



# **Source Water Assessment**

A Hydrogeologic Susceptibility and Vulnerability Assessment for Rapids Camp Lodge Drinking Water System, King Salmon, Alaska

PWSID # 263025.001 March 2004

DRINKING WATER PROTECTION PROGRAM REPORT 1218
Alaska Department of Environmental Conservation

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### DRINKING WATER PROTECTION PROGRAM REPORT 1218

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**

RAPIDS CAMP WATER SYS RAPIDS CAMP	LOI TEM LOI	DGE PUBLIC DRINKING	NVENTORY OF POTENTIAL AND EXISTING CONTAMINANT SOURCES
		TABLE	S
Table 2. Susceptable 3. Contain	ptibil mina	itynt Risks	
		ATTENDI	
APPENDIX	A.	Rapids Camp Lodge Drinking Water Prot	tection Area (Map A)
	B.	Contaminant Source Inventory for Rapids Contaminant Source Inventory and Risk I Bacteria and Viruses (Table 2) Contaminant Source Inventory and Risk I Nitrates/Nitrites (Table 3) Contaminant Source Inventory and Risk I Volatile Organic Chemicals (Table 4)	Ranking for Rapids Camp Lodge – Ranking for Rapids Camp Lodge – Ranking for Rapids Camp Lodge –
	C.	Rapids Camp Lodge Drinking Water Pro and Existing Contaminant Sources (I	
	D.	Vulnerability Analysis for Contaminant S Rapids Camp Lodge Public Drinking	

### Source Water Assessment for Rapids Camp Lodge Source of Public Drinking Water, King Salmon, Alaska

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

#### **EXECUTIVE SUMMARY**

The Rapids Camp Lodge has one Public Water System (PWS) well. The well (PWSID# 263025.001) 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 is located on the shores of the Naknek River, approximately 15-miles from the King Salmon Airport, in King Salmon, Alaska. This system operates seasonally and serves approximately 300 non-residents and one resident through four service connections. Available records indicate that there is no secondary storage of drinking water, other than a pressure tank, and that the untreated drinking water is derived directly from the wellhead. The wellhead received a susceptibility rating of Verv High and the aguifer received a susceptibility rating of 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, and aboveground fuel tanks. 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 Very **High** for nitrates and nitrites, and a vulnerability rating of High for volatile organic chemicals contaminant categories.

# RAPIDS CAMP LODGE PUBLIC DRINKING WATER SYSTEM

The Rapids Camp Lodge water well is a Class B (transient/non-community) public water system. The lodge is located on the shores of the Naknek River, approximately 15-miles from the King Salmon Airport, in King Salmon, Alaska (Sec. 5, T18S, R44W, 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). 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 Rapids Camp Lodge PWS, the depth of the primary water well is 136 feet below the ground surface and is likely screened in an unconfined aquifer based on available construction details. Unconfined aquifers are more susceptible to groundwater impacts resulting from the downward migration of surface contaminants. Based on available data for PWSID's in the local area, the well is assumed to be screened in a gravelly-sandy material. The well is located in a floodplain.

Information acquired from a May 1999 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 not 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).

# RAPIDS CAMP 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 Rapids Camp 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	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 Rapids Camp Lodge PWS was determined using an analytical calculation and includes Zone 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 Rapids Camp 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
- Verv 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 RAPIDS CAMP 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 Rapids Camp Lodge'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 both wells in this PWS.

Table 2. Susceptibility

	Score	Rating
Susceptibility of the	25	Very High
Wellhead		
Susceptibility of the	16	High
Aquifer		
Natural Susceptibility	41	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	41	Very High
Volatile Organic Chemical	ls 24	Medium

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	80	Very High
Nitrates and Nitrites	80	Very High
Volatile Organic Chemicals	65	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 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 remains **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 remains **Very High**.

### **Volatile Organic Chemicals**

The contaminant risk for volatile organic chemicals is **Medium**. The risk is primarily attributed to the presence of aboveground fuel tanks located in Zone A. 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 Rapids Camp 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 remains **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 Rapids Camp 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.

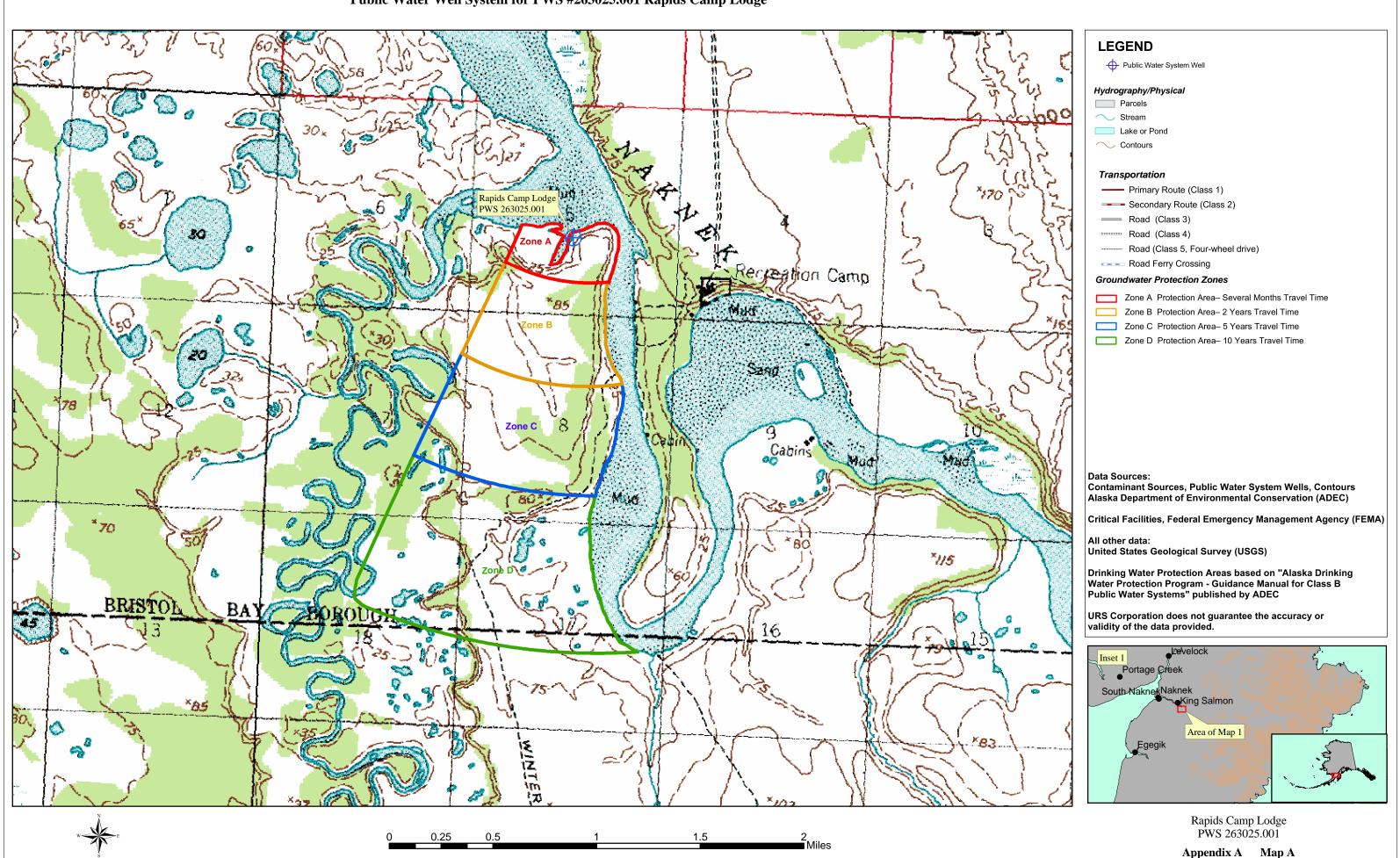
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# **APPENDIX A**

# Drinking Water Protection Area Location Map (Map A)

### Public Water Well System for PWS #263025.001 Rapids Camp Lodge



## **APPENDIX B**

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

### Table 1

## Contaminant Source Inventory for Rapids Camp 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, aviation fuel (above ground)	T02	T02-01	A	С	
Tanks, gasoline (above ground)	T10	T10-01	A	С	
Tanks, heating oil, nonresidential (aboveground)	T14	T14-01	A	С	

PWSID 263025.001

### Table 2

## Contaminant Source Inventory and Risk Ranking for Rapids Camp 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	

PWSID 263025.001

### Table 3

# Contaminant Source Inventory and Risk Ranking for Rapids Camp 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	

### Table 4

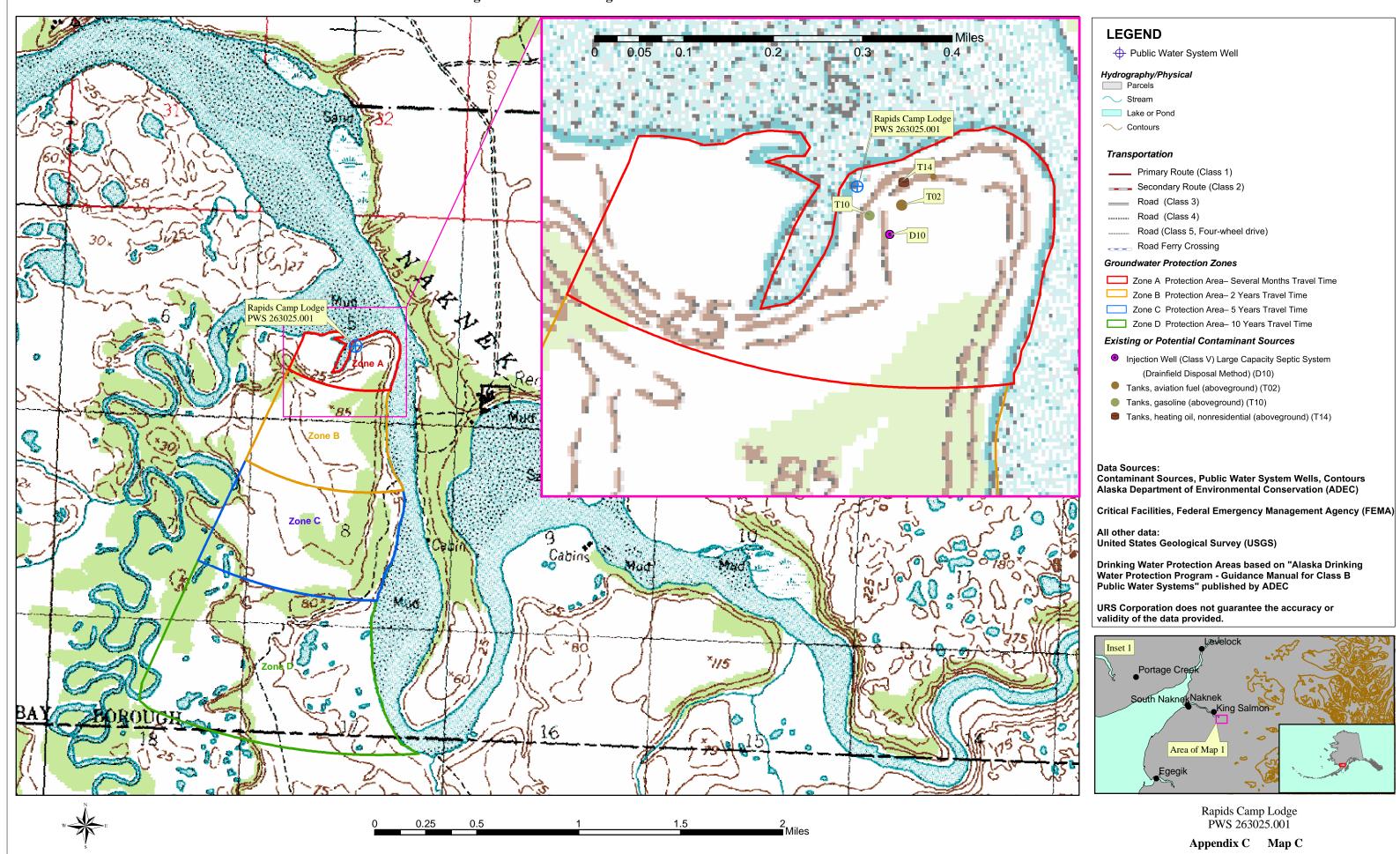
# Contaminant Source Inventory and Risk Ranking for Rapids Camp Lodge Sources of Volatile Organic Chemicals

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, aviation fuel (above ground)	T02	T02-01	A	Medium	C	
Tanks, gasoline (above ground)	T10	T10-01	A	Medium	С	
Tanks, heating oil, nonresidential (aboveground)	T14	T14-01	A	Low	С	

# **APPENDIX C**

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

### Public Water Well System for PWS #263025.001 Rapids Camp Lodge Showing Potential and Existing Sources of Contamination



# **APPENDIX D**

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

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

Chart 1. Susceptibility of the wellhead - Rapids Camp (PWS No. 263025.001)

Chart 2. Susceptibility of the aquifer Rapids Camp (PWS No. 263025.001)

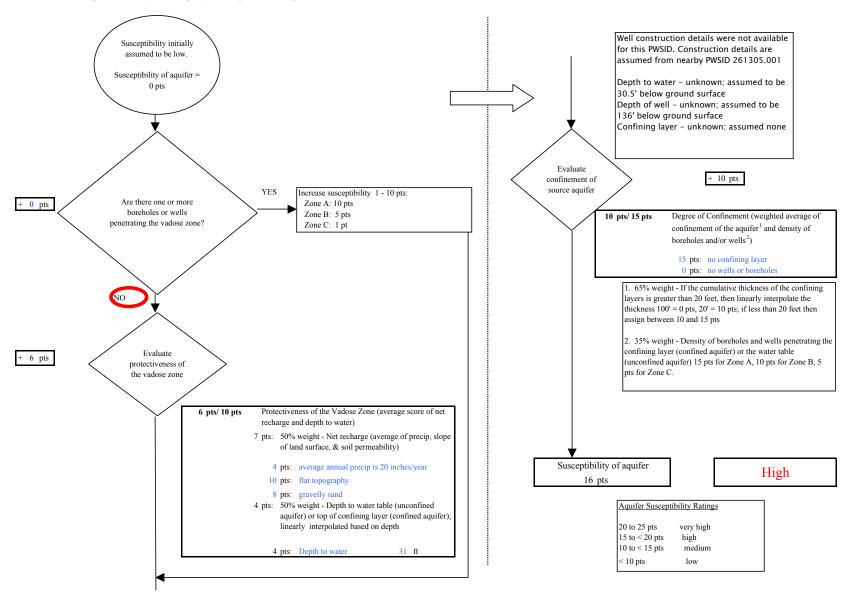


Chart 3. Contaminant risks for Rapids Camp (PWS No. 263025.001) - Bacteria & Viruses

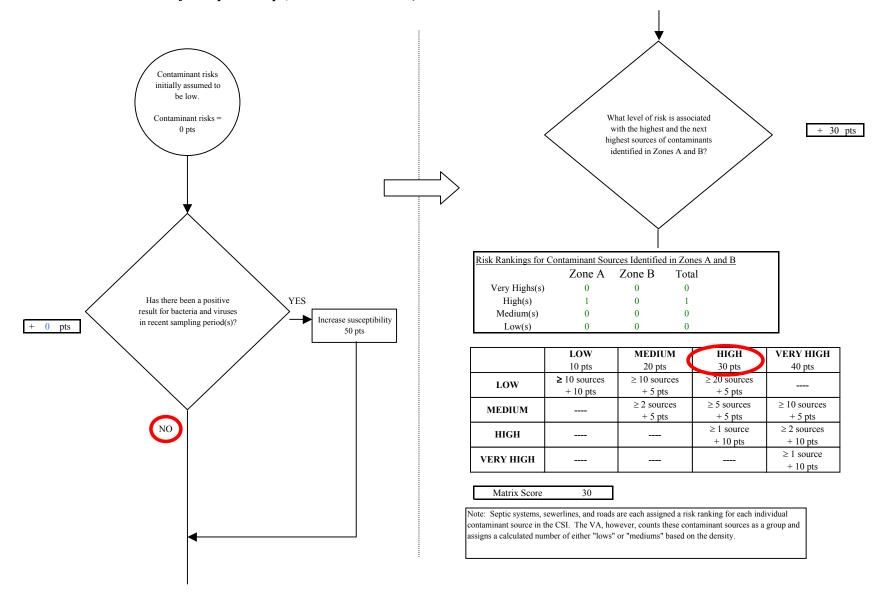


Chart 3. Contaminant risks for Rapids Camp (PWS No. 263025.001) - Bacteria & Viruses NO Are there sufficient Initial assessment of risk posed by Risk unchanged controls, conditions, or potential sources of contamination monitoring to warrant = 30 pts downgrading risk? Are any YES significant Risk unchanged 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 ptshigh Very High  $20 \text{ to} \le 30 \text{ pts}$ 

Page 4 of 13

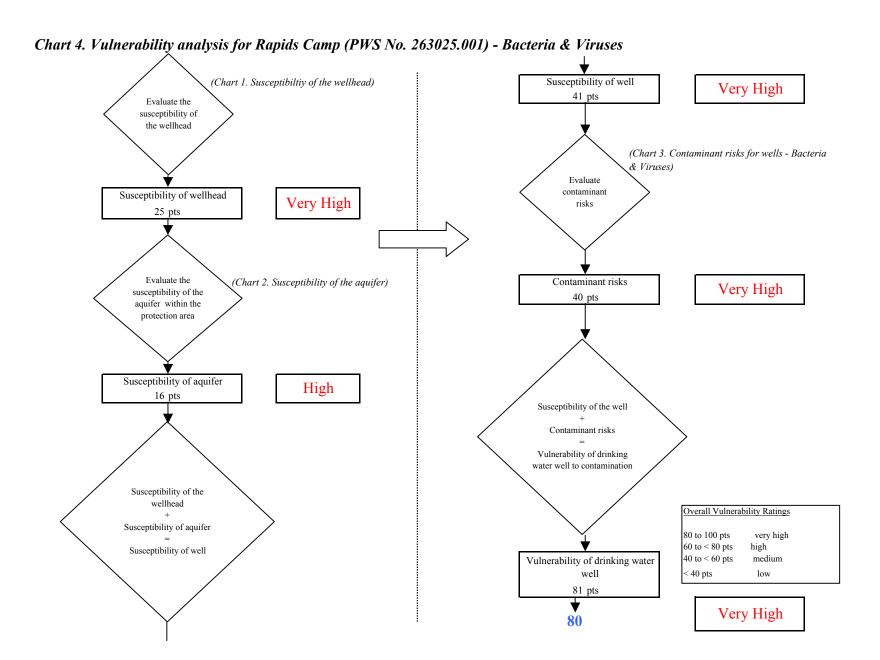
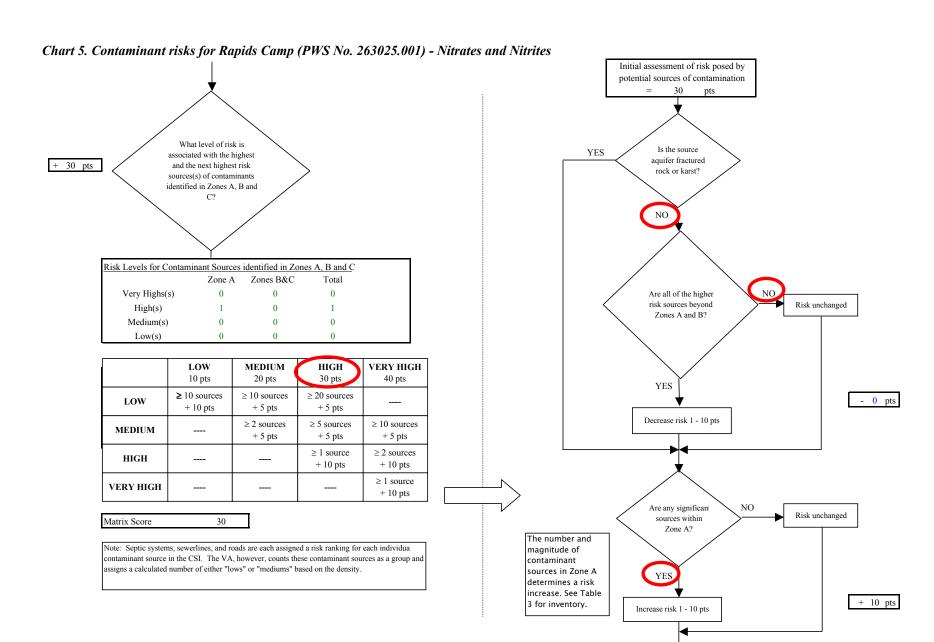
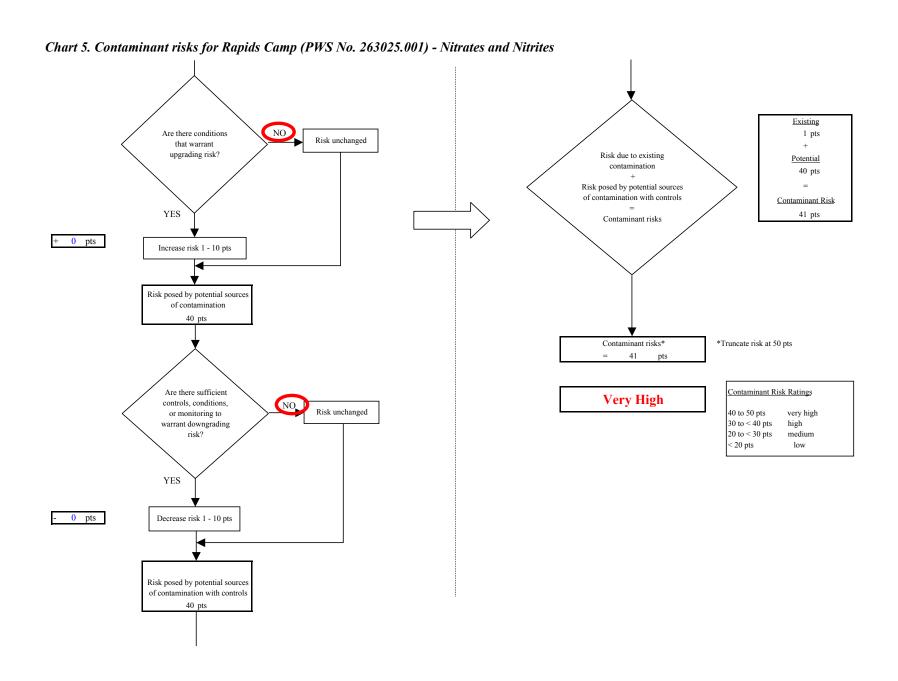


Chart 5. Contaminant risks for Rapids Camp (PWS No. 263025.001) - Nitrates and Nitrites Contaminant risks initially assumed to be low. Current level of Evaluate the level of Contaminant risks background contamination due to man-= 0 pts contamination from made source(s) natural sources Is the concentration 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) 6/3/2003 6/11/2002 ND The nitrate concentration 6/12/2001 ND is assumed to be natural if 12/19/2000 0.25 less than 2 mg/L (20%) 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 sources made sources [MCL = 50 pts; detect = 0 pts]1 pts Risk due to existing contamination 1 pts Was the source of Evaluate the level of NO. contamination contamination from natural? man-made sources





Page 8 of 13

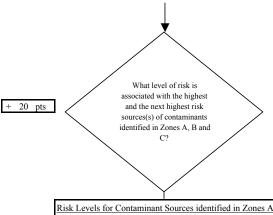
Chart 6. Vulnerability analysis for Rapids Camp (PWS No. 263025.001) - Nitrates and Nitrites (Chart 1. Susceptibiltiy of the wellhead) Susceptibility of well Very High 41 pts Evaluate the susceptibility of the wellhead (Chart 5. Contaminant risks for wells - Nitrates and Nitrites) Evaluate Susceptibility of wellhead contaminant risks Very High 25 pts Evaluate the (Chart 2. Susceptibility of the aquifer) Contaminant risks Very High susceptibility of the 41 pts aquifer within the protection area Susceptibility of aquifer High 16 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 82 pts Very High **80** 

Page 9 of 13

Chart 7. Contaminant risks for Rapids Camp (PWS No. 263025.001) - 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 pts contamination 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 Maximum Contaminant Level (MCL) = ?? mg/LDetected ???? 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 Risk due to existing contamination 0 pts Was the source of Evaluate the level of NO. contamination contamination from natural? man-made sources YES

Page 10 of 13

Chart 7. Contaminant risks for Rapids Camp (PWS No. 263025.001) - Volatile Organic Chemicals



Levels for Contam	ninant Sources	identified in Zone	s A, B and C
	Zone A	Zones B&C	Total
Very Highs(s)	0	0	0
High(s)	0	0	0
Medium(s)	2	0	2
Low(s)	2	0	2

	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 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.

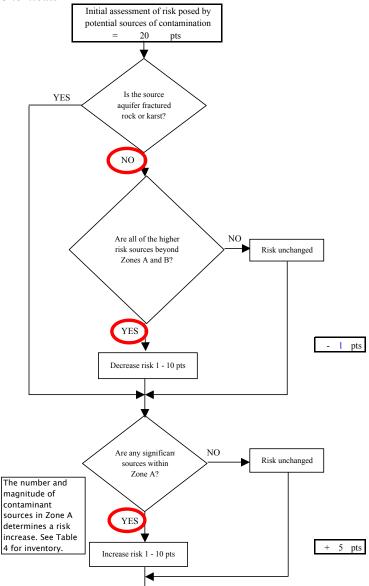


Chart 7. Contaminant risks for Rapids Camp (PWS No. 263025.001) - Volatile Organic Chemicals Existing NO Are there conditions 0 pts Risk unchanged that warrant upgrading risk? Risk due to existing Potential contamination 24 pts Risk posed by potential sources of contamination with controls Contaminant Risk YES 24 pts Contaminant risks 0 pts Increase risk 1 - 10 pts Risk posed by potential sources of contamination 24 pts \*Truncate risk at 50 pts Contaminant risks\* 24 Contaminant Risk Ratings Are there sufficient Medium controls, conditions, NO Risk unchanged or monitoring to 40 to 50 pts very high 30 to < 40 pts warrant downgrading high 20 to < 30 pts risk? medium < 20 pts low YES 0 pts Decrease risk 1 - 10 pts Risk posed by potential sources of contamination with controls

Page 12 of 13

Chart 8. Vulnerability analysis for Rapids Camp (PWS No. 263025.001) - Volatile Organic Chemicals (Chart 1. Susceptibiltiy of the wellhead) Susceptibility of well Very High 41 pts Evaluate the susceptibility of the wellhead (Chart 7. Contaminant risks for wells - Volatile Organic Chemicals) Evaluate Susceptibility of wellhead contaminant risks Very High 25 pts Evaluate the (Chart 2. Susceptibility of the aquifer) Contaminant risks Medium susceptibility of the 24 pts aquifer within the protection area Susceptibility of aquifer High 16 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 65 pts High **65** 

Page 13 of 13