



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10

Alaska Operations Office  
Room 537, Federal Building  
222 W. 7th Avenue, #19  
Anchorage, Alaska 99513-7588

February 28, 1994

RECEIVED

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REGULATORY FUNCTIONS DIVISION  
Alaska District, Corps of Engineers

Mr. Larry Reeder  
U.S. Army Corps of Engineers  
Alaska District  
P. O. Box 898  
Anchorage, Alaska 99506-0898

Re: Zimovia Strait 87, No. 2-880483  
(Alaska Pulp Corporation)

Attn: Houston Hannafous

Dear Mr. Reeder:

EPA has reviewed the referenced public notice for compliance with Section 404 of the Clean Water Act. The applicant originally proposed to discharge 547,350 cy of fill, including 375,000 cy of woodwaste, into 23.9 acres of marine tidelands near Wrangell, Alaska. This project was substantially modified in a second public notice and additional documents submitted on February 4 and 14, 1994. The final version addresses several of the concerns raised during the original project review.

**Practicable Alternatives:** The purpose of the project was clarified as log storage rather than woodwaste disposal. The applicant reduced the size of the fill from 23.9 acres to 9.8 acres, and provided a detailed analysis of existing and proposed log storage capacity. Therefore, EPA believes that the applicant addressed concerns relevant to practicable alternatives.

**Project Impacts:** The original proposed discharge site involved an intertidal area which was severely degraded by shallow water log storage, especially within its southern half. The revised project would limit the discharge area to this more degraded, southern portion of the original proposed site. The applicant proposes to abandon all shallow water log storage areas in the mill vicinity once the project is completed. These areas, including the northern half of the original project site, are expected to recover once the practice of shallow water log storage is discontinued. In addition, the applicant agrees to abandon several other log storage areas once this project is completed. EPA believes that these mitigation measures are appropriate in light of the scope and degree of project impacts.

Also RECEIVED BY FAX ON 2/28/94 *HLA*

**Water Quality Impacts:** In order to reduce the potential for leachate transport, the applicant proposes to install a 20 ml plastic liner along the inside wall of the three woodwaste containment dikes. In order to prevent tearing, the plastic liner will be placed in a bed of clay, and immediately surrounded by finer materials (sawdust and sand). Each cell will be capped with compacted clay and shot rock within 7 months of the initial woodwaste discharge into the cell. The discharge will consist of clean fill material or material excavated from "Mount Seley." EPA advises that any pockets of fresher woodwaste material excavated from Mount Seley will be more prone to leaching, and should therefore be placed near the bottom of the cells in order to allow immediate saturation. In addition, EPA suggests that the compacted clay cap for each containment cell will not be needed if the surface is paved. EPA believes that the proposed measures will effectively minimize potential water quality impacts of the proposed project.

✓  
NOT APPLICABLE  
✓

**Monitoring:** The applicant proposes to monitor three wells placed in the walls of the containment dike for pH, COD, BOD, dissolved oxygen, suspended solids, sulfates, and H<sub>2</sub>S. Monitoring will be conducted quarterly during high and low tide. After one year, the data will be reviewed by concerned state and federal resource agencies (Corps, EPA, USFWS, NMFS, ADEC) to determine whether additional monitoring is necessary.

✓

**Special Conditions:** EPA suggests that the final permit include a single revised set of plans to eliminate confusion over the multiple versions of this project. EPA also recommends that the final permit incorporate the following conditions, in order to ensure compliance with the 404(b)(1) guidelines:

DO NOT

A. All portions of fill which include woodwaste will be compacted throughout and enclosed on all sides with a clay/shotrock/plastic liner within six months from the initial discharge of woodwaste material. The clay/plastic liner on the side of the fill shall be keyed at least three feet deep into the existing bottom. The clay/typar/shotrock cap shall be completed within seven months from the initial discharge of woodwaste.

use shotrock through

B. All fill material will consist of clean material (clay, sand, shot rock, or synthetic liner) or of compacted woodwaste excavated from the adjacent Mount Seley. No discharge of newly generated woodwaste will be allowed at this site.

C. The applicant shall relinquish the Corps permits for the following in-water log storage areas upon completion of the project:

- Blind Slough (66.12 acres)
- Aaron Creek (9.19 acres)
- Pt. Babler (35.03 acres)
- Berg Bay (6.93 acres)
- Fish Bay (53.33 acres) - withdrawal of appeal for tidelands lease

✓

D. All log storage in the vicinity of the mill shall occur in waters at least 40 feet deep at MLLW.

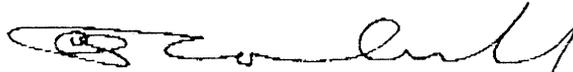
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In conclusion, EPA believes that the revised version of the project adequately addresses concerns raised over practicable alternatives, project impacts (including water quality impacts), and mitigation. Therefore, EPA does not object to issuance of this permit with the inclusion of the recommended special conditions.

Thank you for providing an opportunity to comment. If you have any additional questions, please call Susan Cantor at (907) 271-3411.

Sincerely,



C. D. Robison, Jr., P.E., Chief  
Field Operations Section

cc: NMFS, USFWS, ADEC, ADGC (Juneau)  
USFWS (Sitka)