



## **Source Water Assessment**

A Hydrogeologic Susceptibility and Vulnerability Assessment for Bethel Native Corporation Offices Drinking Water System, Bethel, Alaska

PWSID # 271106.001

April 2004

DRINKING WATER PROTECTION PROGRAM REPORT 1122 Alaska Department of Environmental Conservation

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#### DRINKING WATER PROTECTION PROGRAM REPORT 1122

The Drinking Water Protection Program (DWPP) is producing Source Water Assessments in compliance with the Safe Drinking Water Act Amendments of 1996. Each assessment includes a delineation of the source water area, an inventory of potential and existing contaminant sources that may impact the water, a risk ranking for each of these contaminants, and an evaluation of the potential vulnerability of these drinking water sources.

These assessments are intended to provide public water systems owners/operators, communities, and local governments with the best available information that may be used to protect the quality of their drinking water. The assessments combine information obtained from various sources, including the U.S. Environmental Protection Agency, Alaska Department of Environmental Conservation (ADEC), public water system owners/operators, and other public information sources. The results of this assessment are subject to change if additional data becomes available. It is anticipated this assessment will be updated every five years to reflect any changes in the vulnerability and/or susceptibility of public drinking water source. If you have any additional information that may affect the results of this assessment, please contact the Program Coordinator of DWPP, (907) 269-7521.

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## Source Water Assessment for Bethel Native Corporation Offices Source of Public Drinking Water, Bethel, Alaska

**Drinking Water Protection Program Alaska Department of Environmental Conservation** 

#### **EXECUTIVE SUMMARY**

The Bethel Native Corporation Offices has one Public Water System (PWS) well. The well (PWS No. 271106.001) has been used as a drinking water source since it was drilled in 1981.

The well is a Class A (community and non-transient/non-community) water system located at 460 Ridgecrest Drive in Bethel, Alaska. Available records indicate that there is no water storage, other than the pressure tank, and that the drinking water is treated with calcium hypochlorite and green sand filters. This system operates year round and serves approximately 99 non-residents through two service connections. The wellhead received a susceptibility rating of **Low** and the aquifer received a susceptibility rating of **High**. Combining these two ratings produce a **Medium** rating for the natural susceptibility of the well.

Identified potential and current sources of contaminants for the public drinking water source include: domestic wastewater collections systems, aboveground fuel tanks, wastewater holding tanks, an abandoned well, monitoring wells, water supply wells, cemeteries, roads, pipelines, electric power generation, injection wells, Laundromats, motor/motor vehicle repair shops, petroleum product bulk station/terminals, motor vehicle/general storage vards/facilities, firehouses, a domestic wastewater treatment plant pond/lagoon, landfills, and an ADEC recognized leaking underground storage tank (LUST) site. These identified potential and existing sources of contamination are considered as sources of bacteria and viruses, nitrates and/or nitrites, volatile organic chemicals, heavy metals, cyanide and other inorganic chemicals, synthetic organic chemicals, and other organic chemicals contaminant categories.

Overall, the water well received a vulnerability rating of **Medium** for bacteria and viruses, and a vulnerability rating of **High** for nitrates and nitrites, volatile organic chemicals, heavy metals, cyanide and other inorganic chemicals, synthetic organic chemicals, and other organic chemicals.

#### PUBLIC DRINKING WATER SYSTEM

The Bethel Native Corporation Offices well is a Class A (community/non-transient/non-community) public water system. The system is located at 460 Ridgecrest Drive in Bethel, Alaska (Sec. 8, T8N, R71W, Seward Meridian; see Map A of Appendix A). Bethel serves as the regional center for 56 villages in the Yukon-Kuskokwim Delta. Food, fuel, transportation, medical care, and other services for the region are provided by Bethel. Bethel is located at the mouth of the Kuskokwim River, 40-miles inland from the Bering Sea, and approximately 400air miles west of Anchorage. The community has a population of 5,736 (ADCED, 2003). Average annual precipitation for Bethel is 16 inches, including approximately 50 inches of snowfall. Temperatures range from 42 to 62°F in summer and -2 to 19°F in winter.

The community of Bethel obtains a portion of their water supply from city wells. Some households are served by the central piped water and sewage collection system; however, approximately 75% of households have water delivered and sewage hauled by truck. Several facilities have individual wells and septic tanks (ADCED, 2003). Bethel receives electrical power from the Bethel Utilities Corporation. Power generating facilities are fueled by diesel. Refuse is collected by the City of Bethel and transported to the City operated landfill (ADCED, 2003).

According to information supplied by ADEC for the Bethel Native Corporation Offices PWS, the depth of the primary water well is 421 feet below the ground surface. Well construction details are unknown; however, it is assumed that the well is screened in a confined aquifer based on well construction details for surrounding wells. The well is not located within a floodplain.

Information acquired from a July 1993 sanitary survey for the public water system indicated that the land surface was sloped away from the well.

Generally, land surfaces that slope away from the

wellhead promote surface water drainage, which reduces the potential of contaminant migration down the well casing annulus. The sanitary survey indicates that the well is not grouted according to ADEC regulations. Proper grouting provides added protection against contaminants traveling along the well casing annulus and into source waters.

The Bethel area is near the southern border of the continuous permafrost zone and the City, and most of the area west of the Kuskokwim River, appear to be underlain with permafrost. The permafrost generally extends to a depth of at least 300 feet bgs, with depths of over 600 feet bgs recorded in some areas. The geology in the area consists primarily of unconsolidated floodplain alluvium, silt deposits, and reworked silt. The Bethel area consists of poorly drained wetlands that have permanently ponded water in local depressions. Sloughs, small lakes, ponds, and marshes in meander scars surround Bethel (Dames & Moore, 1996).

#### DRINKING WATER PROTECTION AREA

In order to evaluate whether a drinking water source is at risk, we must first evaluate what are the most likely pathways for surface contamination to reach the groundwater. These areas are determined by looking at the characteristics of the soil, groundwater, aquifer, and well.

The most probable area for contamination to reach the drinking water well is the area that contributes water to the well, the groundwater recharge area. This area is designated as the drinking water protection area (DWPA). Because releases of contaminants within the protection area are most likely to impact the drinking water well, this area will serve as the focus for voluntary protection efforts. An analytical calculation was used to determine the size and shape of the DWPA for the Bethel Native Corporation Offices PWS. The input parameters describing the attributes of the aquifer in this calculation were adopted from Groundwater (Freeze and Cherry, 1979). Available geology and groundwater contours were also considered to take into account any uncertainties in groundwater flow and aquifer characteristics to arrive at a meaningful protection area.

The protection areas established for wells by the ADEC are usually separated into four zones, limited by the watershed. These zones correspond to differences in the time-of-travel (TOT) of the water moving through the aquifer to the well (Please refer

to the Guidance Manual for Class A Public Water Systems for additional information).

The time of travel for contaminants within the water varies and is dependent on the physical and chemical characteristics of each contaminant. The following is a summary of the four protection area zones for wells and the calculated time -of-travel for each:

Table 1. Definition of Zones

Zone	Definition
A	<sup>1</sup> / <sub>4</sub> the distance for the 2-yr. time -of-travel
В	Less than the 2 year time-of-travel
C	Less Than the 5 year time -of-travel
D	Less than the 10 year time -of-travel
	·

The DWPA for the Bethel Native Corporation Offices PWS was determined using an analytical calculation and includes Zones A, B, C, and D (See Map A of Appendix A).

## INVENTORY OF POTENTIAL AND EXISTING CONTAMINANT SOURCES

The Drinking Water Protection Program has completed an inventory of potential and existing sources of contamination within the Bethel Native Corporation Offices DWPA. This inventory was completed through a search of agency records and other publicly available information. Potential sources of contamination to the drinking water aquifer include a wide range of categories and types. Potential drinking water contaminants are found within agricultural, residential, commercial, and industrial areas, but can also occur within areas that have little or no development.

For the basis of all Class A public water system assessments, six categories of drinking water contaminants were inventoried. They include:

- Bacteria and viruses,
- Nitrates and/or nitrites,
- Volatile organic chemicals,
- Heavy metals, cyanide and other inorganic chemicals,
- Synthetic organic chemicals,
- Other organic chemicals.

The sources are displayed on Map C of Appendix C and summarized in Table 1 of Appendix B.

#### RANKING OF CONTAMINANT RISKS

Once the potential and existing sources of contamination have been identified, they are assigned a ranking according to what type and level of risk they represent. Ranking of contaminant risks for a "potential" or "existing" source of contamination is a function of toxicity and volumes of specific contaminants associated with that source. Rankings include:

- Low.
- Medium,
- High, and
- Very High.

The time-of-travel for contaminants within the water varies and is dependent on the physical and chemical characteristics of each contaminant. Bacteria and Viruses are only inventoried in Zones A and B because of their short life span. Only "Very High" and "High" rankings are inventoried within the outer Zone D due to the probability of contaminant dilution by the time the contaminants get to the well. Tables 2 through 4 in Appendix B contain the ranking of potential and existing sources of contamination with respect to bacteria and viruses, nitrates and/or nitrites, volatile organic chemicals, heavy metals, cyanide and other inorganic chemicals, synthetic organic chemicals, and other organic chemicals.

## VULNERABILITY OF THE DRINKING WATER SYSTEM

Vulnerability of a drinking water source to contamination is a combination of two factors:

- Natural susceptibility, and
- Contaminant risks.

Appendix D contains fourteen charts, which together form the 'Vulnerability Analysis' for a source water assessment for a public drinking water source. Chart 1 analyzes the 'Susceptibility of the Wellhead' to contamination by looking at the construction of the well and its surrounding area. Chart 2 analyzes the 'Susceptibility of the Aquifer' to contamination by looking at the naturally occurring attributes of the water source and influences on the groundwater system that might lead to contamination. Chart 3 analyzes 'Contaminant Risks' for the drinking water source with respect to bacteria and viruses. The 'Contaminant Risks' portion of the analysis considers potential sources of contaminants as well as a review of contamination that has or may have occurred, but has not arrived or been detected at the well. Chart 4

contains the 'Vulnerability Analysis for Bacteria and Viruses'. Charts 5 through 14 contain the Contaminant Risks and Vulnerability Analyses for nitrates and nitrites, volatile organic chemicals, heavy metals, cyanide and other inorganic chemicals, synthetic organic chemicals, and other organic chemicals, respectively.

A score for the Natural Susceptibility is reached by considering the properties of the well and the aquifer.

Susceptibility of the Wellhead (0 – 25 Points) (Chart 1 of Appendix D)

+

Susceptibility of the Aquifer (0 – 25 Points) (Chart 2 of Appendix D)

=

Natural Susceptibility (Susceptibility of the Well) (0-50 Points)

A ranking is assigned for the Natural Susceptibility according to the point score:

Natural Susceptibility Ratings						
40 to 50 pts	Very High					
30 to < 40 pts	High					
20 to < 30 pts	Medium					
< 20 pts	Low					

The Bethel Native Corporation Offices' water well is in a confined aquifer. Confined aquifers are less susceptible to potential groundwater quality impacts posed by the migration of surface water contaminants downward from the surface. Table 2 shows the susceptibility scores and ratings for this PWS.

Table 2. Susceptibility

	Score	Rating
Susceptibility of the	5	Low
Wellhead		
Susceptibility of the	15	High
Aquifer		
Natural Susceptibility	20	Medium

Contaminant risks to a drinking water source depend on the type, number or density, and distribution of contaminant sources. This score has been derived from an examination of existing and historical contamination that has been detected at the drinking water source through routine sampling. It also evaluates potential sources of contamination. Flow charts are used to assign a point score, and ratings are assigned in the same way as for the natural susceptibility:

Contaminant Risk Ratings						
40 to 50 pts	Very High					
30 to < 40 pts	High					
20 to < 30 pts	Medium					
< 20 pts	Low					

Table 3 summarizes the Contaminant Risks for each category of drinking water contaminants.

**Table 3. Contaminant Risks** 

Category	Score	Rating
Bacteria and Viruses	25	Medium
Nitrates and/or Nitrites	48	Very High
Volatile Organic Chemical	s 50	Very High
Heavy Metals, Cyanide an	d	
Other Inorganic Chemicals	50	Very High
Synthetic Organic Chemica	als 44	Very High
Other Organic Chemicals	50	Very High

Finally, an overall vulnerability score is assigned for each water system by combining each of the contaminant risk scores with the natural susceptibility score:

+

Contaminant Risks (0 – 50 points)

=

Vulnerability of the Drinking Water Source to Contamination (0 – 100).

Again, rankings are assigned according to a point score:

Overall Vulnerability Ratings						
80 to 100 pts	Very High					
60 to < 80 pts	High					
40 to < 60 pts	Medium					
< 40 pts	Low					

Table 4 contains the overall vulnerability scores (0 – 100) and ratings for each of the six categories of drinking water contaminants. Note: scores are rounded off to the nearest five.

**Table 4. Overall Vulnerability** 

Category	Score	Rating
Bacteria and Viruses	45	Medium
Nitrates and Nitrites	70	High
Volatile Organic Chemicals	70	High
Heavy Metals, Cyanide and		
Other Inorganic Chemicals	70	High
Synthetic Organic Chemicals	65	High
Other Organic Chemicals	70	High

#### **Bacteria and Viruses**

The contaminant risk for bacteria and viruses is **Medium**. The risk is primarily attributed to the presence of a domestic wastewater treatment plant disposal pond/lagoon and a landfill in Zone D (see Table 2 – Appendix B).

A positive bacteria count has not been reported in recent (within five years) sampling events (See Chart 3 – Contaminant Risks for Bacteria and Viruses in Appendix D). Only a small amount of bacteria and viruses are required to endanger public health.

After combining the contaminant risk for bacteria and viruses with the natural susceptibility of the well, the overall vulnerability of the well to contamination is **Medium**.

#### **Nitrates and Nitrites**

The contaminant risk for nitrates and nitrites is **Very High**. The risk to this source of public drinking water is primarily attributed to the presence of an abandoned well, a domestic wastewater treatment plant disposal pond/lagoon, and a landfill in Zones A and D (see Table 3 – Appendix B).

Nitrates are very mobile, moving at approximately the same rate as water. The sampling history for this well indicates that low levels of nitrates have been detected in recent sampling events. However, the reported concentrations of nitrates do not exceed the maximum contaminant level (MCL) of 10 mg/L. Nitrate concentrations in uncontaminated groundwater are typically less than 2 mg/L; therefore, nitrate concentrations above 2 mg/L may be indicative of man-made sources (See Chart 5 - Contaminant Risks for Nitrates and/or Nitrites in Appendix D).

Nitrate levels are often derived from the

decomposition of organic matter in soils. Although the nitrate source is unknown, such occurrences may be attributed to septic systems or other sources. After combining the contaminant risk for nitrates and nitrites with the natural susceptibility of the well, the overall vulnerability of the well to nitrate and nitrite contamination is **High**.

#### **Volatile Organic Chemicals**

The contaminant risk for volatile organic chemicals is **Very High**. The risk is primarily attributed to the presence of an abandoned well, an injection well, a petroleum product bulk station/terminal, a LUST site, and a landfill in Zones A, B, C, and D. Numerous other potential contaminant sources are also found within the protection area (see Table 4 – Appendix B).

Detectable concentrations of trihalomethanes were reported in sampling events for this public water system. However, the detectible concentrations of trihalomethanes reported in 1999 were well below the MCL of 0.08 mg/L. Trihalomethanes are considered byproducts of the water treatment process and are not from the source waters. Since the reported concentration of TTHM's in recent sampling events did not exceed the applicable MCL, risk points were not retained.

Aside from being byproducts of the drinking water treatment process, possible sources of volatile organic chemicals include facilities with automobiles, residential areas, fuel tanks, roads, and airports. See Table 4 in Appendix B for a complete listing.

After combining the contaminant risk for volatile organic chemicals with the natural susceptibility of the well, the overall vulnerability of the well to contamination is **High**.

## Heavy Metals, Cyanide and Other Inorganic Chemicals

The contaminant risk for heavy metals, cyanide and other inorganic chemicals is **Very High**. The risk is primarily attributed to the presence of an injection well, an abandoned well, a landfill, and a LUST site in Zones A, B, and D. Numerous other potential contaminant sources are also found within the protection area (see Table 5 – Appendix B). Based on review of recent sampling records for this public water system, moderate levels of copper and lead have been detected in recent sampling history, but have not exc eeded their respective MCLs of 1.3 mg/L and 0.015 mg/L (see Chart 9 – Contaminant Risks for Heavy Metals, Cyanide, and Other Inorganic Chemicals in Appendix D).

The reported concentrations of copper and lead in recent sampling events are not likely to be representative of source water conditions. These two analytes are likely attributed to either the water treatment process or water distribution network; therefore, no risk points were assigned based on the presence of these analytes.

After combining the contaminant risk for heavy metals, cyanide and other inorganic chemicals with the natural susceptibility of the well, the overall vulnerability of the well to contamination is **High**.

#### **Synthetic Organic Chemicals**

The contaminant risk for synthetic organic chemicals is **Very High**. The risk is primarily attributed to the presence of an abandoned well and a landfill in Zones A and D (see Table 6 – Appendix B).

No recent sampling data was available in ADEC records for the Bethel Native Corporation Offices (See Chart 11 – Contaminant Risks for Synthetic Organic Chemicals in Appendix D).

After combining the contaminant risk for synthetic organic chemicals with the natural susceptibility of the well, the overall vulnerability of the well to contamination is **High**.

#### **Other Organic Chemicals**

The contaminant risk for other organic chemicals is **Very High**. The risk is primarily attributed to the presence of electric power generation, an abandoned well, pipelines, a petroleum product bulk station/terminal, and landfills in Zones A, C, and D. Numerous other potential contaminant sources are also found within the protection area (see Table 7 – Appendix B).

No recent sampling data was available in ADEC records for the Bethel Native Corporation Offices (See Chart 13 – Contaminant Risks for Other Organic Chemicals in Appendix D).

After combining the contaminant risk for other organic chemicals with the natural susceptibility of the well, the overall vulnerability of the well to contamination is **High**.

#### **Using the Source Water Assessment**

This assessment of contaminant risks can be used as a foundation for local voluntary protection efforts as well as a basis for the continuous efforts on the part of the Bethel Native Corporation Offices and the community of Bethel to protect public health. It is

anticipated that Source Water Assessments will be updated every five years to reflect any changes in the vulnerability and/or susceptibility of the drinking water source.

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## **APPENDIX A**

# Drinking Water Protection Area Location Map (Map A)

## Public Water Well System for PWS #271106.001 Bethel Native Corporation Offices **LEGEND** Public Water System Well Hydrography/Physical Lake or Pond Contours Transportation ---- Primary Route (Class 1) Secondary Route (Class 2) Road (Class 3) Road (Class 4) Road (Class 5, Four-wheel drive) **Groundwater Protection Zones** Zone A Protection Area— Several Months Travel Time Zone B Protection Area- 2 Years Travel Time Zone C Protection Area – 5 Years Travel Time Zone D Zone D Protection Area— 10 Years Travel Time Marker ke Data Sources: Contaminant Sources, Public Water System Wells, Contours Alaska Department of Environmental Conservation (ADEC) Critical Facilities, Federal Emergency Management Agency (FEMA) All other data: United States Geological Survey (USGS) Drinking Water Protection Areas based on "Alaska Drinking Water Protection Program - Guidance Manual for Class A Public Water Systems" published by ADEC URS Corporation does not guarantee the accuracy or validity of the data provided. Inset 1 gluk Akiachak Akiak Area of Map 1 Bethel Native Corporation Offices PWS 271106.001 0.25 Appendix A Map A

## **APPENDIX B**

# Contaminant Source Inventory and Risk Ranking (Tables 1-7)

## Contaminant Source Inventory for Bethel Native Corp. Offices

#### PWSID 271106.001

Contaminant Source Type	Contaminant Source ID	CS ID tag	Zone	Map Number	Comments
Domestic wastewater collection systems (sewer lines or lift stations)	D01	D01-01	A	С	
Tanks, heating oil, residential (above ground)	R08	R08-01	A	С	Assume 50 or less residential heating oil tanks in Zone A
Tanks, diesel (above ground)	T06	T06-01	A	С	
Tanks, heating oil, nonresidential (aboveground)	T14	T14-01	A	С	United Pentacostal Church
Tanks, heating oil, nonresidential (aboveground)	T14	T14-02	A	С	
Tanks, heating oil, nonresidential (aboveground)	T14	T14-03	A	С	BNC Office Complex
Wastewater Holding Tank	T22	T22-01	A	С	United Pentacostal Church
Wastewater Holding Tank	T22	T22-02	A	C	
Abandoned wells	W01	W01-01	A	C	
Monitoring wells	W06	W06-01	A	C	
Water supply wells	W09	W09-01	A	C	2 water supply wells in Zone A
Cemeteries	X01	X01-01	A	С	United Pentacostal Church
Highways and roads, dirt/gravel	X24	X24-01	A	С	Assume 1-20 roads in Zone A
Pipelines (oil and gas)	X28	X28-01	A	С	
Electric power generation (fossil fuels)	X36	X36-01	A	С	
Domestic wastewater collection systems (sewer lines or lift stations)	D01	D01-02	В	С	
Injection wells (Class V) Motor Vehicle Waste Disposal Well	D42	D42-01	В	С	The Shop
Tanks, heating oil, residential (above ground)	R08	R08-02	В	С	Assume 50 or less residential heating oil tanks in Zone B
Water supply wells	W09	W09-02	В	С	1 water supply well in Zone B
Highways and roads, dirt/gravel	X24	X24-02	В	С	Assume 1-20 roads in Zone B
Laundromats without dry cleaning	C22	C22-01	С	С	
Motor /motor vehicle repair shops	C31	C31-01	С	С	
Domestic wastewater collection systems (sewer lines or lift stations)	D01	D01-03	С	С	

Contaminant Source Type	Contaminant Source ID	CS ID tag	Zone	Map Number	Comments
Domestic wastewater collection systems (sewer lines or lift stations)	D01	D01-04	С	С	Assume area connected to municipal sewage
Tanks, heating oil, residential (above ground)	R08	R08-03	C	C	Assume 50 or less residential heating oil tanks in Zone C
Water supply wells	W09	W09-03	C	С	3 water supply wells in Zone C
Petroleum product bulk station/terminals	X11	X11-01	C	С	BNC Apartments
Highways and roads, dirt/gravel	X24	X24-03	C	С	Assume 1-20 roads in Zone C
Motor vehicle/general storage yards/facilities	X27	X27-01	C	С	Arctic Moving & Delivery
Firehouses	X38	X38-01	C	С	
Domestic wastewater collection systems (sewer lines or lift stations)	D01	D01-05	D	С	Assume area connected to municipal sewage
Domestic wastewater treatment plant disposal ponds/lagoons	D02	D02-01	D	C	
Landfills (municipal; Class II)	D50	D50-01	D	С	
Landfills (industrial; type of industrial waste?)	D52	D52-01	D	С	
Tanks, heating oil, residential (above ground)	R08	R08-04	D	С	Assume 25 or less residential heating oil tanks in Zone D
Closed leaking fuel storage tank (LUST) (aviation)	U12	U12-01	D	С	Bethel Dump, RecKey #1990250120701, Status: Closed, reported in ADEC Contaminated Sites database, old oil drums amounting in the hundreds leaking in dump.

## Contaminant Source Inventory and Risk Ranking for Bethel Native Corp. Offices Sources of Bacteria and Viruses

Contaminant Source Type	Contaminant Source ID	CS ID tag	Zone	Risk Ranking for Analysis	Map Number	Comments
Domestic wastewater collection systems (sewer line or lift stations)	D01	D01-01	A	Medium	С	
Wastewater Holding Tank	T22	T22-01	A	Low	C	United Pentacostal Church
Wastewater Holding Tank	T22	T22-02	A	Low	С	
Abandoned wells	W01	W01-01	A	Medium	С	
Highways and roads, dirt/gravel	X24	X24-01	A	Low	С	Assume 1-20 roads in Zone A
Domestic wastewater collection systems (sewer line or lift stations)	D01	D01-02	В	Medium	С	
Injection wells (Class V) Motor Vehicle Waste Disposal Well	D42	D42-01	В	Low	С	The Shop
Highways and roads, dirt/gravel	X24	X24-02	В	Low	C	Assume 1-20 roads in Zone B
Laundromats without dry cleaning	C22	C22-01	С	Low	С	
Domestic wastewater collection systems (sewer line or lift stations)	D01	D01-03	С	Medium	С	
Domestic wastewater collection systems (sewer line or lift stations)	D01	D01-04	C	Medium	С	Assume area connected to municipal sewage
Highways and roads, dirt/gravel	X24	X24-03	C	Low	C	Assume 1-20 roads in Zone C
Domestic wastewater collection systems (sewer line or lift stations)	D01	D01-05	D	Medium	С	Assume area connected to municipal sewage
Domestic wastewater treatment plant disposal ponds/lagoons	D02	D02-01	D	High	С	
Landfills (municipal; Class II)	D50	D50-01	D	High	С	
Closed leaking fuel storage tank (LUST) (aviation)	U12	U12-01	D	Low	С	Bethel Dump, RecKey #1990250120701, Status: Closed, reported in ADEC Contaminated Sites database, old oil drums amounting in the hundreds leaking in dump.

## Contaminant Source Inventory and Risk Ranking for Bethel Native Corp. Offices Sources of Nitrates/Nitrites

Contaminant Source Type	Contaminant Source ID	CS ID tag	Zone	Risk Ranking for Analysis	Map Number	Comments
Domestic wastewater collection systems (sewer line or lift stations)	D01	D01-01	A	Medium	С	
Wastewater Holding Tank	T22	T22-01	A	Low	C	United Pentacostal Church
Wastewater Holding Tank	T22	T22-02	A	Low	С	
Abandoned wells	W01	W01-01	A	High	С	
Cemeteries	X01	X01-01	A	Medium	С	United Pentacostal Church
Highways and roads, dirt/gravel	X24	X24-01	A	Low	С	Assume 1-20 roads in Zone A
Domestic wastewater collection systems (sewer line or lift stations)	D01	D01-02	В	Medium	С	
Highways and roads, dirt/gravel	X24	X24-02	В	Low	C	Assume 1-20 roads in Zone B
Laundromats without dry cleaning	C22	C22-01	C	Low	C	
Domestic wastewater collection systems (sewer line or lift stations)	D01	D01-03	С	Medium	С	
Domestic wastewater collection systems (sewer line or lift stations)	D01	D01-04	C	Medium	С	Assume area connected to municipal sewage
Highways and roads, dirt/gravel	X24	X24-03	C	Low	C	Assume 1-20 roads in Zone C
Domestic wastewater collection systems (sewer line or lift stations)	D01	D01-05	D	Medium	С	Assume area connected to municipal sewage
Domestic wastewater treatment plant disposal ponds/lagoons	D02	D02-01	D	High	С	
Landfills (municipal; Class II)	D50	D50-01	D	Very High	С	
Closed leaking fuel storage tank (LUST) (aviation)	U12	U12-01	D	Low	С	Bethel Dump, RecKey #1990250120701, Status: Closed, reported in ADEC Contaminated Sites database, old oil drums amounting in the hundreds leaking in dump.

## Contaminant Source Inventory and Risk Ranking for Bethel Native Corp. Offices Sources of Volatile Organic Chemicals

Contaminant Source Type	Contaminant Source ID	CS ID tag	Zone	Risk Ranking for Analysis	Map Number	Comments
Domestic wastewater collection systems (sewer line or lift stations)	D01	D01-01	A	Low	С	
Tanks, heating oil, residential (above ground)	R08	R08-01	A	Medium	C	Assume 50 or less residential heating oil tanks in Zone A
Tanks, diesel (above ground)	T06	T06-01	A	Medium	C	
Tanks, heating oil, nonresidential (aboveground)	T14	T14-01	A	Low	С	United Pentacostal Church
Tanks, heating oil, nonresidential (aboveground)	T14	T14-02	A	Low	С	
Tanks, heating oil, nonresidential (aboveground)	T14	T14-03	A	Low	С	BNC Office Complex
Wastewater Holding Tank	T22	T22-01	A	Medium	С	United Pentacostal Church
Wastewater Holding Tank	T22	T22-02	A	Medium	С	
Abandoned wells	W01	W01-01	A	High	С	
Highways and roads, dirt/gravel	X24	X24-01	A	Low	С	Assume 1-20 roads in Zone A
Pipelines (oil and gas)	X28	X28-01	A	Medium	С	
Electric power generation (fossil fuels)	X36	X36-01	A	Medium	С	
Domestic wastewater collection systems (sewer line or lift stations)	D01	D01-02	В	Low	С	
Injection wells (Class V) Motor Vehicle Waste Disposal Well	D42	D42-01	В	High	С	The Shop
Tanks, heating oil, residential (above ground)	R08	R08-02	В	Medium	C	Assume 50 or less residential heating oil tanks in Zone B
Highways and roads, dirt/gravel	X24	X24-02	В	Low	С	Assume 1-20 roads in Zone B
Laundromats without dry cleaning	C22	C22-01	С	Low	С	
Motor /motor vehicle repair shops	C31	C31-01	С	Medium	С	
Domestic wastewater collection systems (sewer line or lift stations)	D01	D01-03	С	Low	С	
Domestic wastewater collection systems (sewer line or lift stations)	D01	D01-04	С	Low	С	Assume area connected to municipal sewage
Tanks, heating oil, residential (above ground)	R08	R08-03	C	Medium	C	Assume 50 or less residential heating oil tanks in Zone C

#### Table 4 (continued)

## Contaminant Source Inventory and Risk Ranking for Bethel Native Corp. Offices Sources of Volatile Organic Chemicals

Contaminant Source Type	Contaminant Source ID	CS ID tag	Zone	Risk Ranking for Analysis	Map Number	Comments
Petroleum product bulk station/terminals	X11	X11-01	С	Very High	С	BNC Apartments
Highways and roads, dirt/gravel	X24	X24-03	С	Low	С	Assume 1-20 roads in Zone C
Motor vehicle/general storage yards/facilities	X27	X27-01	С	Low	С	Arctic Moving & Delivery
Firehouses	X38	X38-01	С	Low	С	
Domestic wastewater collection systems (sewer line or lift stations)	D01	D01-05	D	Low	С	Assume area connected to municipal sewage
Domestic wastewater treatment plant disposal ponds/lagoons	D02	D02-01	D	Low	С	
Landfills (municipal; Class II)	D50	D50-01	D	High	С	
Tanks, heating oil, residential (above ground)	R08	R08-04	D	Medium	С	Assume 25 or less residential heating oil tanks in Zone D
Closed leaking fuel storage tank (LUST) (aviation)	U12	U12-01	D	High	С	Bethel Dump, RecKey #1990250120701, Status: Closed, reported in ADEC Contaminated Sites database, old oil drums amounting in the hundreds leaking in dump.

Table 5

## Contaminant Source Inventory and Risk Ranking for Bethel Native Corp. Offices Sources of Heavy Metals, Cyanide and Other Inorganic Chemicals

Contaminant Source Type	Contaminant Source ID	CS ID tag	Zone	Risk Ranking for Analysis	Map Number	Comments
Domestic wastewater collection systems (sewer line or lift stations)	D01	D01-01	A	Low	С	
Tanks, heating oil, nonresidential (aboveground)	T14	T14-01	A	Low	C	United Pentacostal Church
Tanks, heating oil, nonresidential (aboveground)	T14	T14-02	A	Low	C	
Tanks, heating oil, nonresidential (aboveground)	T14	T14-03	A	Low	C	BNC Office Complex
Wastewater Holding Tank	T22	T22-01	A	Medium	C	United Pentacostal Church
Wastewater Holding Tank	T22	T22-02	A	Medium	C	
Abandoned wells	W01	W01-01	A	Very High	С	
Monitoring wells	W06	W06-01	A	Medium	С	
Cemeteries	X01	X01-01	A	Low	С	United Pentacostal Church
Highways and roads, dirt/gravel	X24	X24-01	A	Low	С	Assume 1-20 roads in Zone A
Pipelines (oil and gas)	X28	X28-01	A	Low	С	
Electric power generation (fossil fuels)	X36	X36-01	A	Medium	С	
Domestic wastewater collection systems (sewer line or lift stations)	D01	D01-02	В	Low	С	
Injection wells (Class V) Motor Vehicle Waste Disposal Well	D42	D42-01	В	High	С	The Shop
Highways and roads, dirt/gravel	X24	X24-02	В	Low	C	Assume 1-20 roads in Zone B
Motor /motor vehicle repair shops	C31	C31-01	С	Medium	С	
Domestic wastewater collection systems (sewer line or lift stations)	D01	D01-03	С	Low	С	
Domestic wastewater collection systems (sewer line or lift stations)	D01	D01-04	С	Low	С	Assume area connected to municipal sewage
Petroleum product bulk station/terminals	X11	X11-01	С	Low	C	BNC Apartments
Highways and roads, dirt/gravel	X24	X24-03	C	Low	C	Assume 1-20 roads in Zone C
Firehouses	X38	X38-01	C	Low	С	

#### Table 5 (continued)

## Contaminant Source Inventory and Risk Ranking for Bethel Native Corp. Offices

## Sources of Heavy Metals, Cyanide and Other Inorganic Chemicals

Contaminant Source Type	Contaminant Source ID	CS ID tag	Zone	Risk Ranking for Analysis	Map Number	Comments
Domestic wastewater collection systems (sewer line or lift stations)	D01	D01-05	D	Low	С	Assume area connected to municipal sewage
Domestic wastewater treatment plant disposal ponds/lagoons	D02	D02-01	D	Low	С	
Landfills (municipal; Class II)	D50	D50-01	D	High	C	
Closed leaking fuel storage tank (LUST) (aviation)	U12	U12-01	D	Very High	С	Bethel Dump, RecKey #1990250120701, Status: Closed, reported in ADEC Contaminated Sites database, old oil drums amounting in the hundreds leaking in dump.

## Contaminant Source Inventory and Risk Ranking for Bethel Native Corp. Offices Sources of Synthetic Organic Chemicals

Contaminant Source Type	Contaminant Source ID	CS ID tag	Zone	Risk Ranking for Analysis	Map Number	Comments	
Domestic wastewater collection systems (sewer line or lift stations)	D01	D01-01	A	Low	С		
Abandoned wells	W01	W01-01	A	High	C		
Cemeteries	X01	X01-01	A	Medium	С	United Pentacostal Church	
Domestic wastewater collection systems (sewer line or lift stations)	D01	D01-02	В	Low	С		
Injection wells (Class V) Motor Vehicle Waste Disposal Well	D42	D42-01	В	Low	С	The Shop	
Domestic wastewater collection systems (sewer line or lift stations)	D01	D01-03	C	Low	С		
Domestic wastewater collection systems (sewer line or lift stations)	D01	D01-04	C	Low	С	Assume area connected to municipal sewage	
Petroleum product bulk station/terminals	X11	X11-01	C	Low	C	BNC Apartments	
Domestic wastewater collection systems (sewer line or lift stations)	D01	D01-05	D	Low	С	Assume area connected to municipal sewage	
Domestic wastewater treatment plant disposal ponds/lagoons	D02	D02-01	D	Low	С		
Landfills (municipal; Class II)	D50	D50-01	D	Very High	C		
Closed leaking fuel storage tank (LUST) (aviation)	U12	U12-01	D	Low	С	Bethel Dump, RecKey #1990250120701, Status: Closed, reported in ADEC Contaminated Sites database, old oil drums amounting in the hundreds leaking in dump.	

Table 7

## Contaminant Source Inventory and Risk Ranking for Bethel Native Corp. Offices Sources of Other Organic Chemicals

Contaminant Source Type	Contaminant Source ID	CS ID tag	Zone	Risk Ranking for Analysis	Map Number	Comments
Domestic wastewater collection systems (sewer line or lift stations)	D01	D01-01	A	Low	С	
Wastewater Holding Tank	T22	T22-01	A	Medium	C	United Pentacostal Church
Wastewater Holding Tank	T22	T22-02	A	Medium	С	
Abandoned wells	W01	W01-01	A	High	C	
Highways and roads, dirt/gravel	X24	X24-01	A	Low	С	Assume 1-20 roads in Zone A
Pipelines (oil and gas)	X28	X28-01	A	High	С	
Electric power generation (fossil fuels)	X36	X36-01	A	High	С	
Domestic wastewater collection systems (sewer line or lift stations)	D01	D01-02	В	Low	С	
Injection wells (Class V) Motor Vehicle Waste Disposal Well	D42	D42-01	В	Medium	С	The Shop
Highways and roads, dirt/gravel	X24	X24-02	В	Low	C	Assume 1-20 roads in Zone B
Motor /motor vehicle repair shops	C31	C31-01	С	Medium	С	
Domestic wastewater collection systems (sewer line or lift stations)	D01	D01-03	С	Low	С	
Domestic wastewater collection systems (sewer line or lift stations)	D01	D01-04	С	Low	С	Assume area connected to municipal sewage
Petroleum product bulk station/terminals	X11	X11-01	C	High	C	BNC Apartments
Highways and roads, dirt/gravel	X24	X24-03	С	Low	С	Assume 1-20 roads in Zone C
Motor vehicle/general storage yards/facilities	X27	X27-01	С	Low	С	Arctic Moving & Delivery
Domestic wastewater collection systems (sewer line or lift stations)	D01	D01-05	D	Low	С	Assume area connected to municipal sewage
Domestic wastewater treatment plant disposal ponds/lagoons	D02	D02-01	D	Low	С	
Landfills (municipal; Class II)	D50	D50-01	D	Very High	C	
Landfills (industrial; type of industrial waste?)	D52	D52-01	D	Very High	С	

#### Table 7 (continued)

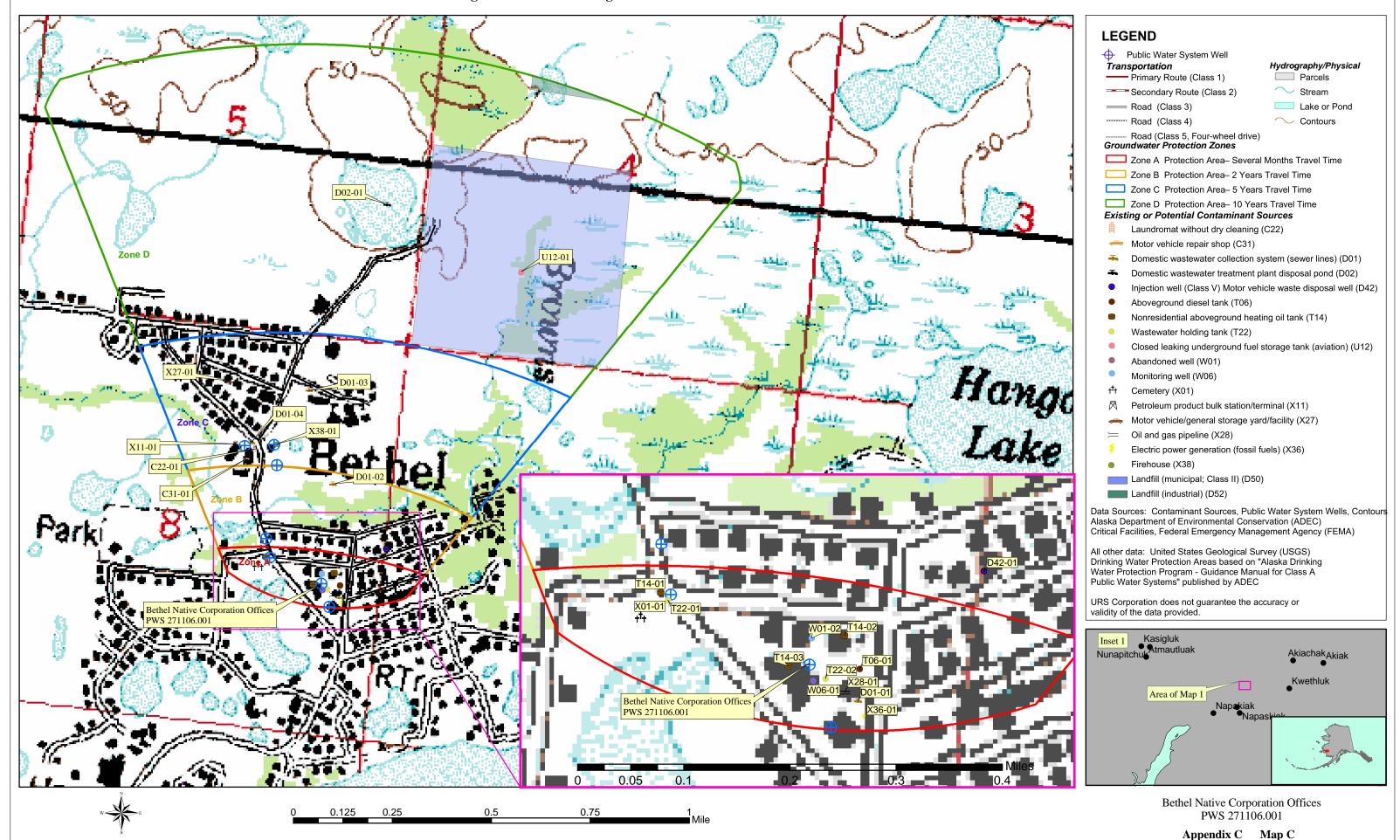
## Contaminant Source Inventory and Risk Ranking for Bethel Native Corp. Offices Sources of Other Organic Chemicals

Contaminant Source Type	Contaminant Source ID	CS ID tag	Zone	Risk Ranking for Analysis	Map Number	Comments
Closed leaking fuel storage tank (LUST) (aviation)	U12	U12-01	D	Low	С	Bethel Dump, RecKey #1990250120701, Status: Closed, reported in ADEC Contaminated Sites database, old oil drums amounting in the hundreds leaking in dump.

## **APPENDIX C**

# Drinking Water Protection Area and Potential and Existing Contaminant Sources (Map C)

## Public Water Well System for PWS #271106.001 Bethel Native Corporation Offices Showing Potential and Existing Sources of Contamination



## **APPENDIX D**

Vulnerability Analysis for Public Drinking Water Source (Charts 1-14)

Susceptibility initially assumed to be low. Susceptibility of wellhead = 0 pts NO Is the well Increase susceptibility 5 pts + 5 pts properly grouted? Is the well Increase susceptibility 20 pts 0 pts capped? YES YES Susceptibility of wellhead Low 5 pts Increase susceptibility: YES Is the well 10 pts: suspected floodplain + 0 pts within a Wellhead Susceptibility Ratings 20 pts: known floodplain floodplain? 20 to 25 pts very high 15 to < 20 pts 10 to < 15 pts medium NO < 10 pts low Is the land surface sloped Increase susceptibility 5 pts 0 pts away from the

Chart 1. Susceptibility of the wellhead - Bethel Native Corp. Offices (PWS No. 271106.001)

Chart 2. Susceptibility of the aquifer Bethel Native Corp. Offices (PWS No. 271106.001)

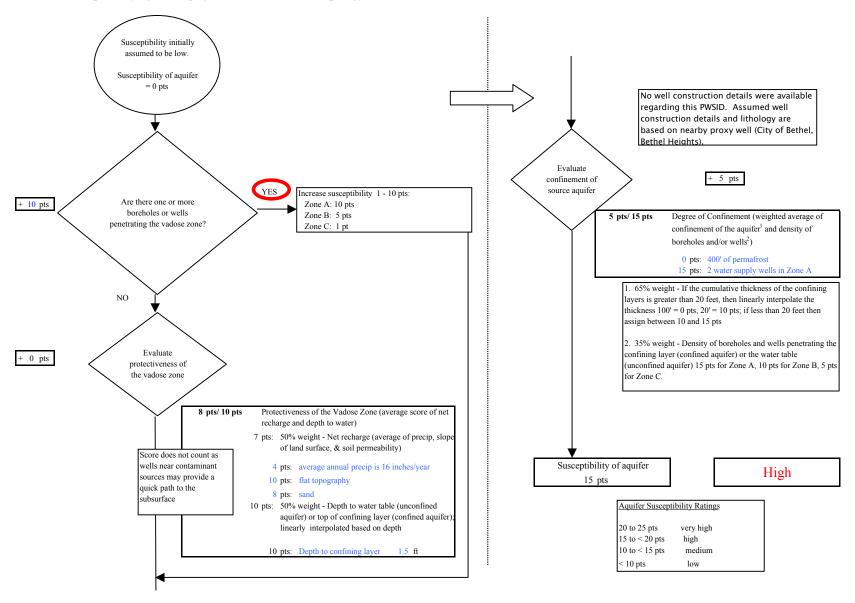


Chart 3. Contaminant risks for Bethel Native Corp. Offices (PWS No. 271106.001) - Bacteria & Viruses

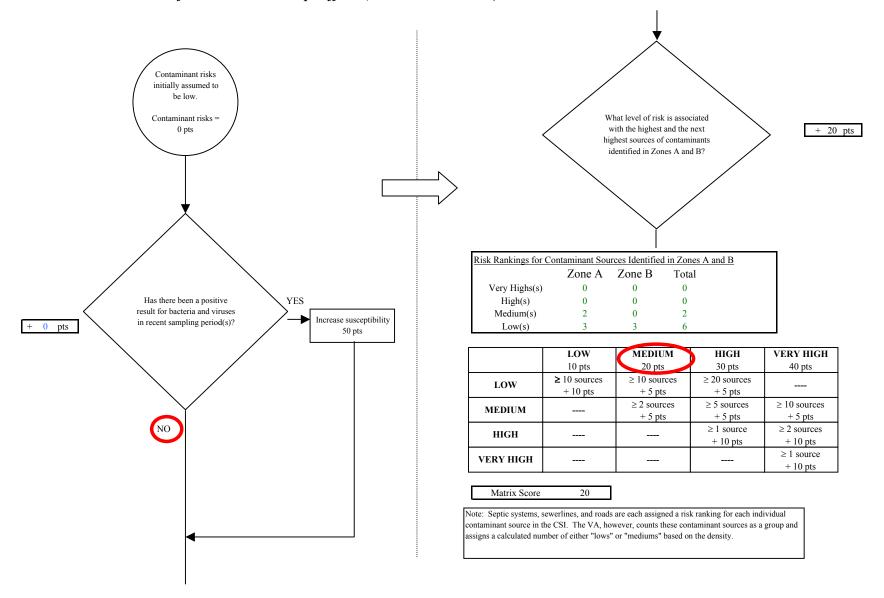


Chart 3. Contaminant risks for Bethel Native Corp. Offices (PWS No. 271106.001) - Bacteria & Viruses NO Are there sufficient Initial assessment of risk posed by Risk unchanged controls, conditions, or potential sources of contamination monitoring to warrant = 20 pts downgrading risk? Are any YES significant Risk unchanged contaminant Reduce risk 1 - 10 pts sources within - 0 pts Zone A? The number and magnitude of Risk posed by potential sources of contaminant sources in YES contamination with controls Zone A determines a risk increase. See Table 2 for 25 5 pts Increase risk 1 - 10 pts inventory. Existing Risk due to existing 0 pts contamination Are there any conditions that Risk unchanged Risk posed by potential sources warrant upgrading Potential of contamination with controls risk? 25 pts Contaminant risks Contaminant Risk YES 25 pts Increase risk 1 - 10 pts + 0 pts Contaminant risks\* \* Truncate risk at 50 pts 25 Contaminant Risk Ratings Risk posed by potential sources of contamination 40 to 50 pts very high 30 to < 40 ptshigh Medium  $20 \text{ to} \le 30 \text{ pts}$ 

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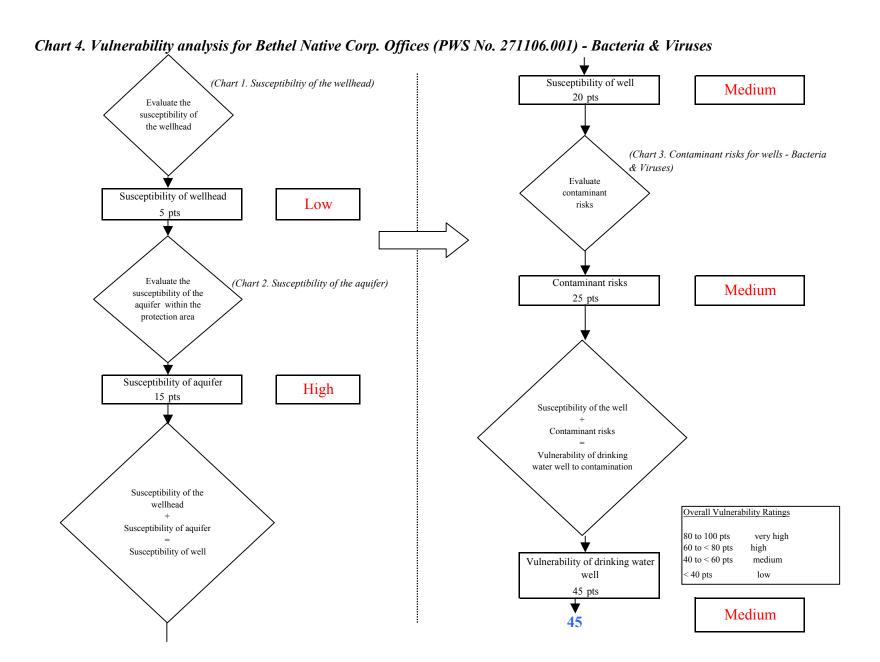
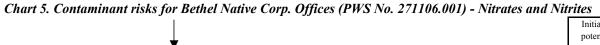


Chart 5. Contaminant risks for Bethel Native Corp. Offices (PWS No. 271106.001) - Nitrates and Nitrites Contaminant risks initially assumed to be low. Evaluate the level of Current level of Contaminant risks background contamination due to man-= 0 ptscontamination from made source(s) natural sources 0 pts Is the concentration of Has nitrates and/or NO the contaminant nitrites been detected in increasing, decreasing, the source waters in or staying the same? recent sampling period(s)? Recent Nitrate Sampling Results (mg/L) 11/26/2002 0.214 11/27/2001 ND The nitrate concentration is 8/15/2000 ND assumed to be natural if less 6/10/1999 0.626 than 2 mg/L (20%), or Increasing: risk up 1 - 10 pts YES attributed to man made 12/22/1998 0.175 Decreasing: risk down 1 - 5 pts sources if greater than 2 + 0 pts Same: risk unchanged mg/L. Maximum Contaminant Level (MCL) = 10 mg/LDetected Nitrate Level = Existing contamination points based on Risk due to natural Risk due to existing manlinear interpolation of most recent detect sources made sources [MCL = 50 pts; detect = 0 pts]3 pts Risk due to existing contamination 3 pts Was the source of Evaluate the level of NO. contamination contamination from natural? man-made sources



What level of risk is associated with the highest and the next highest risk sources(s) of contaminants identified in Zones A, B and C?

11 16 6 4		:1 .:C 1: 7	4 D 16
k Levels for Contam	Zone A	Zones B&C	S A, B and C Total
Very Highs(s)	0	0	0
High(s)	1	0	1
Medium(s)	2	0	2
Low(s)	3	3	6

	LOW 10 pts	MEDIUM 20 pts	HIGH 30 pts	VERY HIGH 40 pts
LOW	≥ 10 sources + 10 pts	≥ 10 sources + 5 pts	≥ 20 sources + 5 pts	
MEDIUM		≥ 2 sources + 5 pts	≥ 5 sources + 5 pts	≥ 10 sources + 5 pts
HIGH			≥ 1 source + 10 pts	≥ 2 sources + 10 pts
VERY HIGH				≥ 1 source + 10 pts

Matrix Score 30

Note: Septic systems, sewerlines, and roads are each assigned a risk ranking for each individua contaminant source in the CSI. The VA, however, counts these contaminant sources as a group and assigns a calculated number of either "lows" or "mediums" based on the density.

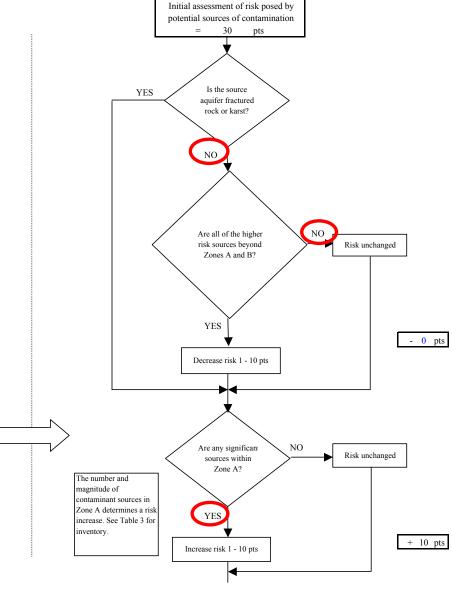
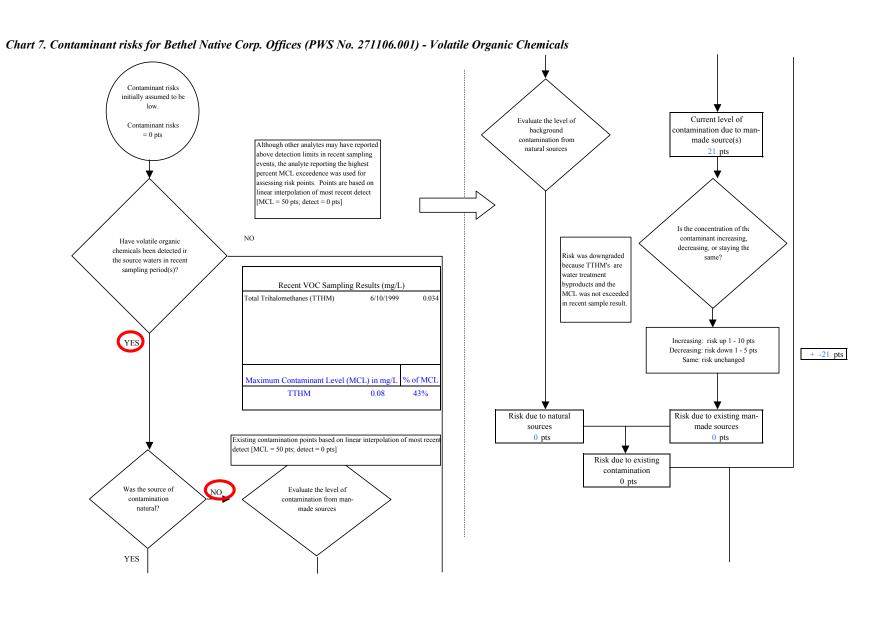


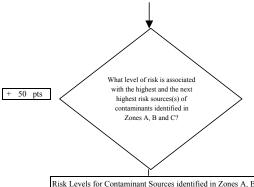
Chart 5. Contaminant risks for Bethel Native Corp. Offices (PWS No. 271106.001) - Nitrates and Nitrites Existing Are there conditions NO 3 pts Risk unchanged that warrant upgrading risk? Risk due to existing Potential contamination 45 pts The number and magnitude of Risk posed by potential sources contaminant sources in of contamination with controls Contaminant Risk Zone D determines a risk YES 48 pts increase. See Table 3 for Contaminant risks inventory. 5 pts Increase risk 1 - 10 pts Risk posed by potential sources of contamination 45 pts \*Truncate risk at 50 pts Contaminant risks\* 48 Contaminant Risk Ratings Are there sufficient Very High controls, conditions, NO. Risk unchanged or monitoring to 40 to 50 pts very high warrant downgrading 30 to < 40 pts high 20 to < 30 pts risk? medium < 20 pts low YES 0 pts Decrease risk 1 - 10 pts Risk posed by potential sources of contamination with controls

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Chart 6. Vulnerability analysis for Bethel Native Corp. Offices (PWS No. 271106.001) - Nitrates and Nitrites (Chart 1. Susceptibiltiy of the wellhead) Susceptibility of well Medium 20 pts Evaluate the susceptibility of the wellhead (Chart 5. Contaminant risks for wells - Nitrates and Nitrites) Evaluate Susceptibility of wellhead contaminant risks Low 5 pts Evaluate the (Chart 2. Susceptibility of the aquifer) Contaminant risks Very High susceptibility of the 48 pts aquifer within the protection area Susceptibility of aquifer High 15 pts Susceptibility of the well Contaminant risks Vulnerability of drinking water well to contamination Susceptibility of the wellhead Overall Vulnerability Ratings Susceptibility of aquifer 80 to 100 pts very high Susceptibility of well 60 to < 80 pts high 40 to < 60 pts medium Vulnerability of drinking water well < 40 pts 68 pts High **70** 







	Zone A	Zones B&C	Total
Very Highs(s)	0	1	1
High(s)	1	1	2
Medium(s)	56	103	159
Low(s)	5	5	10

	LOW 10 pts	MEDIUM 20 pts	HIGH 30 pts	VERY HIGH 40 pts
LOW	≥ 10 sources + 10 pts	≥ 10 sources + 5 pts	≥ 20 sources + 5 pts	
MEDIUM		≥ 2 sources + 5 pts	≥ 5 sources + 5 pts	≥ 10 sources + 5 pts
нідн			≥ 1 source + 10 pts	≥ 2 sources + 10 pts
VERY HIGH				≥ 1 source + 10 pts

Matrix Score 50

Note: Septic systems, sewerlines, and roads are each assigned a risk ranking for each individual contaminant source in the CSI. The VA, however, counts these contaminant sources as a group and assigns a calculated number of either "lows" or "mediums" based on the density.

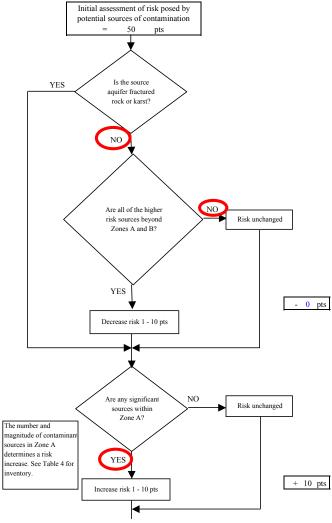


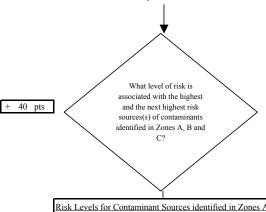
Chart 7. Contaminant risks for Bethel Native Corp. Offices (PWS No. 271106.001) - Volatile Organic Chemicals Existing NO Are there conditions 0 pts Risk unchanged that warrant upgrading Risk due to existing risk? Potential contamination 62 pts The number and magnitude of Risk posed by potential sources contaminant sources in of contamination with controls Contaminant Risk Zone D determines a risk YES increase. See Table 4 for 62 pts Contaminant risks inventory. + 2 pts Increase risk 1 - 10 pts Risk posed by potential sources of contamination 62 pts \*Truncate risk at 50 pts Contaminant risks\* Contaminant Risk Ratings Are there sufficient Very High NO , controls, conditions, or Risk unchanged 40 to 50 pts very high monitoring to warrant 30 to < 40 pts high downgrading risk? 20 to < 30 pts medium < 20 pts YES 0 pts Decrease risk 1 - 10 pts Risk posed by potential sources of contamination with controls 62 pts

Chart 8. Vulnerability analysis for Bethel Native Corp. Offices (PWS No. 271106.001) - Volatile Organic Chemicals (Chart 1. Susceptibiltiy of the wellhead) Susceptibility of well Medium 20 pts Evaluate the susceptibility of the wellhead (Chart 7. Contaminant risks for wells - Volatile Organic Chemicals) Evaluate Susceptibility of wellhead contaminant risks Low 5 pts Evaluate the (Chart 2. Susceptibility of the aquifer) Contaminant risks Very High susceptibility of the 50 pts aquifer within the protection area Susceptibility of aquifer High 15 pts Susceptibility of the well Contaminant risks Vulnerability of drinking water well to contamination Susceptibility of the wellhead Overall Vulnerability Ratings Susceptibility of aquifer 80 to 100 pts very high Susceptibility of well 60 to < 80 pts high 40 to < 60 pts medium Vulnerability of drinking water well < 40 pts 70 pts High **70** 

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Chart 9. Contaminant risks for Bethel Native Corp. Offices (PWS No. 271106.001) - Heavy Metals, Cyanide and Other Inorganic Chemicals Contaminant risks initially assumed to be low. Current level of Evaluate the level of Contaminant risks contamination due to manbackground = 0 ptscontamination from made source(s) natural sources 15 pts NO or Is the concentration of Have heavy metals, UNKNOWN the contaminant cyanide or other inorganic increasing, decreasing, chemicals been detected or staying the same? in the source waters in recent sampling period(s)? Recent Metals Sampling Results (mg/L) 4/4/2002 0.0152 Arsenic Copper 12/31/2001 0.29 12/31/1998 0.3975 YES Increasing: risk up 1 - 10 pts Decreasing: risk down 1 - 5 pts + 0 pts Same: risk unchanged Maximum Contaminant Although other inorganic compounds have Level (MCL) (mg/L) % of MCI been detected in previous sampling events, Arsenic= 0.05 30% arsenic and copper have reported the highest percent MCL values in the past 5 31% Copper= 1.3 years. Risk due to existing man-Risk due to natural Existing contamination points based on linear sources made sources interpolation of most recent detect [MCL = 50 pts; 0 pts 15 pts detect = 0 pts] Risk due to existing contamination 15 pts Evaluate the level Was the source of NO. of contamination contamination from man-made natural? sources YES

Chart 9. Contaminant risks for Bethel Native Corp. Offices (PWS No. 271106.001) - Heavy Metals, Cyanide and Other Inorganic Chemicals

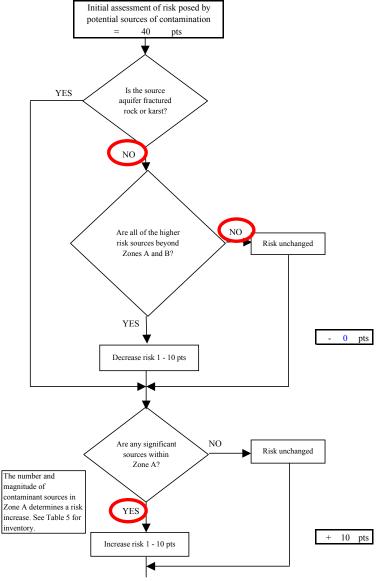


sk Levels for Contaminant Sources identified in Zones A, B and C				
	Zone A	Zones B&C	Total	
Very Highs(s)	1	0	1	
High(s)	0	1	1	
Medium(s)	4	1	5	
Low(s)	7	4	11	

	LOW 10 pts	MEDIUM 20 pts	HIGH 30 pts	VERY HIGH 40 pts
LOW	≥ 10 sources + 10 pts	≥ 10 sources + 5 pts	≥ 20 sources + 5 pts	
MEDIUM		≥ 2 sources + 5 pts	≥ 5 sources + 5 pts	≥ 10 sources + 5 pts
HIGH			≥ 1 source + 10 pts	≥ 2 sources + 10 pts
VERY HIGH				≥ 1 source + 10 pts

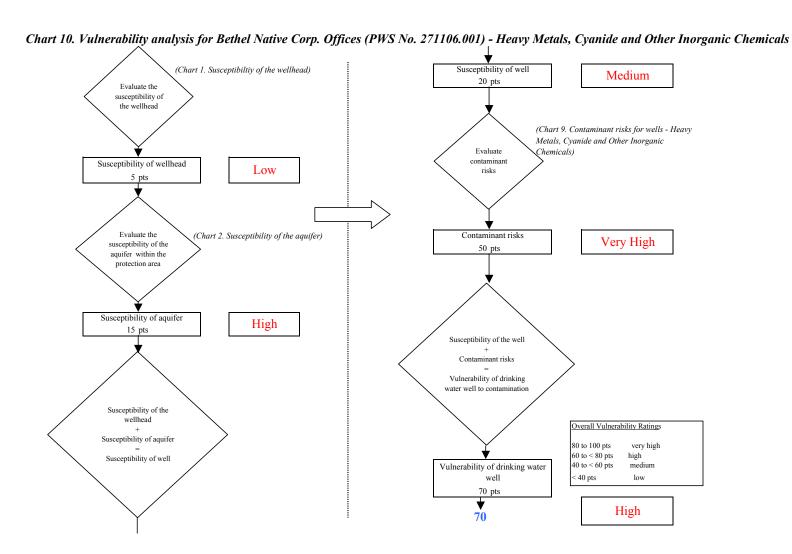
Matrix Score 40

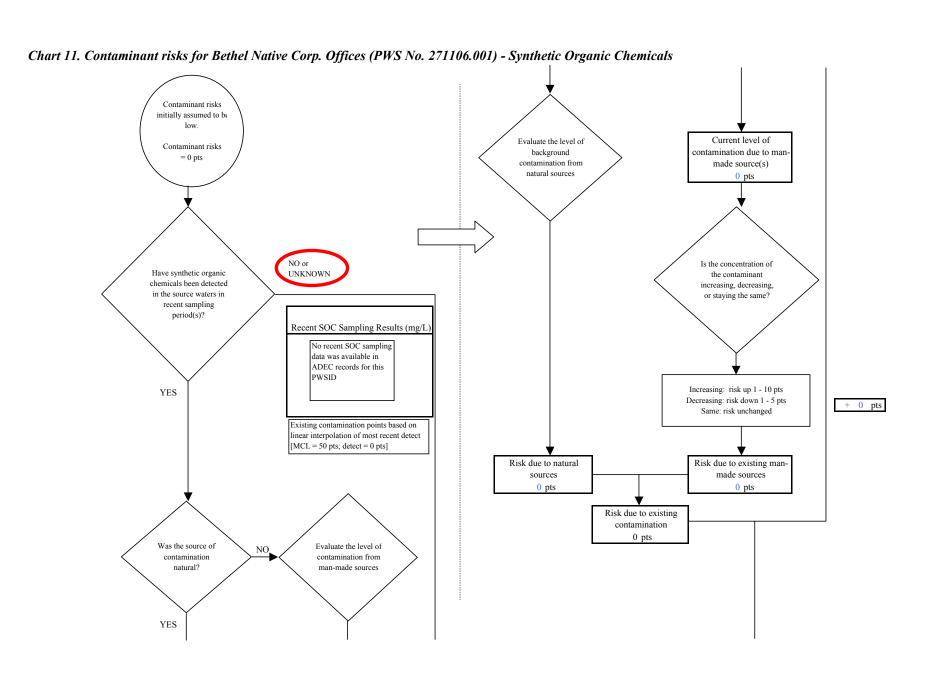
Note: Septic systems, sewerlines, and roads are each assigned a risk ranking for each individual contaminant source in the CSI. The VA, however, counts these contaminant sources as a group and assigns a calculated number of either "lows" or "mediums" based on the density.



Existing Are there conditions 15 pts Risk unchanged upgrading risk? Risk due to existing Potential contamination 55 pts The number and magnitude of Risk posed by potential sources contaminant sources in of contamination with controls Contaminant Risk Zone D determines a YES 70 pts risk increase. See Table Contaminant risks 5 for inventory. 5 pts Increase risk 1 - 10 pts Risk posed by potential sources of contamination 55 pts Contaminant risks\* \*Truncate risk at 50 pts 50 Contaminant Risk Ratings Are there sufficient **Very High** NQ controls, conditions, Risk unchanged 40 to 50 pts very high or monitoring to 30 to < 40 pts warrant downgrading high risk? 20 to < 30 pts medium < 20 pts low YES 0 pts Decrease risk 1 - 10 pts Risk posed by potential sources of contamination with controls 55 pts

Chart 9. Contaminant risks for Bethel Native Corp. Offices (PWS No. 271106.001) - Heavy Metals, Cyanide and Other Inorganic Chemicals





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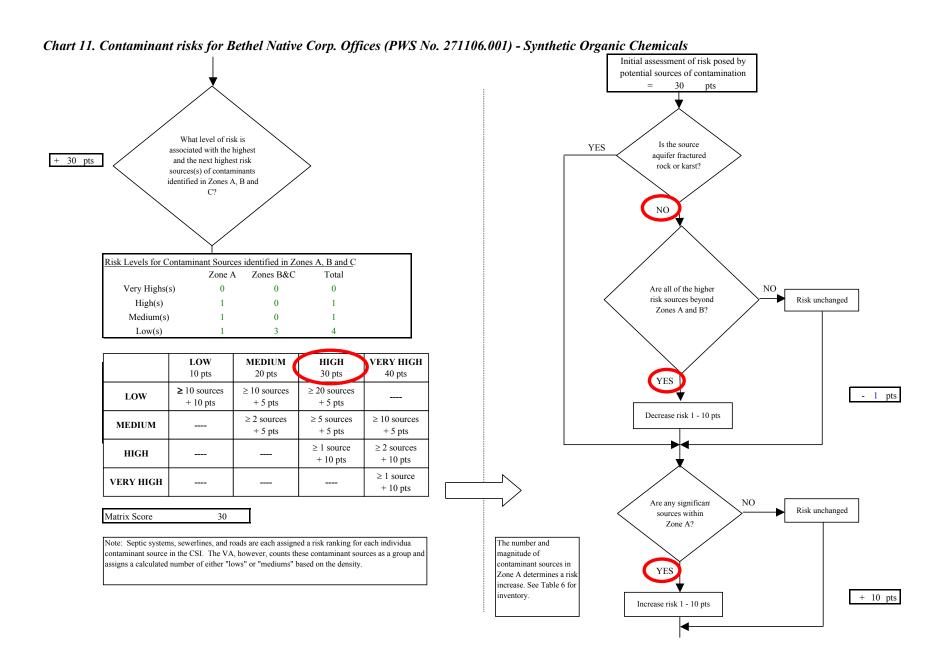
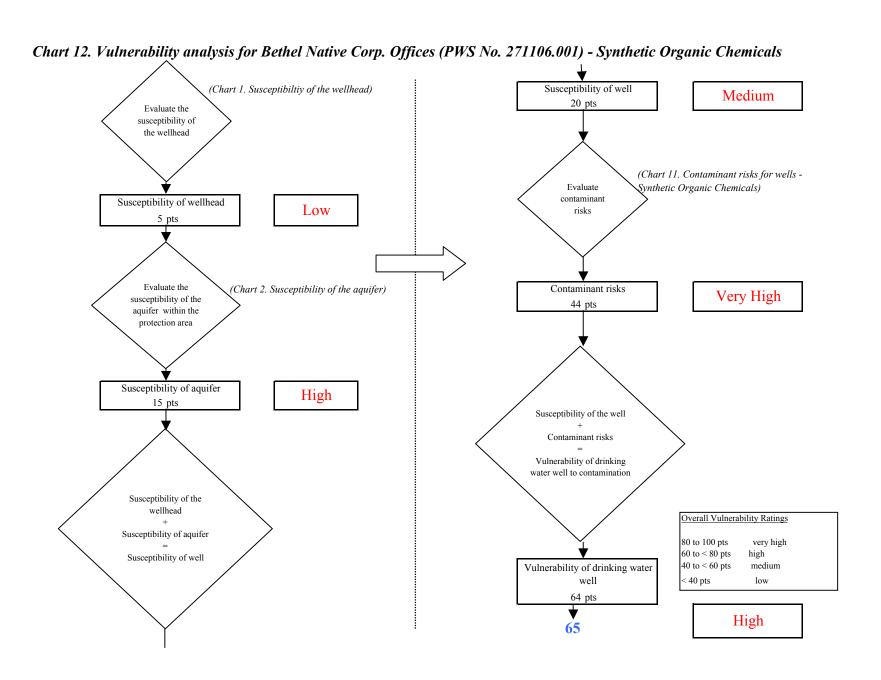
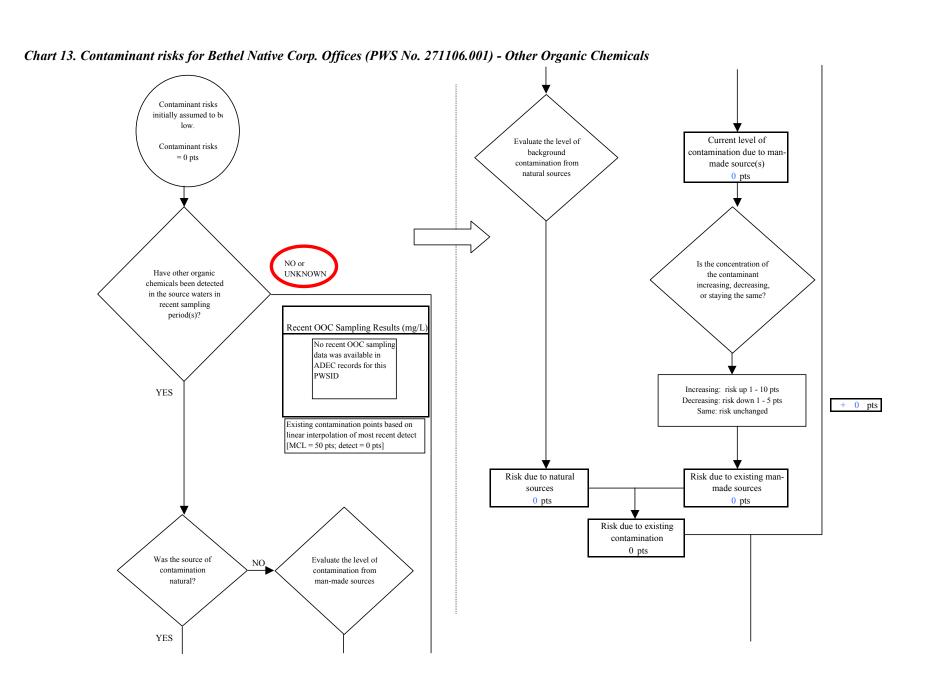


Chart 11. Contaminant risks for Bethel Native Corp. Offices (PWS No. 271106.001) - Synthetic Organic Chemicals Existing NO Are there conditions 0 pts Risk unchanged that warrant upgrading risk? Risk due to existing Potential contamination 44 pts The number and magnitude of Risk posed by potential sources contaminant sources in of contamination with controls Contaminant Risk Zone D determines a risk YES 44 pts increase. See Table 6 for Contaminant risks inventory. 5 pts Increase risk 1 - 10 pts Risk posed by potential sources of contamination 44 pts \*Truncate risk at 50 pts Contaminant risks\* 44 Contaminant Risk Ratings Are there sufficient Very High controls, conditions, NO. Risk unchanged or monitoring to 40 to 50 pts very high warrant downgrading 30 to < 40 pts high 20 to < 30 pts risk? medium < 20 pts low YES 0 pts Decrease risk 1 - 10 pts Risk posed by potential sources of contamination with controls

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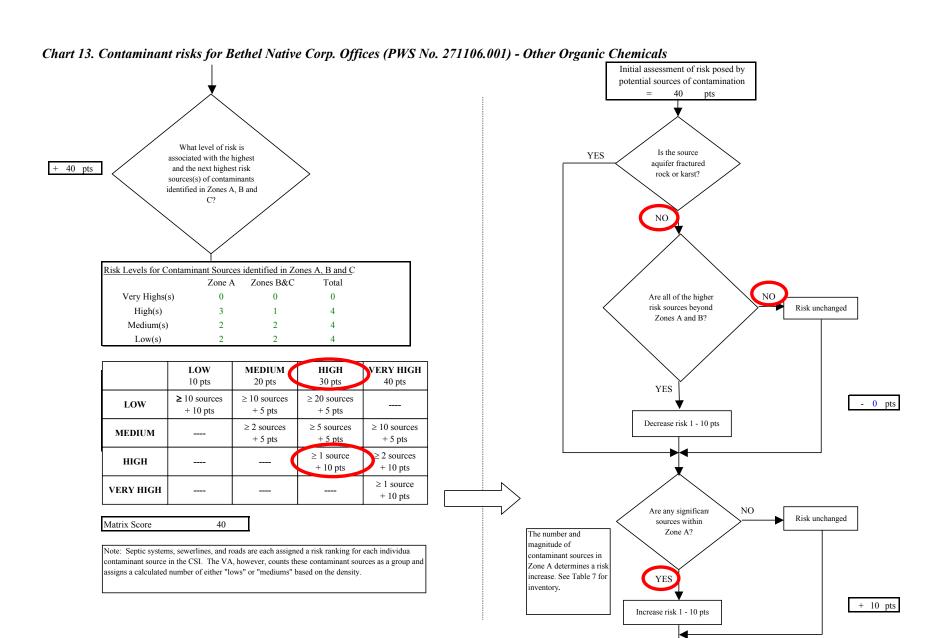


Chart 13. Contaminant risks for Bethel Native Corp. Offices (PWS No. 271106.001) - Other Organic Chemicals Existing NO Are there conditions 0 pts Risk unchanged that warrant upgrading risk? Risk due to existing Potential contamination 55 pts The number and magnitude of Risk posed by potential sources contaminant sources in of contamination with controls Contaminant Risk Zone D determines a risk YES 55 pts increase. See Table 7 for Contaminant risks inventory. 5 pts Increase risk 1 - 10 pts Risk posed by potential sources of contamination 55 pts \*Truncate risk at 50 pts Contaminant risks\* 50 Are there sufficient Contaminant Risk Ratings Very High controls, conditions, NO. Risk unchanged or monitoring to 40 to 50 pts very high warrant downgrading 30 to < 40 pts high 20 to < 30 pts risk? medium < 20 pts low YES 0 pts Decrease risk 1 - 10 pts Risk posed by potential sources of contamination with controls

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