

**Department of Environmental Conservation
Response to Comments**

for

Ketchikan Pulp Company Ward Cove Landfill

APDES Permit No. AK0053392

Public Noticed September 11, 2025 – October 10, 2025

October 15, 2025



**Alaska Department of Environmental Conservation
Wastewater Discharge Authorization Program
555 Cordova Street
Anchorage, AK 99501**

1 Introduction

1.1 Summary of Facility / Permit

KPC owns and maintains the Ward Cove Landfill, located less than a mile west of the site of KPC's former pulp mill at Ward Cove. KPC opened the landfill in 1988 to serve the pulp mill and completed construction of the leachate treatment system in 1998. In 1999, KPC sold the core pulp mill premises to a private party, while retaining ownership of the Landfill. Since then, the former pulp mill properties have been sold and conveyed to different purchasers under varying forms of ownership, including a long-term lease and a related possessory long-term easement. In November 2024, the underlying fee ownership of most of the prior pulp plant premises was sold to Alaska Port Innovations, LLC, ownership of which is held by several underlying private companies.

The landfill is no longer used as a waste disposal site. The first waste disposal cell was closed in 1998 and the second waste disposal cell was closed in 2001. Both cells contain primarily wood waste, boiler bottom ash, and fly ash from past mill operations. Storm water discharges from the landfill flows to Refuge Cove via storm water monitoring locations SWL4 and SWL6B and to Ward Cove via storm water monitoring locations SWL11, and SWL12.

The KPC Landfill was originally permitted under National Pollutant Discharge Elimination System Permit AK0000922 in 1998 by the Environmental Protection Agency (EPA). The permit authorized the discharge of KPC Landfill leachate with other comingled treated wastewater originating from the grounds of the mill. In 2004, KPC constructed a new outfall and requested separate permits for their discharges. Subsequently, in August 2004, EPA issued AK0053392 for the landfill leachate. The 2004 permit, which expired in 2009, was administratively extended until May 1, 2013, when DEC reissued AK0053392 as an Alaska Pollutant Discharge Elimination System (APDES permit). The APDES permit was subsequently reissued in 2020 for a five year period. Under the Administrative Procedures Act and state regulations at 18 AAC 83.155(c), an APDES permit may be administratively extended (i.e., continues in force and effect) provided that the permittee submits a timely and complete application for a new permit prior to the expiration of the current permit. A timely application for a new permit was submitted by KPC on August 28, 2024; therefore, the 2020 permit is administratively extended until such time a new permit is reissued.

1.2 Opportunities for Public Participation

DEC proposed to issue an APDES wastewater discharge permit for the KPC Ward Cove Landfill discharge. To ensure public, agency, local governments and tribal notification and opportunities for participation, the Department:

- identified the permit on the annual Permit Issuance Plan posted online at: [Permit Issuance Plan | AK Dept. of Environmental Conservation](#)
- notified local governments and potentially affected tribes that the Department would be working on this permit via letter, fax and/or email
- posted a preliminary draft of the permit on-line for a 10-day applicant review August 13, 2025 and notified tribes and other agencies
- posted the public notice announcing a 30-day public comment period on the Department's public notice web page on September 11 2025
- sent email notifications via the APDES Program List Serve when the preliminary draft, draft, and proposed final permits were available for review

There were no other comments received during the 30-day public comment period.

1.3 Final Permit

The final permit was adopted by the Department on October 15, 2025. There were no changes from the public noticed permit.