Source Water Assessment

A Hydrogeologic Susceptibility and Vulnerability Assessment for Tundra Center Drinking Water System, Bethel, Alaska

PWSID # 271473.001

February 2004

DRINKING WATER PROTECTION PROGRAM REPORT 1221
Alaska Department of Environmental Conservation

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Tundra Center
Drinking Water System
Bethel, Alaska

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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 Tundra Center Source of Public Drinking Water, Bethel, Alaska

Drinking Water Protection Program
Alaska Department of Environmental Conservation

EXECUTIVE SUMMARY

The Tundra Center has one Public Water System (PWS) well. The well (PWSID# 271473.001) has been used as a drinking water source since it was drilled in the mid-1970's.

The well is a Class B (transient/non-community) water system located at 620 Ridgecrest Drive, near the Bethel Regional High School, in Bethel, Alaska. Available records indicate that there are two, 300-gallon storage tanks, and that the drinking water is treated for lead with potassium permanganate. This system operates year-round and serves 80 residents through two service connections. The wellhead received a susceptibility rating of **Low** and the aquifer received a susceptibility rating of **Low**. Combining these two ratings produce a **Low** rating for the natural susceptibility of the well.

Identified potential and current sources of contaminants for the primary public drinking water source include: domestic wastewater collection systems, aboveground fuel tanks, roads, landfills, and a domestic wastewater treatment plant disposal pond/lagoon. These identified potential and existing sources of contamination are considered as sources of bacteria and viruses, nitrates and/or nitrites, and volatile organic chemicals. Overall, the water well received a vulnerability rating of **Low** for the bacteria and viruses contaminant category and a vulnerability rating of **Medium** for nitrates and nitrites, and volatile organic chemicals contaminant categories.

TUNDRA CENTER PUBLIC DRINKING WATER SYSTEM

The Tundra Center water well is a Class B (transient/non-community) public water system. The system consists of one well located at 620 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 400-air 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 the Alaska Department of Environmental Conservation (ADEC) for the Tundra Center PWS, depth of the water well is 400 feet below the ground surface. Based on available construction details a nearby PWS (PWSID 270469.001), the well is screened in silty sand in a confined aquifer. The well is assumed to not be located in a floodplain.

Information acquired from a December 1998 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 potential of contaminant migration down the well casing annulus. The well is 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 below ground surface, with depths of over 600 feet below ground surface 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 generally 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).

TUNDRA CENTER 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 Tundra Center 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 B 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	¼ the distance for the 2-yr. time-of-travel
B	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 Tundra Center PWS was determined using an analytical calculation and includes Zone A through 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 Tundra Center 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 B public water system assessments, three categories of drinking water contaminants were inventoried. They include:

- Bacteria and viruses,
- Nitrates and/or nitrites,
- Volatile 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, and volatile organic chemicals.

VULNERABILITY OF THE TUNDRA CENTER 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 eight 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. Lastly, Chart 4 contains the 'Vulnerability Analysis for Bacteria and Viruses'. Charts 5 through 8 contain the Contaminant Risks and Vulnerability Analyses for nitrates and nitrites and volatile 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 Tundra Center's 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 both wells in this PWS.

Table 2. Susceptibility

	Score	Rating
Susceptibility of the Wellhead	0	Low
Susceptibility of the Aquifer	8	Low
Natural Susceptibility	8	Low

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	45	Very High
Volatile Organic Chemicals	32	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:

Natural Susceptibility (0 – 50 points)

+

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 three categories of drinking water contaminants. Note: scores are rounded off to the nearest five.

Table 4. Overall Vulnerability

Category	Score	Rating
Bacteria and Viruses	35	Low
Nitrates and Nitrites	55	Medium
Volatile Organic Chemicals	40	Medium

Bacteria and Viruses

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

A positive bacteria count has not been reported in recent (within five years) sampling events. 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 **Low**.

Nitrates and Nitrites

The contaminant risk for nitrates and nitrites is **Very High**. The risk to this source of public drinking water is attributed to the presence of domestic wastewater collection systems in Zone A and a domestic wastewater treatment plant disposal pond/lagoon and landfills in Zones C 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 nitrates have not been detected in recent sampling events. 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).

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 **Medium**.

Volatile Organic Chemicals

The contaminant risk for volatile organic chemicals is **High**. The risk is primarily attributed to the presence of landfills in Zones C and D (see Table 4 – Appendix B).

No recent sampling data was available in ADEC records for the Tundra Center (See Chart 7 – Contaminant Risks for Volatile Organic Chemicals in Appendix D).

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 **Medium**.

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 Tundra Center 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.

REFERENCES

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Dames & Moore, 1996. Final Water and Sewer Facilities Master Plan Update Report, City of Bethel.

Freeze, R. A., and Cherry, J.A. 1979, Groundwater, Prentice-Hall, Englewood Cliffs, New Jersey

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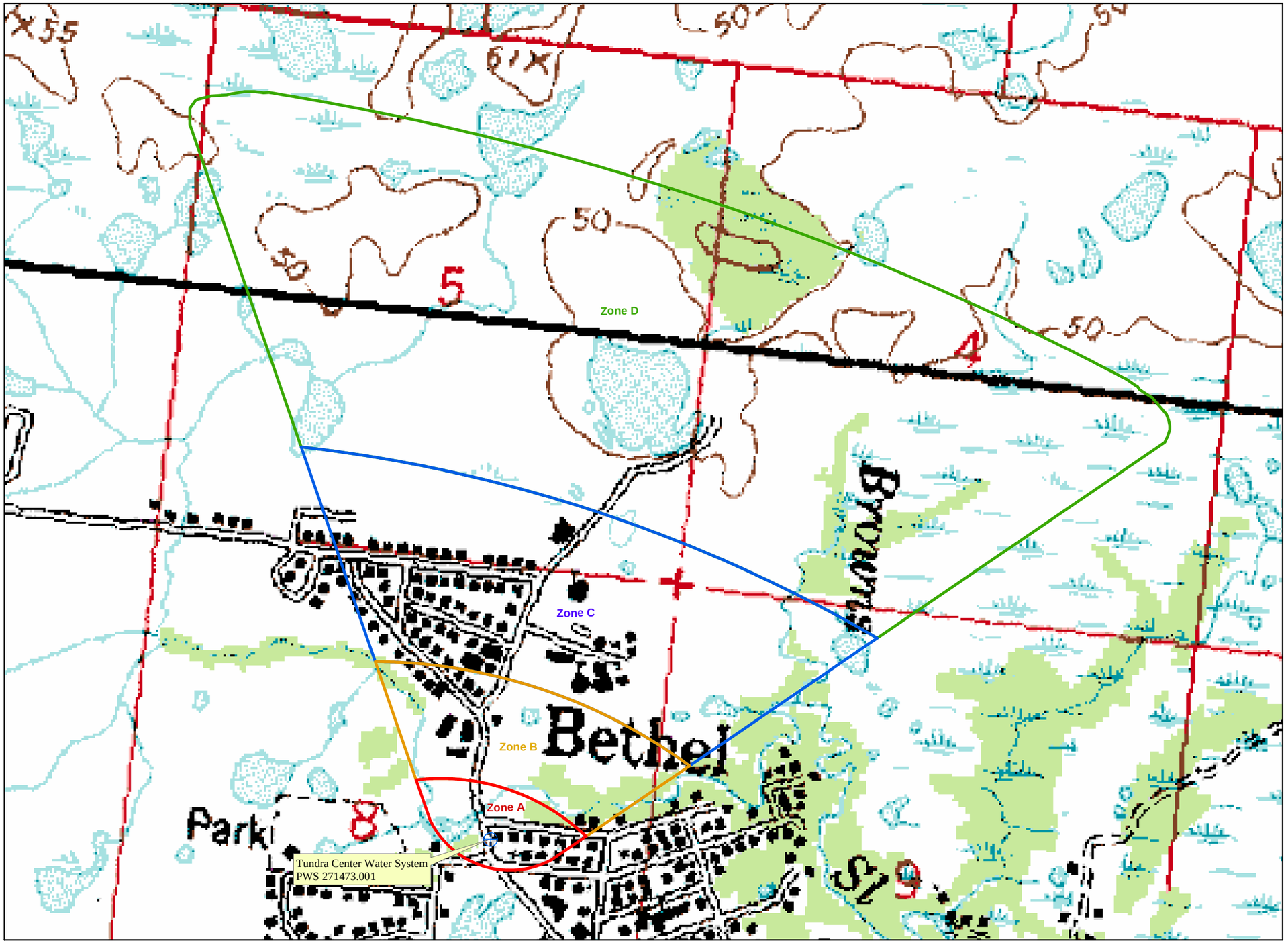
APPENDIX A

Drinking Water Protection Area Location Map
(Map A)

Public Water Well System for PWS #271473.001 Tundra Center Water System



LEGEND

- Public Water System Well

Hydrography/Physical

- Parcels
- Stream
- 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 Protection Area– 10 Years Travel Time

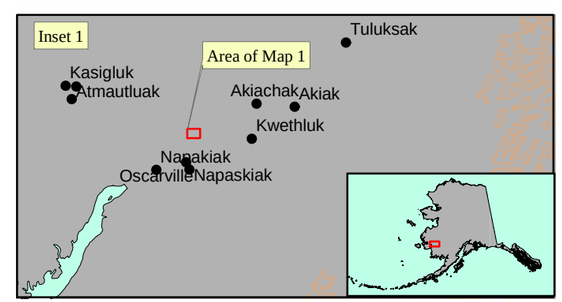
Data Sources:
Contaminant Sources, Public Water System Wells, Contours
Alaska Department of Environmental Conservation (ADEC)

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 B Public Water Systems" published by ADEC

URS Corporation does not guarantee the accuracy or validity of the data provided.



0 0.125 0.25 0.5 0.75 1 Mile

Tundra Center Water System
PWS 271473.001

Appendix A Map A

APPENDIX B

Contaminant Source Inventory and Risk Rankings (Tables 1-4)

Table 1

Contaminant Source Inventory for

Tundra Center Water System

PWSID 271473.001

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	C	Assume connected to municipal sewer
Tanks, heating oil, nonresidential (aboveground)	T14	T14-01	A	C	Assume facility heated by heating oil
Highways and roads, dirt/gravel	X24	X24-01	A	C	Assume 1-20 roads in Zone A
Landfills (municipal; Class II)	D50	D50-01	C	C	
Domestic wastewater treatment plant disposal ponds/lagoons	D02	D02-01	D	C	
Landfills (municipal; Class II)	D50	D50-01	D	C	

Table 2

Contaminant Source Inventory and Risk Ranking for Tundra Center Water System Sources of Bacteria and Viruses

PWSID 271473.001

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	C	Assume connected to municipal sewer
Highways and roads, dirt/gravel	X24	X24-01	A	Low	C	Assume 1-20 roads in Zone A
Landfills (municipal; Class II)	D50	D50-01	C	High	C	
Domestic wastewater treatment plant disposal ponds/lagoons	D02	D02-01	D	High	C	
Landfills (municipal; Class II)	D50	D50-01	D	High	C	

Table 3

Contaminant Source Inventory and Risk Ranking for Tundra Center Water System Sources of Nitrates/Nitrites

PWSID 271473.001

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	C	Assume connected to municipal sewer
Highways and roads, dirt/gravel	X24	X24-01	A	Low	C	Assume 1-20 roads in Zone A
Landfills (municipal; Class II)	D50	D50-01	C	Very High	C	
Domestic wastewater treatment plant disposal ponds/lagoons	D02	D02-01	D	High	C	
Landfills (municipal; Class II)	D50	D50-01	D	Very High	C	

Table 4

Contaminant Source Inventory and Risk Ranking for Tundra Center Water System Sources of Volatile Organic Chemicals

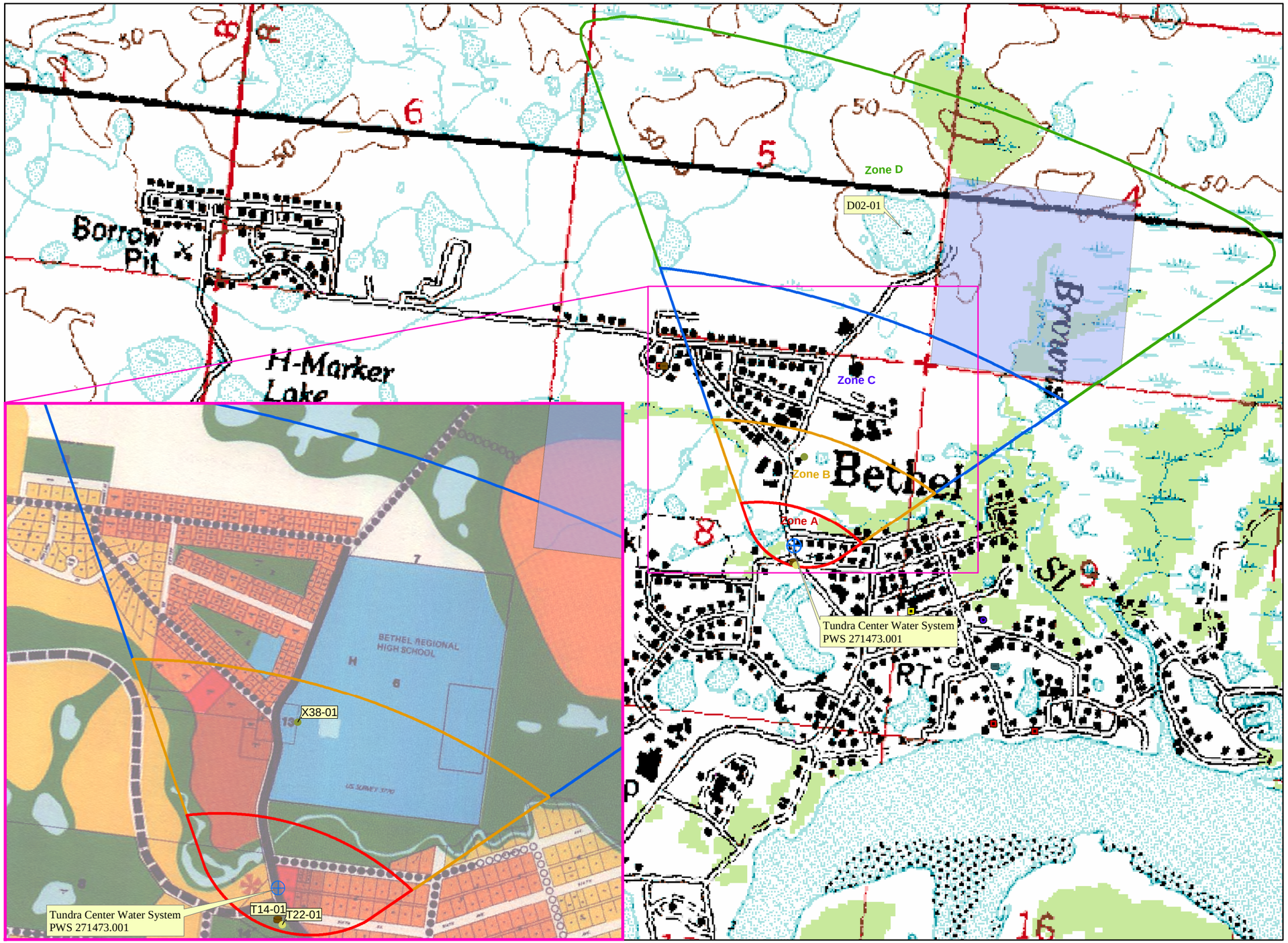
PWSID 271473.001

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	C	Assume connected to municipal sewer
Tanks, heating oil, nonresidential (aboveground)	T14	T14-01	A	Low	C	Assume facility heated by heating oil
Highways and roads, dirt/gravel	X24	X24-01	A	Low	C	Assume 1-20 roads in Zone A
Landfills (municipal; Class II)	D50	D50-01	C	High	C	
Domestic wastewater treatment plant disposal ponds/lagoons	D02	D02-01	D	Low	C	
Landfills (municipal; Class II)	D50	D50-01	D	High	C	

APPENDIX C

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

Public Water Well System for PWS #271473.001 Tundra Center Water System
Showing Potential and Existng Sources of Contamination



LEGEND

- Public Water System Well

Hydrography/Physical

- Parcels
- Stream
- 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 Protection Area– 10 Years Travel Time

Existing or Potential Contaminant Sources

- Domestic wastewater treatment plant disposal ponds/lagoons (D02)
- Tanks, heating oil, nonresidential (aboveground) (T14)
- Wastewater Holding Tank (T22)
- Firehouses (X38)
- Landfills (municipal; Class II) (D50)

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 B Public Water Systems" published by ADEC

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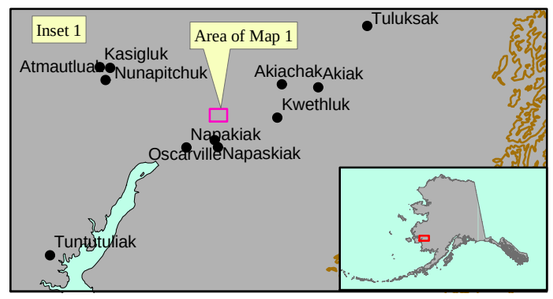


0 0.25 0.5 1 1.5 2 Miles

Tundra Center Water System
PWS 271473.001

Appendix C Map C

APPENDIX D

Vulnerability Analysis for Public Drinking Water Source (Charts 1-8)

Chart 1. Susceptibility of the wellhead - Tundra Center (PWS No. 271473.001)

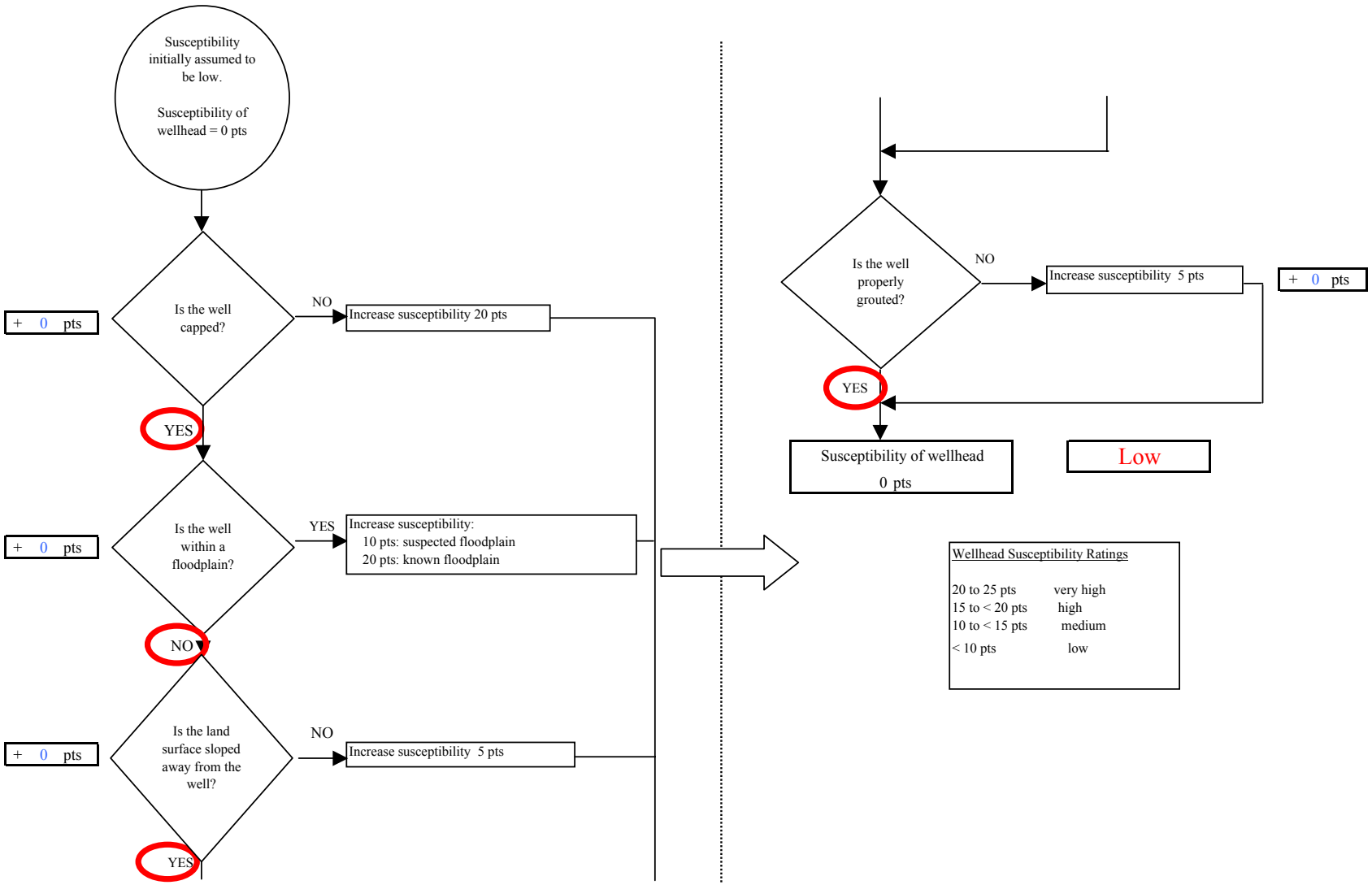


Chart 2. Susceptibility of the aquifer Tundra Center (PWS No. 271473.001)

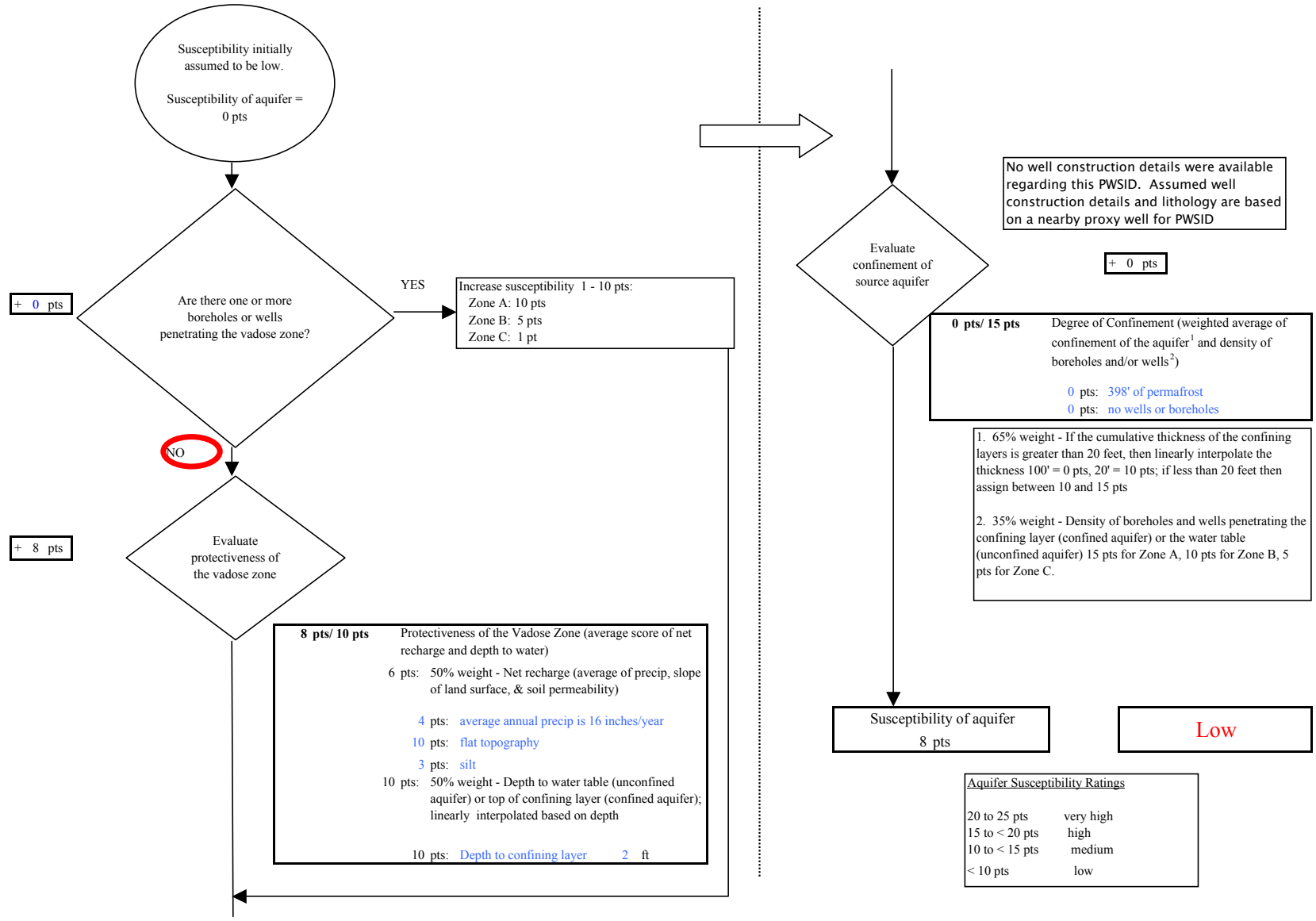
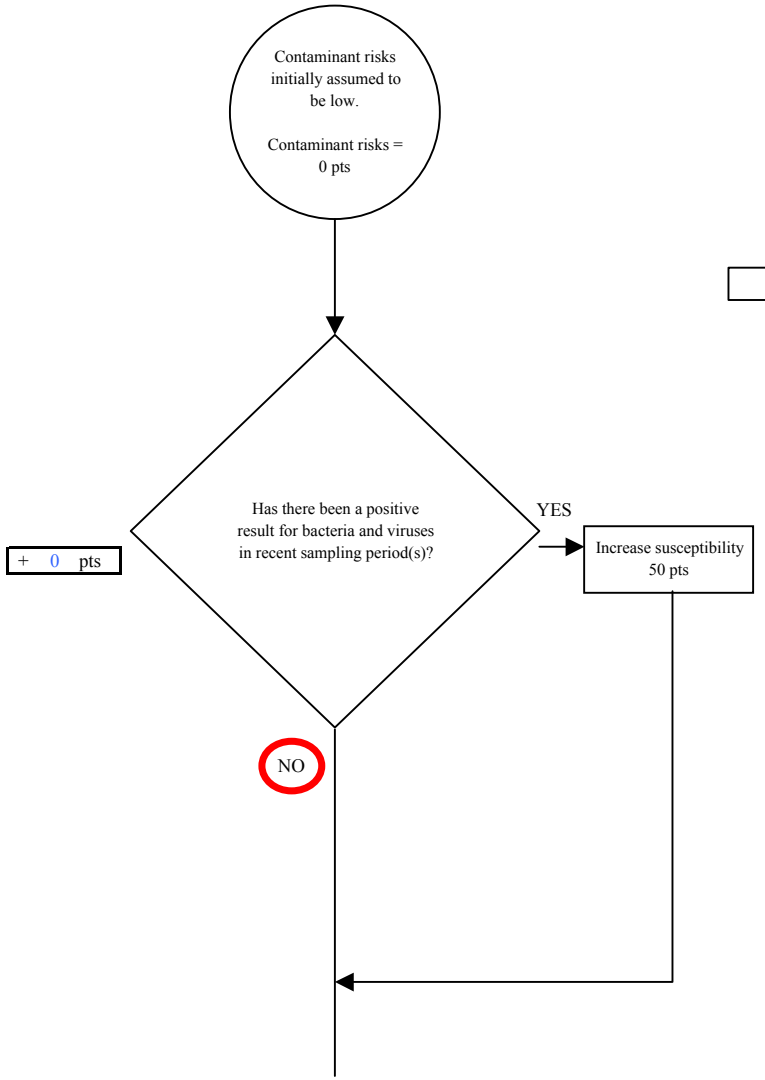
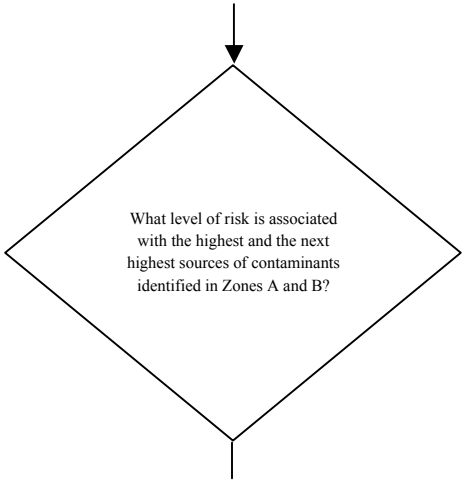


Chart 3. Contaminant risks for Tundra Center (PWS No. 271473.001) - Bacteria & Viruses





+ 20 pts

Risk Rankings for Contaminant Sources Identified in Zones A and B

	Zone A	Zone B	Total
Very Highs(s)	0	0	0
High(s)	0	0	0
Medium(s)	1	0	1
Low(s)	1	0	1

	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 20

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 3. Contaminant risks for Tundra Center (PWS No. 271473.001) - Bacteria & Viruses

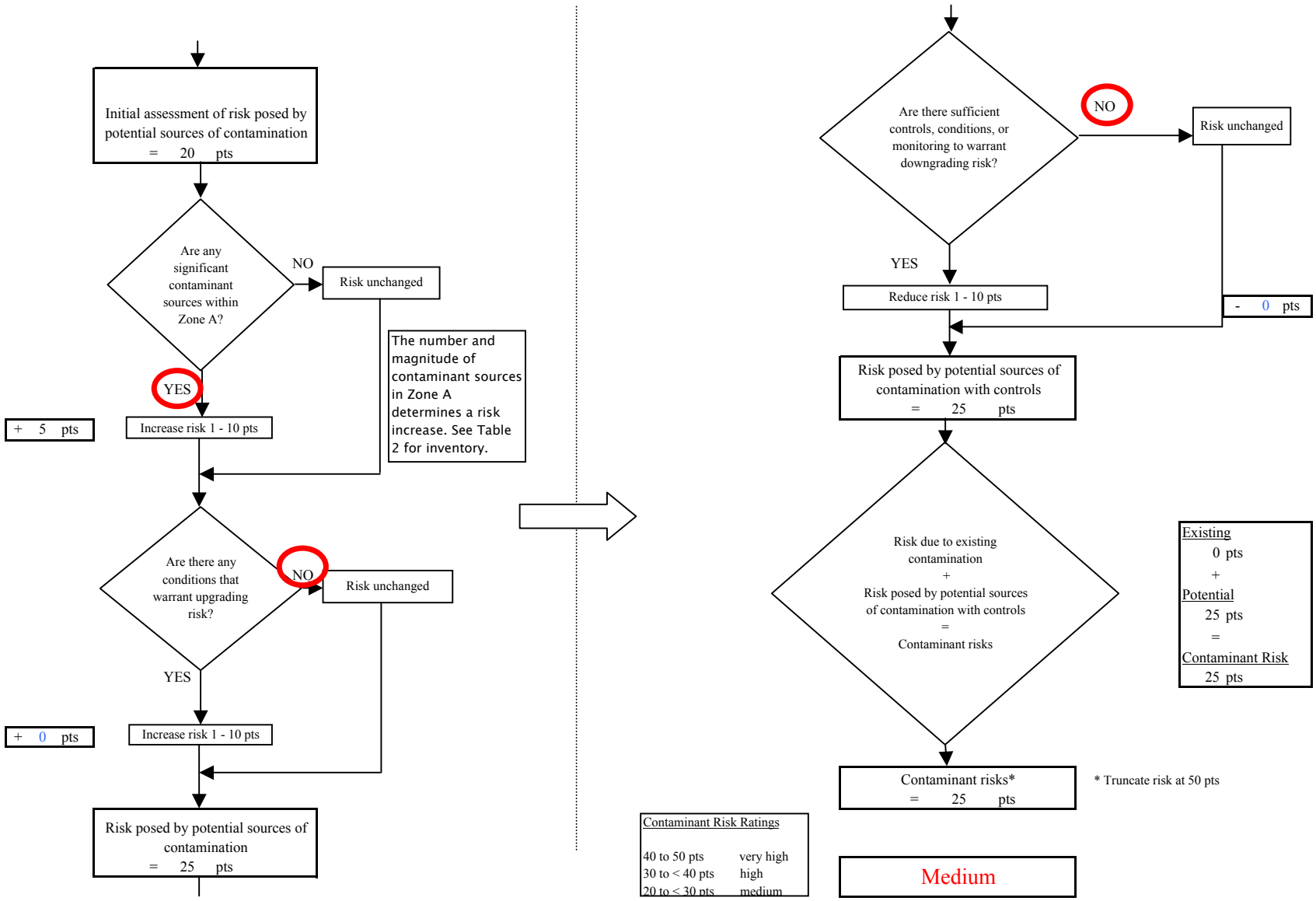


Chart 4. Vulnerability analysis for Tundra Center (PWS No. 271473.001) - Bacteria & Viruses

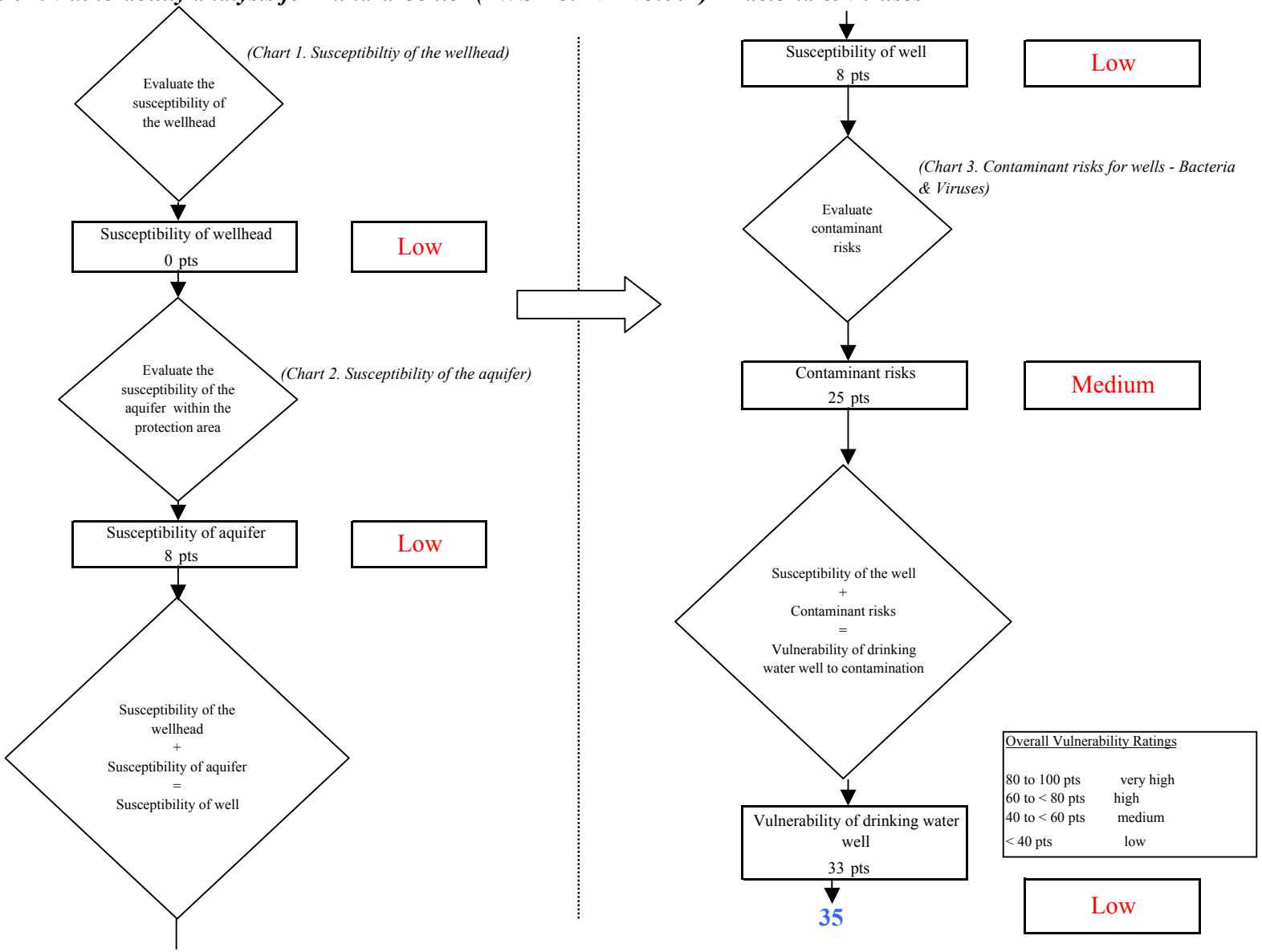


Chart 5. Contaminant risks for Tundra Center (PWS No. 271473.001) - Nitrates and Nitrites

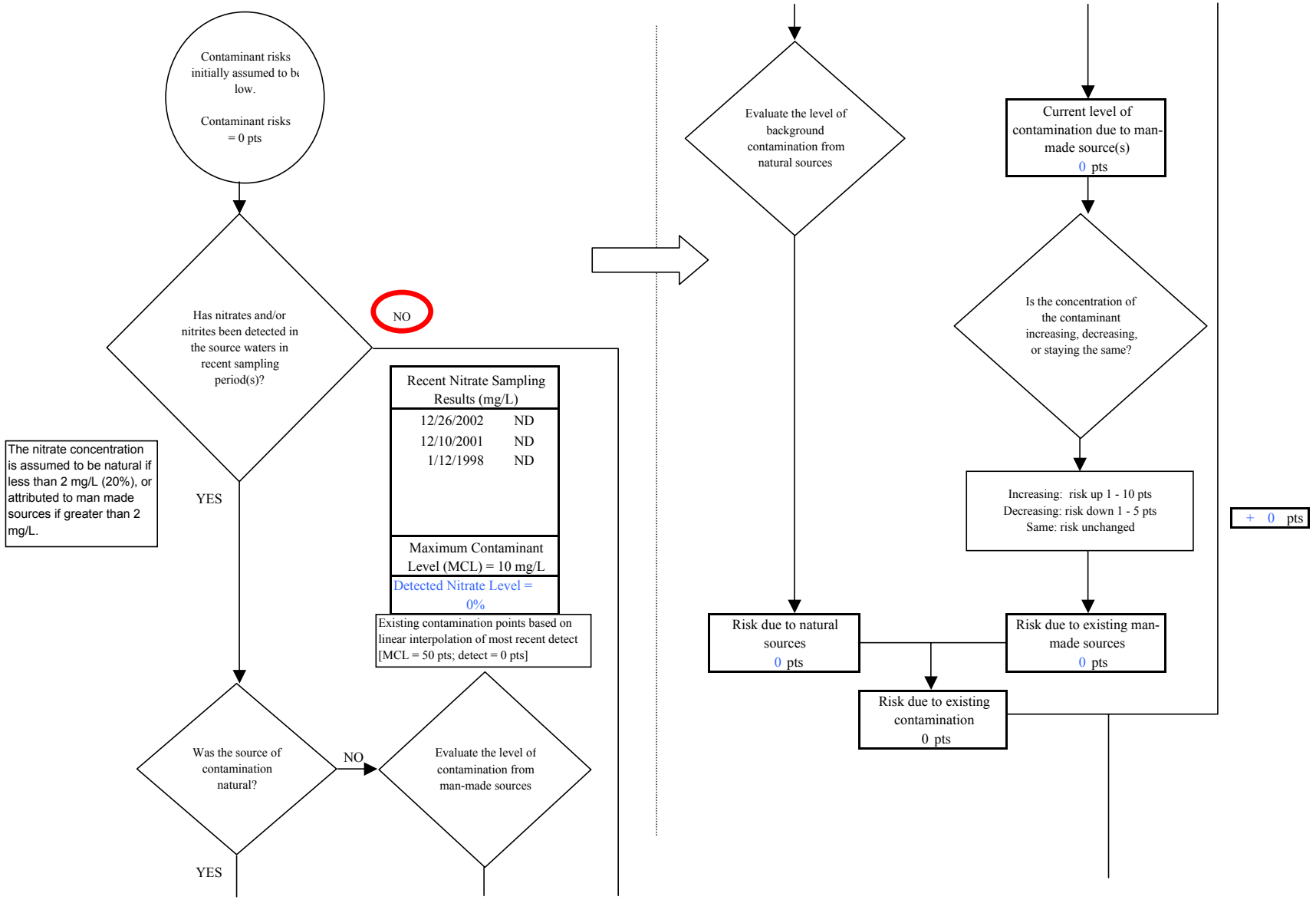
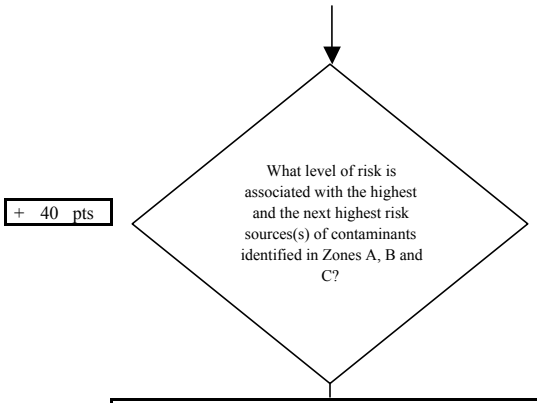


Chart 5. Contaminant risks for Tundra Center (PWS No. 271473.001) - Nitrates and Nitrites



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

	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 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.

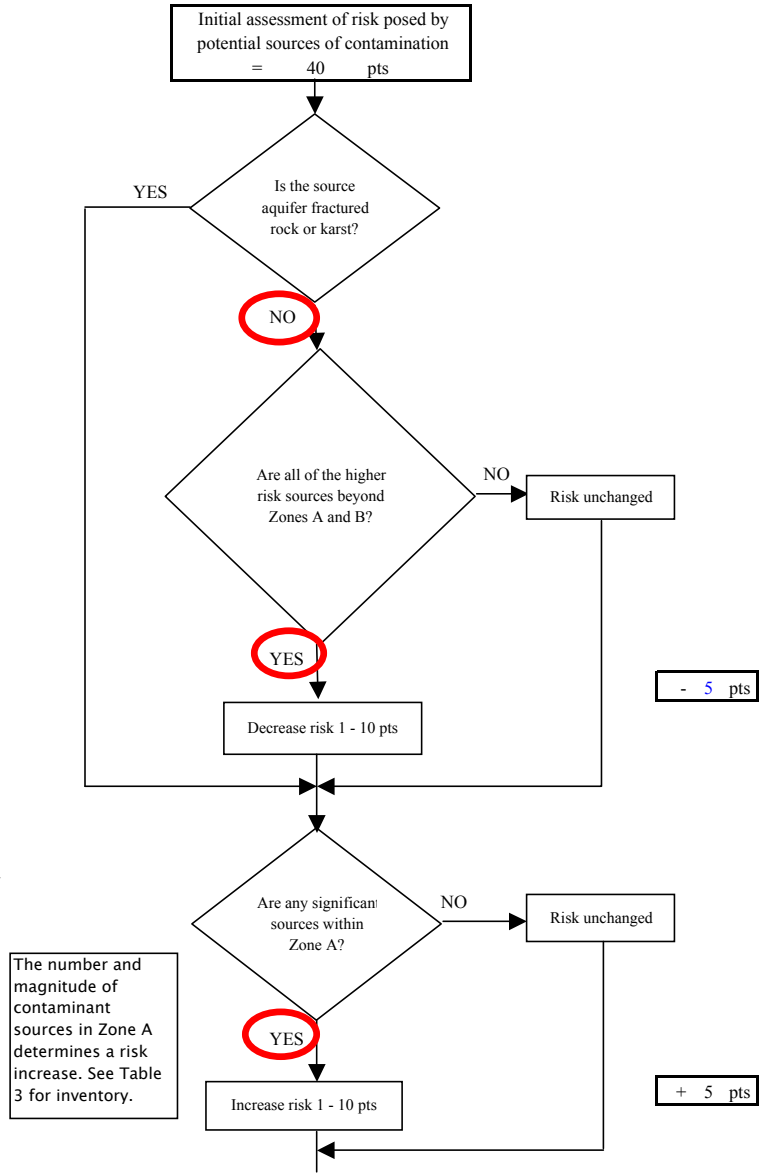


Chart 5. Contaminant risks for Tundra Center (PWS No. 271473.001) - Nitrates and Nitrites

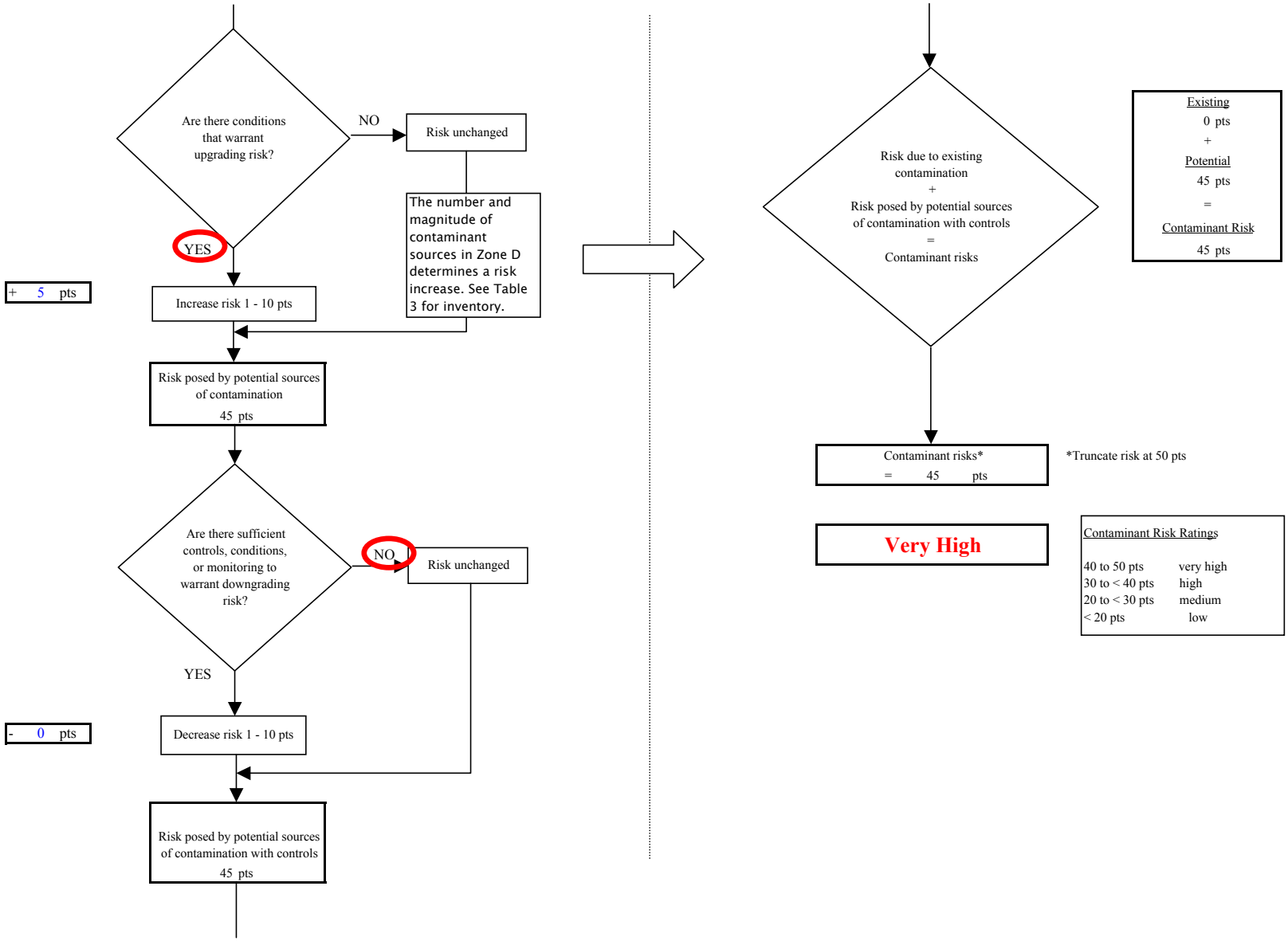


Chart 6. Vulnerability analysis for Tundra Center (PWS No. 271473.001) - Nitrates and Nitrites

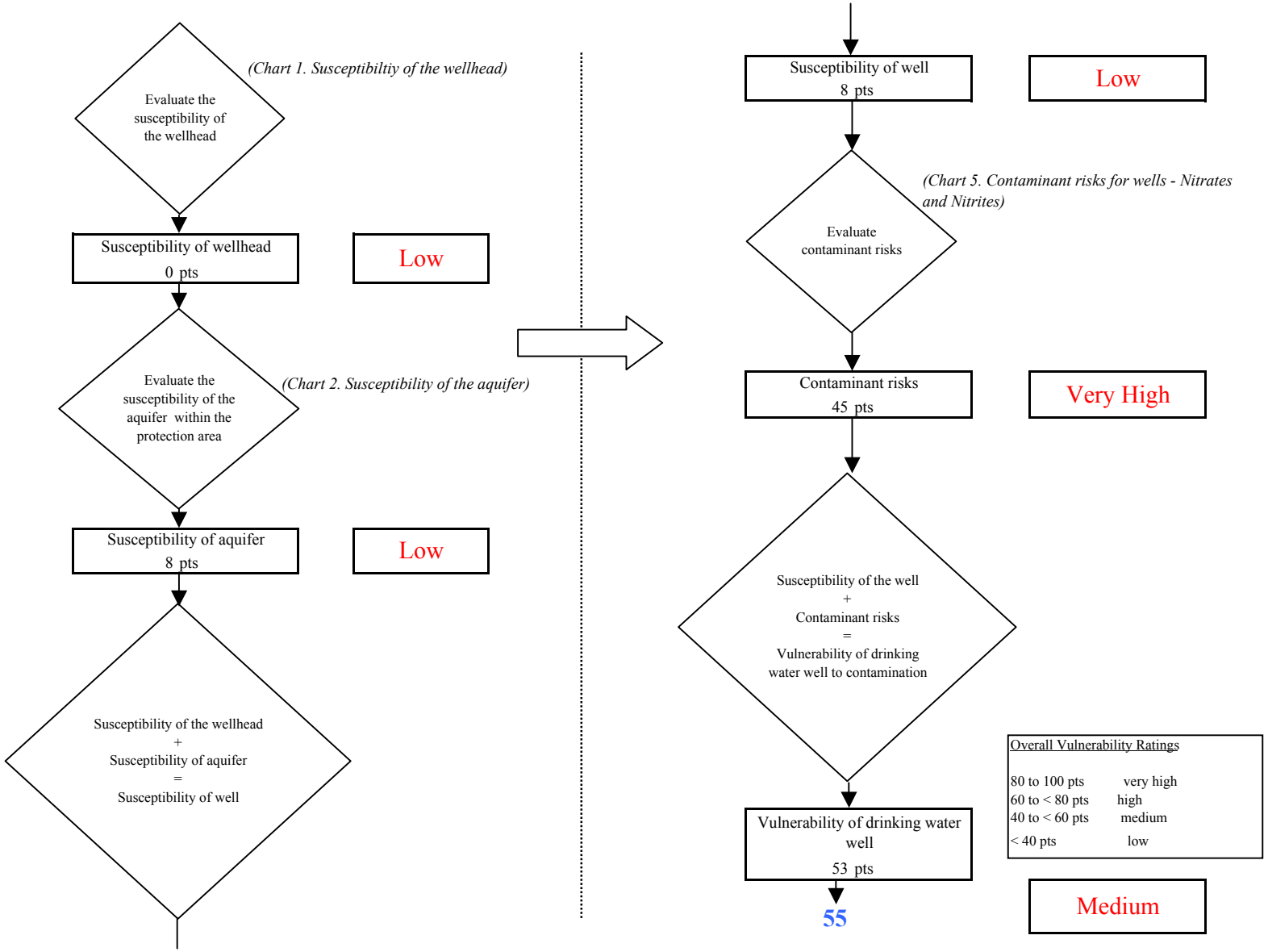


Chart 7. Contaminant risks for Tundra Center (PWS No. 271473.001) - Volatile Organic Chemicals

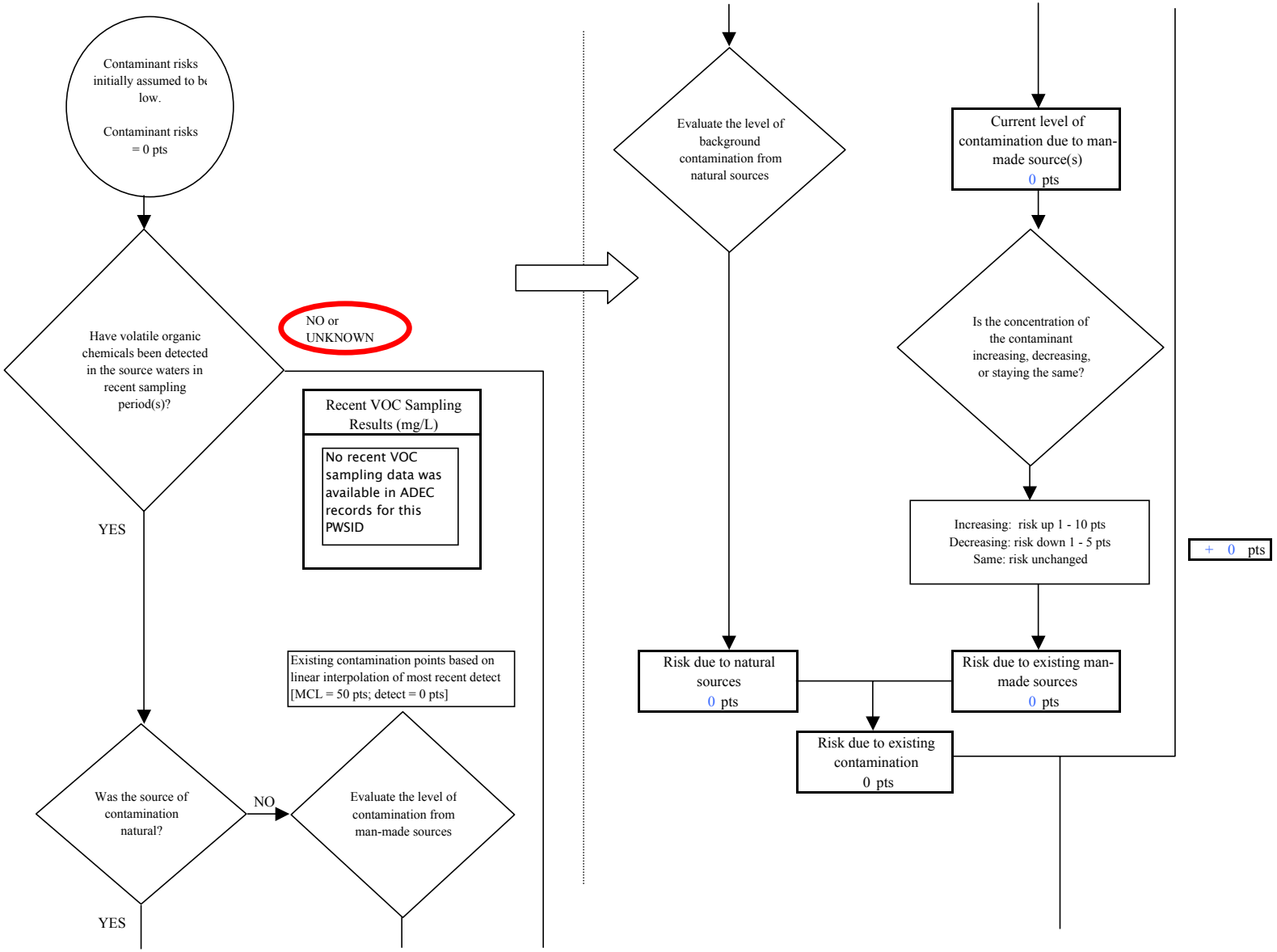


Chart 7. Contaminant risks for Tundra Center (PWS No. 271473.001) - Volatile Organic Chemicals

+ 30 pts

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?

Risk Levels for Contaminant Sources identified in Zones A, B and C

	Zone A	Zones B&C	Total
Very Highs(s)	0	0	0
High(s)	0	1	1
Medium(s)	0	0	0
Low(s)	3	0	3

	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.

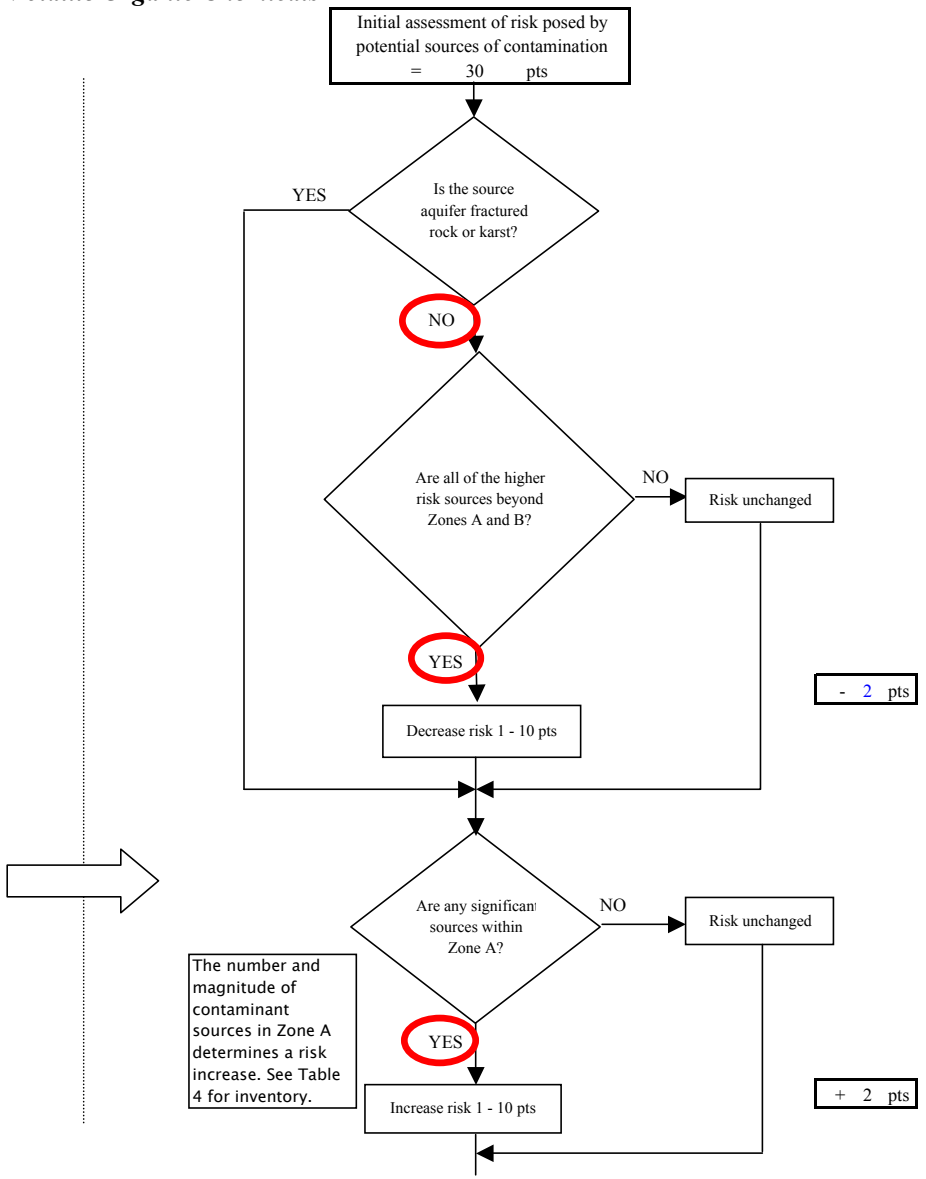


Chart 7. Contaminant risks for Tundra Center (PWS No. 271473.001) - Volatile Organic Chemicals

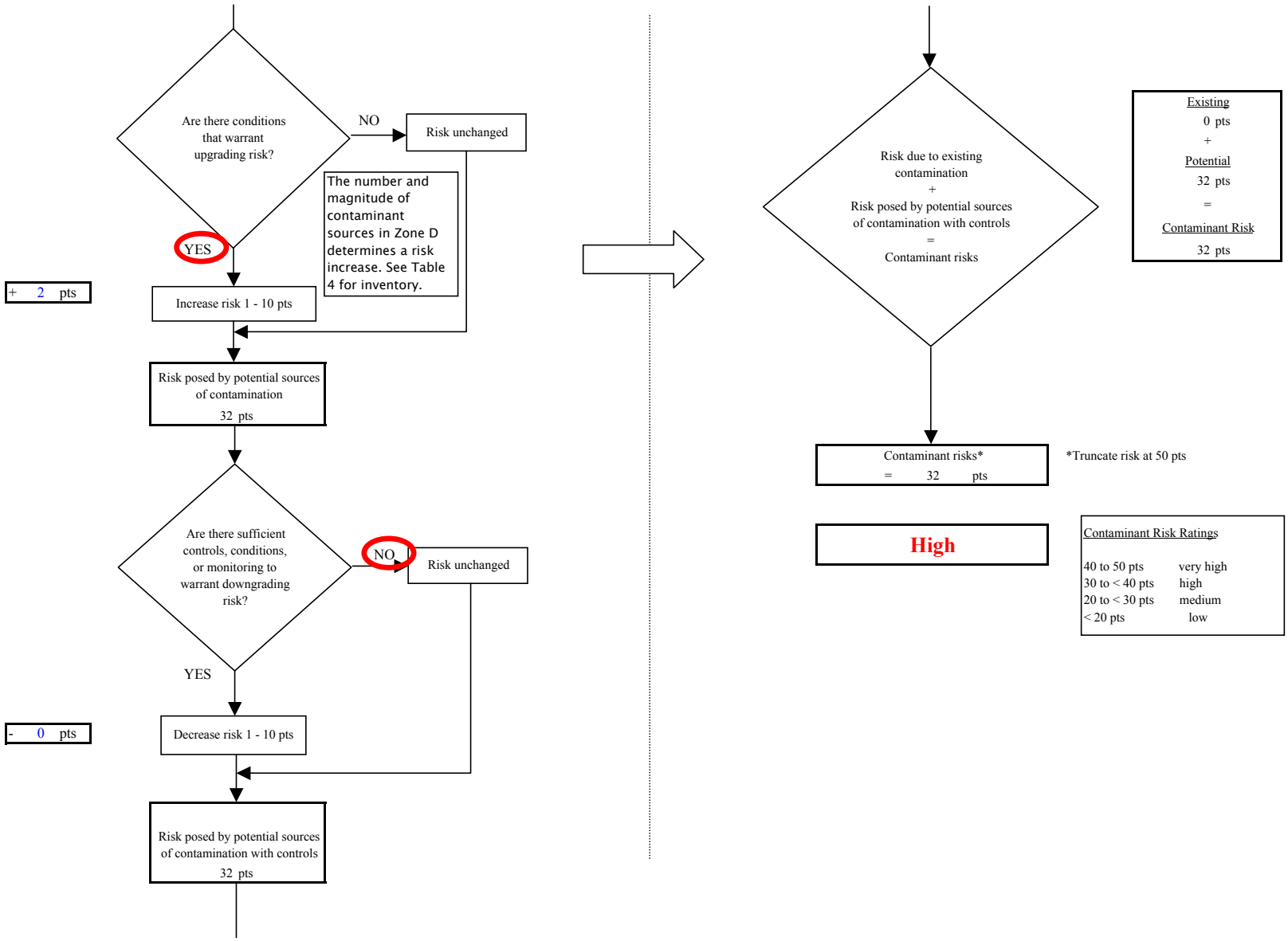


Chart 8. Vulnerability analysis for Tundra Center (PWS No. 271473.001) - Volatile Organic Chemicals