



Source Water Assessment

A Hydrogeologic Susceptibility and Vulnerability Assessment for Willow Tree Inn Drinking Water System, Dillingham, Alaska

PWSID # 263030.001 March 2004

DRINKING WATER PROTECTION PROGRAM REPORT 1220 Alaska Department of Environmental Conservation

Source Water Assessment for Willow Tree Inn Drinking Water System Dillingham, Alaska

PWSID # 263030.001

DRINKING WATER PROTECTION PROGRAM REPORT 1220

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.

CONTENTS

EXECUTIVE SUMMARY WILLOW TREE INN PUBLIC DRINKING WATER SYSTEM WILLOW TREE INN DRINKING WATER PROTECTION AREA			1	INVENTORY OF POTENTIAL AND EXISTING CONTAMINANT SOURCES
		7	Γ AB L	ES
Table 2. Suscep Table 3. Contant	tibil ninai	ity nt Risks		
		API	PEND	DICES
APPENDIX	A.	Willow Tree Inn Drinking Wa	ter Prote	ection Area (Map A)
	В.	Bacteria and Viruses (Tab Contaminant Source Inventory Nitrates/Nitrites (Table 3)	and Risole 2) and Risole 3 and Risol and Risol	sk Ranking for Willow Tree Inn – sk Ranking for Willow Tree Inn – sk Ranking for Willow Tree Inn –
	C.	Willow Tree Inn Drinking Wa and Existing Contaminant		
	D.			nt Source Inventory and Risk Ranking for Water Source (Charts 1 – 8)

Source Water Assessment for Willow Tree Inn Source of Public Drinking Water, Dillingham, Alaska

Drinking Water Protection Program Alaska Department of Environmental Conservation

EXECUTIVE SUMMARY

The Willow Tree Inn has one Public Water System (PWS) well. The well (PWSID# 263030.001) has been used as a drinking water source since it was drilled in 1994.

The well is a Class B (transient/non-community) water system located near the Nushagak River, off of Wood River Road in Dillingham, Alaska. Available records indicate that there is no secondary storage of drinking water, other than an 80-gallon pressure tank, and that the untreated drinking water source is derived directly from the wellhead. This system operates year round and serves approximately 25 nonresidents through one service connection. The wellhead received a susceptibility rating of Verv **High** and the aguifer received a susceptibility rating of Very High. Combining these two ratings produce a Very High rating for the natural susceptibility of the well. Identified potential and current sources of contaminants for the primary public drinking water source include: injection wells, roads, domestic wastewater collections systems, residential areas, aboveground fuel tanks, water supply wells, and an airport. 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 Very High for the bacteria and viruses, a vulnerability rating of Verv **High** for nitrates and nitrites, and a vulnerability rating of Very High for volatile organic chemicals contaminant categories.

WILLOW TREE INN PUBLIC DRINKING WATER SYSTEM

The Willow Tree Inn well is a Class B (transient/non-community) public water system located off of Wood River Road in Dillingham, Alaska (Sec. 21, T13S, R55W, Seward Meridian; see Map A of Appendix A). Dillingham is located at the extreme northern end of Nushagak Bay in northern Bristol Bay, at the confluence of the Wood and Nushagak Rivers. The city is located 327 miles southwest of Anchorage and

175 miles southeast of Bethel. The community has a population of 2,475 (ADCED, 2003). Average annual precipitation in Dillingham is 26 inches, including approximately 65 inches of snowfall. Temperatures range from 37 to 66°F in summer and 4 to 30°F in winter.

The community of Dillingham obtains most of their water supply from three City wells. Approximately 60% of the community uses individual wells. The core town-site is served by a piped sewage collection system and the remaining households have individual septic tanks (ADCED, 2003). Dillingham receives electrical power from Nushagak Electric. Power generating facilities are fueled by diesel. Refuse is collected by Dillingham Refuse, Inc., a private firm, and transported to the landfill (ADCED, 2003).

According to information supplied by ADEC for an adjacent proxy well, the depth of the primary water well is approximately 49 feet below the ground surface. Based on available construction details for the adjacent proxy well, it is assumed the well is in an unconfined aquifer. Unconfined aquifers are more susceptible to groundwater impacts resulting from the downward migration of surface contaminants. The well is not located within a floodplain.

Information acquired from a March 1999 sanitary survey for the public water system indicated that the land surface was not 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. Based on the well construction date, it is assumed 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 entire Bristol Bay area was formerly covered by glaciers and the topography is representative of a postglacial area. Soils information is limited. Generally, the soils consist of silty sand overlying relatively clean sand. The silty soils are slightly frost-susceptible. Isolated pockets of permafrost are scattered throughout the area (DOWL, 1982).

WILLOW TREE INN 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 Willow Tree Inn 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	½ 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 Willow Tree Inn 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 Willow Tree Inn 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 WILLOW TREE INN 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 Willow Tree Inn's water well is in an unconfined aquifer. Unconfined aquifers are more 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	20	Very High
Wellhead		
Susceptibility of the	25	Very High
Aquifer		
Natural Susceptibility	45	Very High

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	40	Very High
Nitrates and/or Nitrites	45	Very High
Volatile Organic Chemical	ls 45	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:

Natural Susceptibility
$$(0 - 50 \text{ points})$$

+

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	85	Very High
Nitrates and Nitrites	90	Very High
Volatile Organic Chemicals	90	Very High

Bacteria and Viruses

The contaminant risk for bacteria and viruses is **Very High**. The risk is primarily attributed to the presence of an injection well in Zone A (see Table 2 – Appendix B).

No positive bacteria counts have 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 **Very High**.

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 injection well in Zone A (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 **Very High**.

Volatile Organic Chemicals

The contaminant risk for volatile organic chemicals is **Very High**. The risk is primarily attributed to the presence of an airport and aboveground fuel tanks located in Zones A and B. Numerous other potential contaminant sources are also found within the protection area (see Table 4 – Appendix B).

No recent sampling data was available in ADEC records for the Willow Tree Inn (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 **Very 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 Willow Tree Inn and the community of Dillingham 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.

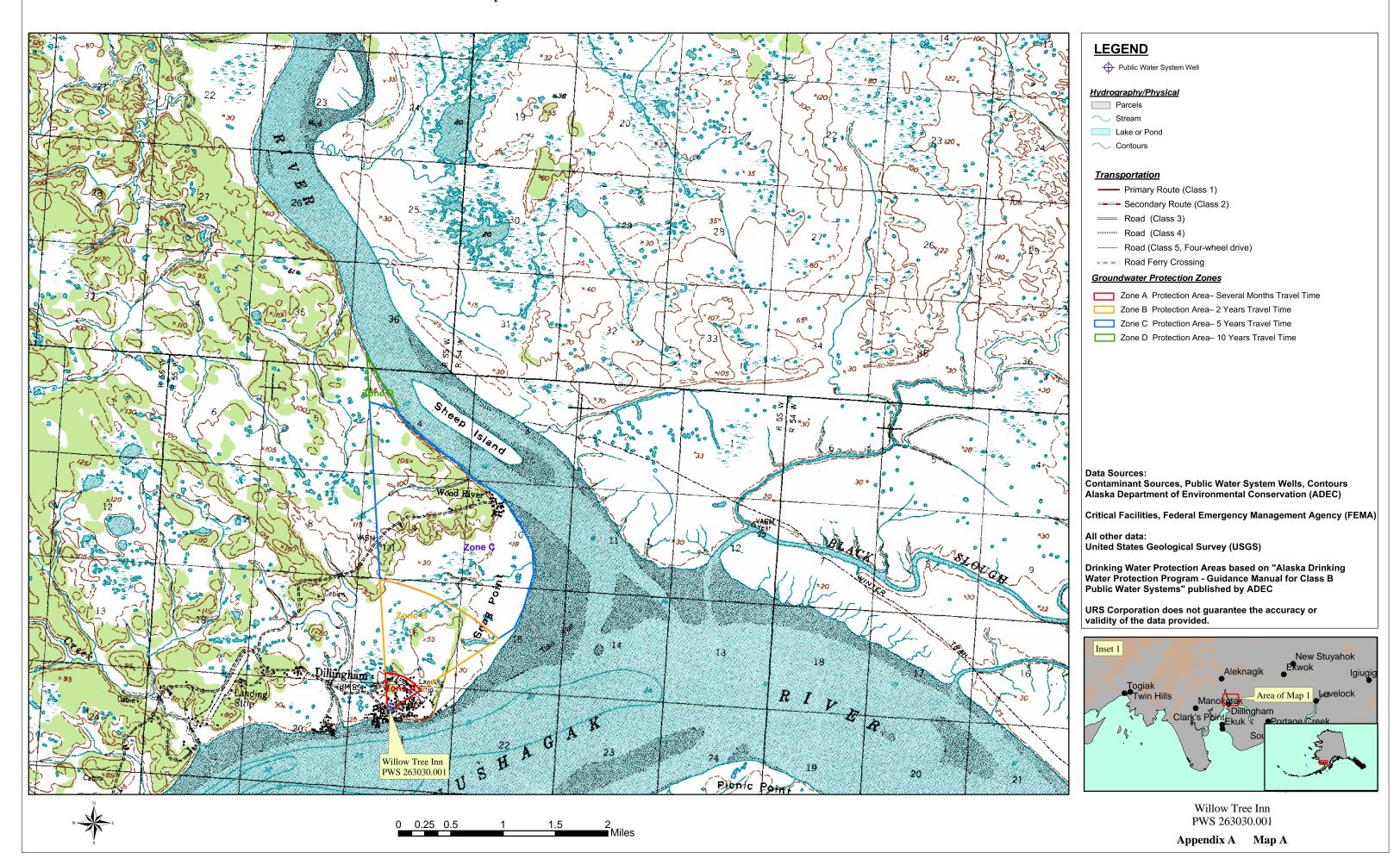
REFERENCES

- Alaska Department of Community and Economic Development (ADCED), 2003 [WWW document]. URL: http://www.dced.state.ak.us/cbd/commdb/CF COMDB.htm
- Alaska Department of Environmental Conservation, Contaminated Sites Database, 2003 [WWW database], URL http://www.state.ak.us/dec/dspar/csites/cs search.htm
- Alaska Department of Environmental Conservation, Leaking Underground Storage Tank Database, 2003 [WWW database], URL http://www.dec.state.ak.us/spar/stp/ust/search/fac_search.asp
- DOWL Engineers (DOWL), 1982, Upper Bristol Bay Region Community Planning Profiles.
- Freeze, R. A., and Cherry, J.A. 1979, Groundwater, Prentice-Hall, Englewood Cliffs, New Jersey
- United States Environmental Protection Agency (EPA), 2002 [WWW document]. URL http://www.epa.gov/safewater/mcl.html.

APPENDIX A

Drinking Water Protection Area Location Map (Map A)

Public Water Well System for PWS #263030.001 Willow Tree Inn



APPENDIX B

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

Contaminant Source Inventory for Willow Tree Inn

Contaminant Source Type	Contaminant Source ID	CS ID tag	Zone	Map Number	Comments
Domestic wastewater collection systems (sewer lines or lift stati-	D01	D01-01	A	С	It is assumed that 15 or less sewer lines are located in Zone A
Injection wells (Class V) Large-Capacity Septic System (Drainfie Disposal Method)	D10	D10-01	A	С	
Residential Areas	R01	R01-01	A	С	It is assumed that 50 or less acres of residential area is located in Zone A
Tanks, heating oil, residential (above ground)	R08	R08-01	A	С	It is assumed that 20 or less residential above ground heating oil tanks are located in Zone A
Water supply wells	W09	W09-01	A	C	
Water supply wells	W09	W09-02	A	С	
Water supply wells	W09	W09-03	A	С	
Water supply wells	W09	W09-04	A	C	
Airports	X14	X14-01	A	С	
Highways and roads, dirt/gravel	X24	X24-01	A	С	It is assumed that there are 1 to 20 roads located in Zone A
Residential Areas	R01	R01-02	В	С	It is assumed that 50 or less acres of residential area is located in Zone B
Tanks, heating oil, residential (above ground)	R08	R08-02	В	С	It is assumed that 5 or less residential above ground heating oil tanks are presin Zone B
Highways and roads, dirt/gravel	X24	X24-02	В	C	It is assumed that there are 1 to 20 roads located in Zone B
Water supply wells	W09	W09-05	С	С	

Contaminant Source Inventory and Risk Ranking for Willow Tree Inn 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	It is assumed that 15 or less sewer lines are located in Zone A
Injection wells (Class V) Large-Capacity Septic System (Drainfield Disposal Method)	D10	D10-01	A	High	С	
Residential Areas	R01	R01-01	A	Low	С	It is assumed that 50 or less acres of residential area is located in Zone A
Highways and roads, dirt/gravel	X24	X24-01	A	Low	С	It is assumed that there are 1 to 20 roads located in Zone A
Residential Areas	R01	R01-02	В	Low	С	It is assumed that 50 or less acres of residential area is located in Zone B
Highways and roads, dirt/gravel	X24	X24-02	В	Low	С	It is assumed that there are 1 to 20 roads located in Zone B

Contaminant Source Inventory and Risk Ranking for Willow Tree Inn 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	It is assumed that 15 or less sewer lines are located in Zone A
Injection wells (Class V) Large-Capacity Septic System (Drainfield Disposal Method)	D10	D10-01	A	High	С	
Residential Areas	R01	R01-01	A	Low	C	It is assumed that 50 or less acres of residential area is located in Zone A
Airports	X14	X14-01	A	Low	С	
Highways and roads, dirt/gravel	X24	X24-01	A	Low	С	It is assumed that there are 1 to 20 roads located in Zone A
Residential Areas	R01	R01-02	В	Low	С	It is assumed that 50 or less acres of residential area is located in Zone B
Highways and roads, dirt/gravel	X24	X24-02	В	Low	С	It is assumed that there are 1 to 20 roads located in Zone B

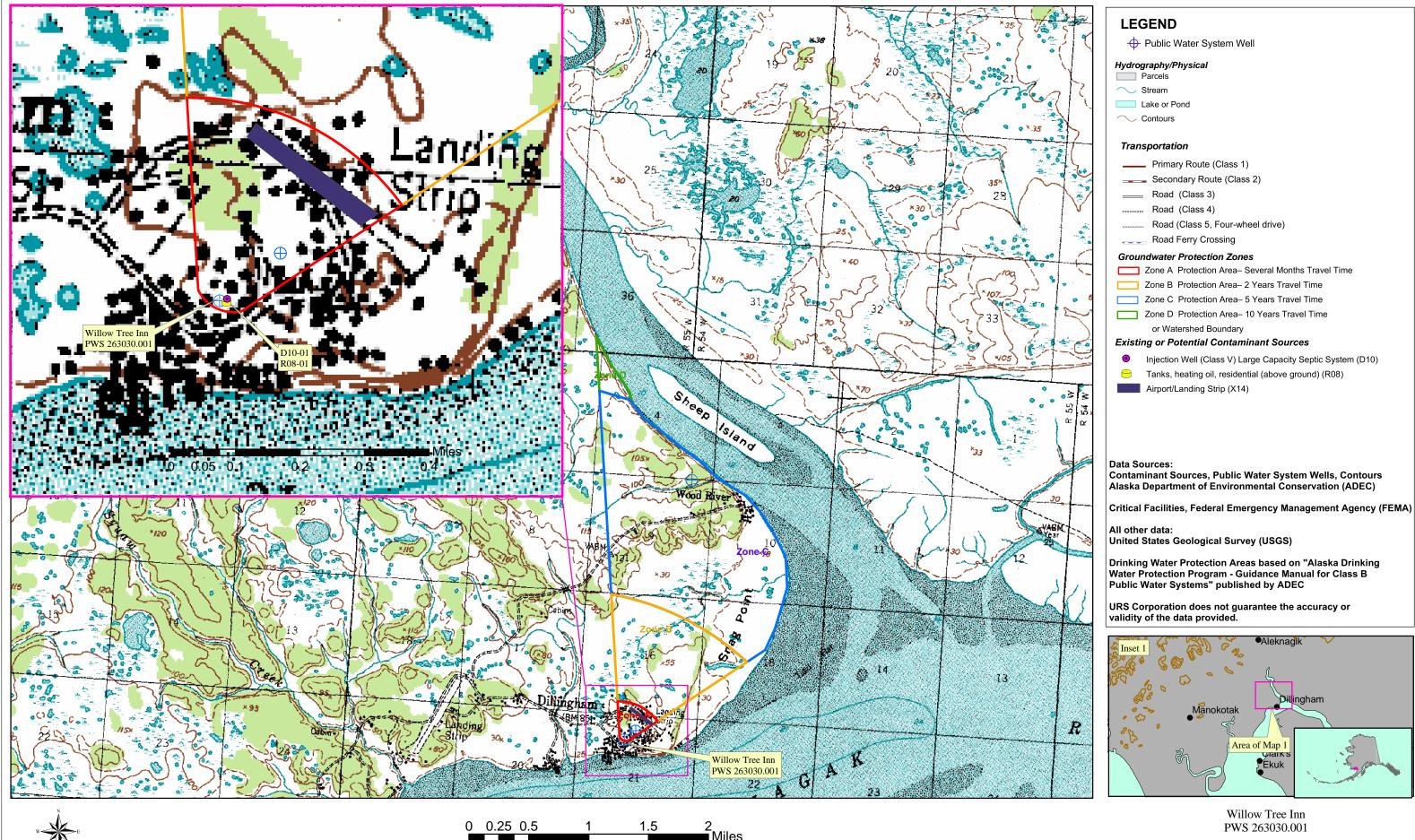
Contaminant Source Inventory and Risk Ranking for Willow Tree Inn Sources of Volatile Organic Chemicals

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	It is assumed that 15 or less sewer lines are located in Zone A	
Injection wells (Class V) Large-Capacity Septic System (Drainfield Disposal Method)	D10	D10-01	A	Low	С		
Residential Areas	R01	R01-01	A	Low	C	It is assumed that 50 or less acres of residential area is located in Zone A	
Tanks, heating oil, residential (above ground)	R08	R08-01	A	Medium	С	It is assumed that 20 or less residential above ground heating oil tanks are located in Zone A	
Airports	X14	X14-01	A	High	C		
Highways and roads, dirt/gravel	X24	X24-01	A	Low	С	It is assumed that there are 1 to 20 roads located in Zone A	
Residential Areas	R01	R01-02	В	Low	С	It is assumed that 50 or less acres of residential area is located in Zone B	
Tanks, heating oil, residential (above ground)	R08	R08-02	В	Medium	С	It is assumed that 5 or less residential above ground heating oil tanks are present in Zone B	
Highways and roads, dirt/gravel	X24	X24-02	В	Low	С	It is assumed that there are 1 to 20 roads located in Zone B	

APPENDIX C

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

Public Water Well System for PWS #263030.001 Willow Tree Inn Showing Potential and Existing Sources of Contamination



Appendix C Map C

APPENDIX D

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

Chart 1. Susceptibility of the wellhead - Willow Tree Inn (263030.001) Susceptibility initially assumed to be low. Susceptibility of wellhead = 0 pts Unknown, assumed uncapped Is the well Increase susceptibility 5 pts + 0 pts properly NO grouted? Is the well Increase susceptibility 20 pts It is unknown whether the well is + 20 pts capped? properly grouted; however it is assumed to be grouted based on date of well construction (1994). YES YES Very High Susceptibility of wellhead 20 pts YES Increase susceptibility: 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 Unknown, assumed no NO Is the land surface sloped Increase susceptibility 5 pts 0 pts away from the well? YES

Page 1 of 13

Chart 2. Susceptibility of the aquifer - Willow Tree Inn (263030.001)

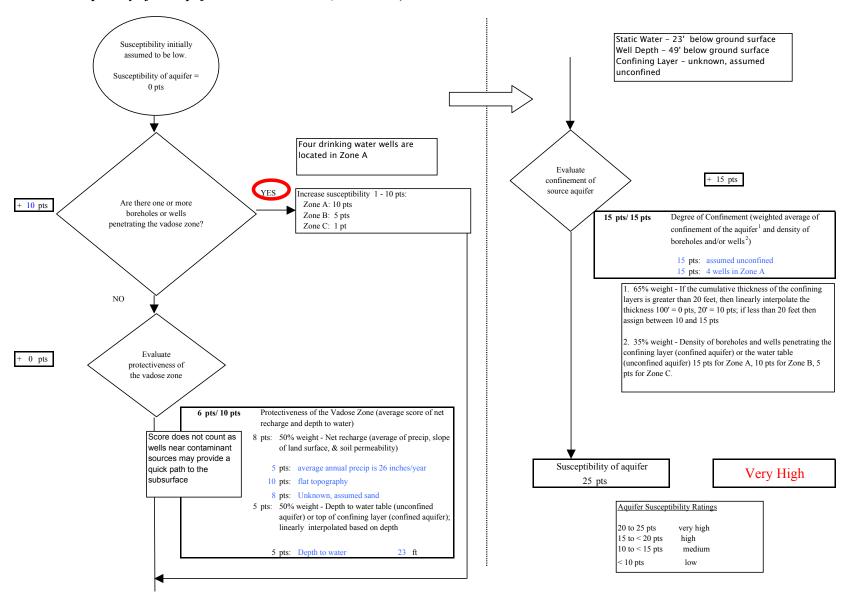


Chart 3. Contaminant risks for Willow Tree Inn (263030.001) - Bacteria & Viruses

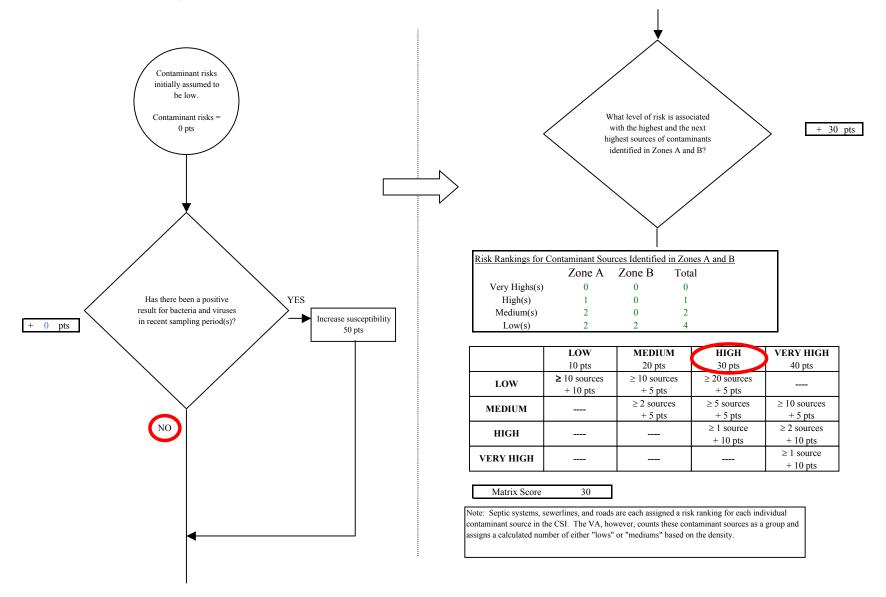


Chart 3. Contaminant risks for Willow Tree Inn (263030.001) - Bacteria & Viruses NO Are there sufficient Initial assessment of risk posed by Risk unchanged controls, conditions, or potential sources of contamination monitoring to warrant = 30 pts downgrading risk? Are any YES significant Risk unchanged 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 YES contamination with controls in Zone A determines a risk + 10 pts Increase risk 1 - 10 pts increase. See Table 2 for 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? 40 pts Contaminant risks Contaminant Risk YES 40 pts Increase risk 1 - 10 pts + 0 pts Contaminant risks* * Truncate risk at 50 pts 40 Contaminant Risk Ratings Risk posed by potential sources of contamination very high 40 to 50 pts = 40 30 to < 40 pts high Very High $20 \text{ to} \le 30 \text{ pts}$

Page 4 of 13

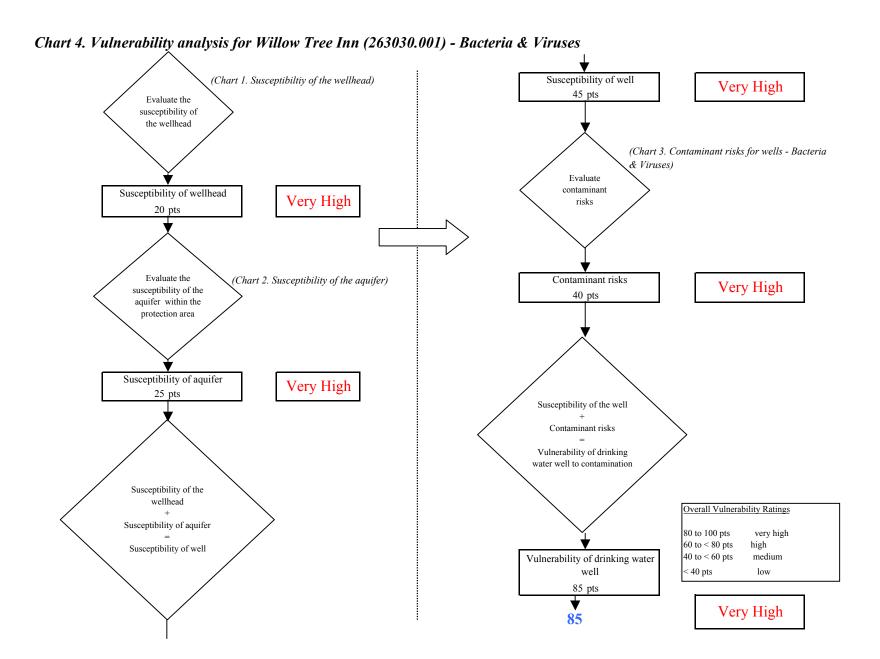
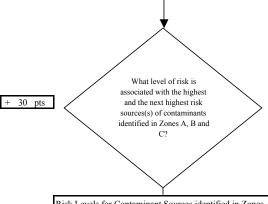


Chart 5. Contaminant risks for Willow Tree Inn (263030.001) - Nitrates and Nitrites Contaminant risks initially assumed to be low. Current level of Evaluate the level of Contaminant risks background contamination due to man-= 0 ptscontamination from made source(s) natural sources 0 pts Is the concentration 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) 2/13/2003 1.09 12/28/2000 ND 3/3/1999 0.313 Increasing: risk up 1 - 10 pts YES Decreasing: risk down 1 - 5 pts + 0 pts Same: risk unchanged Maximum Contaminant Level (MCL) = 10 mg/LDetected Nitrate Level = The nitrate level is likely attributed to natural causes if Existing contamination points based on Risk due to existing man-Risk due to natural less than 2 mg/L linear interpolation of most recent detect sources made sources (20%) [MCL = 50 pts; detect = 0 pts]5 pts Risk due to existing contamination 5 pts Was the source of Evaluate the level of contamination contamination from natural? man-made sources YES

Chart 5. Contaminant risks for Willow Tree Inn (263030.001) - Nitrates and Nitrites



k 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)	1	0	1		
Medium(s)	2	0	2		
Low(s)	3	2	5		

	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.

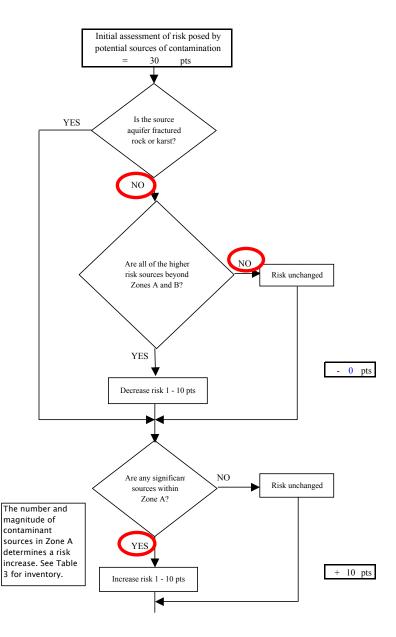


Chart 5. Contaminant risks for Willow Tree Inn (263030.001) - Nitrates and Nitrites Existing NO Are there conditions 5 pts Risk unchanged that warrant upgrading risk? Risk due to existing Potential contamination 40 pts Risk posed by potential sources of contamination with controls Contaminant Risk YES 45 pts Contaminant risks 0 pts Increase risk 1 - 10 pts Risk posed by potential sources of contamination 40 pts *Truncate risk at 50 pts Contaminant risks* 45 Contaminant Risk Ratings Are there sufficient Very High controls, conditions, NO Risk unchanged very high or monitoring to 40 to 50 pts 30 to < 40 pts warrant downgrading high 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

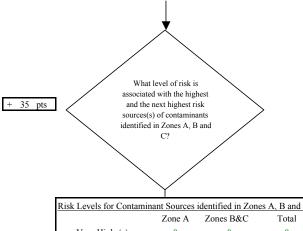
Page 8 of 13

Chart 6. Vulnerability analysis for Willow Tree Inn (263030.001) - Nitrates and Nitrites (Chart 1. Susceptibiltiy of the wellhead) Susceptibility of well Very High 45 pts Evaluate the susceptibility of the wellhead (Chart 5. Contaminant risks for wells - Nitrates and Nitrites) Evaluate Susceptibility of wellhead contaminant risks Very High 20 pts Evaluate the (Chart 2. Susceptibility of the aquifer) Contaminant risks Very High susceptibility of the 45 pts aquifer within the protection area Susceptibility of aquifer Very High 25 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 90 pts Very High 90

Chart 7. Contaminant risks for Willow Tree Inn (263030.001) - Volatile Organic Chemicals Contaminant risks initially assumed to be low. Current level of Evaluate the level of Contaminant risks background contamination due to man-= 0 ptscontamination from made source(s) natural sources NO or Is the concentration of Have volatile organic UNKNOWN the contaminant chemicals been detected increasing, decreasing, in the source waters in or staying the same? recent sampling Recent VOC Sampling period(s)? Results (mg/L) No recent VOC sampling data was available in ADEC records for this Increasing: risk up 1 - 10 pts PWSID YES Decreasing: risk down 1 - 5 pts + 0 pts Same: risk unchanged Existing contamination points based on Risk due to existing man-Risk due to natural linear interpolation of most recent detect made sources sources [MCL = 50 pts; detect = 0 pts]0 pts Risk due to existing contamination 0 pts Was the source of Evaluate the level of contamination contamination from natural? man-made sources YES

Page 10 of 13

Chart 7. Contaminant risks for Willow Tree Inn (263030.001) - Volatile Organic Chemicals



sk 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)	1	0	1	
Medium(s)	21	6	27	
Low(s)	5	2	7	

	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 35

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.

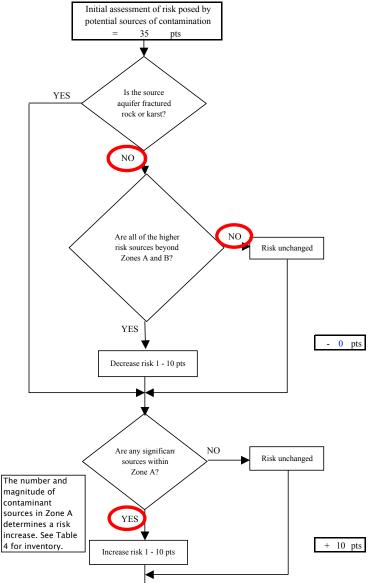


Chart 7. Contaminant risks for Willow Tree Inn (263030.001) - Volatile Organic Chemicals Existing NO Are there conditions 0 pts Risk unchanged that warrant upgrading risk? Risk due to existing Potential contamination 45 pts Risk posed by potential sources of contamination with controls Contaminant Risk YES 45 pts Contaminant risks 0 pts Increase risk 1 - 10 pts Risk posed by potential sources of contamination 45 pts *Truncate risk at 50 pts Contaminant risks* 45 Contaminant Risk Ratings Are there sufficient Very High controls, conditions, NO Risk unchanged very high or monitoring to 40 to 50 pts 30 to < 40 pts warrant downgrading high 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

Page 12 of 13

Chart 8. Vulnerability analysis for Willow Tree Inn (263030.001) - Volatile Organic Chemicals (Chart 1. Susceptibiltiy of the wellhead) Susceptibility of well Very High 45 pts Evaluate the susceptibility of the wellhead (Chart 7. Contaminant risks for wells - Volatile Organic Chemicals) Evaluate contaminant Susceptibility of wellhead Very High risks 20 pts Evaluate the (Chart 2. Susceptibility of the aquifer) Contaminant risks Very High susceptibility of the 45 pts aquifer within the protection area Susceptibility of aquifer Very High 25 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 60 to < 80 pts high Susceptibility of well Vulnerability of drinking water 40 to < 60 ptsmedium well < 40 pts low 90 pts Very High 90

Page 13 of 13