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March 4, 1998

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Alaska Department of Environmental Conservation
Division of Air and Water Quality
Attention: Drew Grant
410 Willoughby, Suite 105
Juneau, Alaska 99801-1795

I am writing this letter to make it known that the creeks around Nome, especially Anvil and Dexter Creek do not meet minimal water quality standards because of poor mining practices.

Each spring both creeks are turbid, contain sediments and possibility heavy metals and hydrocarbons. The inspections of the Nome region have been in my opinion neglected by the DEC, because we do not have a DEC office in Nome.

The mining is now encroaching on our water supply for Nome. The primary and secondary recharge areas for Moonlight Springs (our water supply) are now being mined.

The city's water supply is in danger. The utilities are concerned, a few citizens, and the state hydrologist said the situation is "scary".

I have seen the sediments in both creeks in the Spring. Reclamation in both areas is not being done in a timely manner.

Dexter Creek:

The creek empties into the Nome River . . . Our local State fish and game has observed the sediment that occurs each year. This heavy sedimentation could have a negative impact on the local fish population. This has been going on for a few years. I think it is about time that this issue is addressed and not ignored. I have not seen any evidence of reclamation. This lack of adequate reclamation may contribute to the sedimentation. It is known that settling ponds concentrate heavy metals. The settling ponds are within the Moonlight Springs recharge area. The protective layer of tundra has been striped away. This certainly can have a negative effect on the aquifer. In the area there are now very deep pits that are dangerous, especially to people traveling by snowmachine. I feel that it is the

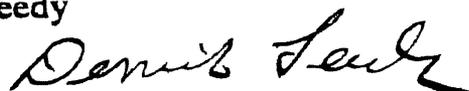
responsibility of the City of Nome to prevent mining or any other activities that could possibly affect our water quality. The well-head area needs to be protected. Their attitude is that there has to be absolutely proof that mining has affected our water quality. I feel and I believe the law states that if there is a good possibility that mining may affect water quality that it should be eliminated. The law states that there does not have to be contamination but just the possibility of contamination to the water to have it protected.

Anvil Creek:

There is a mining operation up Anvil creek that is now mining right in the natural fault line that hydrologists say direct the flow of water into the Moonlight springs collection gallery. This operation is dirty. I have seen spilled oil and have given pictures of it to the DEC about 3 years ago. Our local fish and game have been very concerned about sediments, especially in the spring. This mining operation has diverted the Creek many times and has even moved a major road, the Glacier Creek Road. The movement of the mining operation has increased the danger to Moonlight Springs.

I would like DEC and the Alaska Department of Fish and Game to get involved fully in enforcement concerning mining, protection of our water supply and fish habitat. The City of Nome has no interest in the protection of our natural resources mainly because the problem is outside the City limits. I would encourage the DEC to assist the City of Nome in protecting our water supply. The federal well-head protection statutes may apply in Nome. Please list Anvil and Dexter Creek as a polluted waterbody and implement a waterbody recovery plan.

Derrick Leedy



cc. Alaska Board of Fish and Game
City of Nome, Nome Joint Utilities

Grant, Drew

From: Hock, Jeff
Sent: Monday, July 13, 1998 11:57 AM
To: 'Grant, Drew'
Subject: FW: FW: Anvil Creek Update

-----Original Message-----

From: Ash, Amy
Sent: Monday, July 06, 1998 8:43 AM
To: Wingerter, Tim; Hock, Jeff
Subject: FW: FW:

the latest on the Anvil/Dexter creeks issue.

From: Ryan Hull
To: Ash, Amy
Cc: 'jimv@dnr.state.ak.us'; 'stevem@dnr.state.ak.us'
Subject: Re: FW:
Date: Tuesday, June 30, 1998 4:00PM

Amy,

I am working with Alaska Gold Company (land owner) in Nome, Mac McLean (ADG&G), and Cindy Godsey (EPA), concerning the water quality issues on Anvil Creek near Nome.

Reclamation has occurred and is now occurring on Anvil Creek. The miners are capping or otherwise reclaiming all ponds and ground that is not needed for current mining operations. Surface and ground water ditches have been constructed to carry water around the settling ponds.

Pete Rob (ADF&G) conducted an extensive sampling program during the period of discharge from the involved mining operations. There was a discharge and water quality problem that has been documented. Latest report was that water quality had returned to below maximum allowable levels of turbidity and settleable solids.

The person that collected the water samples that Mr. Russell analyzed was the local veterinarian who took a personal interest in the situation. I don't know if proper sampling protocol was followed during sampling.

We will be on-site in July to finalize action needed to avoid this problem in the future.

The EPA is well aware of the situation and are weighing the possibility of compliance action. I received a call from Jim Corpuz (EPA) informing me that he would be in the Nome area sometime in mid-July.

I have copies of the sample results and photographs from ADG&G and the local veterinarian. If you would like to see them please let me know.

As to the validity of the miner's comments, I don't know. I do know that Alaska Gold is pressing the miners and that we will impose necessary stipulations to correct the problem.

If you have any questions about the situation and the plan for correction please let me know.

Thanks - Ryan

*Derrick
Leedy?*

Grant, Drew

From: Hock, Jeff [JUNEAU/ADEC/JHock]
Sent: Tuesday, June 30, 1998 12:52 PM
To: Wingerter, Tim; Lamoreaux, Bill; Beelman, Joyce; McGee, Pete; Henkins, Deena; Sturdevant, Dave; George, Kenwyn; Braley, Susan
Cc: 'Ash, Amy'; 'Grant, Drew'
Subject: RE: Anvil & Dexter Creeks

Thanks for the latest, Tim. We specifically decided NOT to list on the 1998 303d list because it was more an enforcement and compliance issue. If not much changes by the year 2000, it may well be up for reconsideration, because persistence will have been clearly established. We recently were clued in to the cheap practice for cleaning out the settling ponds.

-----Original Message-----

From: Wingerter, Tim
Sent: Tuesday, June 30, 1998 11:48 AM
To: Lamoreaux, Bill; Beelman, Joyce; McGee, Pete; Henkins, Deena; Sturdevant, Dave; Hock, Jeff; George, Kenwyn; Braley, Susan
Subject:

I had a phone call from Bob Russell, (443-5058), the WWTP Supt in Nome. He called about a WW permit issue, but also informed me that the WQ on Anvil and Dexter Creeks has been seriously degraded by mining upstream and that there are very few salmon any more. He has collected samples and run turbidities. He said that he could not even get a reading until he diluted the samples and then got readings in excess of 1000 NTU. Apparently EPA is coming up there in July to inspect the mining operations according to Bob. He said that one of his employees overheard some of the mining folks bragging in the bar that they build the settling ponds so that they wash out in the spring and that way they don't have to clean out the sediment in the ponds. Apparently they also have not done any reclamation at the site either. These creeks should probably be evaluated for the 303 list and we should likely get involved in enforcement if it's really as bad as Bob said. I just wanted to let you folks know in case you want to pursue this further, but you may already be aware of this.....Thanks.....Tim W.

Grant, Drew

From: Grant, Drew [JUNEAU/ADEC/DGrant]
Sent: Tuesday, June 16, 1998 9:39 AM
To: 'VanHaagen, Paula - EPA'
Cc: Hock, Jeff; Ash, Amy; Grant, Drew
Subject: Dexter and Anvil Creeks

Importance: High

Paula - here's a follow-up on one of your questions as to whether the inspection had been made on Dexter and Anvil Creeks.

Both creeks apparently blew out this spring. AK Dept. of Fish and Game Habitat/Fairbanks have had teleconference calls with EPA (Bob Loiselle and Cindy Godsey), the COE and Div. of Mining on it. They collected settleable solids measurements (up to 15 ml/l) - not sure these are "persistent." Doctor Leedy [not sure who Leedy is with] collected turbidity samples and had them analyzed [haven't heard results]. Alaska Gold is directing remedial actions. ADF&G and the team are evaluating enforcement options.

Please contact Jeff or I if you are entertaining any thoughts of proposing that Alaska 303(d) list these creeks - it is our determination at this time not to do so and there would need to be investigation and discussion prior to any consideration for listing.

Grant, Drew

From: McLean, Mac
Sent: Monday, June 15, 1998 3:37 PM
To: Grant, Drew
Subject: RE: Dexter/Anvil Creeks

Both creeks blew out this spring. We have had teleconference calls with EPA (Bub Loiselle and Cindy Godsey), the COE and Div. of Mining. We collected settleable solids measurements (up to 15 ml/l). Doctor Leedy collected turbidity samples and had them analyzed. Alaska Gold is directing remedial actions. We are evaluating enforcement options.

From: Grant, Drew
To: McLean, Mac
Cc: Ash, Amy
Subject: Dexter/Anvil Creeks
Date: Monday, June 15, 1998 3:00PM

Hi Mac - we had a conference call with EPA last week and they are going to be issuing their "approval/disapproval" letter to DEC here very quickly on our proposed list of Sec. 303(d)/TMDL waters. Anyway, more on the side/in passing (meaning I don't think they were going to push for listing Dexter/Anvil Creeks) they asked if I had heard if you had conducted the on-site visit yet on Dexter/Anvil Creeks that you mentioned in an earlier email. Any word yet? Did you make it out? - thanks Mac—
drew