

SOUTHEAST MANAGEMENT SERVICES

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October 17, 1996

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DEPARTMENT OF
ENVIRONMENTAL CONSERVATION

Eric Decker
Watershed Management Program
**Department of Environmental
Conservation**
410 Willoughby Avenue, Suite 105
Juneau, Alaska 99801-1795

Dear Mr. Decker:

On behalf of Alaska Pulp Corporation and confirming our earlier telephone discussion, arrangements have been made to meet with you at the Wrangell sawmill offices starting about 4:30 p.m. on October 24, to review the Shoemaker Bay water quality conditions.

A vicinity map and recent photos of the area just north of the Wrangell sawmill are enclosed, to assist your preparations for reviewing Shoemaker Bay's listing as a 'Tier-I water-limited waterbody'. We believe Shoemaker Bay's designation is incorrect and should be changed at least to a 'Tier-III water-limited waterbody', if not Tier-IV. Our reasons are as follows:

1. According to page 7 in Appendix A of "Alaska's 1996 Water Quality Assessment Report", Shoemaker Bay was placed on the 303(d) list based on a 1993 report by the U.S. Fish & Wildlife Service. That report and its supporting data were generated to assist F&W in evaluating the mill's 1993-proposed 9.8-acre intertidal fill project, to be located just north of the mill. The project was approved by the Corps of Army Engineers, but only after extensive mitigation steps were proposed and accepted which addressed the concerns of the F&W report. A copy of the permit is enclosed for your information, and Conditions #4 - #6 directly responded to the F&W report;
2. The Wrangell sawmill has been shut down since 1994, and the intertidal area of the F&W study no longer is used for new log-raft storage. As shown by the photographs, some logs still remain on the intertidal area, but no-where near the amount formerly occupying the site. The remaining log booms and miscellaneous timber should be totally removed within the next few weeks. Consequently, the mitigation activities required by the intertidal fill project's permit are being enacted, even though the project itself has not begun construction;

3. A large woodwaste fill is immediately upland of the north-end intertidal area, and prior to 1992 had numerous leachate streams. The fill was capped with blue clay & rock in 1992. Within a year its leachate was substantially reduced in strength and was hardly detectable by early-1994. Consequently, leachate no longer should be assumed to be adversely affecting this intertidal area;
4. The F&W report suggested it was 'probable' that chronic and acute pollution problems had been caused by 'petroleum product spills' from the mill. However, no evidence was presented to substantiate this claim, and the only mill activity in this tidelands area consisted of little more than an infrequent bronco boat when log rafts were moved into or out of the area. Consequently, it is highly unlikely than an oil pollution 'problem' of any consequence ever occurred in this area;
5. The mill conducted a 3-year water quality sampling program along its tidelands, consisting of 15 stations including 5 along the front of F&W's study area. The results of that study (see Enclosure #3) could not detect any adverse water quality effects, even though a substantial number of parameters were tested (pH, DO, NTU, color, COD, BOD, sulfates, suspended solids). The sampling was discontinued in 1994, after being reported to ADEC;
6. The tidelands on which the F&W data was taken, and on which the mill's permitted intertidal fill project would be built, were specifically permitted by State Tidelands Lease ADL-102848 for use as an intertidal log storage area. Therefore some reduction and change in its aquatic biomass should have been expected and allowable. While the F&W report documented a reduction in numbers and weights of the biomass, it also concluded that the area's ecological diversity remained similar to the control site. Now that the area no longer is being used for log storage, it can be expected to naturally rebound on its own. Even if the intertidal fill project goes forward, the remaining intertidal areas will not revert to log storage use, and
7. Shoemaker Bay also includes the tidelands and water in front of the sawmill, an area not evaluated in the F&W report. However, this entire area was evaluated by remote underwater camera last month and confirmed there were no barrels, batteries or other solid waste which might need to be cleaned up. In addition, no wood debris deposits of any consequence were found. Abundant fish, sea cucumbers, starfish & crabs were observed throughout the shallower waters, and I will bring the video tapes to Wrangell in case you want to view them. A 1993-94 evaluation of an earlier-completed intertidal woodwaste fill (the Zimovia-52 fill along the south end of the mill property, completed in 1991 and shown in Figure I of Enclosure #3) confirmed there was no standing water within the encapsulated fill (see Enclosure #4).

In summary, the 1993 F&W report documented concerns about the intertidal area immediately north of the Wrangell sawmill, but they were resolved by the mitigation steps incorporated into the mill's early-1994 Corps of Engineers permit. In addition, the Wrangell sawmill no longer is operating and the remaining logs in the intertidal area will be completely removed in the next few weeks. Finally, the mill conducted several water quality evaluations and just completed a thorough underwater

survey of Shoemaker Bay beyond the intertidal area, all of which confirmed the high degree of water quality throughout the Bay and the lack of any solid waste deposits. Consequently, Tier-III and Tier-IV water quality listings appear to be the only logical designation options for Shoemaker Bay.

Thank you for your consideration in this matter. I look forward to discussing this issue in more detail on October 24.

Sincerely yours,

A handwritten signature in black ink that reads "Thomas R. Hanna". The signature is written in a cursive style with a large initial 'T' and 'H'.

Thomas R. Hanna

Enclosures (4)

cc: Frank Roppel, Alaska Pulp Corporation