

3/15/2001

Dear Mr. Grant:

Alaska Community Action on Toxics provides the following information in response to the Alaska Department of Environmental Conservation's public comment announcement requesting submission of water quality, water quantity, and fisheries habitat information for waters of Alaska. We understand that this information will be used in a water resources assessment report to the Environmental Protection Agency under Section 505(b) of the Clean Water Act. We are deeply concerned that the Alaska Department of Environmental Conservation continues to permit mixing zones. This practice causes continuing degradation of our waters, undermines the fundamental tenets of the Clean Water Act, and should be discontinued. All water bodies with designated mixing zones should be listed as impaired under section 303(d) of the Clean Water Act because water quality standards are exceeded within the mixing zones and/or public uses are negatively affected. We also include specific information about the following water bodies:-

Suqitughneq (abbreviated Suqi) River and Associated Wetlands, Northeast Cape, Saint Lawrence Island

Pollutant source: Formerly Used Defense (FUD) and White Alice Site at NE Cape
The Department of Defense operated a large military installation from the early 1950s to the early 1970s approximately 9 miles west of the northeastern cape of Saint Lawrence Island between Kitnagak Bay to the northeast and Kanggighsak Point to the northwest. The Suqi River flows from the Kinipaghulghat Mountains to the Bering Sea and drains the area encompassed by the NE Cape FUD site. Contamination from the military activities include: massive fuel spills totaling approximately 220,000 gallons, PCBs, solvents, and heavy metals. The military created several landfills with thousands of barrels and other wastes. The Army Corps of Engineers has identified at least 25

contaminated sites that require investigation and remediation. Corps contractors are conducting further site investigations and debris removal, but the source areas and extent of contamination have not been adequately determined. Elevated levels of PCBs and PAHs in fish samples prompted ATSDR to issue warnings urging that adults and children of Savoonga and Gambell refrain from eating fish from the Suqi River. Elders from Savoonga state that the Suqi River watershed was once one of the most important areas on the island for subsistence fishing, hunting, and gathering of berries and greens. Once abundant with fish, the Suqi River anadromous fish runs and resident fish populations have greatly diminished since the military contaminated the area. People from the Island are now afraid to use this area for traditional fishing and hunting because the area is so heavily contaminated. Saint Lawrence Island residents also used the Suqi River as a source of drinking water. People from the island have observed significant increases in cancers and other health problems that they attribute to the contamination of NE Cape.

USE
Impaired:

Troutman Lake, Gambell, Saint Lawrence Island

Pollutant source: Formerly Used Defense Site at Gambell
Gambell and Troutman Lake are located on the northwest cape of Saint Lawrence Island at 63°47'N latitude and 171°45'W longitude. During the Cold War, the military constructed an installation that included numerous buildings and an airstrip. Drums containing petroleum products, generators, transformers, and other hazardous and toxic waste were left behind. Hazardous materials were dumped into Troutman Lake or may be

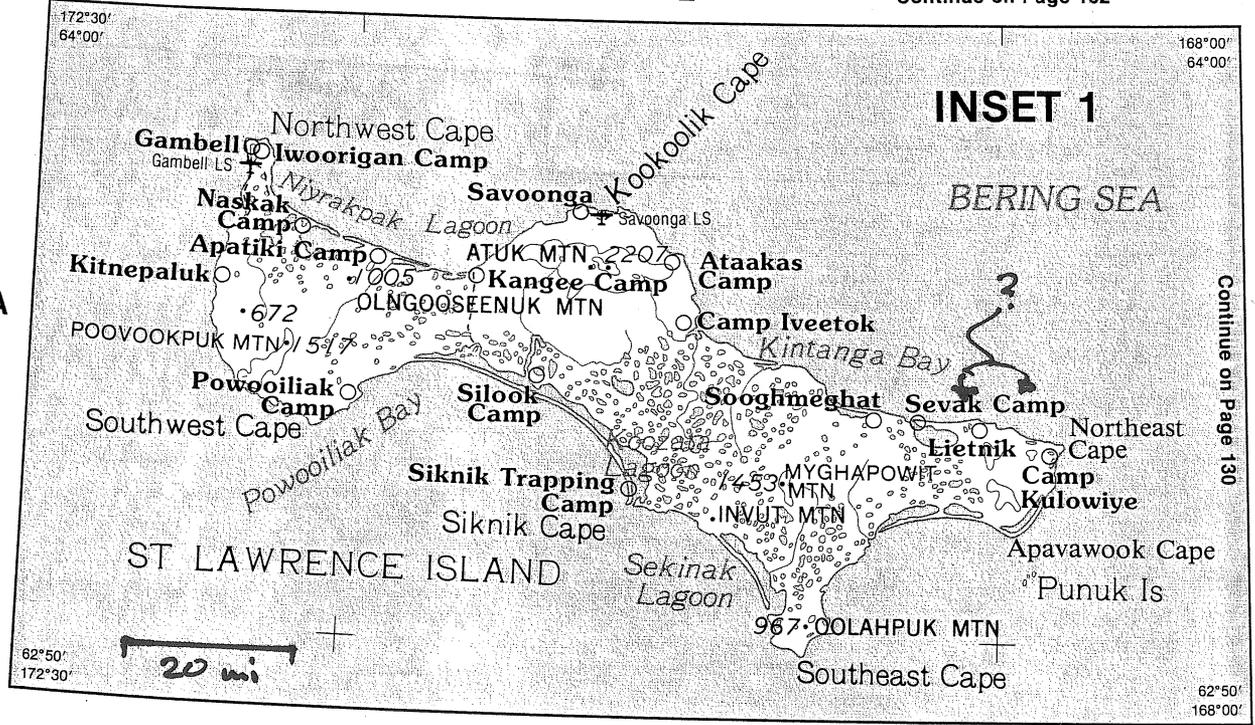
139 INSETS



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BERING SEA

Port Moller State Critical Habitat Area

