



Source Water Assessment

A Hydrogeologic Susceptibility and Vulnerability Assessment for the Usibelli Coal Mine Healy area, Alaska PWSID 390984

April 2004

DRINKING WATER PROTECTION PROGRAM REPORT Report 1506
Alaska Department of Environmental Conservation

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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 the Usibelli Coal Mine

Healy area, Alaska

Drinking Water Protection Program Alaska Department of Environmental Conservation

EXECUTIVE SUMMARY

This source water assessment provides an evaluation of the vulnerability to potential contamination of the public water system serving Usibelli Coal Mine. This Class A (non-community non-transient) water system consists of one well northwest of Healy, Alaska. The well received a natural susceptibility rating of **Medium**. This rating is a combination of a susceptibility rating of **Medium** for the actual wellhead and a **Medium** rating for the aquifer in which the well is drawing water from. Identified potential sources of contamination for the Usibelli Coal Mine public water system include: a railroad. It is 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. Combining the natural susceptibility of the well with the contaminant risk, the public water system for Usibelli Coal Mine received an overall vulnerability rating of **Medium** for volatile organic chemicals and synthetic organic chemicals, and a **Low** for bacteria and viruses, and nitrates and/or nitrites, heavy metals, cyanide, and other inorganic chemicals, and other organic chemicals.

USIBELLI COAL MINE PUBLIC DRINKING WATER SYSTEM

The Usibelli Coal Mine public water system is a Class A (non-community non-transient) water system. The well is located northwest of Healy, Alaska (T12S, R7W, Section 6) (See Map 1 of Appendix A). Healy is located 78 miles southwest of Fairbanks along the George Parks Highway.

Residents in the area of Healy primarily use individual water wells and septic systems (ADCED, 2002). Electricity is provided by Golden Valley Electric Association. Residents use heating oil (typically stored in both above and below ground 275 to 500-gallon tanks), wood, or the coal produced from the Usibelli Coal Mine to heat homes and buildings (ADCED, 2002). Refuse is hauled to the new Denali Borough regional landfill, located south of Anderson.

The Usibelli Coal Mine lies in the alluvial plain of the Nenana River at an elevation of approximately 1200 feet above sea level.

According to the well log for this water system, the depth of the well is 80 feet below the ground surface and is screened in sand and gravel. The coarse, alluvial, sandy gravel in the floodplains of the areas streams and rivers provides a large aquifer even in the winter when infiltration is low. Discontinuous permafrost (perennially frozen areas) may also be present in the alluvial plain. Areas with discontinuous permafrost may locally affect the ground water flow directions. Both the Nenana Rivers as well as surface infiltration contribute water to this alluvial aquifer.

The Usibelli Coal Mine public drinking water system serves approximately 50 non-residents through one service connection.

USIBELLI COAL MINE DRINKING WATER PROTECTION AREA

The pathways most likely for surface contamination to reach the groundwater are identified as the first step in determining a drinking water system's risk. 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 wells is the area that contributes water to the well, the groundwater capture zone. The groundwater capture zone is located in the area circling the well (the area influenced by pumping) and also the area of the water table upgradient of the well, usually forming a parabola shape.

There are many different ways of calculating the size of capture zones. This assessment uses a combination of two simple groundwater flow equations, the Thiem and uniform flow equations for all groundwater wells screened in unconsolidated material. The orientation of the capture zone is then drawn using a water table elevation map (if available) or a land surface elevation map of the area. The capture zone calculated in this assessment is only a best guess using the information and resources available to us, and may differ slightly from the actual capture zone.

The parameters used to calculate the shape of this capture zone are general for the whole alluvial plain and were obtained from area well logs in the area and the Groundwater textbook by Freeze and Cherry (Freeze and Cherry, 1979).

Only limited information is available for the aquifer Usibelli Coal Mine’s public water system well draws its water from. The orientation of the capture zone was drawn based on the assumption that groundwater flow direction is generally the same direction as the topography.

Because of uncertainties and changing site conditions, a factor of safety is added to the groundwater capture zone to form the drinking water protection area for the well.

The protection areas established for wells are usually separated into four zones, limited by the watershed. These zones correspond to times-of-travel (TOT) of the water moving through the aquifer to the well (plus the factor of safety).

The following is a summary of the four 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 2 years time-of-travel
C	Less than 5 years time-of-travel
D	Less than 10 years time-of-travel

The time of travel for *contaminants* within the water varies with their unique physical and chemical characteristics.

The drinking water protection area outlined for the Usibelli Coal Mine on Map 1 of Appendix A will serve as the focus for voluntary protection efforts.

INVENTORY OF POTENTIAL AND EXISTING CONTAMINANT SOURCES

The Drinking Water Protection Program (DWPP) has completed an inventory of potential and existing sources of contamination within the Usibelli Coal Mine protection area. This inventory was completed through a search of agency records and other publicly available information. 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; and
- Other inorganic chemicals.

The sources are displayed on Map 2 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 each 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 combination of toxicity and volume associated with that source. Rankings include:

- Low;
- Medium;
- High; and
- Very High.

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 7 in Appendix B contain the ranking of inventoried potential and existing sources of contamination with respect to the six contaminant categories.

VULNERABILITY OF USIBELLI COAL MINE 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 properties of the aquifer and the presence of other wells or boreholes in the area. 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 the water system’s contaminant sample results. Lastly, Chart 4 combines the results of the first three charts to produce 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.

$$\begin{aligned}
 &\text{Susceptibility of the Wellhead (0 – 25 Points)} \\
 &\quad \text{(Chart 1 of Appendix D)} \\
 &\quad + \\
 &\text{Susceptibility of the Aquifer (0 – 25 Points)} \\
 &\quad \text{(Chart 2 of Appendix D)} \\
 &\quad = \\
 &\text{Natural Susceptibility (Susceptibility of the Well)} \\
 &\quad \text{(0 – 50 Points)}
 \end{aligned}$$

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 wellhead for the Usibelli Coal Mine received a Medium Susceptibility rating. The location of the well is in a suspected floodplain. Flood waters have the ability to quickly transfer large amounts of contaminants existing on the surface down through the well into the groundwater. The 5/15/03 Sanitary Survey indicates the well is capped with a sanitary seal and the land surface is sloped away from the well, and the well is grouted. A sanitary seal prevents potential contaminants from entering the well from the inside while sloping the land surface away from the well and grouting help to prevent potential contaminants from traveling down the outside of the well casing.

The aquifer the Usibelli Coal Mine well is completed in received a High Susceptibility rating. The highly transmissive aquifer material (sand and gravel) in the area allows contaminants to travel quickly through it. The shallow depth of the water table also allows contaminants to come into contact with the ground water with little natural filtering. Most contaminants disperse much quicker in water than in soils. There is a very low permeability 18-foot thick sandstone layer above the aquifer that provides some protection. Table 2 summarizes the Susceptibility scores and ratings for Usibelli Coal Mine.

Table 2. Susceptibility

	Score	Rating
Susceptibility of the Wellhead	10	Medium
Susceptibility of the Aquifer	13	Medium
Natural Susceptibility	23	Medium

The Contaminant Risk has been derived from an evaluation of the routine sampling results of the water system and the presence of potential sources of contamination. Contaminant risks to a drinking water source depend on the type and distribution of contaminant sources. 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	0	Low
Nitrates and/or Nitrites	1	Low
Volatile Organic Chemicals	20	Medium
Heavy Metals, Cyanide, and Other Inorganic Chemicals	4	Low
Synthetic Organic Chemicals	20	Medium
Other Organic Chemicals	10	Low

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

$$\begin{aligned}
 &\text{Natural Susceptibility (0 – 50 points)} \\
 &\quad + \\
 &\text{Contaminant Risks (0 – 50 points)} \\
 &\quad = \\
 &\text{Vulnerability of the} \\
 &\text{Drinking Water Source to Contamination (0 – 100)}.
 \end{aligned}$$

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	25	Low
Nitrates and/or Nitrites	25	Low
Volatile Organic Chemicals	45	Medium
Heavy Metals, Cyanide, and Other Inorganic Chemicals	25	Low
Synthetic Organic Chemicals	45	Medium
Other Organic Chemicals	35	Low

Bacteria and Viruses

There are no identified risks of Bacteria and Viruses to this water system.

Only a small amount of bacteria and viruses are required to endanger public health. Coliforms (a bacteria) are found naturally in the environment and although they aren't necessarily a health threat, it is an indicator of other potentially harmful bacteria in the water, more specifically, fecal coliforms and E. coli which only come from human and animal fecal waste (EPA, 2002). Harmful bacteria can cause diarrhea, cramps, nausea, headaches, or other symptoms (EPA, 2002). Routine sampling has not detected coliforms in the water.

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

There are also no identified risks of nitrates and nitrites for this source of public drinking water.

Nitrates are very mobile, moving at approximately the same rate as water. Nitrates have been not detected in significant concentrations in recent sampling history for the Usibelli Coal Mine well.

After combining the contaminant risk for nitrates and nitrites with the natural susceptibility of the well, the

overall vulnerability of the well to contamination is low.

Volatile Organic Chemicals

The railroad represents the only risk of volatile organic chemical contamination to the well.

Volatile Organic Chemicals have not been detected during routine sampling of this water system. 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.

Heavy Metals, Cyanide, and Other Inorganic Chemicals

The railroad also represents the only risk to heavy metals for this source of public drinking water.

Barium, Chromium, Nickel, and Selenium have all been detected but in small concentrations with respect to their MCL. A MCL is the concentration of a contaminant allowed in the drinking water by the Environmental Protection Area (EPA). These concentrations of metals are probably naturally occurring within the groundwater. No other inorganics were detected.

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 low.

Synthetic Organic Chemicals

Again, the railroad represents the only identified risk of Synthetic Organic Chemical to this public water system.

Synthetic Organic Chemicals have not been sampled for in this water system.

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 medium.

Other Organic Chemicals

The railroad also represents the only risk of Other Organic Chemicals for this source of public drinking water.

Other Organic Chemicals have not been sampled for in this water system.

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 low.

REFERENCES

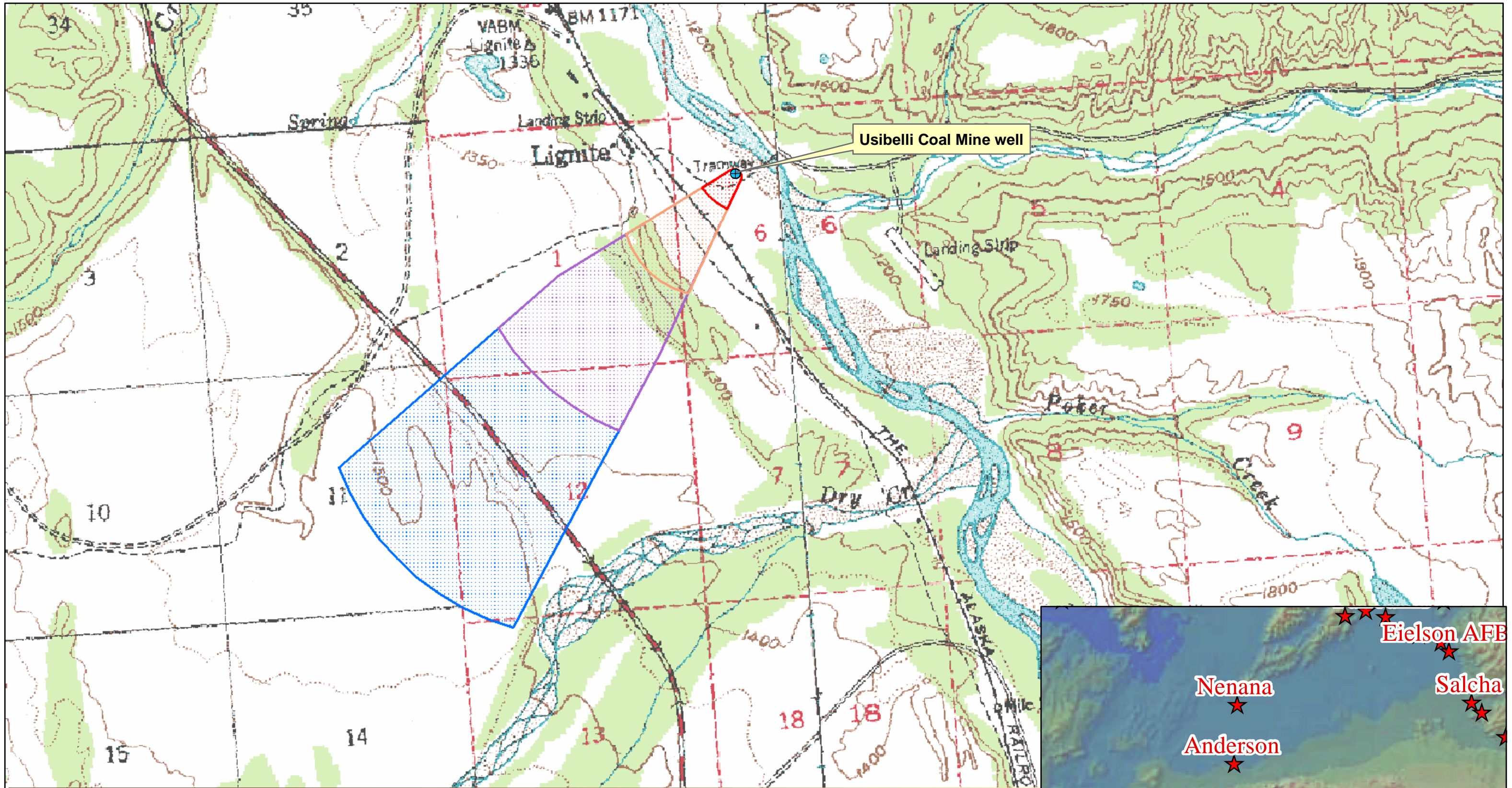
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Freeze, R.A. and Cherry, J.A., 1979. Groundwater. Prentice-Hall, Englewood Cliffs, NJ.

United States Environmental Protection Agency (EPA), 2002 [WWW document]. URL <http://www.epa.gov/safewater/mcl.html>.

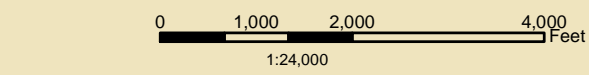
APPENDIX A

Usibelli Coal Mine Drinking Water Protection Area Location Map (Map 1)



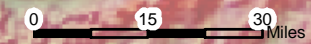
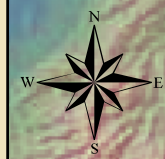
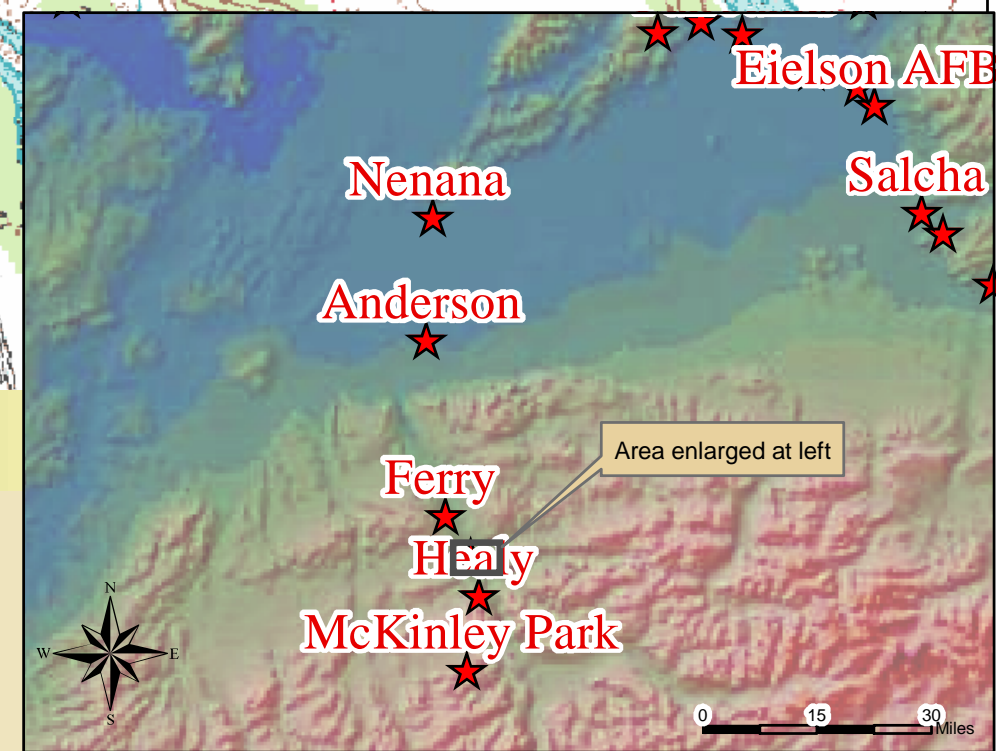
Map 1: Usibelli Coal Mine Drinking Water Protection Area

PWSID: 390984



Data Sources:
Background image
- USGS 1:63,000 mapping

- Legend**
- Usibelli Coal Mine well
 - Zone A
 - Zone B
 - Zone C
 - Zone D



APPENDIX B

Contaminant Source Inventory and Risk Ranking for Usibelli Coal Mine (Tables 1-5)

Table 1

**Contaminant Source Inventory for
Usibelli Coal Mine**

PWSID 390984.001

Contaminant Source Type	Contaminant Source ID	CS ID tag	Zone	Map Number	Comments
Rail corridors	X30	X30-1	B	2	

Table 2

*Contaminant Source Inventory and Risk Ranking for
Usibelli Coal Mine
Sources of Volatile Organic Chemicals*

PWSID 390984.001

<i>Contaminant Source Type</i>	<i>Contaminant Source ID</i>	<i>CS ID tag</i>	<i>Zone</i>	<i>Risk Ranking for Analysis</i>	<i>Map Number</i>	<i>Comments</i>
Rail corridors	X30	X30-1	B	Medium	2	

Table 3

*Contaminant Source Inventory and Risk Ranking for
Usibelli Coal Mine*

PWSID 390984.001

Sources of Heavy Metals, Cyanide and Other Inorganic Chemicals

<i>Contaminant Source Type</i>	<i>Contaminant Source ID</i>	<i>CS ID tag</i>	<i>Zone</i>	<i>Risk Ranking for Analysis</i>	<i>Map Number</i>	<i>Comments</i>
Rail corridors	X30	X30-1	B	Low	2	

Table 4

*Contaminant Source Inventory and Risk Ranking for
Usibelli Coal Mine
Sources of Synthetic Organic Chemicals*

PWSID 390984.001

<i>Contaminant Source Type</i>	<i>Contaminant Source ID</i>	<i>CS ID tag</i>	<i>Zone</i>	<i>Risk Ranking for Analysis</i>	<i>Map Number</i>	<i>Comments</i>
Rail corridors	X30	X30-1	B	Medium	2	

Table 5

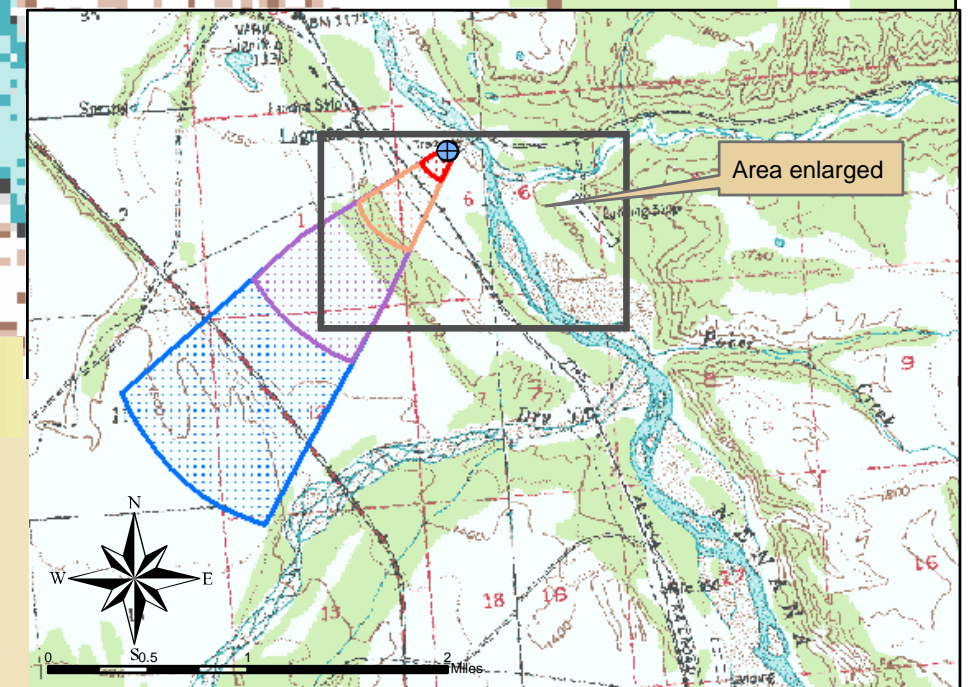
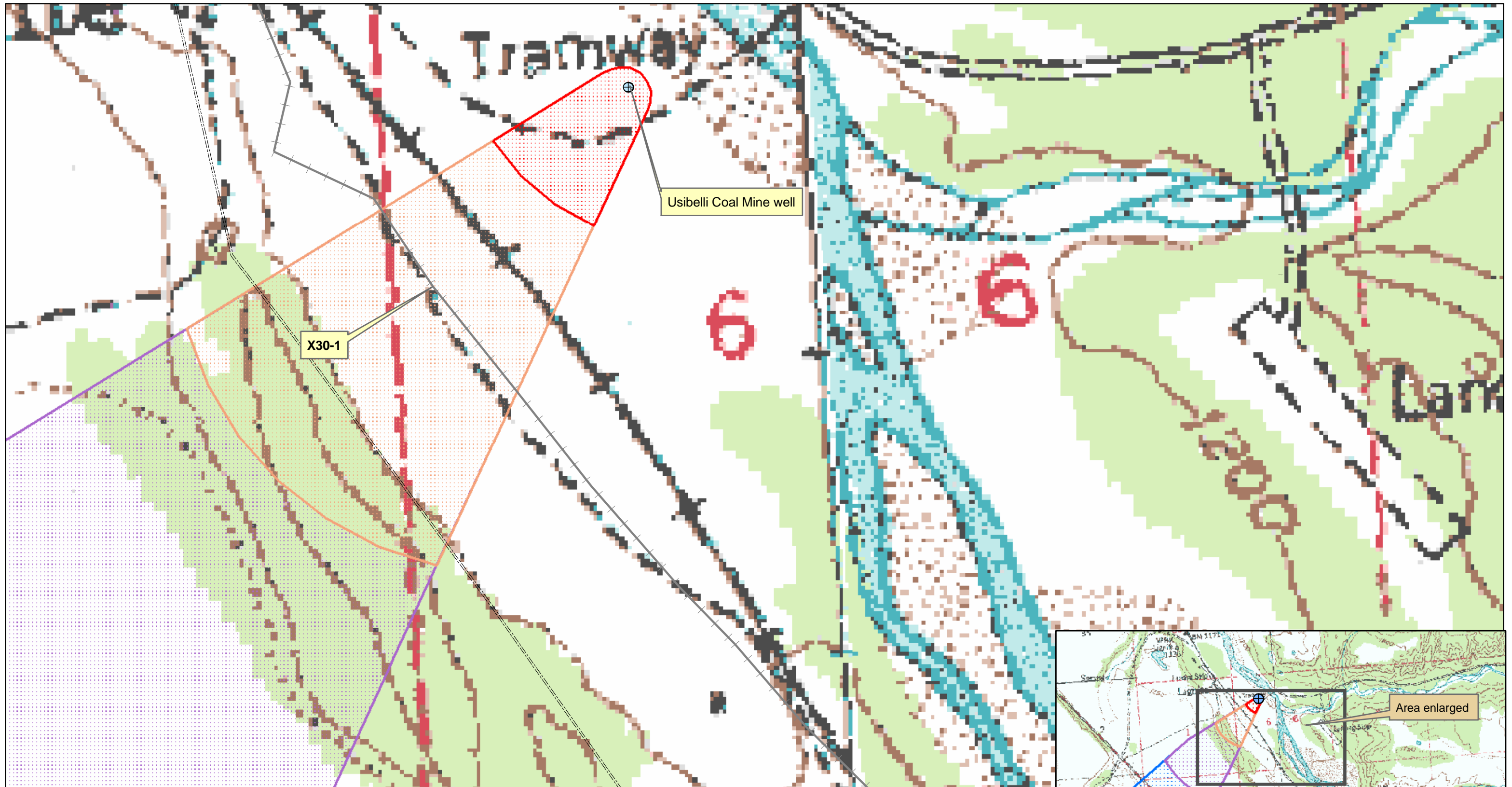
*Contaminant Source Inventory and Risk Ranking for
Usibelli Coal Mine
Sources of Other Organic Chemicals*

PWSID 390984.001

<i>Contaminant Source Type</i>	<i>Contaminant Source ID</i>	<i>CS ID tag</i>	<i>Zone</i>	<i>Risk Ranking for Analysis</i>	<i>Map Number</i>	<i>Comments</i>
Rail corridors	X30	X30-1	B	Low	2	

APPENDIX C

Usibelli Coal Mine Potential Contaminant Sources (Map 2)



Map 2: Usibelli Coal Mine Potential Contaminant Sources

PWSID: 390984.001



Data Sources:

Background image
- USGS 1:63,000 mapping

Legend

- ⊕ Usibelli Coal Mine well
- ⊕ Rail corridor
- ▨ Zone A
- ▨ Zone B
- ▨ Zone C
- ▨ Zone D
- ⊕ Roads

APPENDIX D

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

Chart 1. Susceptibility of the wellhead - Usibelli Coal Mine

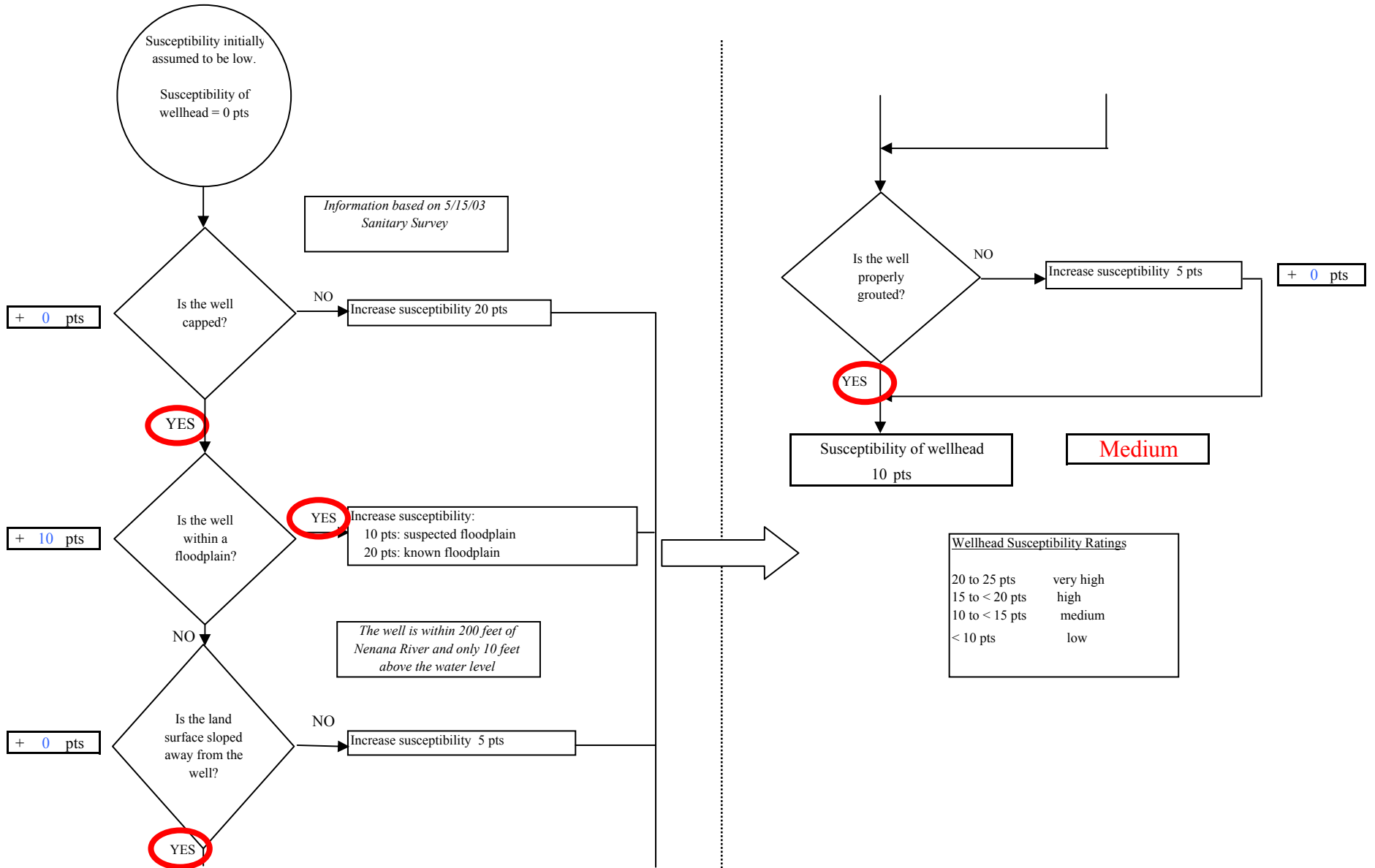


Chart 2. Susceptibility of the aquifer - Usibelli Coal Mine

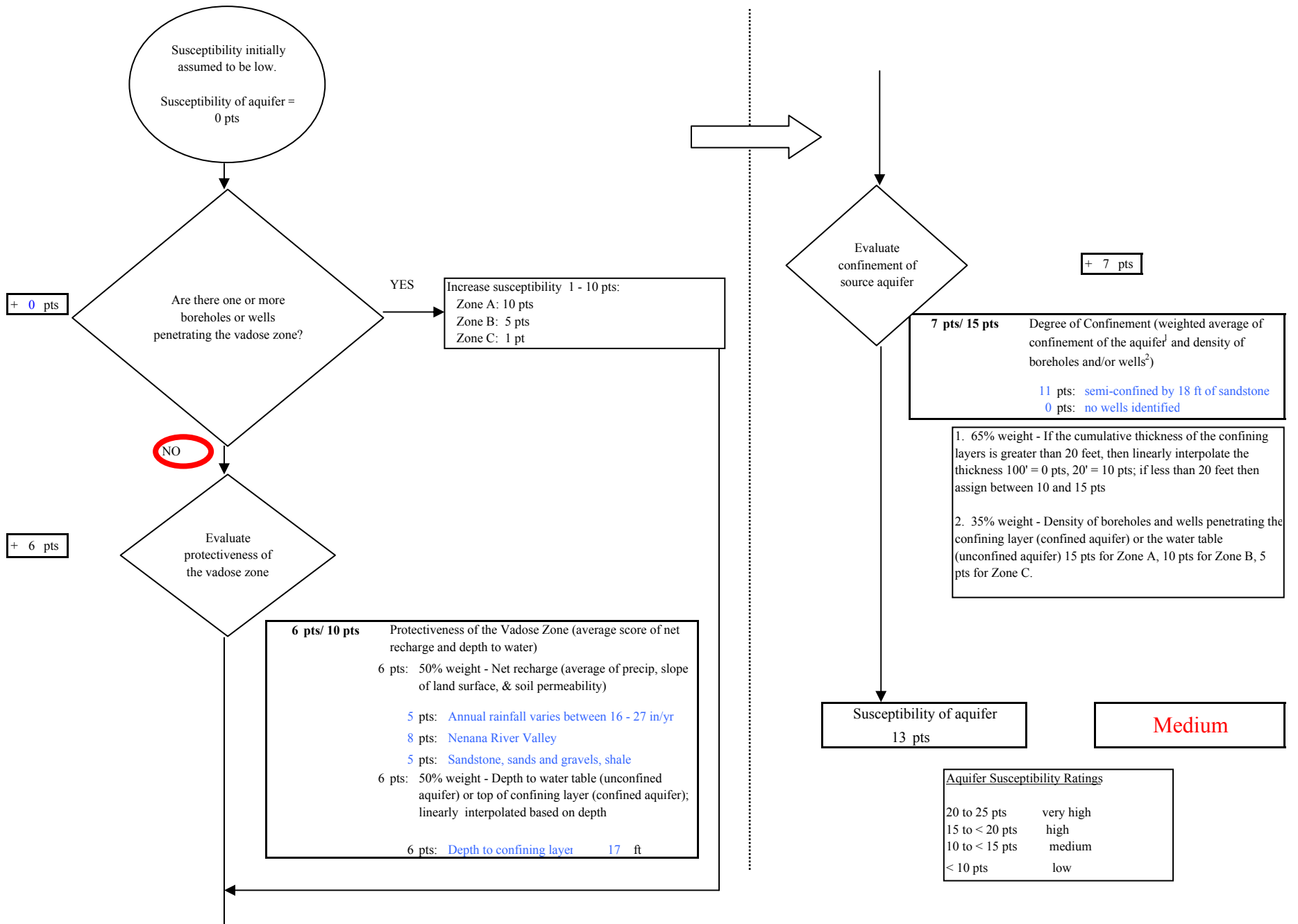
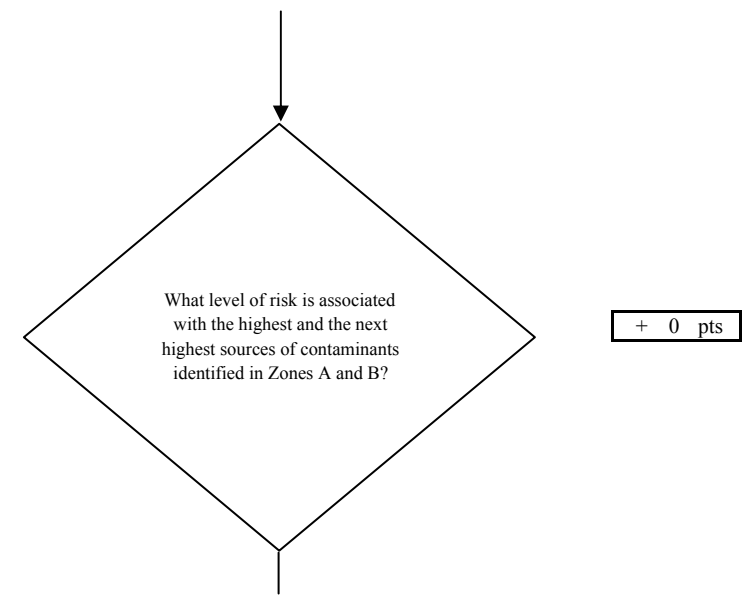
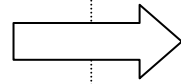
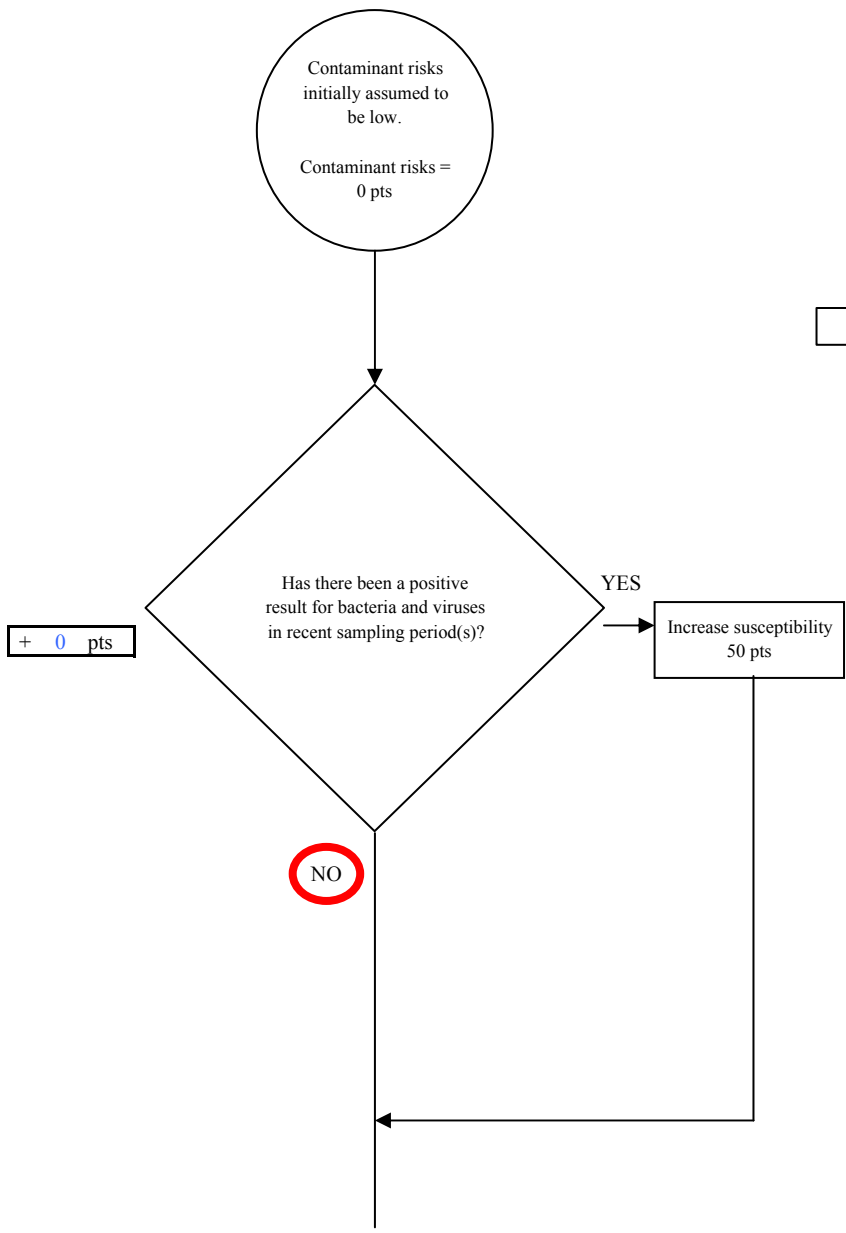


Chart 3. Contaminant risks for Usibelli Coal Mine - Bacteria & Viruses



Risk Rankings for Contaminant Sources Identified in Zones A and B

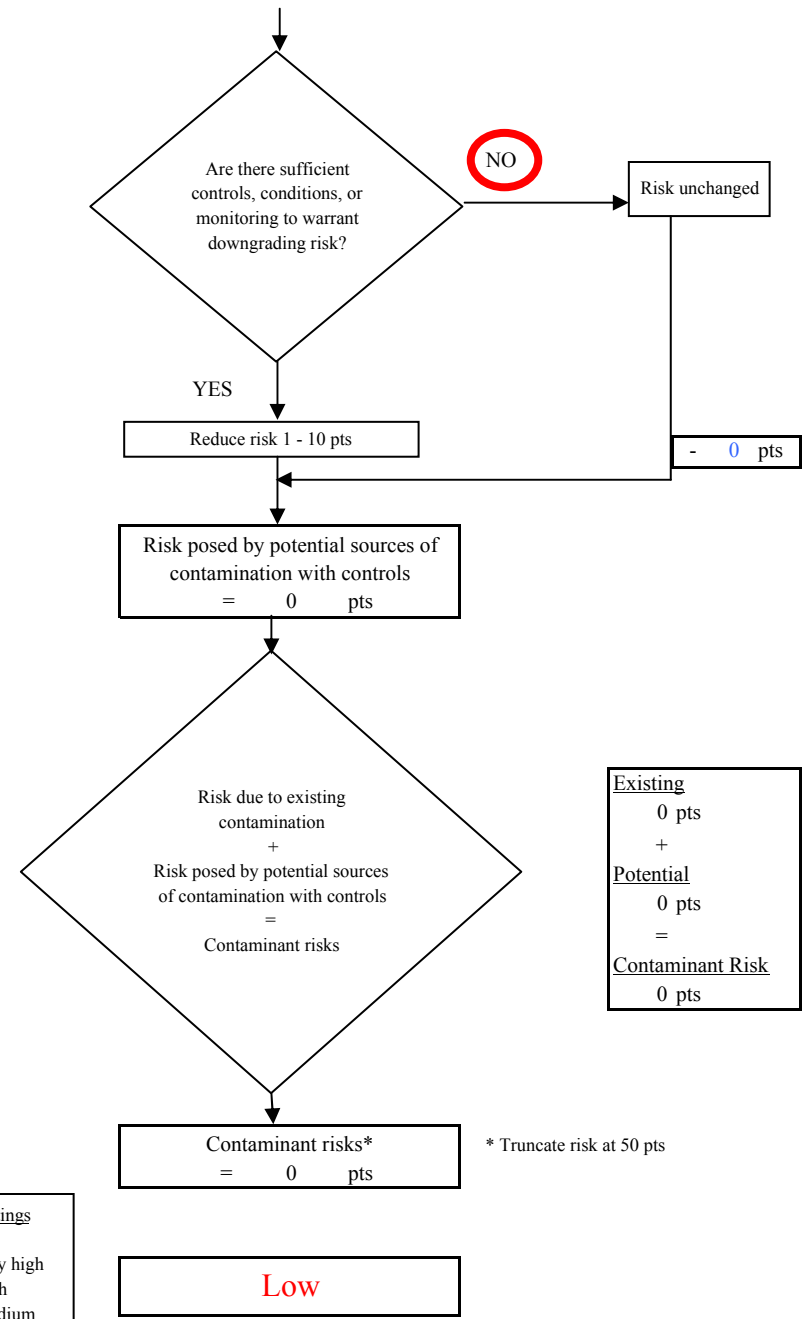
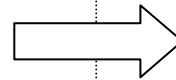
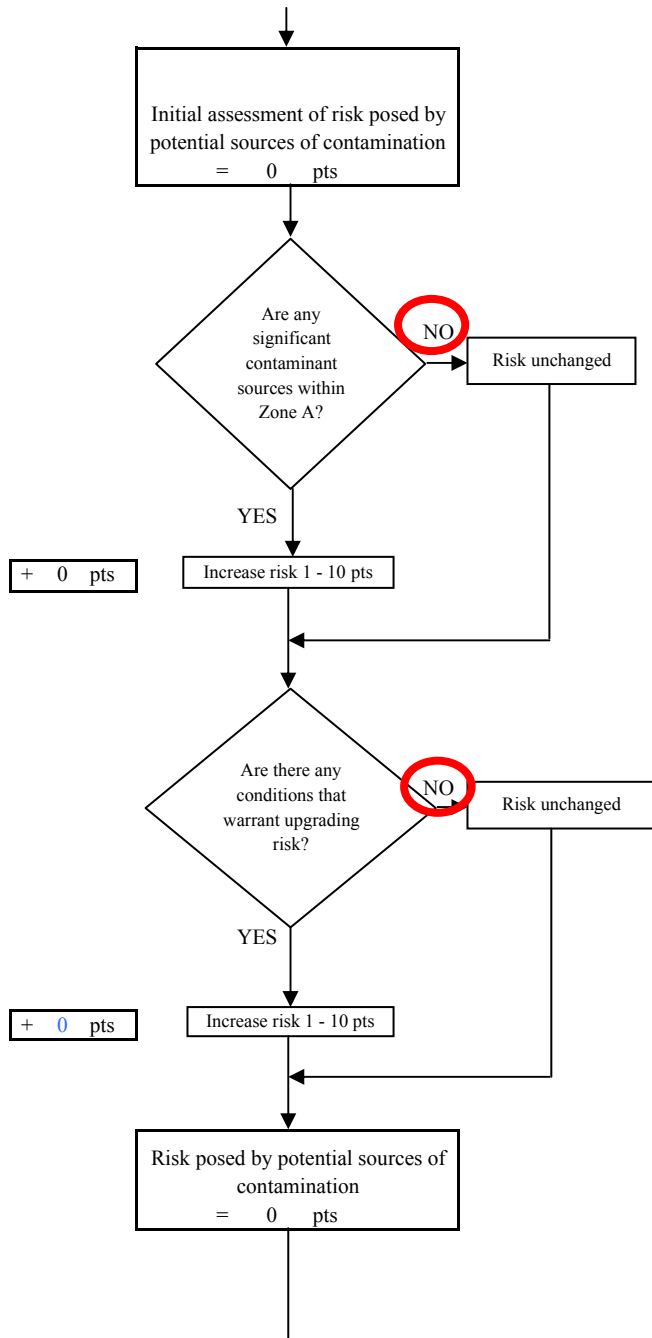
	Zone A	Zone B	Total
Very High(s)	0	0	0
High(s)	0	0	0
Medium(s)	0	0	0
Low(s)	0	0	0

	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 0

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 Usibelli Coal Mine - Bacteria & Viruses



Existing	0 pts
+	
Potential	0 pts
=	
Contaminant Risk	0 pts

Contaminant Risk Ratings	
40 to 50 pts	very high
30 to < 40 pts	high
20 to < 30 pts	medium
< 20 pts	low

* Truncate risk at 50 pts

Chart 4. Vulnerability analysis for Usibelli Coal Mine - Bacteria & Viruses

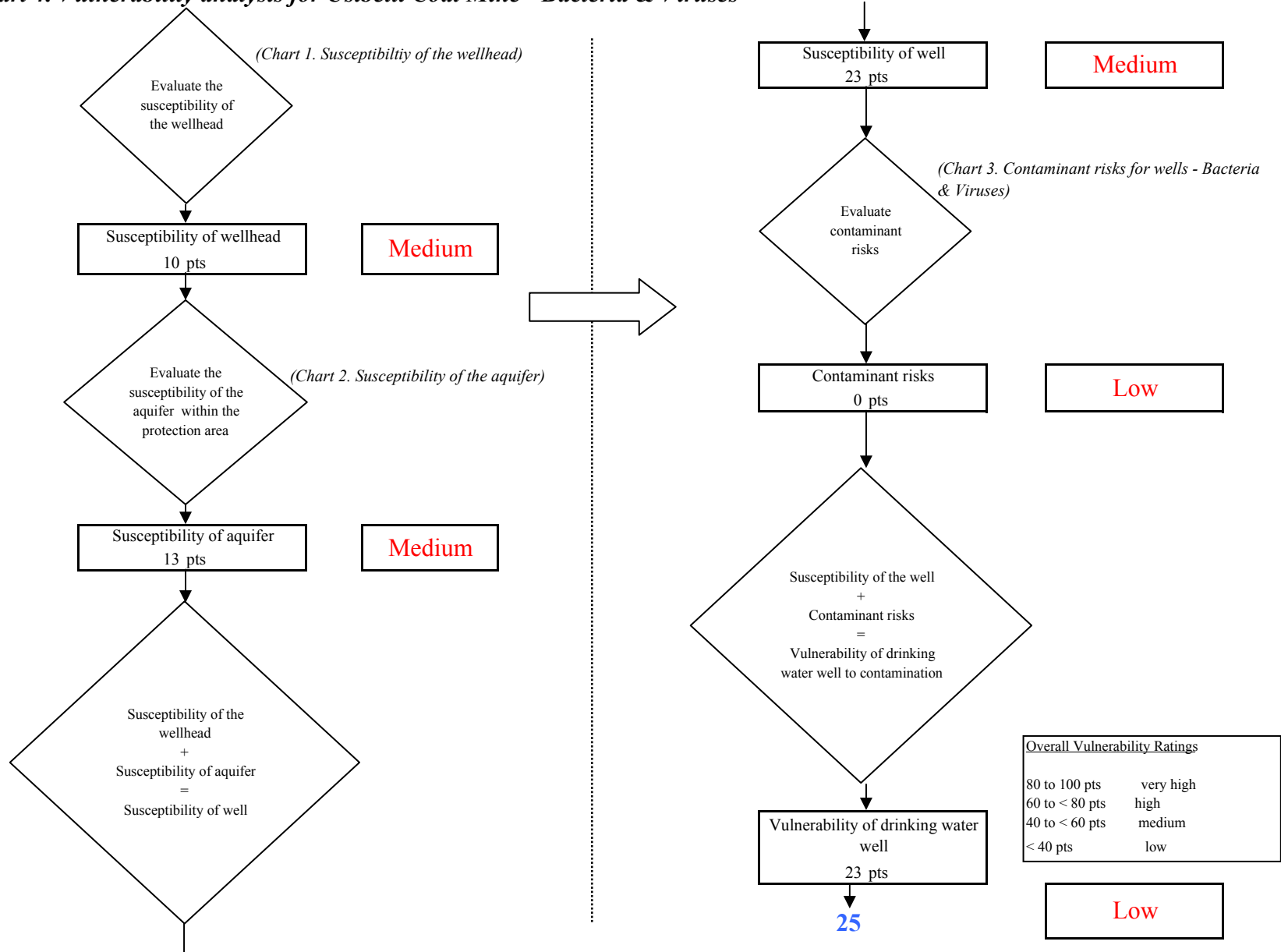


Chart 5. Contaminant risks for Usibelli Coal Mine - Nitrates and Nitrites

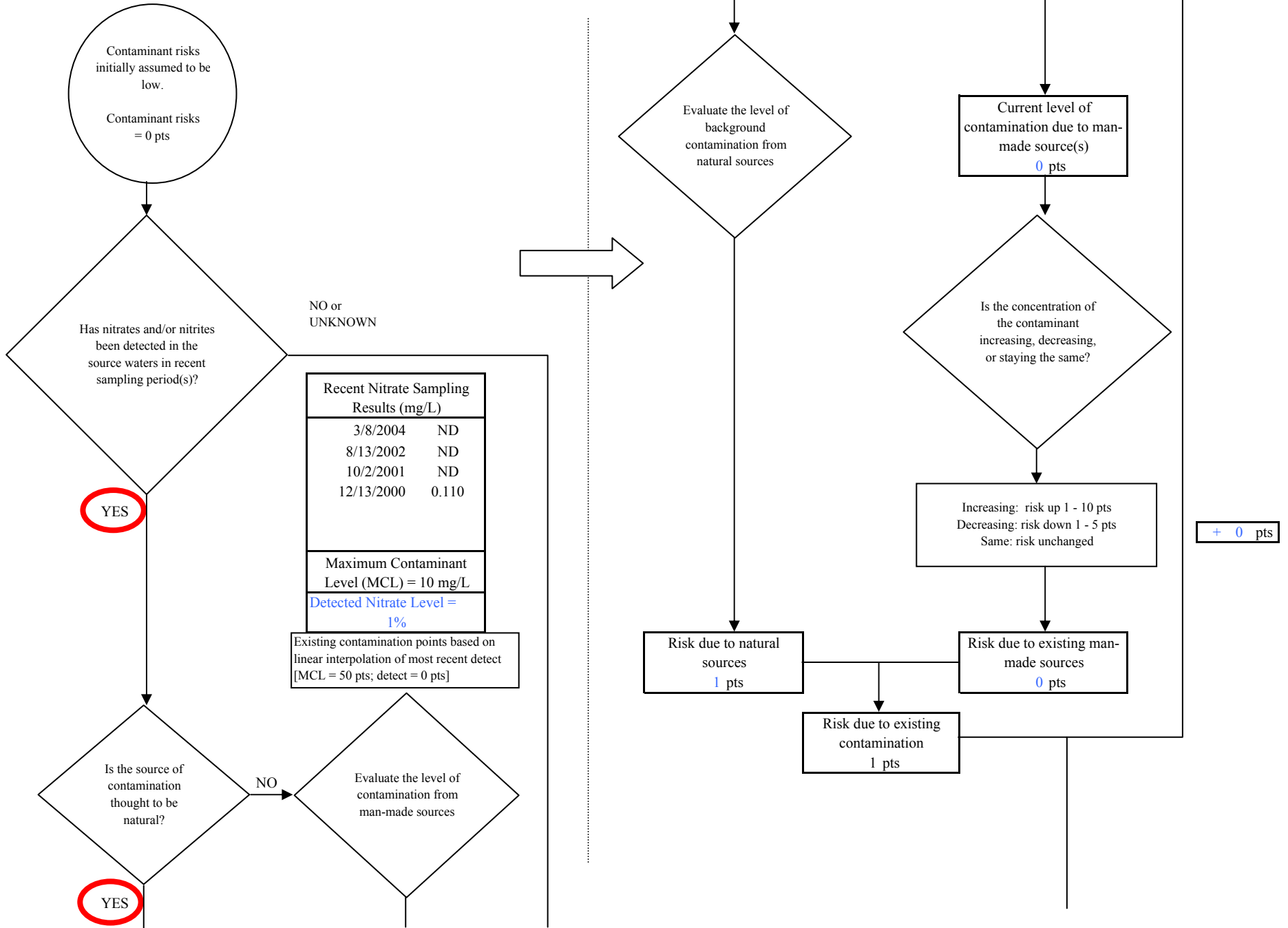
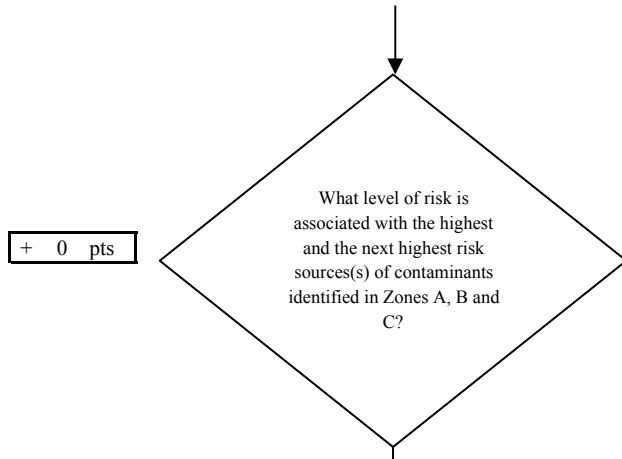


Chart 5. Contaminant risks for Usibelli Coal Mine - Nitrates and Nitrites



+ 0 pts

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

	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 0

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.

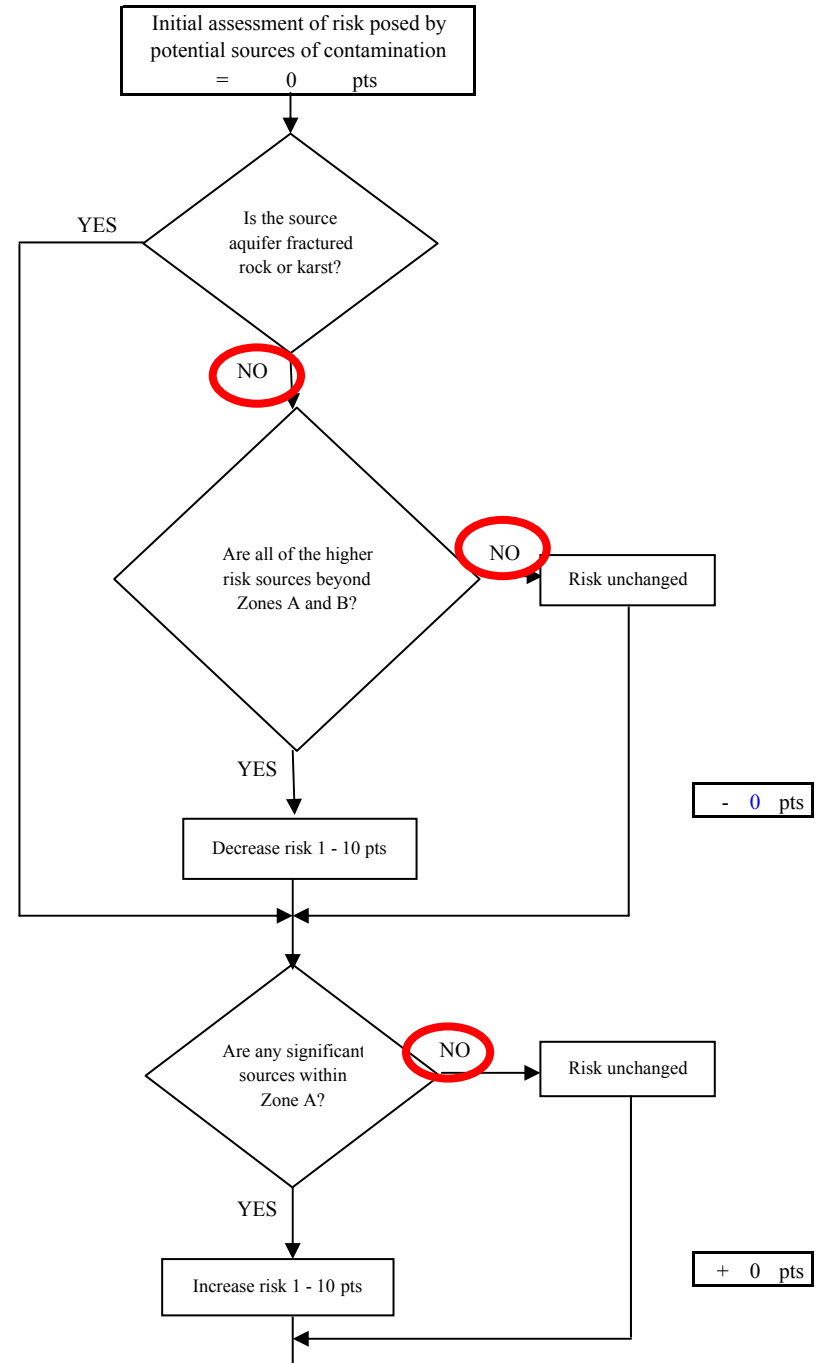
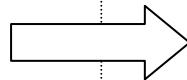


Chart 5. Contaminant risks for Usibelli Coal Mine - Nitrates and Nitrites

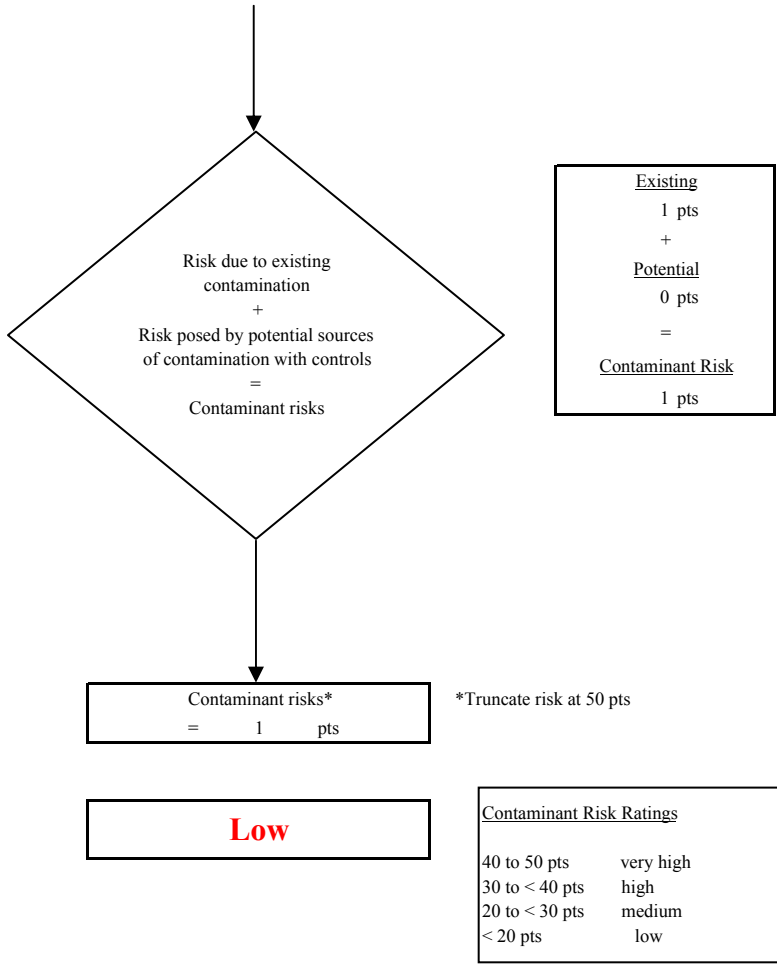
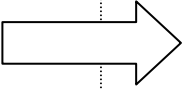
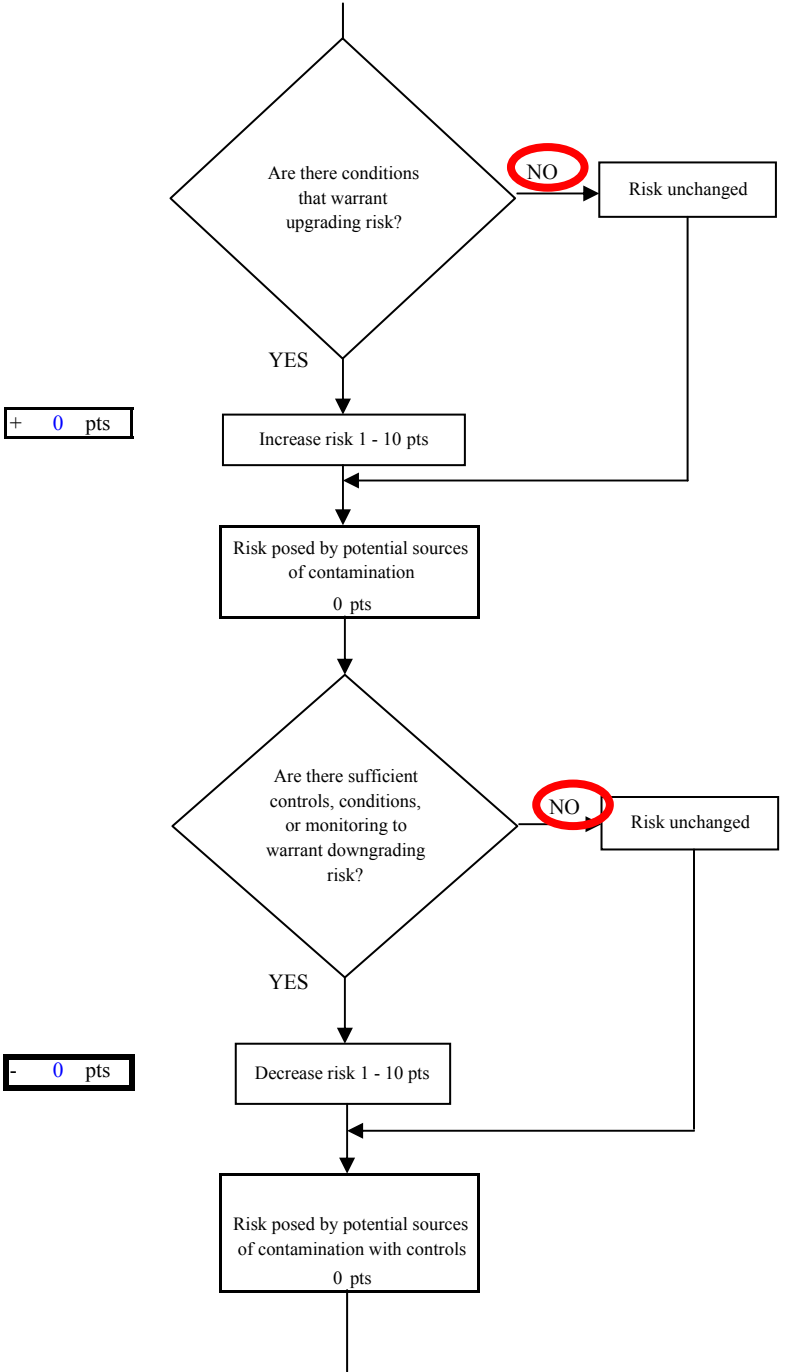


Chart 6. Vulnerability analysis for Usibelli Coal Mine - Nitrates and Nitrites

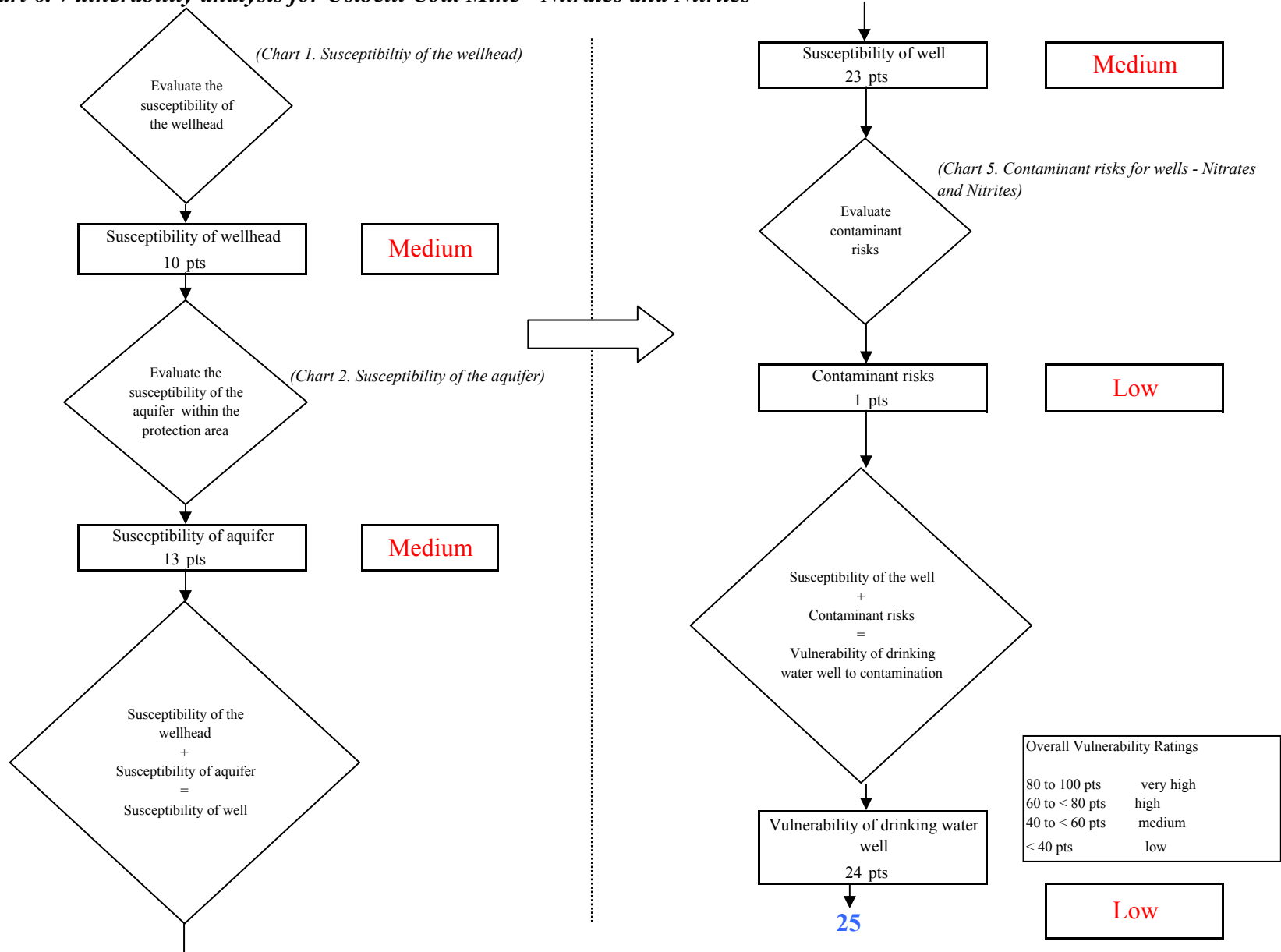


Chart 7. Contaminant risks for Usibelli Coal Mine - Volatile Organic Chemicals

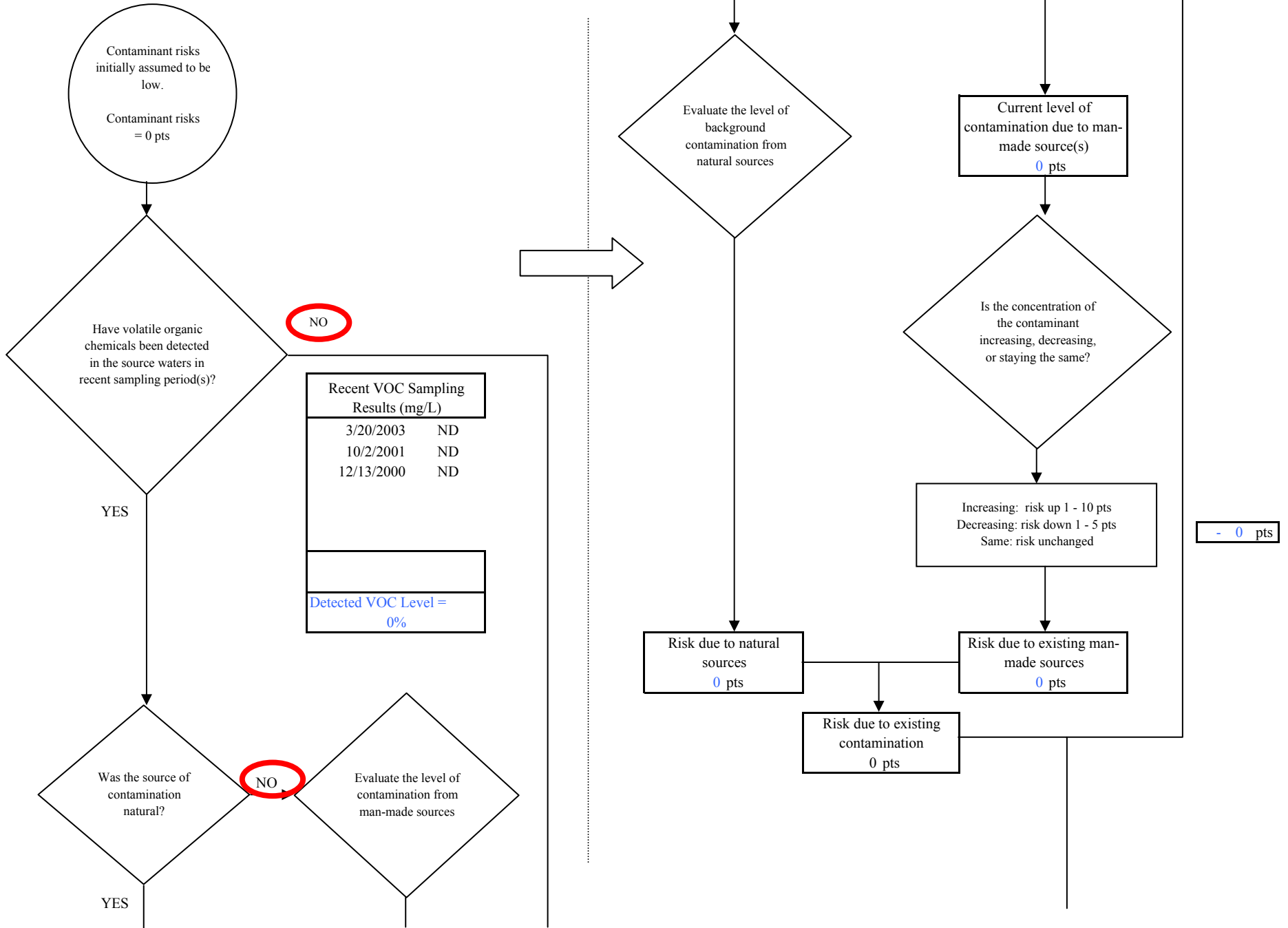
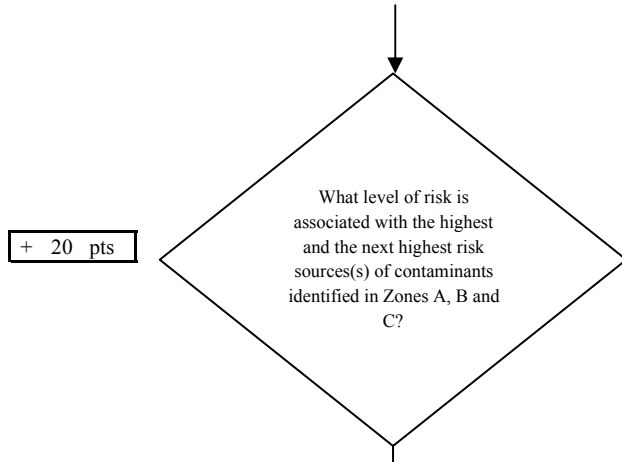


Chart 7. Contaminant risks for Usibelli Coal Mine - Volatile Organic Chemicals



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

	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.

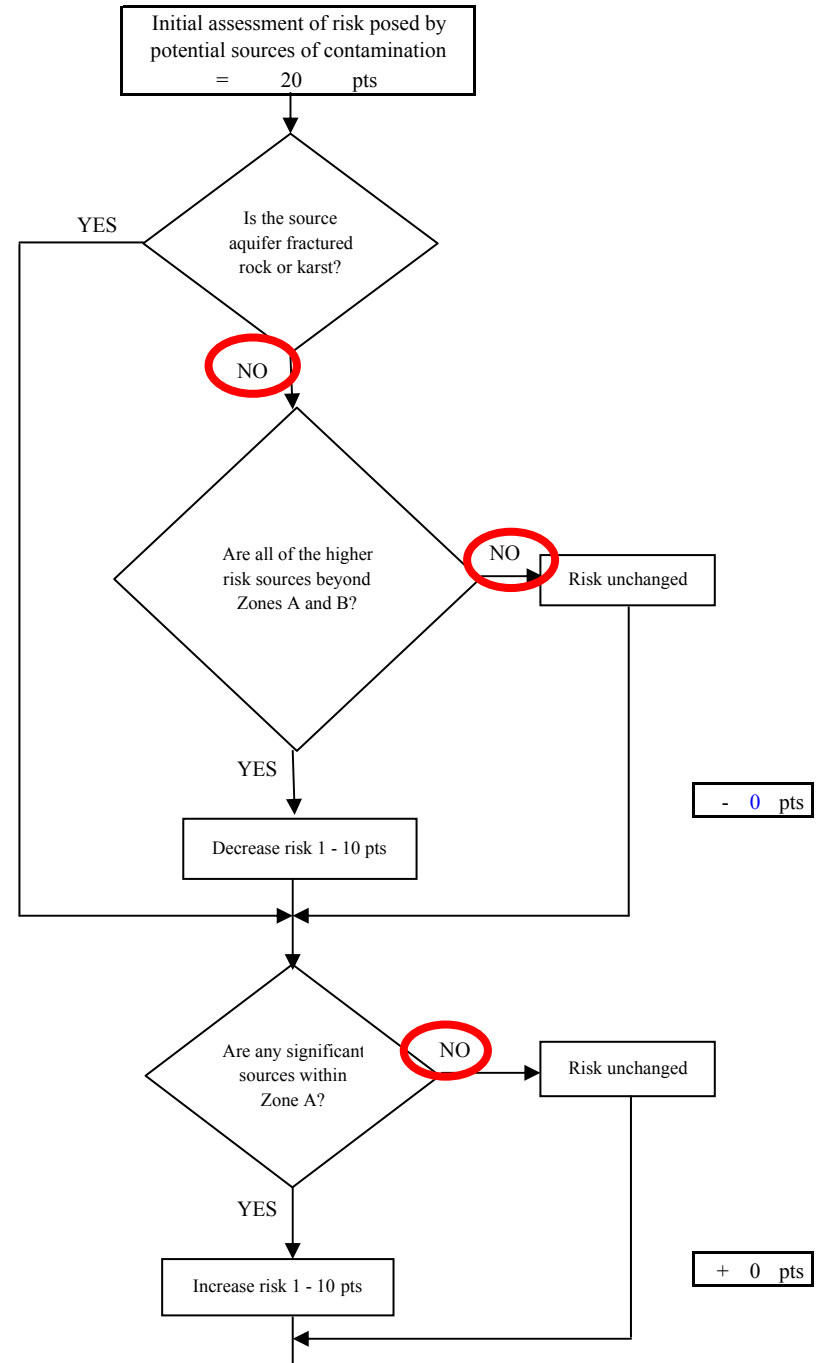
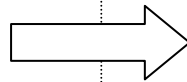


Chart 7. Contaminant risks for Usibelli Coal Mine - Volatile Organic Chemicals

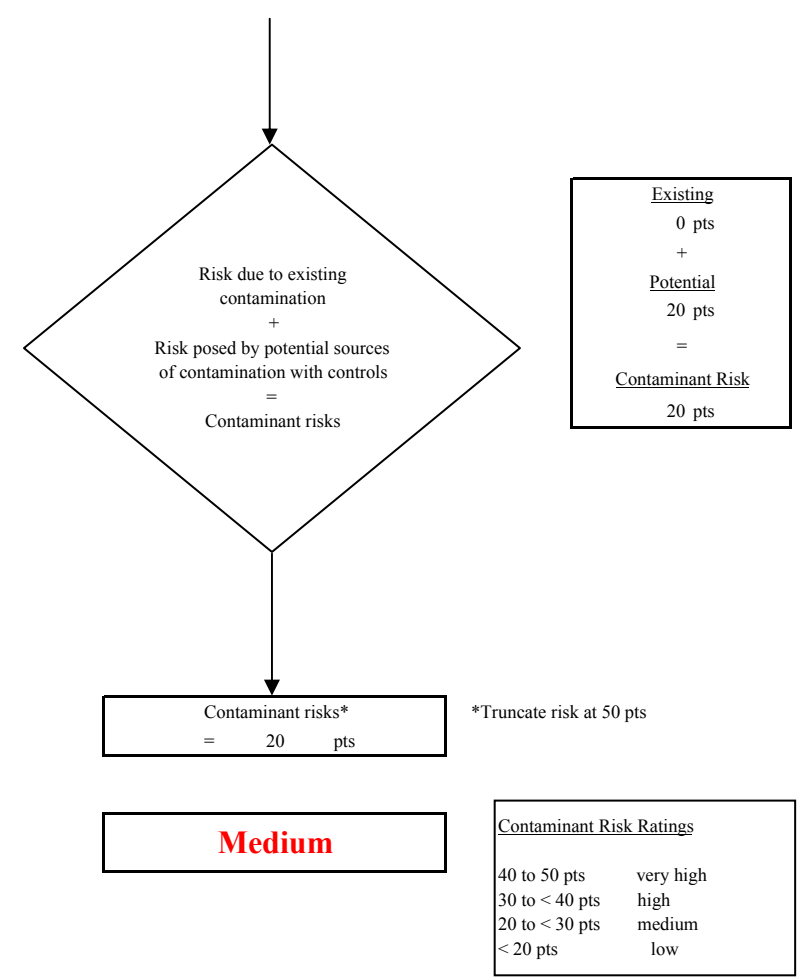
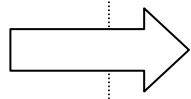
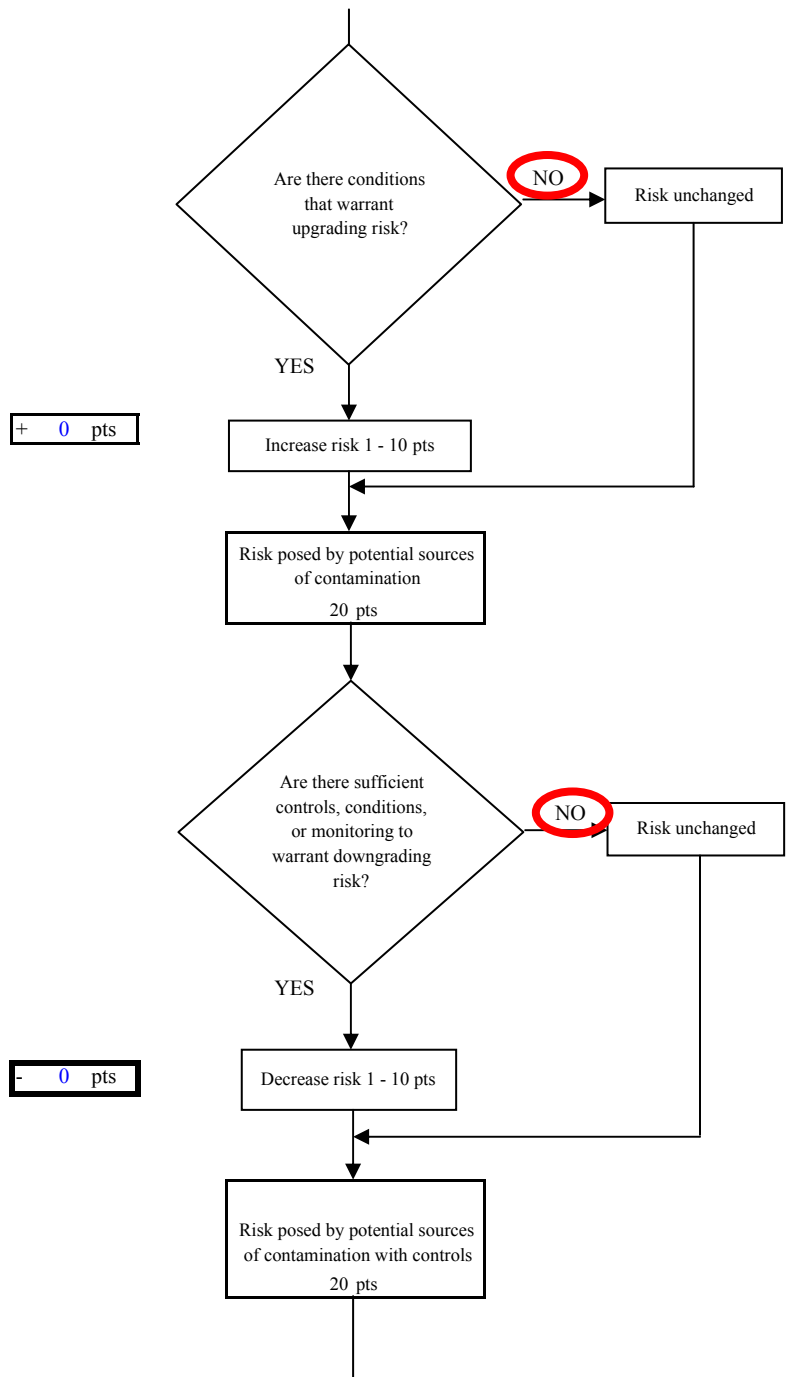


Chart 8. Vulnerability analysis for Usibelli Coal Mine - Volatile Organic Chemicals

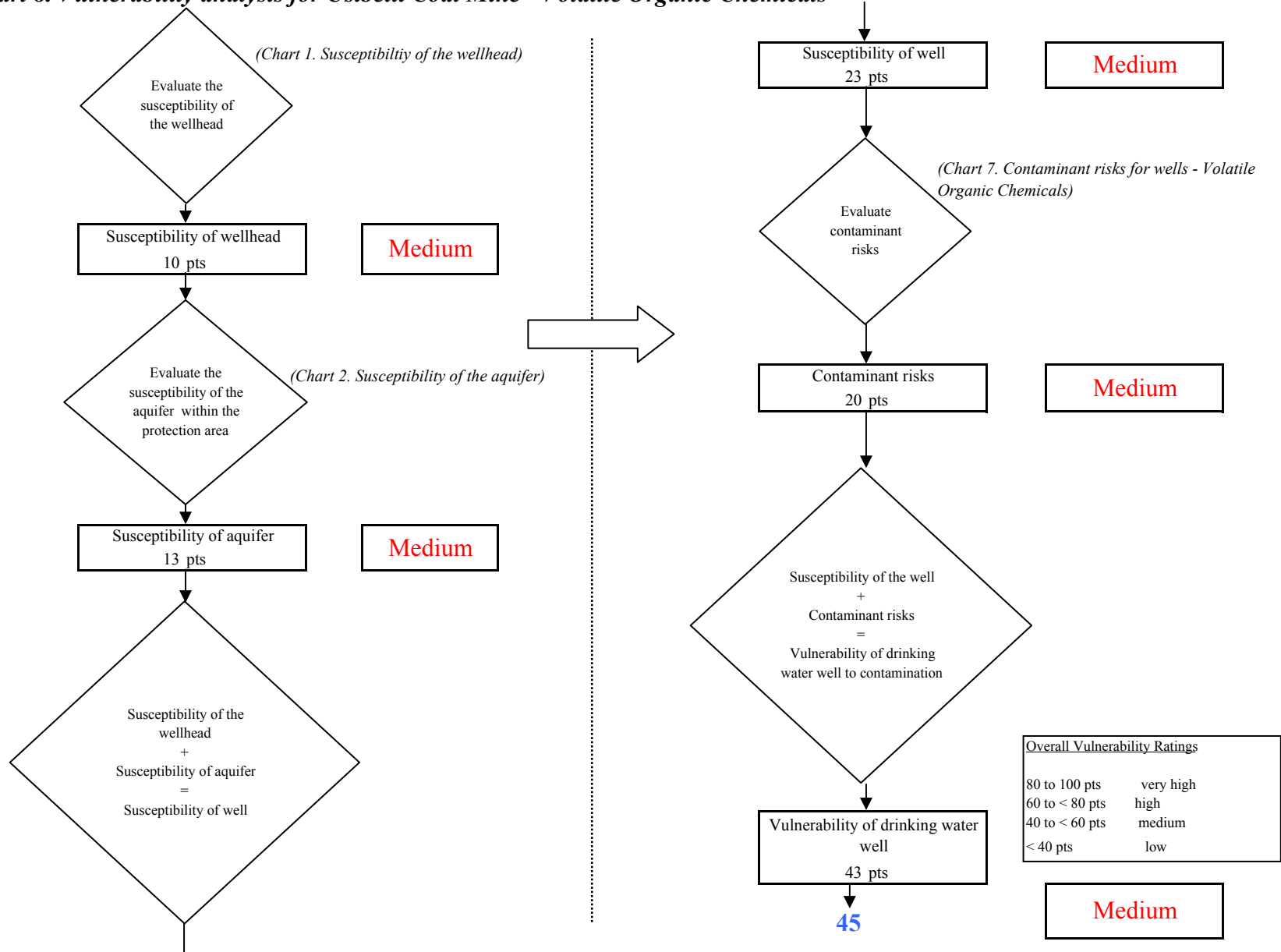


Chart 9. Contaminant risks for Usibelli Coal Mine - Heavy Metals, Cyanide and Other Inorganic Chemicals

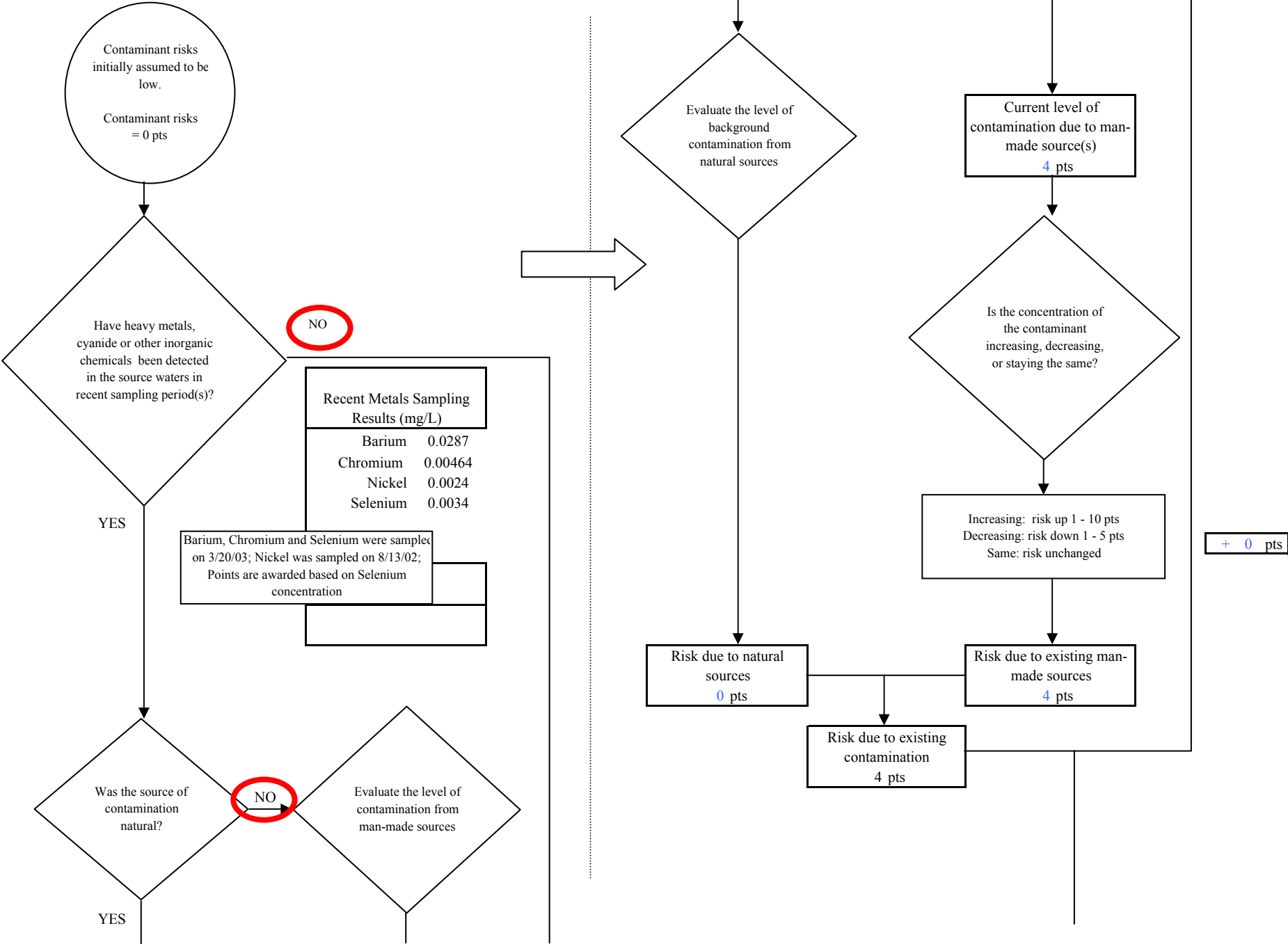
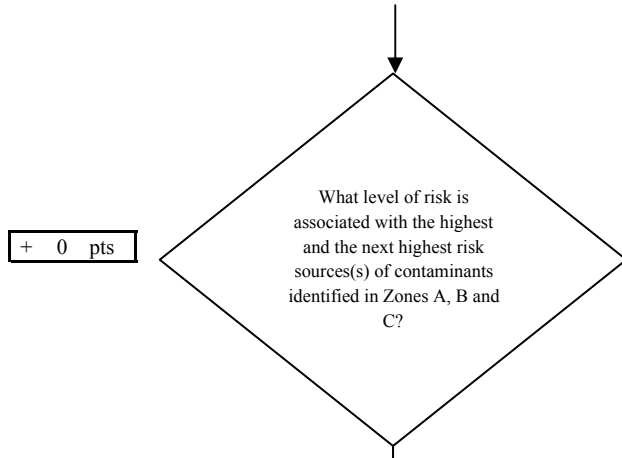


Chart 9. Contaminant risks for Usibelli Coal Mine - Heavy Metals, Cyanide and Other Inorganic Chemicals



+ 0 pts

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

	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 0

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.

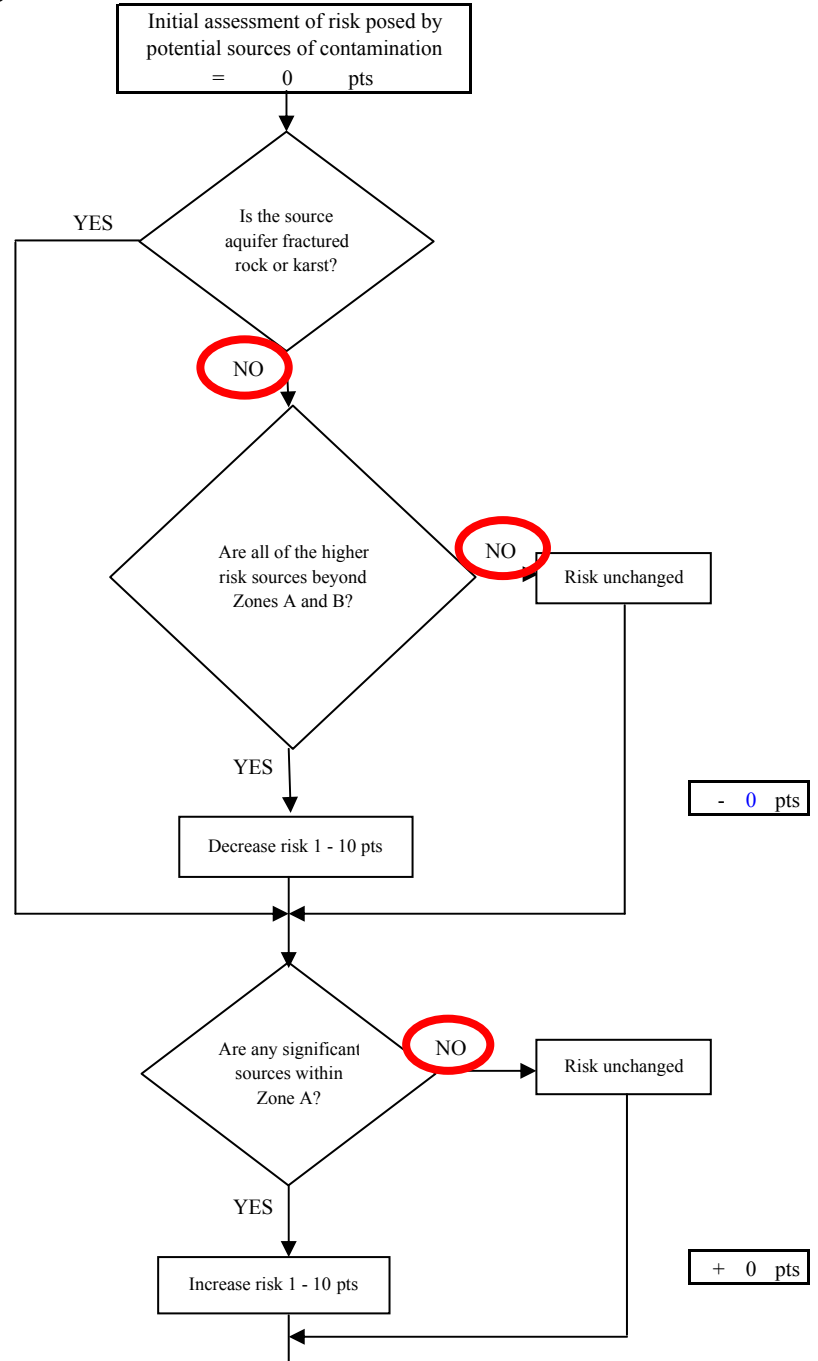
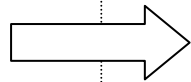


Chart 9. Contaminant risks for Usibelli Coal Mine - Heavy Metals, Cyanide and Other Inorganic Chemicals

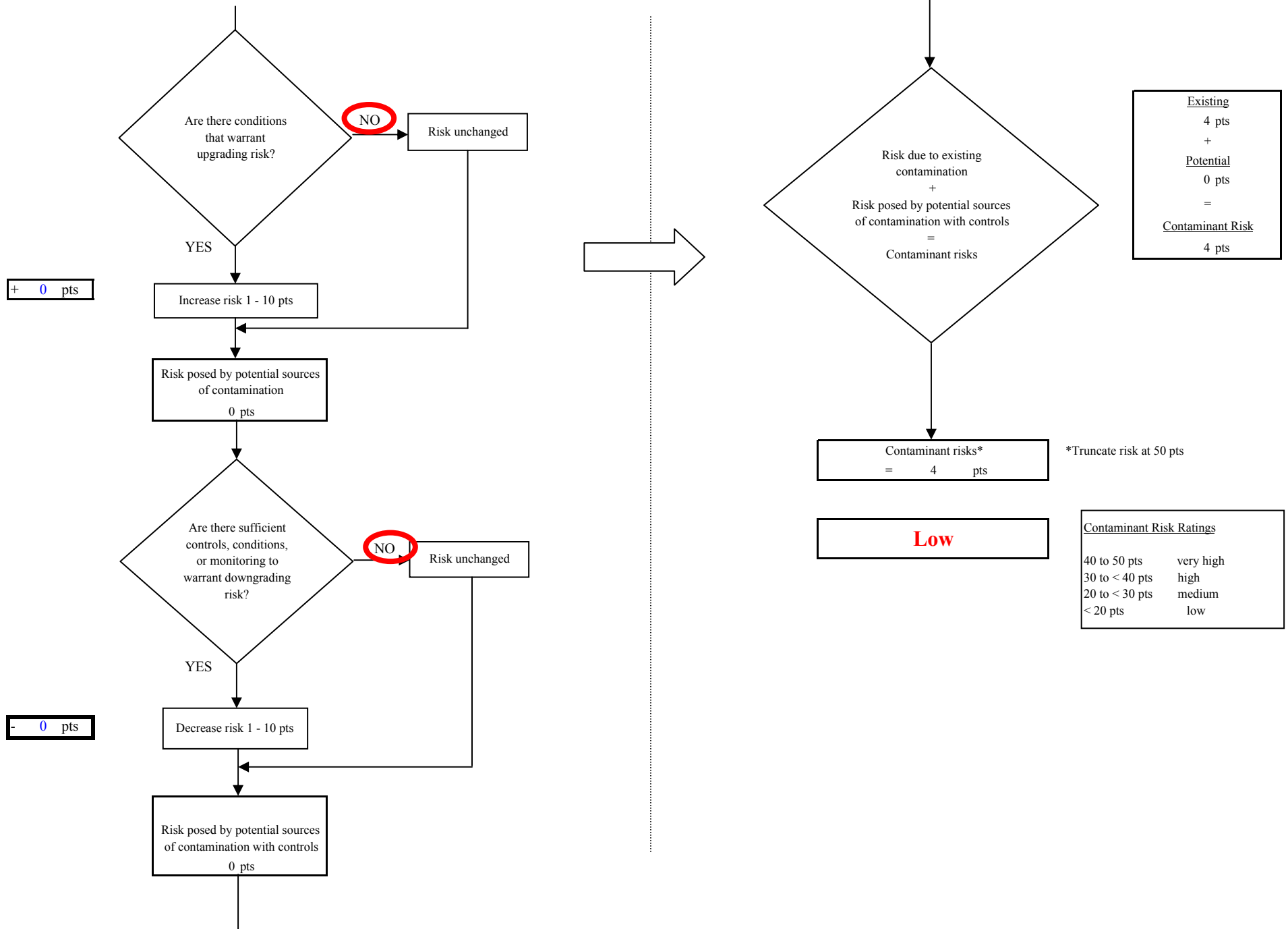


Chart 10. Vulnerability analysis for Usibelli Coal Mine - Heavy Metals, Cyanide and Other Inorganic Chemicals

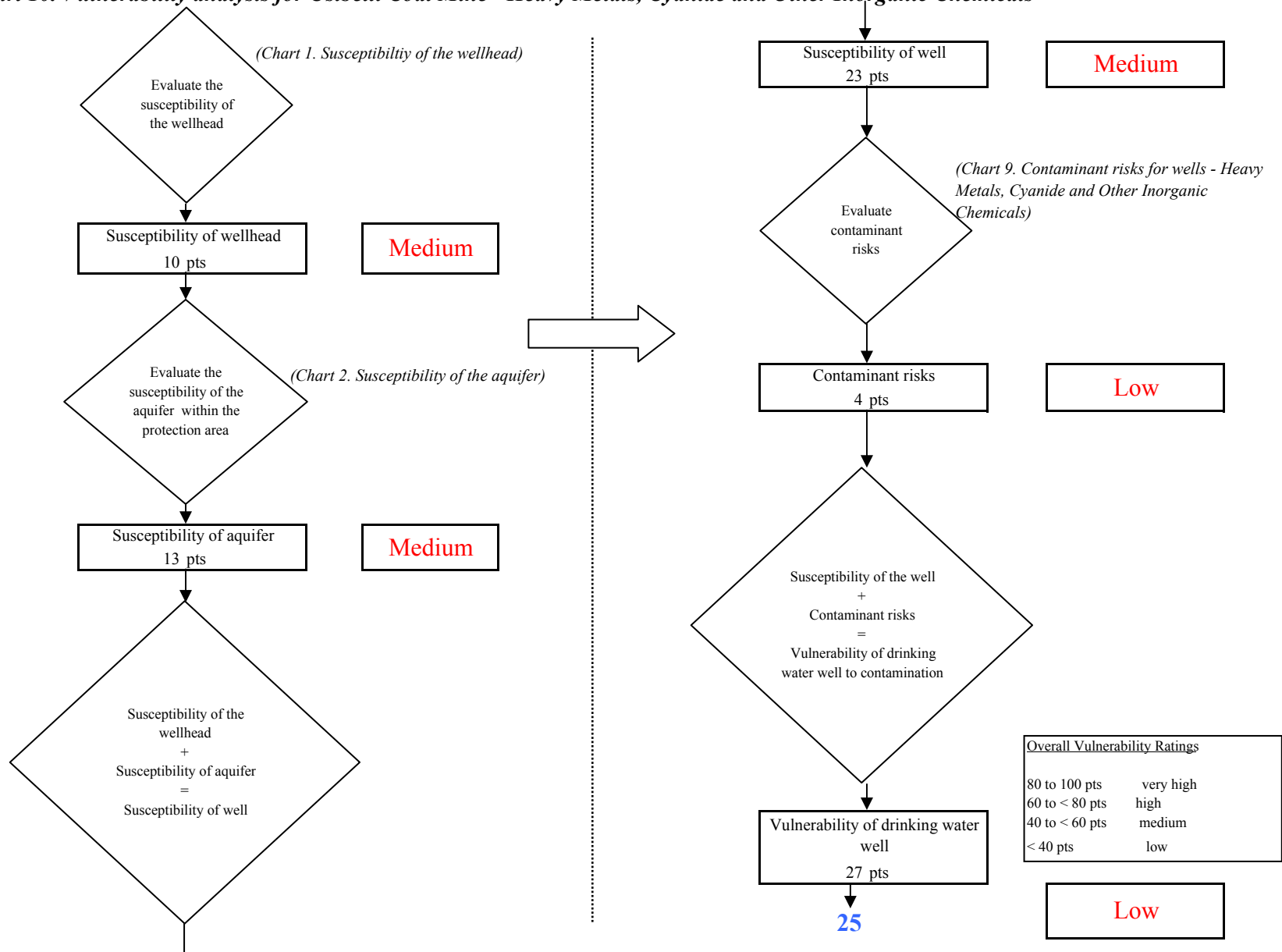


Chart 11. Contaminant risks for Usibelli Coal Mine - Synthetic Organic Chemicals

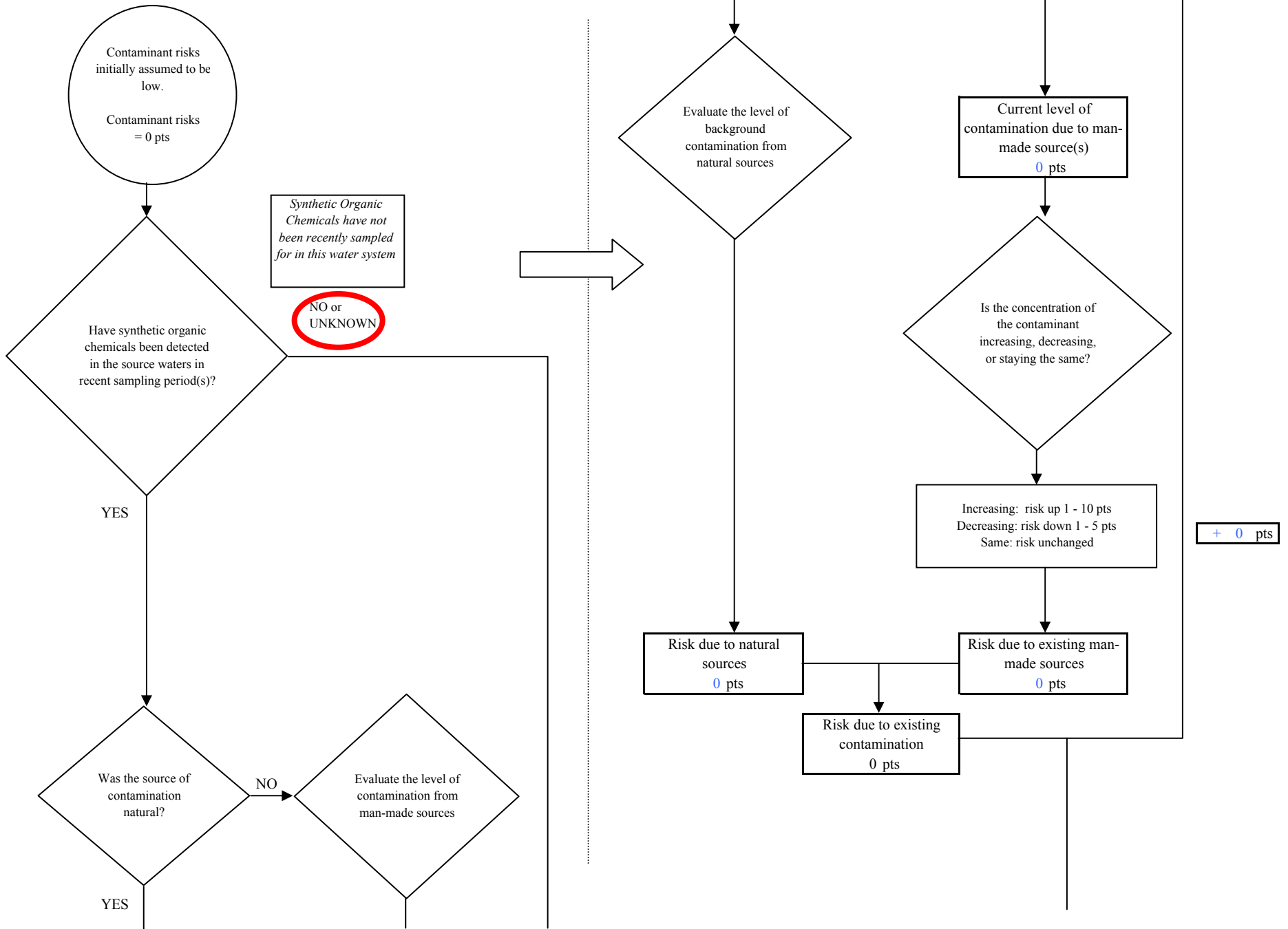
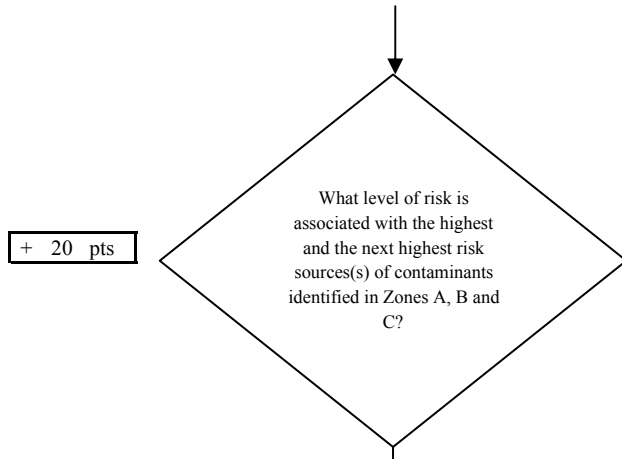


Chart 11. Contaminant risks for Usibelli Coal Mine - Synthetic Organic Chemicals



+ 20 pts

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

	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.

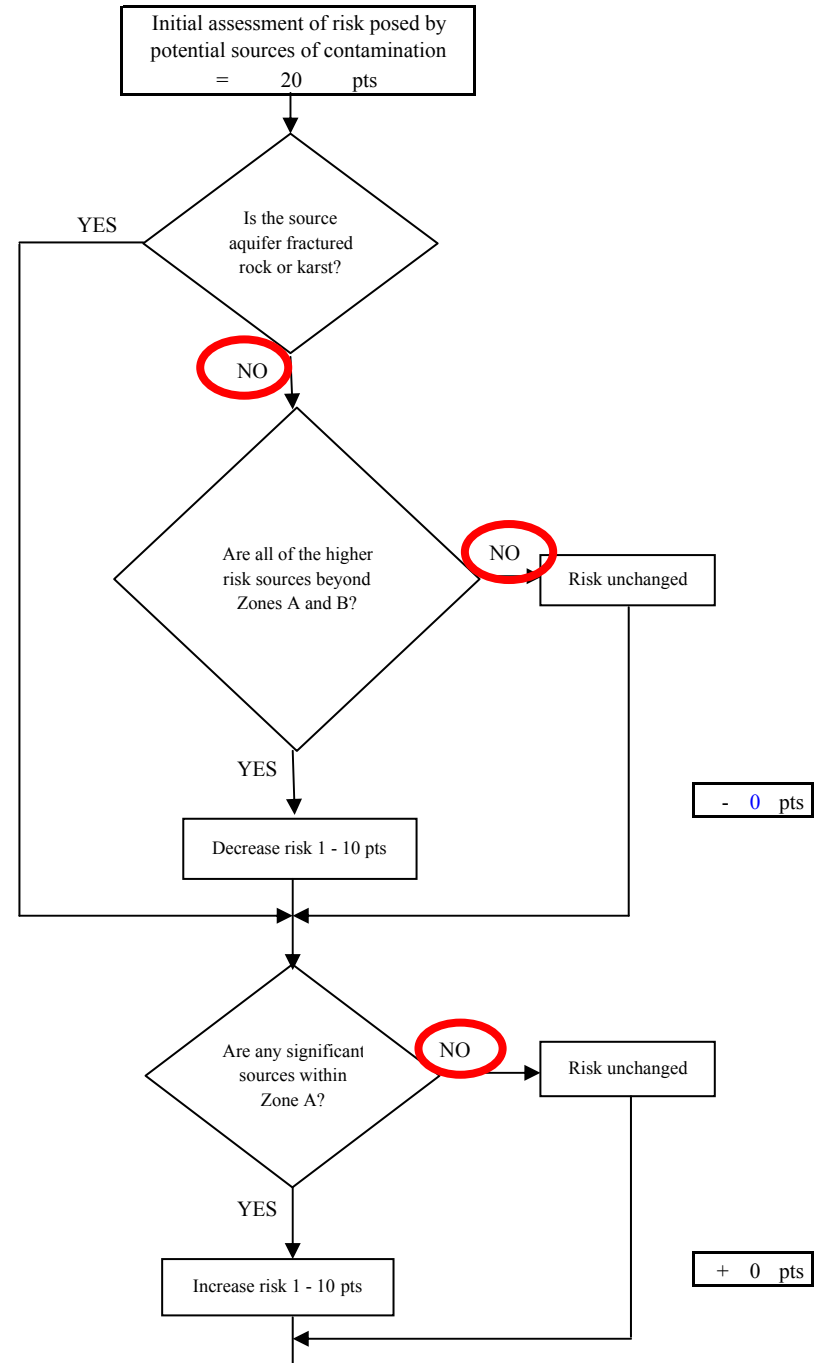
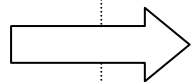


Chart 11. Contaminant risks for Usibelli Coal Mine - Synthetic Organic Chemicals

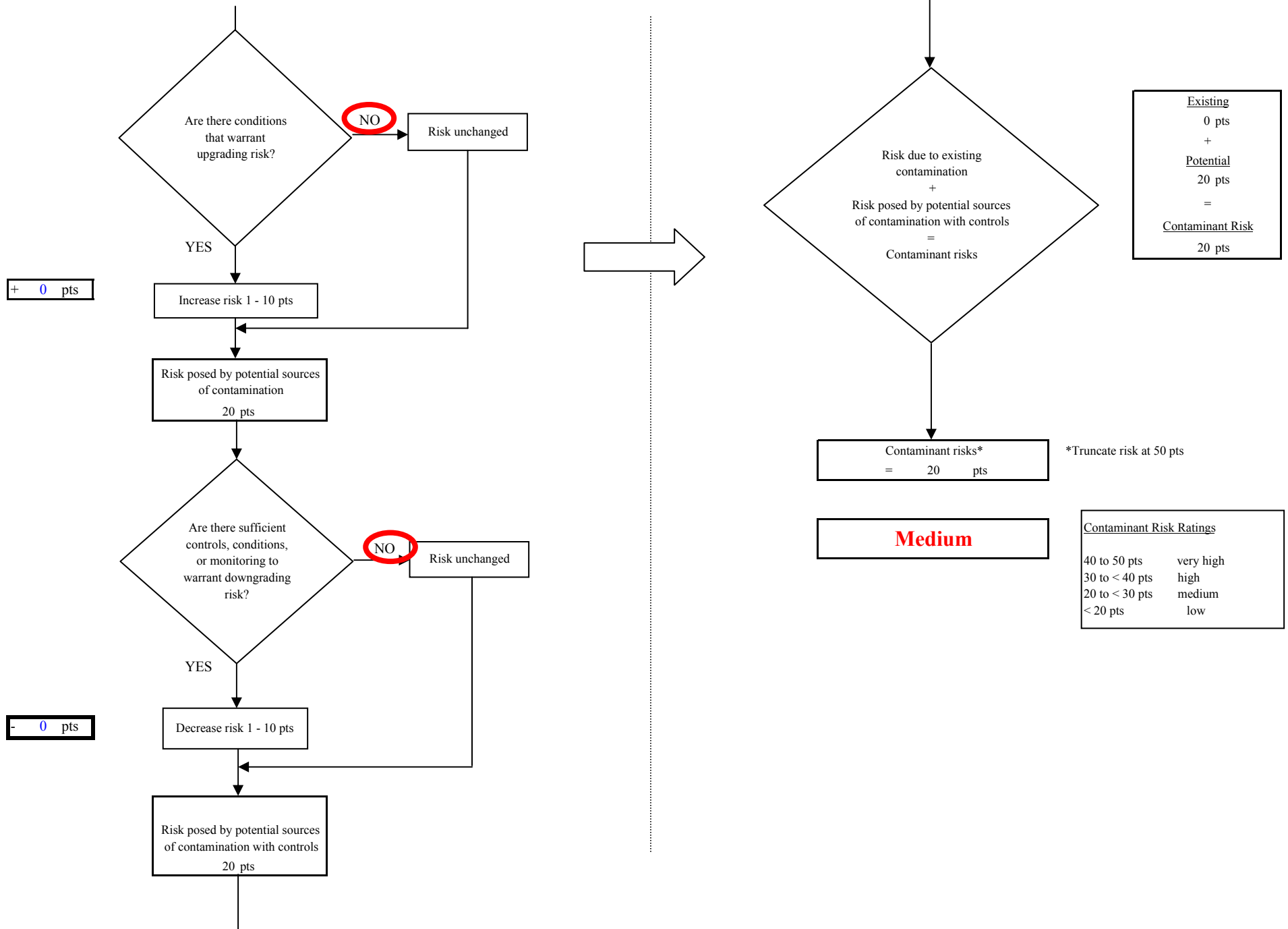


Chart 12. Vulnerability analysis for Usibelli Coal Mine - Synthetic Organic Chemicals

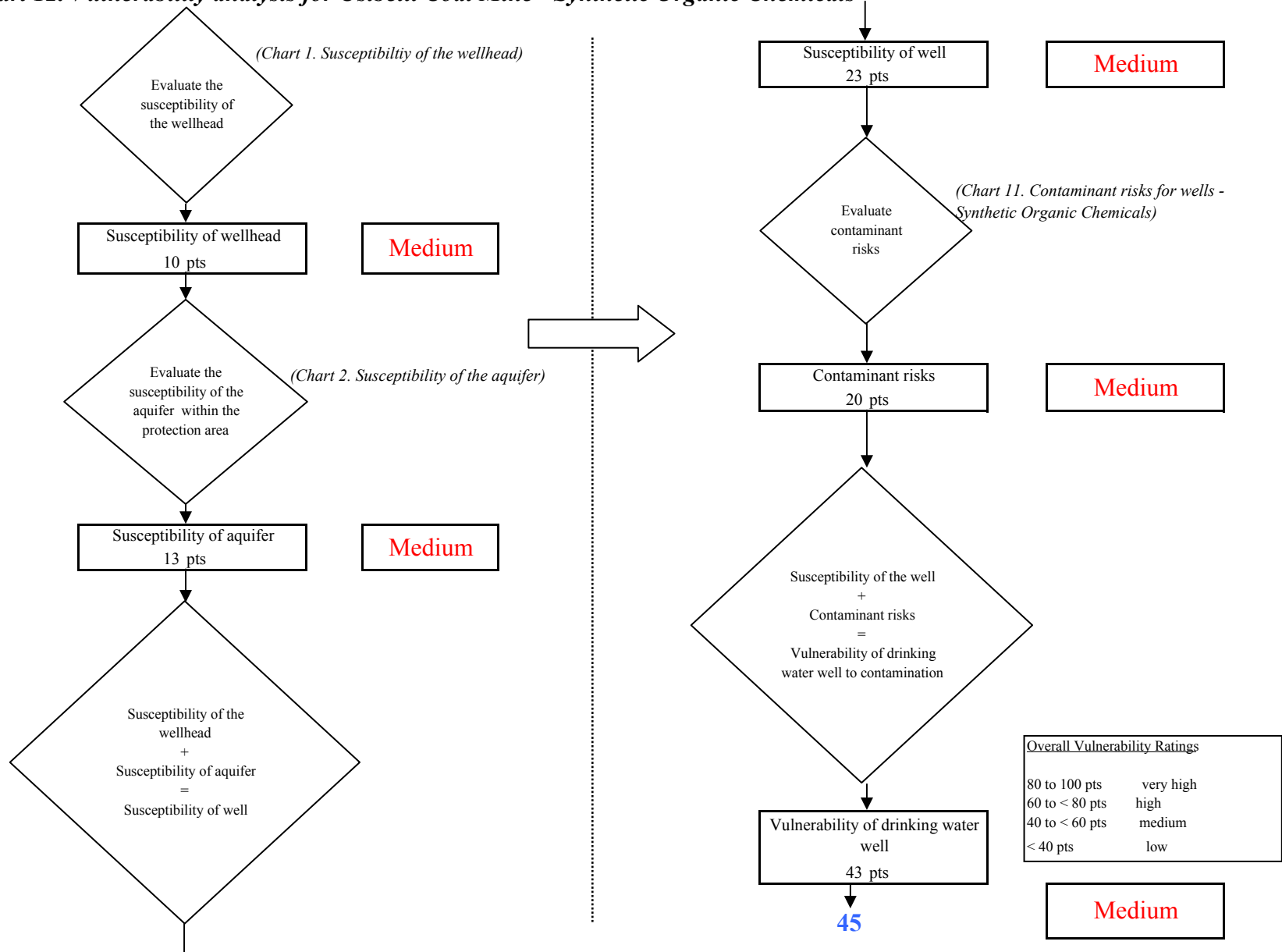


Chart 13. Contaminant risks for Usibelli Coal Mine - Other Organic Chemicals

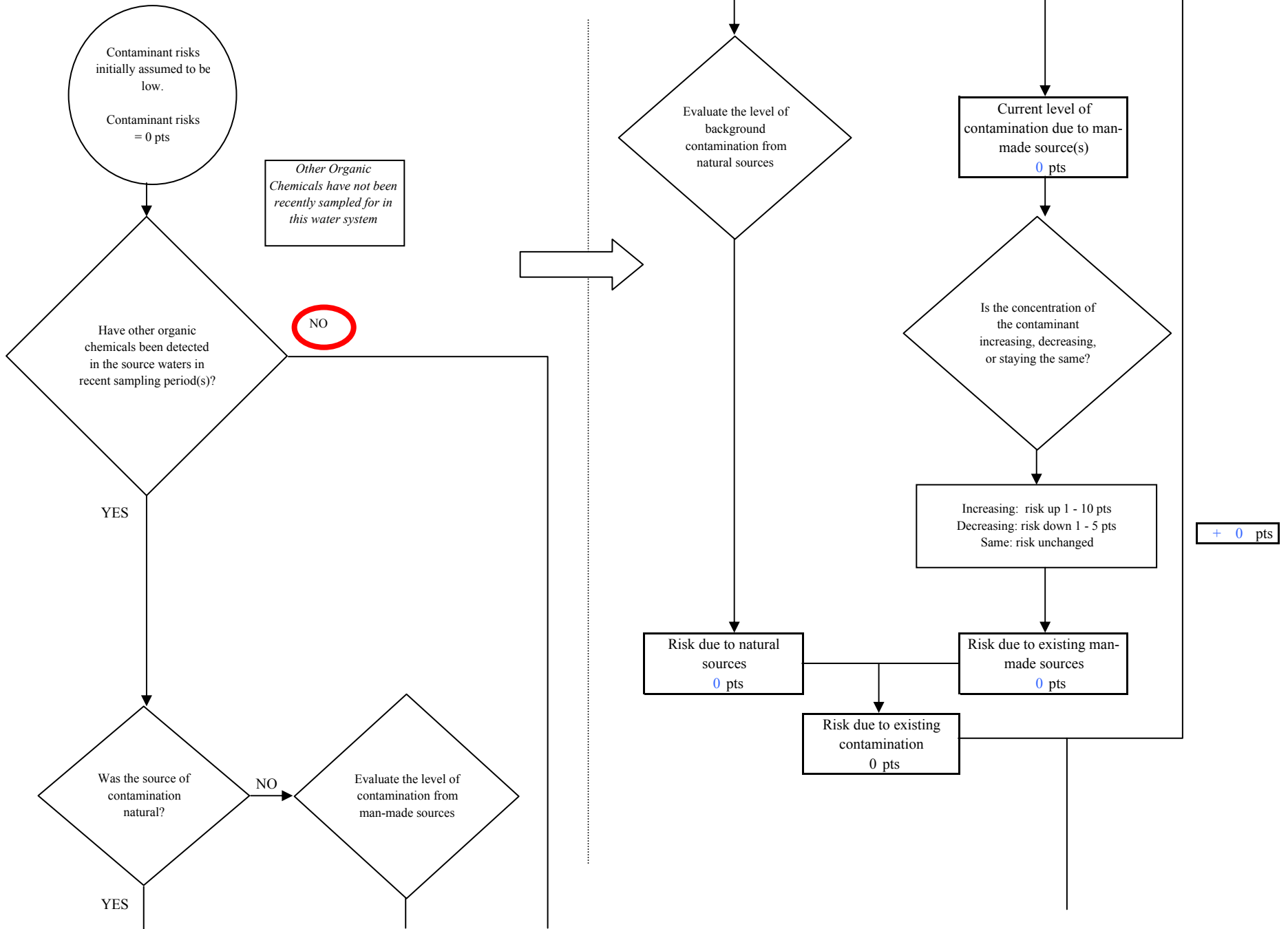
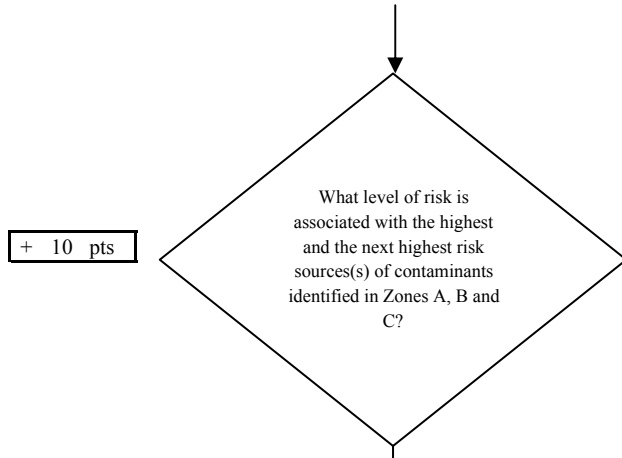


Chart 13. Contaminant risks for Usibelli Coal Mine - Other Organic Chemicals



+ 10 pts

Risk Levels for Contaminant Sources identified in Zones A, B and C			
	Zone A	Zones B&C	Total
Very High(s)	0	0	0
High(s)	0	0	0
Medium(s)	0	0	0
Low(s)	0	1	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 10

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.

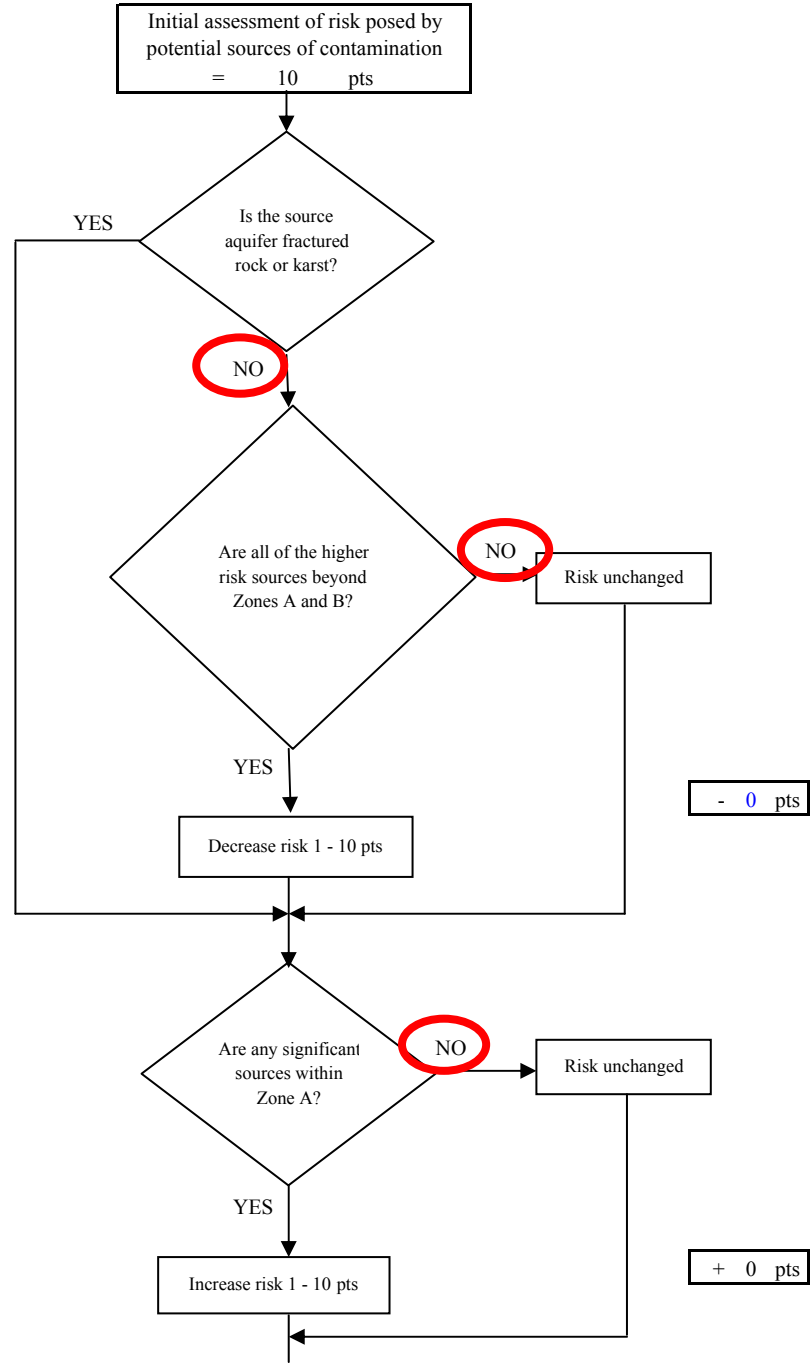
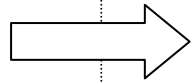


Chart 13. Contaminant risks for Usibelli Coal Mine - Other Organic Chemicals

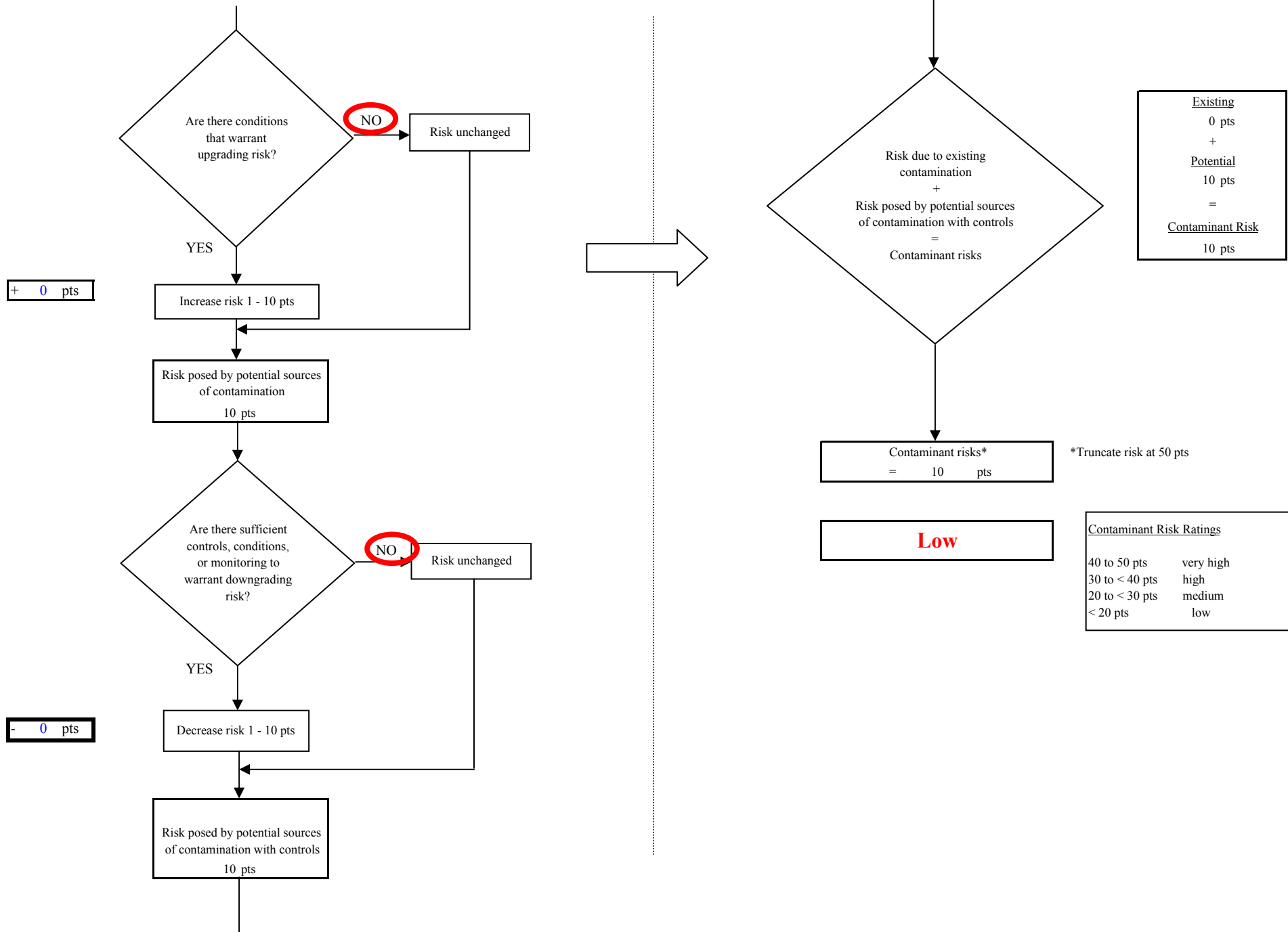


Chart 14. Vulnerability analysis for Usibelli Coal Mine - Other Organic Chemicals

