These criteria and the Department's findings, reached following consultation with the Departments of Fish and Game and Natural Resources, are set out below.

1. 11 AAC 70.015 (a)(2)(A). Allowing lower water quality is necessary to accommodate important economic or social development in the area where the water is located.

Alcan Alaska Timber Corporation (Alcan) has provided adequate information to satisfy this criterion. Alcan is in the business to harvest timber for the manufacture of wood products worldwide. Alcan harvests timber from both public and private sources for sale to timber brokers and sawmills both in Alaska and worldwide. Alcan and its subcontractors employ approximately 100 people in southeast Alaska.

Alcan has purchased timber sales from the University of Alaska and the Alaska Mental Health Trust. Timber harvest operations have directly employed up to 200 workers in Alaska as well as provided employment for various towing services and longshoring companies on an as needed basis. The Tongass Narrows Ship Loading LTF will provide employment opportunities for residents of Ketchikan involved in the timber and longshoring industries. Alcan plans to maintain a strong presence in the timber industry in Alaska, providing employment to the residents of the state. The Tongass Narrows Ship Loading LTF is a necessary part of this plan.

ADEC concurs that operation of the Tongass Narrows Ship LTF constitutes important economic development in the area, with corresponding social significance. Because the Residue criteria of the Water Quality Standards prohibit any waste material in the water or on the bottom, ADEC believes that a Zone of Deposit authorization, and the corresponding lowering of water quality, are necessary to accommodate operation of the LTF.

ADEC concludes that this criterion is met.

2. 11 AAC 70.015 (a)(2)(B). Except as allowed under this subsection, reducing water quality will not violate the applicable criteria of 18 AAC 70.020 or 18 AAC 70.235 or the whole effluent toxicity limit in 18 AAC 70.030.

ADEC concludes that this criterion is met outside the authorized Zone of Deposit.

3. 11 AAC 70.015 (a)(2)(C). The resulting water quality will be adequate to fully protect existing uses of the water.

The expected life of the LTF is 5 years. The maximum timber volume to be transferred over the life of the General Permit is 75 mmbf; average annual volume is 10 mmbf; and maximum annual volume is 15 mmbf.

The depth of water at the LTF site is approximately 170 feet. Therefore, a pre-discharge dive survey was not conducted, as this depth is beyond the limits of diver safety.

The Departments of Fish and Game and Natural Resources have reviewed the Notice of Intent, and have concurred that operation of this LTF complies with the requirements of the General Permit.

After consultation with the Departments of Fish and Game and Natural Resources, ADEC believes that ecologically significant effects from the discharge and accumulation of bark and wood debris at this LTF are not likely to occur outside the Zone of Deposit, especially given the depth of water in which the discharge will occur.

With respect to the proposed discharge of bark and wood debris, ADEC concludes that water quality will be adequate to fully protect existing uses of the water.

4. 11 AAC 70.015 (a)(2)(D). The methods of pollution prevention, control, and treatment found by the department be most effective and reasonable will be applied to all wastes and other substances to be discharged.

The methods of prevention, control, and treatment ADEC finds to be most effective are the practices and requirements set out in the General Permit. The General Permit requires the operator to follow prescribed Best Management Practices, and to develop and implement a Pollution Prevention Plan to control waste discharge. The General Permit also requires the operator to prepare a proposed Remediation Plan if continuous cover by bark and wood debris exceeds a threshold of one acre. ADEC concludes that this criterion is met.

5. 11 AAC 70.015 (a)(2)(E). All wastes and other substances discharged will be treated and controlled to achieve
 - (i) for new and existing point sources, the highest statutory and regulatory requirements;
 - and
 - (ii) for non-point sources, all cost-effective and reasonable best management practices.

In ADEC's understanding, no BAT treatment and control requirements are specifically applicable to LTFs. ADEC believes that the highest statutory and regulatory requirements for

point sources, and the cost-effective and reasonable best management practices for non-point sources, are the practices and requirements set out in the General Permit. ADEC concludes that this criterion is met.

Conclusion. ADEC finds that authorization of the Tongass Narrows Ship LTF under the State's "Post-1985" General Permit for Log Transfer Facilities is consistent with the Antidegradation Policy of the Alaska Water Quality Standards.

Zone of Deposit

Under the Zone of Deposit provision of the Alaska Water Quality Standards (18 AAC 70.210), the Department may allow deposit of substances on the bottom of marine waters within limits set by the Department. The water quality criteria and the antidegradation requirement may be exceeded in a Zone of Deposit, but must be met at every point outside the Zone of Deposit.

In authorizing a Zone of Deposit, the Department must consider: (1) alternatives that would eliminate or reduce adverse effects of the deposit; (2) potential direct and indirect impacts on human health; (3) potential impacts on aquatic life and other wildlife; (4) potential impacts on other uses of the waterbody; (5) expected duration of the deposit and any adverse effects; and (6) potential transport of pollutants by biological, physical, and chemical processes.

The General Permit authorizes a Zone of Deposit for the accumulation of bark and wood debris on the ocean bottom within the project area of an LTF. The Zone of Deposit may include "continuous coverage," "discontinuous coverage," and "trace coverage" by bark and wood debris. The area limit is the project area of the LTF. However, the General Permit also establishes a "threshold" of 1.0 acre and a thickness of 10 centimeters for continuous cover by bark and wood debris. If a bark monitoring survey shows that continuous cover bark exceeds that amount, the operator must submit a proposed Remediation Plan to the Department to reduce continuous bark cover to less than both 1.0 acre and a thickness of 10 centimeters at any point. That plan is subject to the Department's approval, modification, or denial.

Under the Certificate of Reasonable Assurance, the Department may determine that a Zone of Deposit is not appropriate at the proposed location, and is not authorized.

Zone of Deposit Assessment

The Tongass Narrows Ship LTF is an existing LTF that has been used since 1994. Previously, Gateway Forest Products operated the Tongass Narrows Barge Unloading facility at the same location, where an unknown volume of timber was transferred. A maximum of 75 mmbf is projected to be transferred over the next five years.

As indicated, ADEC believes that ecologically significant effects from the discharge and accumulation of bark and wood debris are not likely to occur outside the Zone of Deposit, especially given the depth of water in which the discharge will occur, and that water quality will be adequate to fully protect existing uses of the water.

There is no indication that discharge and accumulation of bark will cause direct or indirect impacts on human health.

The Department recognizes that duration of a bark deposit may be long term, even many decades. That fact must be accepted in allowing a Zone of Deposit for accumulation of bark.

The Department has no information on quantities of bark that are transported beyond the project area.

Because this is a previously used LTF, alternative sites and methods of transfer were not considered. The Department recognizes that barging of logs would eliminate bark discharge and accumulation, and the need for a Zone of Deposit. However, the transfer of log bundles directly from barges to log ships has not proven feasible and, therefore, inwater log storage and transfer is necessary in this case.

Conclusion. The Department concludes that bark discharge and accumulation are consistent with the Zone of Deposit provision at the Tongass Narrows Ship LTF, and does not find it warranted to deny authorization of a Zone of Deposit at this LTF.