ENCLOSURE #3 TO 10/17/96 LETTER

PHONE (907) 874-3371
FAX (907) 874-3654

ALASKA PULP CORPORATION
LUMBER DIVISION
6.5 MILE ZIMOVIA HIGHWAY
P.O. BOX 591
WRANGELL, ALASKA 99929

October 17, 1994

Michael A. Conway
Administrator
Southeast Regional Office
Alaska Department of
Environmental Conservation
410 Willoughby Avenue, Suite 105
Juneau, Alaska 99801-1795

Dear Mr. Conway:

Enclosed is a summary of more than three years of water quality data along the mill's tidelands, in support of the Corps of Army Engineers Permit No. N-810402, Zimovia Strait 52. Alaska Pulp Corporation now considers its monitoring obligations to have been met, and requests the Department's concurrance to discontinue further monitoring.

The Zimovia Strait 52 project was permitted on 9/27/90, and consisted of two intertidal fills of compacted woodwaste sealed with clay caps and perimeter liners. The main fill was completed in mid-1991, and quarterly water quality monitoring began immediately to determine any adverse water quality effects. The monitoring eventually included 15 stations as shown in the enclosed figure. The final fill along the dockside bulkhead was completed in mid-1993, more than a year ago. However, no water quality problem has detected in spite of substantial interagency review as part of the Zimovia Strait 87 permit application, which was approved earlier this year.

We would be glad to discuss the data in more detail if you wish. At this point there is no useful purpose in collecting more data. If the Zimovia Strait 87 project is constructed, water quality monitoring will be re-started prior to construction.

By all means give me a call (874-3371) on any questions or additional information you might need. Alaska Pulp Corporation went to great lengths to properly construct this project, and we believe the data clearly demonstrates that it was done in an environmentally clean manner.

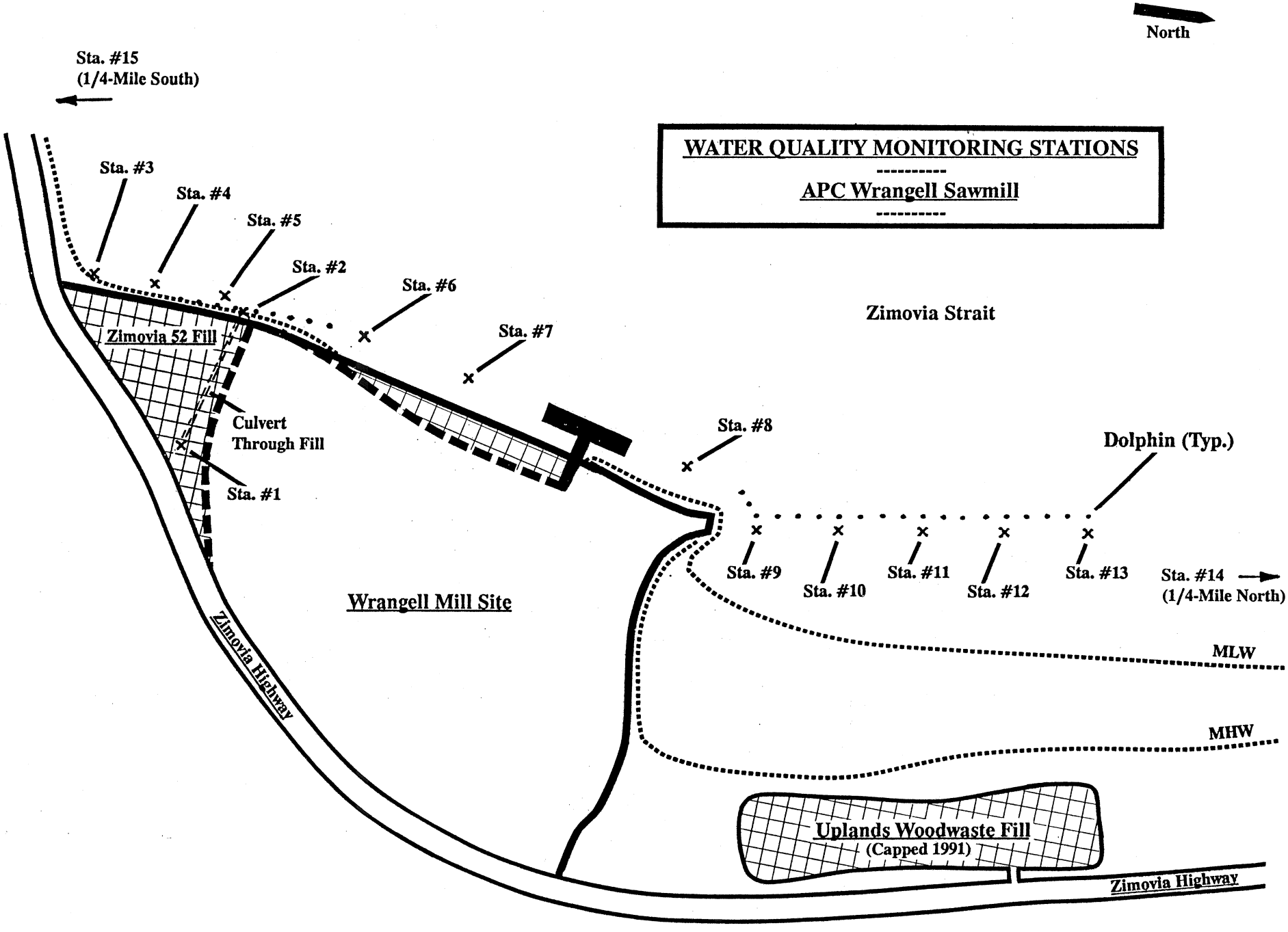
Sincerely yours,

Carl R Alsup

Carl Alsup
Manager

Enclosures:

cc: Barry Hogarty, ADEC Ketchikan District Office
SE Management Services


WATER QUALITY MONITORING STATIONS
APC Wrangell Sawmill
North
Sta. #15
(1/4-Mile South)
Sta. #3
Sta. #4
Sta. #5
Sta. #2
Sta. #6
Sta. #7
Sta. #8
Sta. #1
Sta. #9
Sta. #10
Sta. #11
Sta. #12
Sta. #13
Sta. #14
(1/4-Mile North)
Zimovia Strait
Zimovia 52 Fill
Culvert
Through Fill
Dolphin (Typ.)
Wrangell Mill Site
Zimovia Highway
MLW
MHW
Uplands Woodwaste Fill
(Capped 1991)
Zimovia Highway

Scale: 1" = 400'

ALASKA PULP CORPORATION - WRANGELL SAWMILL WATER QUALITY DATA
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Quarterly Data from Summer-1991 through Fall-1994

NOTES: 1. Stations #1 & #2 are fresh water
****** 2. Stations 3 - 15 are salt water

Date	MONITORING STATION NO.														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
					Ph **										
7/5/91	6.2	6.1	7.2	6.9	6.7										
10/4/91	6.6	6.4	6.9	6.6	7.3	7.9	7.9	8.0	7.9	7.7	7.8	7.5	7.9		
1/6/92	6.6	6.4	6.9	6.6	7.3	7.9	7.9	8.0	7.9	7.7	7.8	7.5	7.9		
4/14/92	5.6	6.6	7.4	7.0	7.0	7.7	7.7	7.7	7.6	7.5	7.4	7.6	7.7		
7/2/92	7.2	7.2	7.1	7.5	7.8	7.6	8.0	7.6	7.9	8.0	8.0	8.0	8.0	8.0	8.0
10/5/92	6.1	8.2	8.3	8.2	8.3	8.4	8.4	8.4	8.5	8.4	8.4	8.4	8.5	8.4	8.5
1/4/93	7.3	8.3	7.3	7.2	7.9	7.9	8.1	8.1	7.9	7.9	7.9	7.8	7.9	8.2	8.1
4/8/93	6.1	5.9	6.9	7.3	7.2	8.1	7.8	7.5	7.7	7.2	7.6	8.0	7.9	7.8	7.4
7/6/93	6.0	5.4	7.1	8.0	8.0	8.0	8.1	8.1	8.1	8.2	8.2	8.1	8.2	8.2	8.2
10/4/93	5.8	5.4	7.5	7.9	7.7	7.9	8.0	8.0	7.9	8.0	8.0	8.1	8.0	8.1	8.1
1/11/94	6.1	6.2	7.4	7.6	7.9	7.9	8.1	8.1	8.1	8.2	8.2	8.1	8.2	8.2	8.2
4/12/94	5.4	5.3	7.9	8.1	8.2	8.2	8.2	8.2	8.3	8.3	8.3	8.3	8.2	8.3	8.2
7/14/94	5.8	5.3	7.7	8.0	8.0	8.1	8.2	8.1	8.2	8.2	8.2	8.2	8.2	8.2	8.2
					Disolved Oxygen (DO) **********										
7/5/91	9.6	9.5	7.7	7.0	6.8										
10/4/91	11.3	11.0	7.7	6.9	10.3	10.8	10.6	10.6	10.5	10.1	10.4	10.6	10.7		
1/6/92	13.2	13.1	11.4	11.2	12.4	11.3	11.3	11.3	11.2	10.8	10.9	11.5	11.4		
4/14/92	10.0	10.2	9.5	10.0	10.2	10.1	9.5	10.4	10.2	9.8	10.0	9.8	10.6		
7/2/92	7.7	10.4	12.1	11.6	11.6	11.5	12.0	11.4	11.6	11.8	11.8	11.6	12.5	11.3	12.1
10/5/92	12.7	12.4	11.0	11.3	10.8	11.2	11.0	11.0	10.4	10.2	11.0	10.9	9.2	9.2	9.4
1/4/93	13.7	11.9	10.0	10.1	10.7	11.5	11.6	11.6	11.5	11.9	11.8	11.8	11.9	11.6	11.5
4/8/93	11.7	12.1	12.4	12.3	11.9	14.2	13.3	13.5	12.8	13.7	13.8	13.8	14.1	14.5	14.9
7/6/93	7.8	8.4	8.6	8.5	8.9	8.7	8.8	8.9	8.8	8.8	9.0	8.7	8.6	9.0	8.9
10/4/93	9.5	9.8	9.4	9.3	9.4	9.4	9.3	9.4	9.1	9.3	9.3	9.3	9.2	9.3	9.2
1/11/94	7.8	8.4	8.6	8.5	8.9	8.7	8.0	8.0	8.0	8.0	8.0	8.0	7.9	8.0	8.0
4/12/94	12.4	12.4	13.2	13.1	13.1	12.8	13.0	13.1	13.1	13.0	12.9	12.9	11.9	12.8	13.2
7/14/94	10.5	10.2	10.3	10.6	10.5	10.6	10.5	10.5	10.7	10.6	10.5	10.5	10.6	10.5	10.5

ALASKA PULP CORPORATION - WRANGELL SAWMILL WATER QUALITY DATA
****

Quarterly Data from Summer-1991 through Fall-1994

NOTES: 1. Stations #1 & #2 are fresh water
****** 2. Stations 3 - 15 are salt water

Date	MONITORING STATION NO. 1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
					NTU ***										
7/5/91	2.4	2.2	7.5	6.2	5.1										
10/4/91	0.8	0.6	4.8	17.0	2.5	1.8	2.2	2.1	2.6	2.4	2.6	3.9	4.1		
1/6/92	0.6	1.0	0.8	6.2	1.0	0.9	0.7	0.8	1.8	2.6	2.2	1.1	1.1		
4/14/92	2.8	2.4	3.8	4.2	3.2	3.1	3.5	2.0	3.7	2.2	2.0	2.3	3.3		
7/2/92	1.3	17.0	20.0	17.0	15.0	20.0	17.0	13.0	19.0	17.0	15.0	18.0	15.0	15.0	28.0
10/5/92	0.5	0.3	8.1	10.0	6.5	7.5	15.0	12.0	3.3	2.9	5.9	6.0	3.7	4.1	23.0
1/4/93	0.2	2.8	0.7	1.1	1.6	0.6	0.5	0.8	0.6	0.8	0.9	0.9	1.2	1.0	0.9
4/8/93	1.5	2.5	2.2	2.7	1.5	1.3	3.2	2.5	3.2	3.4	2.7	3.3	3.5	4.8	4.2
7/6/93	13.0	16.0	18.0	18.0	15.0	20.0	19.0	15.0	15.0	18.0	15.0	14.0	15.0	15.0	15.0
10/4/93	0.5	0.5	1.9	1.5	3.1	2.1	1.1	2.0	2.6	1.5	1.4	1.4	2.6	1.5	1.5
1/11/94	1.0	1.0	1.8	1.8	2.3	1.0	0.9	1.1	0.7	0.8	0.8	1.1	0.8	0.6	0.9
4/12/94	0.6	0.5	1.5	1.8	1.7	1.6	1.8	1.2	1.5	1.2	1.3	1.3	4.2	2.7	1.3
7/14/94	0.2	0.2	2.0	6.0	4.0	4.0	4.0	3.0	3.0	4.0	3.0	3.0	3.0	4.0	3.0
					Color *****										
7/5/91	50	55	40	35	50										
10/4/91	60	20	10	20	15	15	10	10	15	15	5	10	10		
1/6/92	50	40	10	15	10	10	5	10	15	10	5	10	5		
4/14/92	50	45	20	25	15	25	20	20	15	10	10	10	10		
7/2/92	40	45	35	35	40	35	45	45	40	30	40	40	40	35	50
10/5/92	30	30	20	15	15	10	15	10	15	10	15	15	10	10	20
1/4/93	10	15	15	15	10	10	10	10	15	15	15	10	15	15	15
4/8/93	20	25	20	15	20	15	10	5	5	10	15	15	10	10	15
7/6/93	25	20	10	10	10	15	10	10	10	15	10	10	10	10	10
10/4/93	20	20	5	5	5	5	5	5	5	5	5	5	5	5	5
1/11/94	10	10	5	5	5	5	5	5	5	5	5	5	5	5	5
4/12/94	10	10	5	5	5	5	5	5	5	5	5	5	10	5	5
7/14/94	25	25	5	5	5	5	5	5	5	5	5	5	5	5	5

ALASKA PULP CORPORATION - WRANGELL SAWMILL WATER QUALITY DATA
****

Quarterly Data from Summer-1991 through Fall-1994

NOTES: 1. Stations #1 & #2 are fresh water
****** 2. Stations 3 - 15 are salt water

Date	MONITORING STATION NO. 1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
C.O.D.															
7/5/91	11	15	26	26	19										
10/4/91	24	40	626	546	433	995	979	963	385	850	738	546	594		
1/6/92	> 5	16	941	430	510	780	710	1,100	390	1,000	390	1,000	550		
4/14/92	28	20	630	320	400	830	870	910	830	870	790	670	630		
7/2/92	> 5	> 5	790	390	230	880	800	400	440	1,200	910	760	240	380	160
10/5/92	19	19	56	75	110	100	135	64	83	95	48	87	95	71	56
1/4/93	13	44	50	45	48	60	64	69	52	55	58	70	78	85	87
4/8/93	24	29	70	69	88	580	140	360	340	630	280	360	350	260	340
7/6/93	n.d.	10	76	65	32	85	245	91	440	315	310	325	395	550	265
10/4/93	n.d.	21	510	420	264	435	435	405	405	420	420	390	480	395	395
1/11/94	13	14	1,010	860	625	1,160	952	963	987	883	999	1,150	907	1,070	1,070
4/12/94	19	19	739	953	912	1,040	901	761	959	570	837	1,010	770	870	868
7/14/94	14	10	719	385	587	639	573	669	682	584	757	587	616	448	766
Sulfate															
7/5/91	< 0.1	< 0.1	332	331	236										
10/4/91	< 0.1	< 0.1	31	25	27	35	34	34	26	32	32	29	30		
1/6/92	7	109	2,150	1,050	1,060	2,180	2,210	2,200	1,720	1,610	1,630	2,150	2,180		
4/14/92	< 0.1	< 0.1	1,550	1,640	2,230	2,280	2,270	2,250	2,170	2,240	2,250	2,230	2,200		
7/2/92	< 0.1	830	780	800	770	770	850	860	840	830	840	860	850	860	820
10/5/92	6	3	1,330	1,010	1,270	1,220	1,110	1,260	1,350	1,190	1,500	1,490	1,740	1,680	750
1/4/93	7	1,850	2,070	2,030	2,160	2,480	2,490	2,480	2,380	2,460	2,490	2,470	2,390	2,470	2,430
4/8/93	n.d.	321	10	1,092	1,926	2,186	2,284	2,384	2,361	2,350	2,291	2,276	2,379	2,299	2,309
7/6/93	n.d.	n.d.	790	780	470	820	860	890	990	1,090	1,020	1,000	1,040	1,220	810
10/4/93	n.d.	n.d.	1,950	2,000	1,250	2,050	2,050	2,000	1,950	2,000	2,000	2,000	2,000	2,000	2,000
1/11/94	2	2	2,270	2,190	2,150	2,570	2,370	2,300	2,420	2,370	2,350	2,390	2,380	2,360	2,380
4/12/94	< 0.1	< 0.1	2,130	2,090	2,090	2,160	2,160	2,140	2,170	2,160	2,100	2,230	994	2,100	2,160
7/14/94	2	1	1,160	903	1,130	1,190	1,100	1,220	1,150	1,100	1,040	1,110	1,120	1,090	1,150

ALASKA PULP CORPORATION - WRANGELL SAWMILL WATER QUALITY DATA
****

Quarterly Data from Summer-1991 through Fall-1994

NOTES: 1. Stations #1 & #2 are fresh water
****** 2. Stations 3 - 15 are salt water

Date	MONITORING STATION NO. 1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
B.O.D. ******															
7/5/91	0.70	0.95	1.45	1.70	1.70										
10/4/91	5.67	5.67	1.17	4.17	0.42	3.17	3.92	3.42	3.67	3.92	1.92	4.45	2.42		
1/6/92	6.25	6.75	0.00	6.25	0.75	2.00	2.25	2.00	1.25	1.25	0.75	1.50	2.00		
4/14/92	6.50	6.50	4.00	0.00	2.25	5.25	0.25	6.00	1.00	0.00	2.75	0.00	0.00		
7/2/92	1.84	0.84	4.09	6.59	5.09	2.90	8.84	3.44	0.34	3.59	1.59	1.59	0.49	0.09	2.59
10/5/92	4.83	4.08	0.83	1.33	0.33	1.08	1.33	1.83	2.08	5.58	3.33	3.83	2.33	3.33	2.08
1/4/93	4.67	5.42	4.92	4.17	3.67	4.17	3.92	3.17	2.92	1.92	3.67	1.67	2.42	0.92	0.42
4/8/93	n.d.	n.d.	n.d.	n.d.	n.d.	n.d.	n.d.	n.d.	n.d.	n.d.	n.d.	n.d.	n.d.	n.d.	n.d.
7/6/93	n.d.	n.d.	n.d.	n.d.	n.d.	n.d.	n.d.	n.d.	n.d.	n.d.	n.d.	n.d.	n.d.	n.d.	n.d.
10/4/93	n.d.	n.d.	n.d.	n.d.	n.d.	n.d.	n.d.	n.d.	n.d.	n.d.	n.d.	n.d.	n.d.	n.d.	n.d.
1/11/94	2.4	1.6	n.d.	n.d.	n.d.	n.d.	n.d.	n.d.	n.d.	n.d.	n.d.	n.d.	n.d.	n.d.	n.d.
4/12/94	8.0	4.0	n.d.	n.d.	n.d.	2.4	n.d.	n.d.	n.d.	n.d.	n.d.	n.d.	n.d.	n.d.	n.d.
7/14/94	n.d.	0.4	n.d.	n.d.	n.d.	n.d.	n.d.	n.d.	n.d.	n.d.	n.d.	n.d.	n.d.	n.d.	n.d.
Suspended Solids ********															
7/5/91	4.0	4.0	4.0	6.0	4.0										
10/4/91	3.0	3.0	11.0	37.0	25.0	33.0	35.0	32.0	15.0	31.0	23.0	26.0	32.0		
1/6/92	7.0	7.0	25.0	17.0	20.0	10.0	8.0	4.0	32.0	6.0	7.0	11.0	4.0		
4/14/92	1.5	1.5	11.0	17.0	15.5	28.5	23.0	28.5	33.5	11.0	21.5	25.5	24.0		
7/2/92	8.5	6.0	9.5	5.5	7.0	6.0	7.5	5.0	4.0	6.5	10.5	9.5	4.5	7.5	8.0
10/5/92	4.3	5.0	2.3	3.8	6.0	2.5	3.3	5.5	4.3	3.5	2.5	4.0	6.3	3.8	5.3
1/4/93	11.0	7.8	7.0	9.5	2.8	5.0	4.3	11.5	1.8	2.3	4.8	4.8	6.0	1.0	3.0
4/8/93	n.d.	4.0	4.0	8.0	12.0	8.0	8.0	7.0	6.0	6.0	n.d.	5.0	4.0	5.0	4.0
7/6/93	6.3	5.5	10.5	11.3	9.3	13.5	15.5	12.0	16.3	14.3	13.0	4.3	7.5	10.8	9.5
10/4/93	3.5	7.5	16.3	9.8	19.3	13.5	13.8	14.0	16.5	16.8	8.0	8.0	14.0	10.5	9.0
1/11/94	3.3	4.3	1.0	1.0	1.8	1.8	2.0	1.3	2.0	2.3	1.3	1.8	0.8	1.5	2.5
4/12/94	1.3	1.8	4.3	9.5	6.0	9.0	1.8	4.3	4.5	5.3	5.0	5.5	6.8	26.3	6.0
7/14/94	1.0	1.0	2.5	8.0	11.0	13.0	12.0	11.0	25.0	9.5	9.0	10.0	10.0	4.5	13.0