



## **Source Water Assessment**

A Hydrogeologic Susceptibility and Vulnerability Assessment for Moorcroft Bear Trail Lodge Drinking Water System, King Salmon, Alaska

> PWSID # 263024.001 March 2004

DRINKING WATER PROTECTION PROGRAM REPORT 1217 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 Moorcroft Bear Trail Lodge Source of Public Drinking Water, King Salmon, Alaska

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

#### **EXECUTIVE SUMMARY**

The Moorcroft Bear Trail Lodge has one Public Water System (PWS) well. The well (PWSID# 263024.001) has been used as a drinking water source since it was drilled in 1996.

The well is a Class B (transient/non-community) water system located at the confluence of the Naknek River and King Salmon Creek in King Salmon, Alaska. Available records indicate that there is no secondary storage of drinking water and the untreated drinking water source is derived directly from the wellhead. The wellhead received a susceptibility rating of Low and the aquifer received a susceptibility rating of Medium. 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: injection wells, aboveground fuel tanks, underground fuel tanks, construction trade areas and materials, petroleum product bulk stations/terminals, an ADEC recognized leaking underground storage tank (LUST) site, and roads. 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 **Medium** for the bacteria and viruses, a vulnerability rating of **Medium** for nitrates and nitrites, and a vulnerability rating of Medium for volatile organic chemicals contaminant categories.

## MOORCROFT BEAR TRAIL LODGE PUBLIC DRINKING WATER SYSTEM

The Moorcroft Bear Trail Lodge water well is a Class B (transient/non-community) public water system located at the confluence of the Naknek River and King Salmon Creek in King Salmon, Alaska (Sec. 22, T17S, R45W, Seward Meridian; see Map A of Appendix A). King Salmon is located on the north bank of the Naknek River near Bristol Bay. The village is located about 15 miles upriver from Naknek and 280 miles southwest of Anchorage. The

community has a population of 392 (ADCED, 2003). The Moorcroft Bear Trail Lodge has a seasonal non-resident population of approximately 14 people and a resident population of three. Average annual precipitation in King Salmon is 20 inches, including approximately 45 inches of snowfall. Temperatures range from 42 to 63°F in summer and 29 to 44°F in winter. Temperatures can be as extreme as -46 to 88°F.

The community of King Salmon gets most of their water supply from individual wells. Most households are served by the piped sewage collection system and the remaining households have individual septic tanks (ADCED, 2003). King Salmon receives electrical power from the Naknek Electric Association operated by the REA Cooperative. Power generating facilities are fueled by diesel. Refuse is collected by the Peterson Sanitation Company and trucked to the landfill located at mile five of the King Salmon-Naknek Road (ADCED, 2003).

According to information supplied by ADEC for the Moorcroft Bear Trail Lodge PWS, the depth of the primary water well is 186 feet below the ground surface and is screened in a confined aquifer based on available construction details. Confined aquifers are likely less susceptible to groundwater impacts resulting from the downward migration of surface contaminants. Based on available data for the PWSID, the well is screened in gravel. The well is not located in a floodplain.

Information acquired from a June 2000 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 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).

#### MOORCROFT BEAR TRAIL LODGE 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 Moorcroft Bear Trail Lodge 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	<sup>1</sup> / <sub>4</sub> the distance for the 2-yr. time-of-travel
В	Less than the 2 year time-of-travel
C	Less Than the 5 year time-of-travel
D	Less than the 10 year time-of-travel

The DWPA for the Moorcroft Bear Trail Lodge 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 Moorcroft Bear Trail Lodge 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 MOORCROFT BEAR TRAIL LODGE 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 Moorcroft Bear Trail Lodge'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	0	Low
Wellhead		
Susceptibility of the	11	Medium
Aquifer		
Natural Susceptibility	11	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	40	Very High
Nitrates and/or Nitrites	40	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 points)

+

Contaminant Risks (0 – 50 points)

=

 $\label{eq:Vulnerability} Vulnerability of the \\ Drinking Water Source to Contamination (0 - 100).$ 

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	50	Medium
Nitrates and Nitrites	50	Medium
Volatile Organic Chemicals	55	Medium

#### **Bacteria and Viruses**

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

No positive bacteria counts were reported in recent (within five years) sampling events (See Chart 3 – Contaminant Risks for Bacteria and Viruses in Appendix D). Only a small amount of bacteria and viruses are required to endanger public health.

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

#### **Nitrates and Nitrites**

The contaminant risk for nitrates and nitrites is **Very High**. The risk to this source of public drinking water is primarily attributed to the presence of injection wells 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 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).

Nitrate levels are often derived from the decomposition of organic matter in soils. 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 **Very High**. The risk is primarily attributed to the presence of a petroleum product bulk station/terminal and an ADEC recognized LUST site located in Zone 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 Moorcroft Bear Trail Lodge (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 Moorcroft Bear Trail Lodge and the community of King Salmon 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 <a href="http://www.state.ak.us/dec/dspar/csites/cs">http://www.state.ak.us/dec/dspar/csites/cs</a> search.htm
- Alaska Department of Environmental Conservation, Leaking Underground Storage Tank Database, 2003 [WWW database], URL <a href="http://www.dec.state.ak.us/spar/stp/ust/search/fac\_search.asp">http://www.dec.state.ak.us/spar/stp/ust/search/fac\_search.asp</a>
- 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 <a href="http://www.epa.gov/safewater/mcl.html">http://www.epa.gov/safewater/mcl.html</a>.

## **APPENDIX A**

# Drinking Water Protection Area Location Map (Map A)

#### Public Water Well System for PWS #263024.001 Moorcroft Bear Trail Lodge **LEGEND** Public Water System Well ×120 ~235 Hydrography/Physical Parcels Stream Lake or Pond TRAIL Contours **Transportation** —— Primary Route (Class 1) Secondary Route (Class 2) = Road (Class 3) \* (35 ×90 Road (Class 4) 120 ----- Road (Class 5, Four-wheel drive) Road Ferry Crossing 195 × **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 ×130 Zone D Protection Area – 10 Years Travel Time WWIER 105 Contaminant Sources, Public Water System Wells, Contours Alaska Department of Environmental Conservation (ADEC) Critical Facilities, Federal Emergency Management Agency (FEMA) **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. 00 Lævelock Portage Creek Area of Map 1 King Salmon King Salmon Moorcroft Bear Trail Lodge PWS 263024.001 Moorcroft Bear Trail Lodge PWS 263024.001 Appendix A Map A

## **APPENDIX B**

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

#### Table 1

## Contaminant Source Inventory for Moorcraft Bear Trail Lodge

Contaminant Source Type	Contaminant Source ID	CS ID tag	Zone	Map Number	Comments
Injection wells (Class V) Large-Capacity Septic System (Drainfie Disposal Method)	D10	D10-01	A	С	
Tanks, heating oil, residential (above ground)	R08	R08-01	A	С	
Highways and roads, dirt/gravel	X24	X24-01	A	С	Assumed that 1 to 20 roads are located in Zone A
Construction trade areas and materials	C09	C09-01	В	С	Bristol Bay Contractors Inc.
Tanks, heating oil, nonresidential (underground)	T16	T16-01	В	C	Bristol Bay Contractors Inc.
Open Leaking Underground Fuel Storage Tank (LUST) Sites	U07	U07-01	В	С	Bristol Bay Contractors Inc.
Petroleum product bulk station/terminals	X11	X11-01	В	С	Bristol Bay Contractors Inc.

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#### Table 2

## Contaminant Source Inventory and Risk Ranking for Moorcraft Bear Trail Lodge Sources of Bacteria and Viruses

Contaminant Source Type	Contaminant Source ID	CS ID tag	Zone	Risk Ranking for Analysis	Map Number	Comments
Injection wells (Class V) Large-Capacity Septic System (Drainfield Disposal Method)	D10	D10-01	A	High	С	
Highways and roads, dirt/gravel	X24	X24-01	A	Low	С	Assumed that 1 to 20 roads are located in Zone A

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#### Table 3

## Contaminant Source Inventory and Risk Ranking for Moorcraft Bear Trail Lodge Sources of Nitrates/Nitrites

Contaminant Source Type	Contaminant Source ID	CS ID tag	Zone	Risk Ranking for Analysis	Map Number	Comments
Injection wells (Class V) Large-Capacity Septic System (Drainfield Disposal Method)	D10	D10-01	A	High	С	
Highways and roads, dirt/gravel	X24	X24-01	A	Low	С	Assumed that 1 to 20 roads are located in Zone A

#### Table 4

## Contaminant Source Inventory and Risk Ranking for Moorcraft Bear Trail Lodge Sources of Volatile Organic Chemicals

Contaminant Source Type	Contaminant Source ID	CS ID tag	Zone	Risk Ranking for Analysis	Map Number	Comments
Injection wells (Class V) Large-Capacity Septic System (Drainfield Disposal Method)	D10	D10-01	A	Low	С	
Tanks, heating oil, residential (above ground)	R08	R08-01	A	Medium	C	
Highways and roads, dirt/gravel	X24	X24-01	A	Low	C	Assumed that 1 to 20 roads are located in Zone A
Tanks, heating oil, nonresidential (underground)	T16	T16-01	В	Low	C	Bristol Bay Contractors Inc.
Open Leaking Underground Fuel Storage Tank (LUST) Sites	U07	U07-01	В	High	С	Bristol Bay Contractors Inc.
Petroleum product bulk station/terminals	X11	X11-01	В	Very High	С	Bristol Bay Contractors Inc.

## **APPENDIX C**

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

#### Public Water Well System for PWS #263024.001 Moorcroft Bear Trail Lodge **Showing Potential and Existing Sources of Contamination LEGEND** Public Water System Well 0.125 0.25 0.5 Hydrography/Physical Parcels Stream Lake or Pond Contours Transportation li 🛈 Toyy Primary Route (Class 1) Secondary Route (Class 2) = Road (Class 3) Road (Class 4) okoshar ----- Road (Class 5, Four-wheel drive) Road Ferry Crossing **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** Construction trade areas and materials (C09) Tanks, heating oil, nonresidential (underground) (T16) LWWIER Open Leaking Underground Fuel Storage Tank (LUST) (lubricants or other petroleum products) (U07) 70 **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) Zone C **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. Portage Creck Area of Map 1 Moorcroft Bear Trail Lodge PWS 263024.001 Moorcroft Bear Trail Lodge 0.375 0.75 PWS 263024.001 Appendix C Map C

## **APPENDIX D**

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

Susceptibility initially assumed to be low. Susceptibility of wellhead = 0 ptsIs the well Increase susceptibility 5 pts + 0 pts properly grouted? Is the well Increase susceptibility 20 pts + 0 pts capped? YES YES Susceptibility of wellhead Low 0 pts YES Increase susceptibility: Is the well 10 pts: suspected floodplain 0 pts within a Wellhead Susceptibility Ratings floodplain? 20 pts: known floodplain 20 to 25 pts very high 15 to < 20 pts high 10 to < 15 pts medium < 10 pts Is the land surface sloped Increase susceptibility 5 pts 0 pts away from the well?

Chart 1. Susceptibility of the wellhead - Moorcroft Bear Trail Lodge (263024.001)

Chart 2. Susceptibility of the aquifer - Moorcroft Bear Trail Lodge (263024.001)

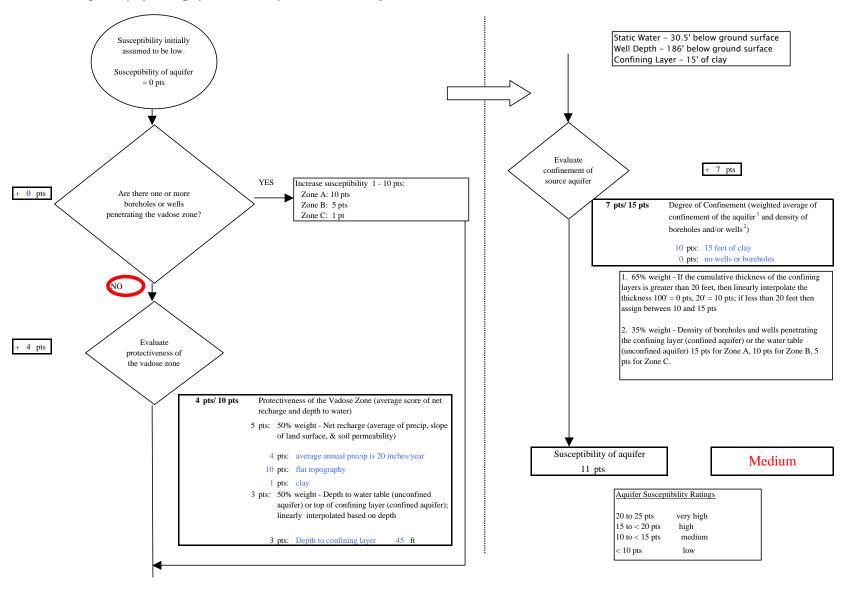


Chart 3. Contaminant risks for Moorcroft Bear Trail Lodge (263024.001) - Bacteria & Viruses

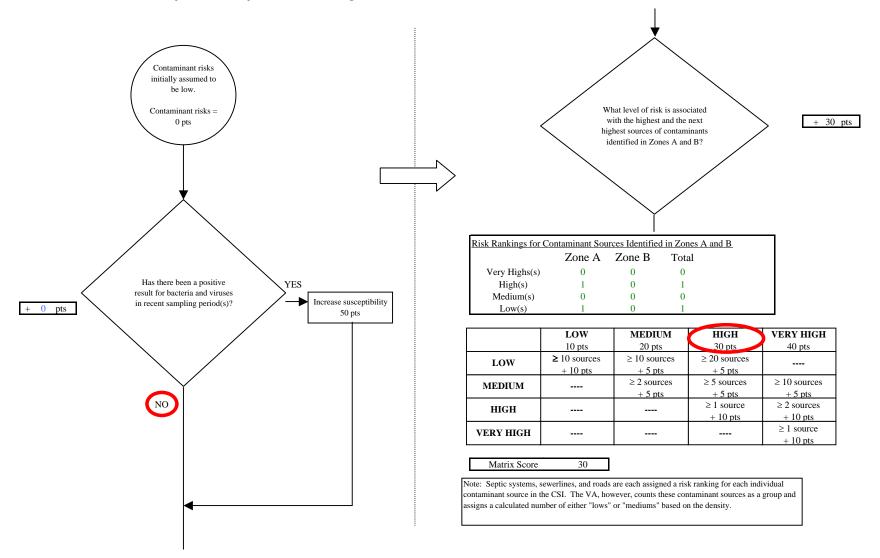


Chart 3. Contaminant risks for Moorcroft Bear Trail Lodge (263024.001) - Bacteria & Viruses NO Are there sufficient Initial assessment of risk posed by Risk unchanged controls, conditions, or potential sources of contamination monitoring to warrant = 30 pts downgrading risk? Are any YES significant contaminant Risk unchanged 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 Increase risk 1 - 10 pts + 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 Potential of contamination with controls 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 40 to 50 pts very high 30 to < 40 ptshigh Very High 20 to < 30 pts

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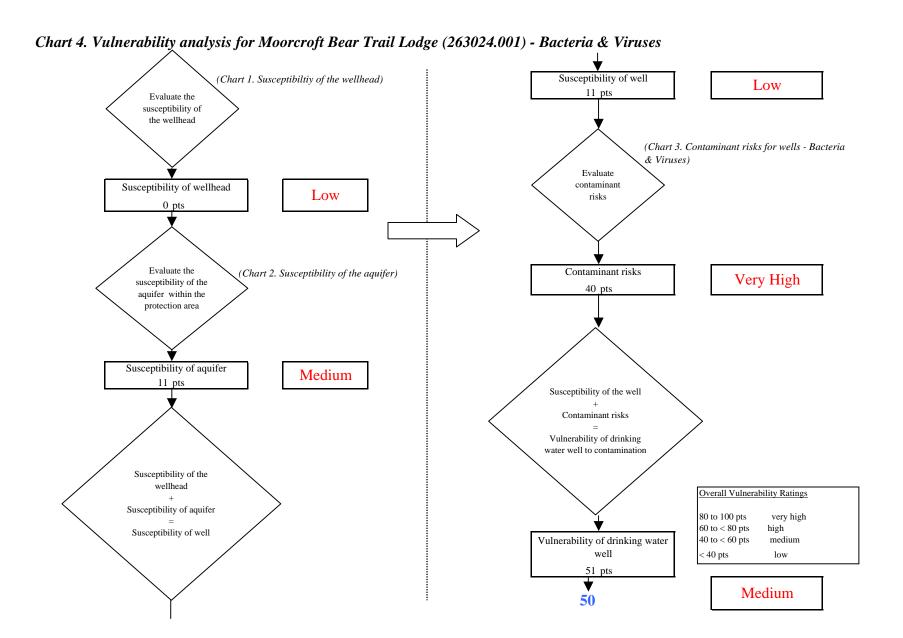
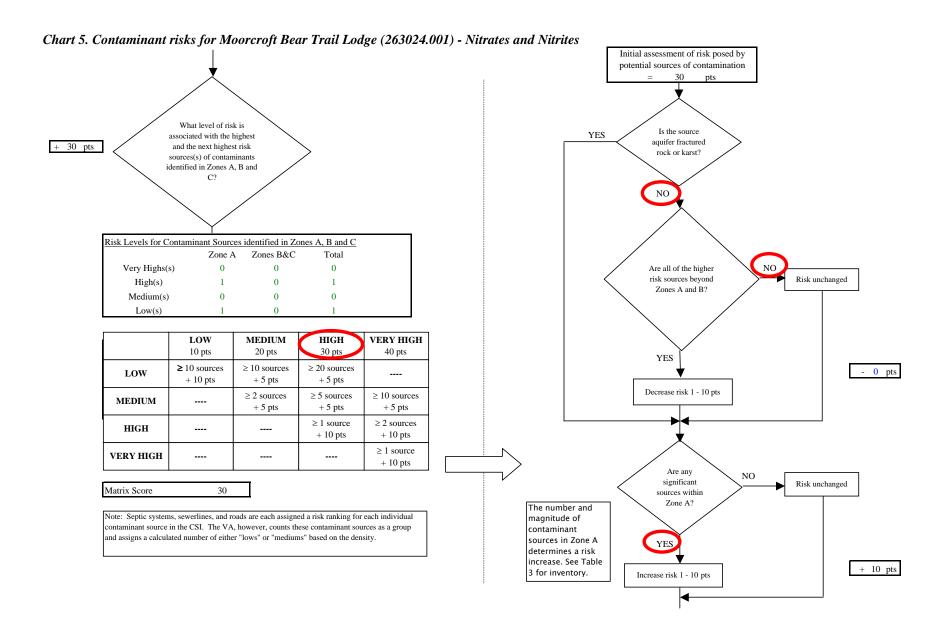
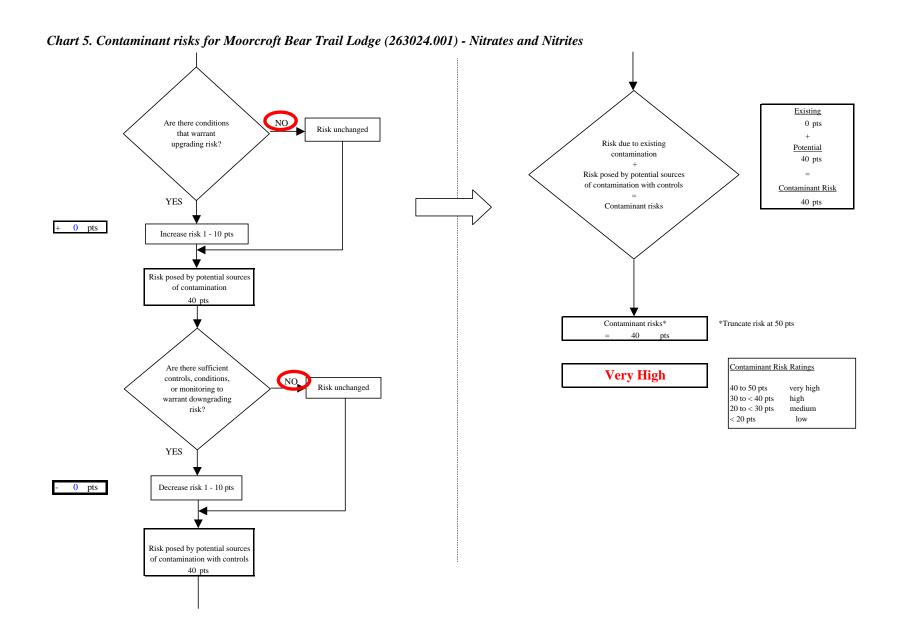


Chart 5. Contaminant risks for Moorcroft Bear Trail Lodge (263024.001) - Nitrates and Nitrites Contaminant risks initially assumed to be low. Current level of Evaluate the level of Contaminant risks contamination due to manbackground = 0 ptscontamination from made source(s) natural sources 0 pts Is the 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) 6/28/2000 4/28/1999 ND 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 = 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 0 pts Risk due to existing contamination 0 pts Was the source of Evaluate the level of NO. contamination contamination from natural? man-made sources YES

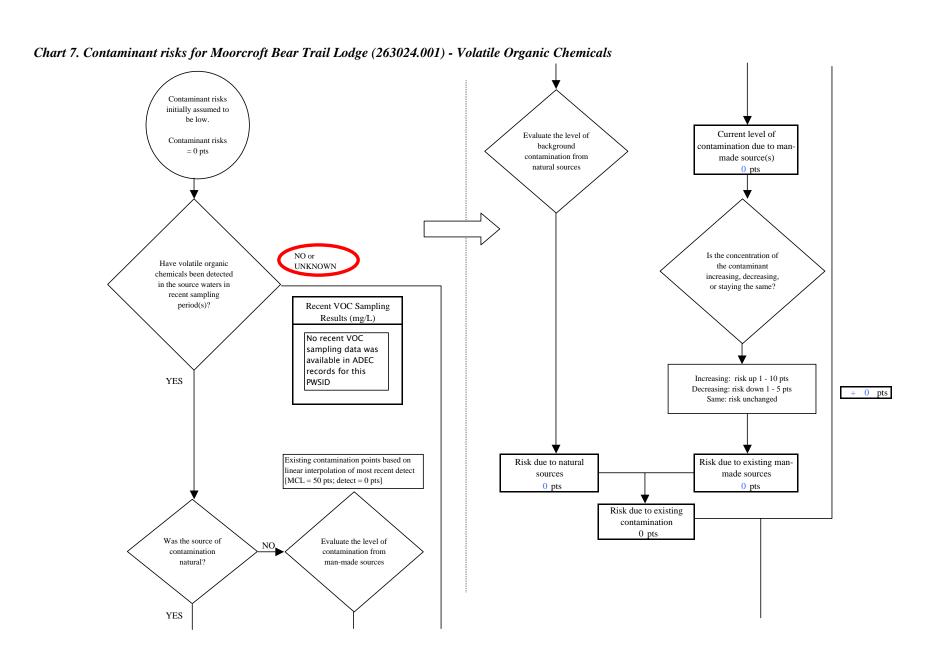




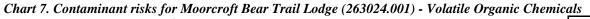
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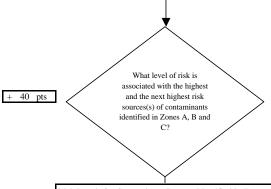
Chart 6. Vulnerability analysis for Moorcroft Bear Trail Lodge (263024.001) - Nitrates and Nitrites Susceptibility of well (Chart 1. Susceptibiltiy of the wellhead) Low 11 pts Evaluate the susceptibility of the wellhead (Chart 5. Contaminant risks for wells - Nitrates and Nitrites) Evaluate contaminant Susceptibility of wellhead Low risks 0 pts Evaluate the Contaminant risks (Chart 2. Susceptibility of the aquifer) Very High susceptibility of the 40 pts aquifer within the protection area Susceptibility of aquifer Medium 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 pts medium well < 40 pts 51 pts Medium **50** 

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k 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	1	1		
Medium(s)	1	0	1		
Low(s)	2	1	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 40

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

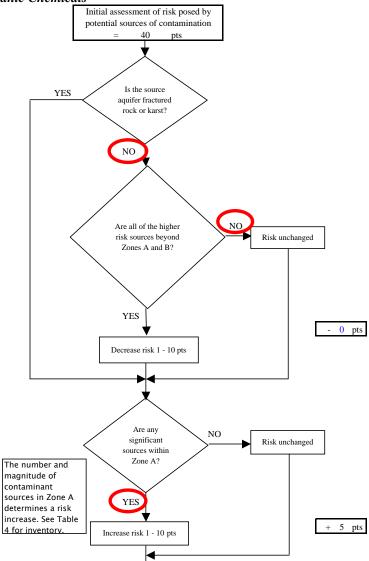


Chart 7. Contaminant risks for Moorcroft Bear Trail Lodge (263024.001) - Volatile Organic Chemicals Existing NO Are there conditions 0 pts Risk unchanged that warrant upgrading risk? Risk due to existing Potential contamination 45 pts Risk posed by potential sources of contamination with controls Contaminant Risk YES 45 pts Contaminant risks 0 pts Increase risk 1 - 10 pts Risk posed by potential sources of contamination Contaminant risks\* \*Truncate risk at 50 pts 45 Contaminant Risk Ratings Are there sufficient **Very High** controls, conditions, NO. Risk unchanged 40 to 50 pts very high or monitoring to 30 to < 40 pts high warrant downgrading risk? 20 to < 30 pts medium < 20 pts YES 0 pts Decrease risk 1 - 10 pts Risk posed by potential sources of contamination with controls 45 pts

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Chart 8. Vulnerability analysis for Moorcroft Bear Trail Lodge (263024.001) - Volatile Organic Chemicals Susceptibility of well (Chart 1. Susceptibiltiy of the wellhead) Low 11 pts Evaluate the susceptibility of the wellhead (Chart 7. Contaminant risks for wells - Volatile Organic Chemicals) Evaluate contaminant Susceptibility of wellhead Low risks 0 pts Evaluate the Contaminant risks (Chart 2. Susceptibility of the aquifer) Very High susceptibility of the 45 pts aquifer within the protection area Susceptibility of aquifer Medium 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 pts medium well < 40 pts low 56 pts Medium **55** 

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