

THE TATITLEK CORPORATION

P.O. Box 650, Cordova, Alaska 99574 • Phone (907) 424-3777



March 3, 1998

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

Dear Mr. Grant:

The following comments are in response to Alaska's proposed 1998 Section 303(d) list.

The **Two Moon Bay** waterbody (Alaska ID Number) 20201-XXX should be eliminated from the Section 303(d) list for the following reasons:

- The facility was sited and operated in compliance with the Log Transfer Facility Siting, Construction, Operation and Monitoring/Reporting Guidelines of October 21, 1995.
- The State of Alaska has conducted no water quality monitoring, there is no evidence of "persistent exceedances".
- The only data on the facility is a dive report that is now two years old, that was conducted just prior to the end of operations at the site.
- There is no documentation that designated uses are adversely affected.
- There have been no notices of violations or other enforcement action of any kind associated with the operation of this facility.

This site has been inactive since the summer of 1996, and will not be used for the transfer of logs in the future. Modification or close-out of permits and other associated activity has been scheduled for 1998.

Sincerely,

THE TATITLEK CORPORATION

A handwritten signature in cursive script that reads "Carroll Kompkoff".

Carroll Kompkoff
President

REF 98-034
CK/pkm

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March 4, 1998

Drew Grant
Alaska Department of Environmental Conservation
410 Willoughby, Suite 105
Juneau, AK 99801-1795

Dear Mr. Grant:

I have received a copy of the proposed 1998 Section 303(d) list of waters that are not expected to meet state water quality standards. My primary interest concerns **Two Moon Bay**, Alaska ID 20201-XXX.

I have been involved on a consulting basis since the log transfer site at Two Moon Bay was first located in the late 1980's. I have also been intimately involved with the monitoring of bark and other logging debris in the bay through regular bark dives in accordance with our EPA permit. While the last year or two of dive results, in 1995 and 1996, did indicate the possibility that the *voluntary* guidelines of the LTF task force may have been exceeded insofar as the accumulation of bark was concerned, there is no procedure for continued monitoring or remediation of that situation. Therefore, it is patently unfair to list Two Moon Bay on your 303(d) waterbody list. Both the operator and the adjoining landowner there, Citifor, Inc. and the Tatitlek Corporation, respectively, have done everything called for in their permits in connection with this situation. For all we know at this time, the bay may have naturally cleansed itself of some or most of the logging debris by this time, what with the flushing action and storms that occur there.

In short, the LTF at Two Moon Bay was appropriately sited, responsibly operated, and adequately monitored to comply with its permit stipulations at the time. No logs have crossed its dock for nearly two years now. The State does not have conclusive information one way or the other if the bark accumulation in the bay exceeds the *voluntary* guidelines of the Timber Task Force. Neither the landowner nor the operator has been asked to conduct any further compliance monitoring. To list Two Moon Bay under these circumstances cannot be called a responsible act by the ADEC. I ask you to reconsider this action.

Sincerely,



Carl A. Propes Jr.

Cc: Tatitlek Corporation
Citifor, Inc.