



Source Water Assessment

A Hydrogeologic Susceptibility and Vulnerability Assessment for IASD Innoko River School Drinking Water System, Shageluk, Alaska

PWSID # 280058.001

April 2004

DRINKING WATER PROTECTION PROGRAM REPORT 1147 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.

CONTENTS

		MARY1 G WATER SYSTEM1	INVENTORY OF POTENTIAL AND EXISTING CONTAMINANT SOURCES			
		R PROTECTION AREA2	RANKING OF CONTAMINANT RISKS			
			SYSTEM3			
		TABI	LES			
			2			
			3			
			4			
		APPENI	DICES			
APPENDIX	A.	IASD Innoko River School Drinking	Water Protection Area (Map A)			
	В.	Contaminant Source Inventory for IA	SD Innoko River School (Table 1)			
			isk Ranking for IASD Innoko River School –			
		Bacteria and Viruses (Table 2) Contaminant Source Inventory and R Nitrates/Nitrites (Table 3)	isk Ranking for IASD Innoko River School –			
			isk Ranking for IASD Innoko River School –			
		Contaminant Source Inventory and R	isk Ranking for IASD Innoko River School –			
		Heavy Metals, Cyanide and Other Inc Contaminant Source Inventory and R Synthetic Organic Chemicals (Table	isk Ranking for IASD Innoko River School –			
			isk Ranking for IASD Innoko River School –			
	C.	IASD Innoko River School Drinking and Existing Contaminant Source				
	D.		ant Source Inventory and Risk Ranking for ic Drinking Water Source (Charts 1 – 14)			

Source Water Assessment for IASD Innoko River School Source of Public Drinking Water, Shageluk, Alaska

Drinking Water Protection Program Alaska Department of Environmental Conservation

EXECUTIVE SUMMARY

The IASD Innoko River School has one Public Water System (PWS) well. The well (PWS No. 280058.001) has been used as a drinking water source since it was drilled in 1987.

The well is a Class A (community and non-transient non-community) water system located on Main Street in Shageluk, Alaska. Available records indicate that there is secondary storage of drinking water, with a capacity of 3,200-gallons, and that the untreated drinking water source is derived directly from the wellhead. This system operates seasonally and serves approximately 50 non-residents through one service connection. 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 public drinking water source include: motor/motor vehicle repair shops, domestic wastewater treatment plant disposal ponds/lagoons, nonresidential pit toilets, a landfill, aboveground fuel tanks, a cemetery, municipal or city parks, a petroleum product bulk station/terminal, and roads. These identified potential and existing sources of contamination are 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 contaminant categories.

Overall, the water well received a vulnerability rating of **High** for the bacteria and viruses, nitrates and nitrites, volatile organic chemicals, synthetic organic chemicals, and other organic chemicals, and a vulnerability rating of **Medium** for heavy metals, cyanide and other inorganic chemicals.

PUBLIC DRINKING WATER SYSTEM

The IASD Innoko River School well is a Class A (community/non-transient/non-community) public

water system. The system is located on Main Street in Shageluk, Alaska (Sec. 26, T30N, R55W, Seward Meridian; see Map A of Appendix A). Shageluk is located on the east bank of the Innoko River, approximately 20 miles east of Anvik and 34 miles northeast of Holy Cross. The Innoko River is a tributary of the Yukon River. The community has a population of 146 (ADCED, 2003). Average annual precipitation in Shageluk is 67 inches, including approximately 110 inches of snowfall. Temperatures range from 42 to 80°F in summer and -62 to 0°F in winter.

The community of Shageluk obtains most of their water supply from a community well. Most households dispose of honeybuckets in pit privies or bunkers (ADCED, 2003). Shageluk receives electrical power from AVEC, operated by the REA Cooperative. Power generating facilities are fueled by diesel. Refuse is collected by individuals and transported to the landfill (ADCED, 2003).

According to information supplied by ADEC for the IASD Innoko River School PWS, the depth of the primary water well is 82 feet below the ground surface and is screened in a confined aquifer based on available construction details. The well is not located within a floodplain.

Information acquired from a January 2003 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 the potential of contaminant migration down the well casing annulus. The sanitary survey indicates that it is unknown if 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 Innoko lowlands are described as a group of flat floodplains whose bounding slopes are generally steep banks cut into the surrounding hills. Surface soil deposits in the area include stream and beach deposits. The region surrounding the community is reported to be underlain by moderately thin to thick permafrost, with various pockets of thawed soils (URS Corporation, 2001).

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 IASD Innoko River School 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 A 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	¹ / ₄ 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 IASD Innoko River School PWS was determined using an analytical calculation and includes Zone A (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 IASD Innoko River School 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 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,
- Other 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, volatile organic chemicals, heavy metals, cyanide and other inorganic chemicals, synthetic organic chemicals, and other organic chemicals.

VULNERABILITY OF THE 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 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. Chart 4 contains 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.

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 IASD Innoko River School'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 this PWS.

Table 2. Susceptibility

	Score	Rating
Susceptibility of the	5	Low
Wellhead		
Susceptibility of the	13	Medium
Aquifer		
Natural Susceptibility	18	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	50	Very High
Nitrates and/or Nitrites	50	Very High
Volatile Organic Chemical	s 50	Very High
Heavy Metals, Cyanide an	d	
Other Inorganic Chemicals	40	Very High
Synthetic Organic Chemica	als 50	Very High
Other Organic Chemicals	50	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)

Ŧ

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 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	70	High
Nitrates and Nitrites	70	High
Volatile Organic Chemicals	70	High
Heavy Metals, Cyanide and		
Other Inorganic Chemicals	55	Medium
Synthetic Organic Chemicals	70	High
Other Organic Chemicals	70	High

Bacteria and Viruses

The contaminant risk for bacteria and viruses is **Very High**. The risk is primarily attributed to the presence of a landfill and a domstic wastewater treatment plant disposal pond/lagoon Zone A (see Table 2 – Appendix B).

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

After combining the contaminant risk for bacteria and viruses with the natural susceptibility of the well, the overall vulnerability of the well to contamination is **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 a landfill and a domestic wastewater treatment disposal pond/lagoon 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. Although the nitrate source is unknown, such occurrences may be attributed to septic systems or other sources. After combining the contaminant risk for nitrates and nitrites with the natural susceptibility of the well, the overall vulnerability of the well to nitrate and nitrite contamination is **High**.

Volatile Organic Chemicals

The contaminant risk for volatile organic chemicals is **Very High**. The risk is primarily attributed to the presence of a landfill and a petroleum product bulk station/terminal located in Zone A. Numerous other potential contaminant sources are also found within the protection area (see Table 4 – Appendix B).

All recent sampling data for VOCs were below detection levels for the IASD Innoko River School (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 **High**.

Heavy Metals, Cyanide and Other Inorganic Chemicals

The contaminant risk for heavy metals, cyanide and other inorganic chemicals is **Very High**. The risk is primarily attributed to the presence of a landfill located in Zone A. Numerous other potential contaminant sources are also found within the protection area (see Table 5 – Appendix B).

Based on review of recent sampling records for this public water system, moderate levels of copper and lead have been detected in recent sampling history, but have not exceeded their respective MCLs of 1.3 mg/L and 0.015 mg/L (see Chart 9 – Contaminant Risks for Heavy Metals, Cyanide, and Other Inorganic Chemicals in Appendix D).

The reported concentrations of copper and lead in recent sampling events are not likely to be representative of source water conditions. These two analytes are likely attributed to either the water treatment process or water distribution network; therefore, no risk points were assigned based on the presence of these analytes.

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 **Medium**.

Synthetic Organic Chemicals

The contaminant risk for synthetic organic chemicals is **Very High**. The risk is primarily attributed to the presence of a landfill located in Zone A. Numerous other potential contaminant sources are also found within the protection area (see Table 6 – Appendix B).

No recent sampling data was available in ADEC records for the IASD Innoko River School (See Chart 11 – Contaminant Risks for Synthetic Organic Chemicals in Appendix D).

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 **High**.

Other Organic Chemicals

The contaminant risk for other organic chemicals is **Very High**. The risk is primarily attributed to the presence of a landfill and a petroleum product bulk station/terminal located in Zone A. Numerous other potential contaminant sources are also found within the protection area (see Table 7 – Appendix B).

No recent sampling data was available in ADEC records for the IASD Innoko River School (See Chart 13 – Contaminant Risks for Other Organic Chemicals in Appendix D).

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 **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 IASD Innoko River School and the community of Shageluk 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.

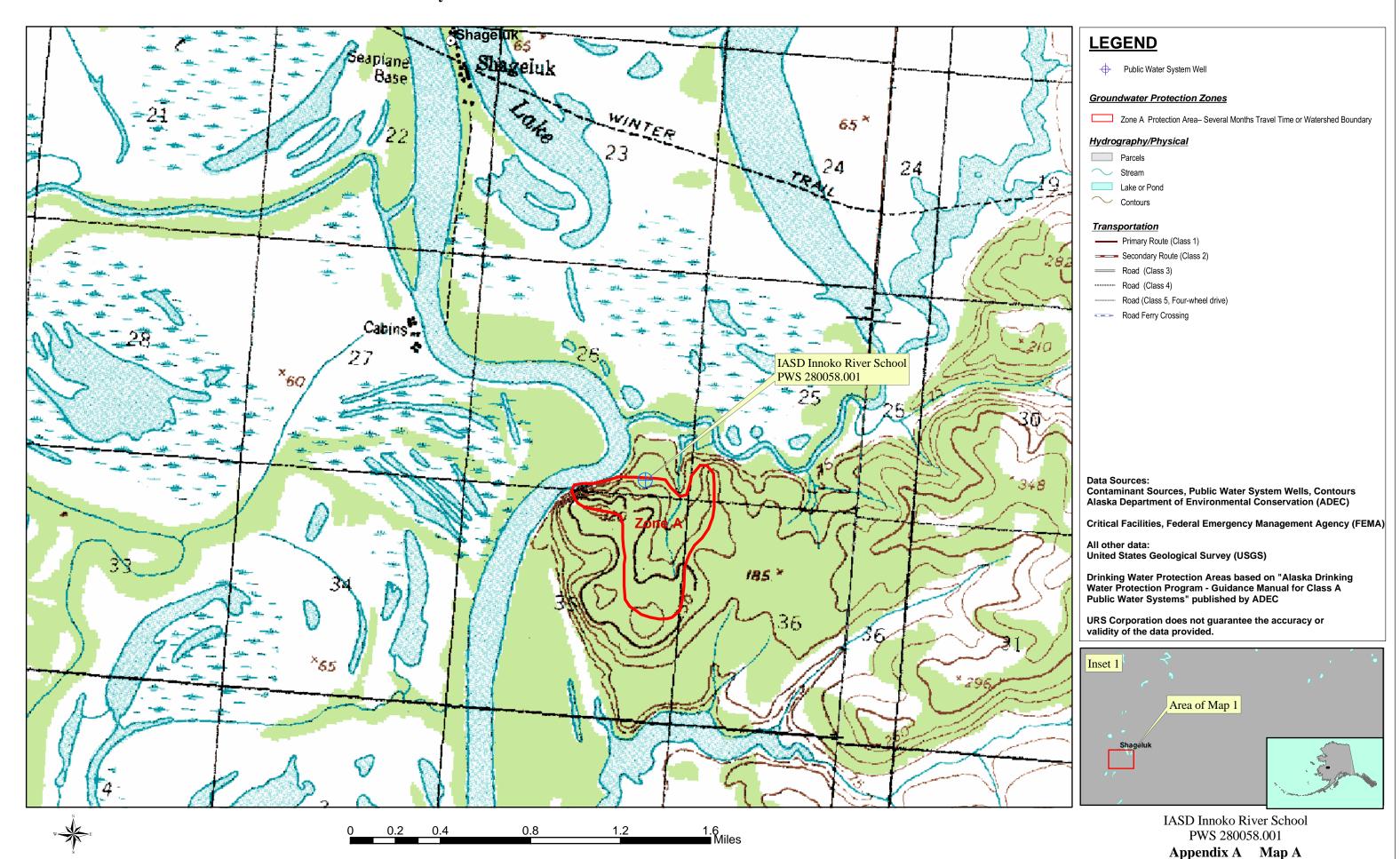
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APPENDIX A

Drinking Water Protection Area Location Map (Map A)

Public Water Well System for PWS #280058.001 IASD Innoko River School



APPENDIX B

Contaminant Source Inventory and Risk Ranking (Tables 1-7)

Contaminant Source Inventory for IASD Innoko River School

PWSID 280058.001

Contaminant Source Type	Contaminant Source ID	CS ID tag	Zone	Map Number	Comments
Motor /motor vehicle repair shops	C31	C31-01	A	C	School Shop
Domestic wastewater treatment plant disposal ponds/lagoons	D02	D02-01	A	С	
Pit toilets (open hole), nonresidential (one or more)	D16	D16-01	A	С	Assume 3 or less honeybucket pits/bunkers located in Zone A
Landfills (municipal; Class III)	D51	D51-01	A	С	
Tanks, heating oil, residential (above ground)	R08	R08-01	A	С	Assume 5 or less residential heating oil tanks in Zone A
Tanks, heating oil, nonresidential (aboveground)	T14	T14-01	A	С	IASD Satellite
Tanks, heating oil, nonresidential (aboveground)	T14	T14-02	A	С	IASD
Cemeteries	X01	X01-01	A	С	
Municipal or city parks (with green areas)	X04	X04-01	A	С	
Petroleum product bulk station/terminals	X11	X11-01	A	С	IASD
Highways and roads, dirt/gravel	X24	X24-01	A	С	Assume 1-20 roads in Zone A

Contaminant Source Inventory and Risk Ranking for IASD Innoko River School Sources of Bacteria and Viruses

Contaminant Source Type	Contaminant Source ID	CS ID tag	Zone	Risk Ranking for Analysis	Map Number	Comments
Domestic wastewater treatment plant disposal ponds/lagoons	D02	D02-01	A	High	С	
Pit toilets (open hole), nonresidential (one or more	D16	D16-01	A	Medium	C	Assume 3 or less honeybucket pits/bunkers located in Zone A
Landfills (municipal; Class III)	D51	D51-01	A	High	С	
Municipal or city parks (with green areas)	X04	X04-01	A	Medium	С	
Highways and roads, dirt/gravel	X24	X24-01	A	Low	С	Assume 1-20 roads in Zone A

Contaminant Source Inventory and Risk Ranking for IASD Innoko River School Sources of Nitrates/Nitrites

Contaminant Source Type	Contaminant Source ID	CS ID tag	Zone	Risk Ranking for Analysis	Map Number	Comments
Domestic wastewater treatment plant disposal ponds/lagoons	D02	D02-01	A	High	С	
Pit toilets (open hole), nonresidential (one or more	D16	D16-01	A	Medium	С	Assume 3 or less honeybucket pits/bunkers located in Zone A
Landfills (municipal; Class III)	D51	D51-01	A	Very High	С	
Cemeteries	X01	X01-01	A	Medium	С	
Municipal or city parks (with green areas)	X04	X04-01	A	Medium	С	
Highways and roads, dirt/gravel	X24	X24-01	A	Low	С	Assume 1-20 roads in Zone A

Contaminant Source Inventory and Risk Ranking for IASD Innoko River School Sources of Volatile Organic Chemicals

Contaminant Source Type	Contaminant Source ID	CS ID tag	Zone	Risk Ranking for Analysis	Map Number	Comments
Motor /motor vehicle repair shops	C31	C31-01	A	Medium	С	School Shop
Domestic wastewater treatment plant disposal ponds/lagoons	D02	D02-01	A	Low	С	
Pit toilets (open hole), nonresidential (one or more	D16	D16-01	A	Low	C	Assume 3 or less honeybucket pits/bunkers located in Zone A
Landfills (municipal; Class III)	D51	D51-01	A	High	C	
Tanks, heating oil, residential (above ground)	R08	R08-01	A	Medium	C	Assume 5 or less residential heating oil tanks in Zone A
Tanks, heating oil, nonresidential (aboveground)	T14	T14-01	A	Low	С	IASD Satellite
Tanks, heating oil, nonresidential (aboveground)	T14	T14-02	A	Low	С	IASD
Petroleum product bulk station/terminals	X11	X11-01	A	Very High	С	IASD
Highways and roads, dirt/gravel	X24	X24-01	A	Low	С	Assume 1-20 roads in Zone A

Table 5

Contaminant Source Inventory and Risk Ranking for IASD Innoko River School Sources of Heavy Metals, Cyanide and Other Inorganic Chemicals

Contaminant Source Type	Contaminant Source ID	CS ID tag	Zone	Risk Ranking for Analysis	Map Number	Comments
Motor /motor vehicle repair shops	C31	C31-01	A	Medium	С	School Shop
Domestic wastewater treatment plant disposal ponds/lagoons	D02	D02-01	A	Low	С	
Pit toilets (open hole), nonresidential (one or more	D16	D16-01	A	Low	C	Assume 3 or less honeybucket pits/bunkers located in Zone A
Landfills (municipal; Class III)	D51	D51-01	A	High	С	
Tanks, heating oil, nonresidential (aboveground)	T14	T14-01	A	Low	С	IASD Satellite
Tanks, heating oil, nonresidential (aboveground)	T14	T14-02	A	Low	С	IASD
Cemeteries	X01	X01-01	A	Low	С	
Municipal or city parks (with green areas)	X04	X04-01	A	Low	С	
Petroleum product bulk station/terminals	X11	X11-01	A	Low	С	IASD
Highways and roads, dirt/gravel	X24	X24-01	A	Low	С	Assume 1-20 roads in Zone A

Contaminant Source Inventory and Risk Ranking for IASD Innoko River School Sources of Synthetic Organic Chemicals

Contaminant Source Type	Contaminant Source ID	CS ID tag	Zone	Risk Ranking for Analysis	Map Number	Comments
Domestic wastewater treatment plant disposal ponds/lagoons	D02	D02-01	A	Low	С	
Landfills (municipal; Class III)	D51	D51-01	A	Very High	C	
Cemeteries	X01	X01-01	A	Medium	С	
Municipal or city parks (with green areas)	X04	X04-01	A	Low	С	
Petroleum product bulk station/terminals	X11	X11-01	A	Low	С	IASD

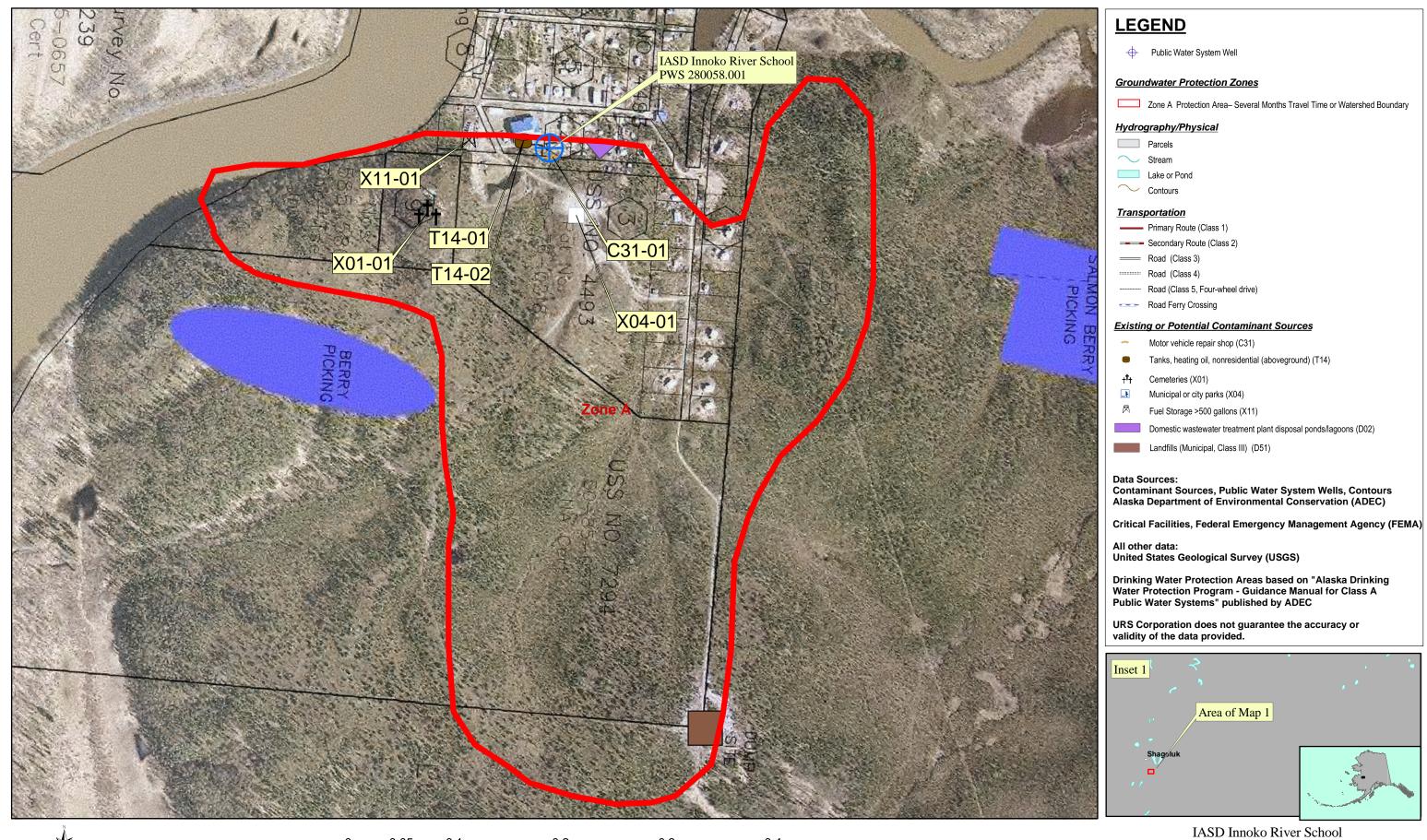
Contaminant Source Inventory and Risk Ranking for IASD Innoko River School Sources of Other Organic Chemicals

Contaminant Source Type	Contaminant Source ID	CS ID tag	Zone	Risk Ranking for Analysis	Map Number	Comments
Motor /motor vehicle repair shops	C31	C31-01	A	Medium	С	School Shop
Domestic wastewater treatment plant disposal ponds/lagoons	D02	D02-01	A	Low	С	
Landfills (municipal; Class III)	D51	D51-01	A	Very High	C	
Petroleum product bulk station/terminals	X11	X11-01	A	High	С	IASD
Highways and roads, dirt/gravel	X24	X24-01	A	Low	С	Assume 1-20 roads in Zone A

APPENDIX C

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

Public Water Well System for PWS #280058.001 IASD Innoko River School Showing Potential and Existing Sources of Contamination



IASD Innoko River School PWS 280058.001 Appendix C Map C

APPENDIX D

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

Susceptibility initially assumed to be low. Susceptibility of wellhead = 0 pts Unknown if well is properly grouted; however, it is assumed well is not grouted based on date of well construction (1987) NO Is the well Increase susceptibility 5 pts + 5 pts properly grouted? Is the well Increase susceptibility 20 pts 0 pts capped? YES YES Susceptibility of wellhead Low 5 pts Increase susceptibility: YES Is the well 10 pts: suspected floodplain + 0 pts within a Wellhead Susceptibility Ratings 20 pts: known floodplain floodplain? 20 to 25 pts very high 15 to < 20 pts 10 to < 15 pts medium NO < 10 pts low Is the land surface sloped Increase susceptibility 5 pts 0 pts away from the

Chart 1. Susceptibility of the wellhead - IASD Innoko River School (PWS No. 280058.001)

Chart 2. Susceptibility of the aquifer IASD Innoko River School (PWS No. 280058.001)

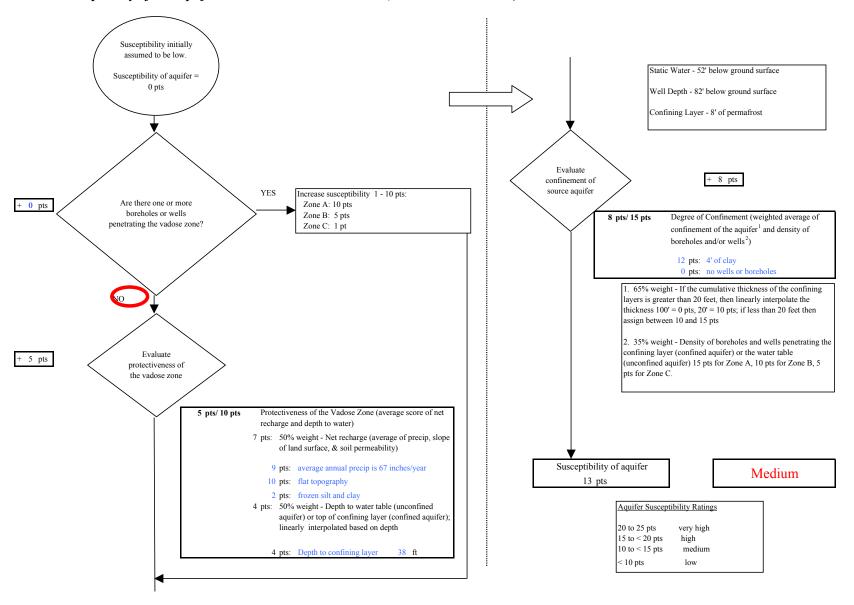


Chart 3. Contaminant risks for IASD Innoko River School (PWS No. 280058.001) - Bacteria & Viruses

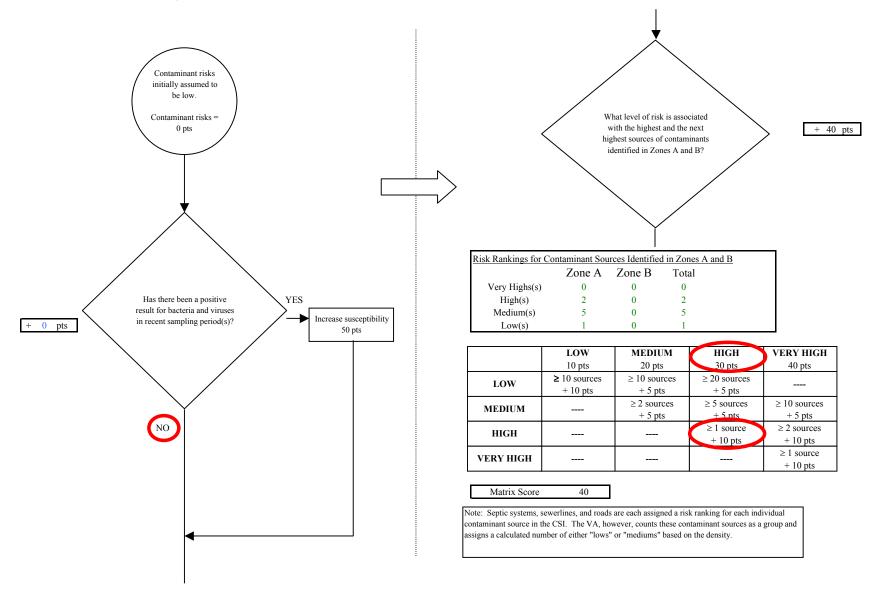


Chart 3. Contaminant risks for IASD Innoko River School (PWS No. 280058.001) - Bacteria & Viruses NO Are there sufficient Initial assessment of risk posed by Risk unchanged controls, conditions, or potential sources of contamination monitoring to warrant = 40 pts downgrading risk? Are any YES significant 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 in YES contamination with controls Zone A determines a risk increase. See Table 2 for 50 + 10 pts Increase risk 1 - 10 pts 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? 50 pts Contaminant risks Contaminant Risk YES 50 pts Increase risk 1 - 10 pts + 0 pts Contaminant risks* * Truncate risk at 50 pts 50 Contaminant Risk Ratings Risk posed by potential sources of contamination 40 to 50 pts very high 50 30 to < 40 pts high Very High $20 \text{ to} \le 30 \text{ pts}$

Page 4 of 25

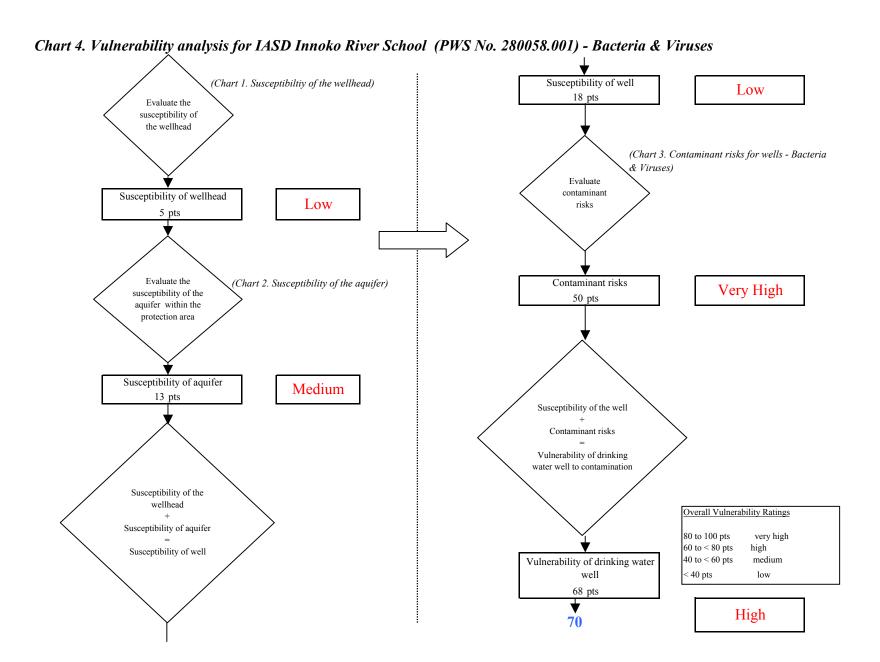
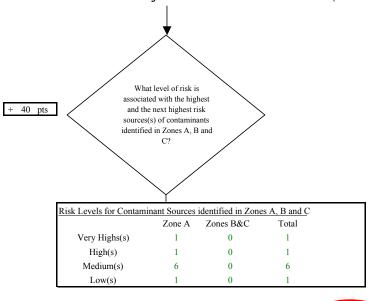


Chart 5. Contaminant risks for IASD Innoko River School (PWS No. 280058.001) - Nitrates and Nitrites Contaminant risks initially assumed to be low. Evaluate the level of Current level of Contaminant risks background contamination due to man-= 0 ptscontamination from made source(s) natural sources 0 pts Is the concentration of NO Has nitrates and/or 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) 1/10/2003 ND 4/8/2002 ND The nitrate concentration is 5/20/1999 ND assumed to be natural if less than 2 mg/L (20%), or Increasing: risk up 1 - 10 pts attributed to man made YES Decreasing: risk down 1 - 5 pts sources if greater than 2 + 0 pts Same: risk unchanged mg/L. 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]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

Chart 5. Contaminant risks for IASD Innoko River School (PWS No. 280058.001) - Nitrates and Nitrites



	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.

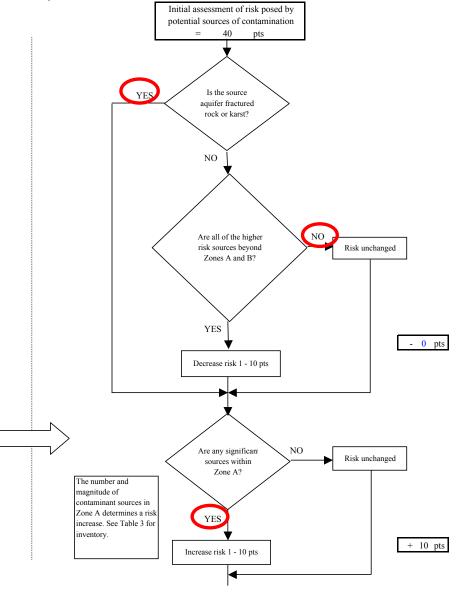
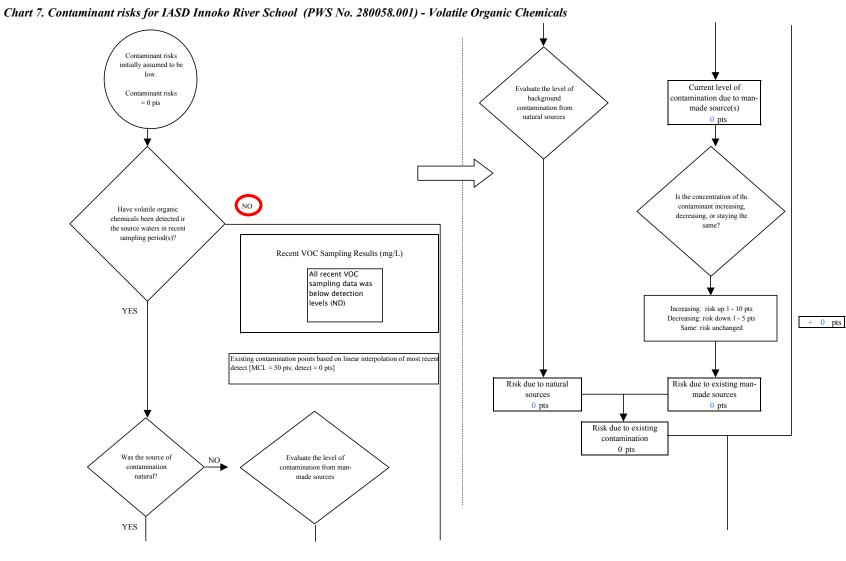


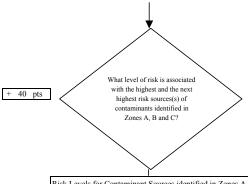
Chart 5. Contaminant risks for IASD Innoko River School (PWS No. 280058.001) - Nitrates and Nitrites Existing NO Are there conditions 0 pts Risk unchanged that warrant upgrading risk? Risk due to existing Potential contamination 50 pts The number and magnitude of Risk posed by potential sources contaminant sources in of contamination with controls Contaminant Risk Zone D determines a risk YES 50 pts increase. See Table 3 for Contaminant risks inventory. 0 pts Increase risk 1 - 10 pts Risk posed by potential sources of contamination 50 pts *Truncate risk at 50 pts Contaminant risks* 50 Contaminant Risk Ratings Are there sufficient Very High controls, conditions, NO. Risk unchanged or monitoring to 40 to 50 pts very high warrant downgrading 30 to < 40 pts 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 8 of 25

Chart 6. Vulnerability analysis for IASD Innoko River School (PWS No. 280058.001) - Nitrates and Nitrites (Chart 1. Susceptibiltiy of the wellhead) Susceptibility of well Low 18 pts Evaluate the susceptibility of the wellhead (Chart 5. Contaminant risks for wells - Nitrates and Nitrites) Evaluate Susceptibility of wellhead contaminant risks Low 5 pts Evaluate the (Chart 2. Susceptibility of the aquifer) Contaminant risks Very High susceptibility of the 50 pts aquifer within the protection area Susceptibility of aquifer Medium 13 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 68 pts High **70**





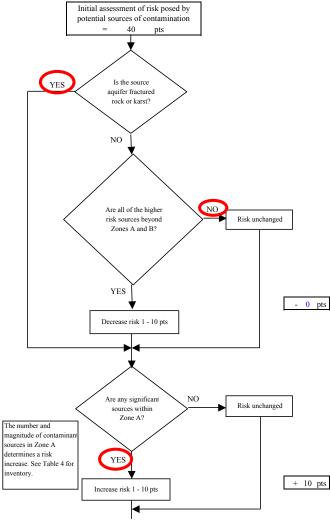


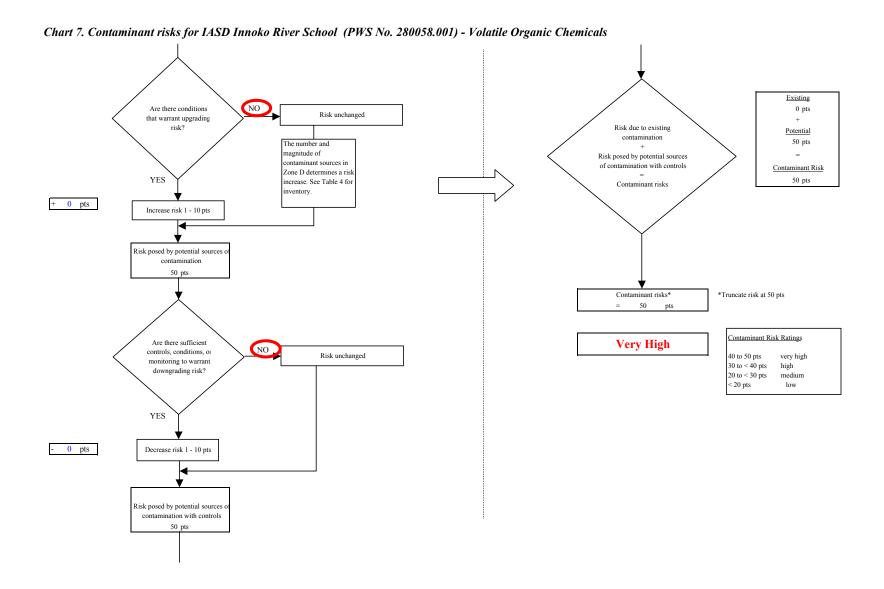
Risk Levels for Contam	inant Sources	identified in Zones A,	B and C
	Zone A	Zones B&C	Total
Very Highs(s)	1	0	1
High(s)	1	0	1
Medium(s)	7	0	7
Low(s)	8	0	8

	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.





Page 12 of 25

Chart 8. Vulnerability analysis for IASD Innoko River School (PWS No. 280058.001) - Volatile Organic Chemicals (Chart 1. Susceptibiltiy of the wellhead) Susceptibility of well Low 18 pts Evaluate the susceptibility of the wellhead (Chart 7. Contaminant risks for wells - Volatile Organic Chemicals) Evaluate Susceptibility of wellhead contaminant risks Low 5 pts Evaluate the (Chart 2. Susceptibility of the aquifer) Contaminant risks Very High susceptibility of the 50 pts aquifer within the protection area Susceptibility of aquifer Medium 13 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 68 pts High **70**

Page 13 of 25

Chart 9. Contaminant risks for IASD Innoko River School (PWS No. 280058.001) - Heavy Metals, Cyanide and Other Inorganic Chemicals Contaminant risks initially assumed to be low. Current level of Evaluate the level of Contaminant risks background contamination due to man-= 0 ptscontamination from made source(s) natural sources 30 pts NO or Is the concentration of The reported Have heavy metals, UNKNOWN the contaminant concentrations of copper cyanide or other inorganic are likely attributed to the increasing, decreasing, chemicals been detected water or staying the same? in the source waters in treatment/conveyance recent sampling Recent Metals Sampling Results system. No risk points period(s)? (mg/L) assigned since the analyte did not exceeded 100% of 6/30/2003 0.12 Copper the MCL in most recent 6/30/1999 0.123 sampling event. Lead 6/30/2003 0.009 YES Increasing: risk up 1 - 10 pts Decreasing: risk down 1 - 5 pts + -30 pts Same: risk unchanged Maximum Contaminant Although other inorganic compounds have Level (MCL) (mg/L) 6 of MCI been detected in previous sampling events, Copper= lead has reported the highest percent MCL values in the past 5 years. Lead= 60% 0.015 Risk due to natural Risk due to existing man-Existing contamination points based on linear sources made sources interpolation of most recent detect [MCL = 50 pts; 0 pts 0 pts detect = 0 ptsRisk due to existing contamination 0 pts Evaluate the level Was the source of of contamination contamination from man-made natural? sources YES

Page 14 of 25

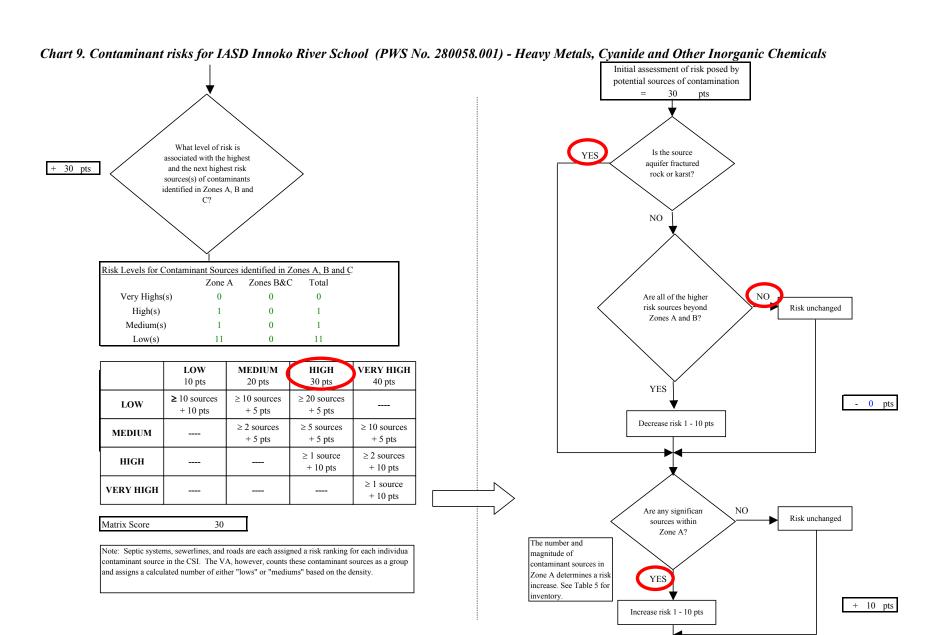


Chart 9. Contaminant risks for IASD Innoko River School (PWS No. 280058.001) - Heavy Metals, Cyanide and Other Inorganic Chemicals Existing NO Are there conditions 0 pts Risk unchanged that warrant upgrading risk? Risk due to existing Potential contamination 40 pts The number and magnitude of Risk posed by potential sources contaminant sources in of contamination with controls Contaminant Risk Zone D determines a YES 40 pts risk increase. See Table Contaminant risks 5 for inventory. 0 pts Increase risk 1 - 10 pts Risk posed by potential sources of contamination 40 pts *Truncate risk at 50 pts Contaminant risks* 40 Are there sufficient Contaminant Risk Ratings Very High controls, conditions, NQ 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

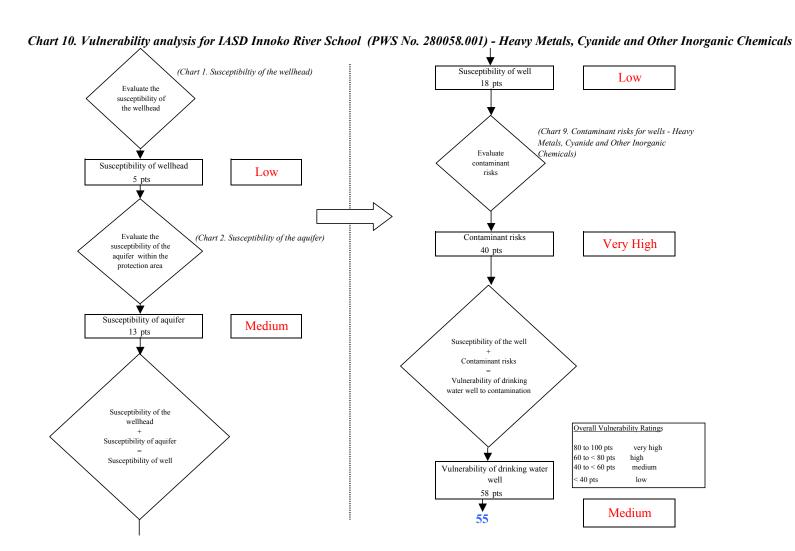


Chart 11. Contaminant risks for IASD Innoko River School (PWS No. 280058.001) - Synthetic Organic Chemicals Contaminant risks initially assumed to be low. Current level of Evaluate the level of Contaminant risks background contamination due to man-= 0 ptscontamination from made source(s) natural sources 0 pts NO or Is the concentration of Have synthetic organic UNKNOWN the contaminant chemicals been detected increasing, decreasing, in the source waters in or staying the same? recent sampling period(s)? Recent SOC Sampling Results (mg/L) No recent SOC sampling data was available in ADEC records for this PWSID Increasing: risk up 1 - 10 pts YES Decreasing: risk down 1 - 5 pts + 0 pts Same: risk unchanged Existing contamination points based on linear interpolation of most recent detect [MCL = 50 pts; detect = 0 pts]Risk due to natural Risk due to existing mansources made sources 0 pts 0 pts Risk due to existing contamination 0 pts Was the source of Evaluate the level of NO. contamination contamination from man-made sources YES

Page 18 of 25

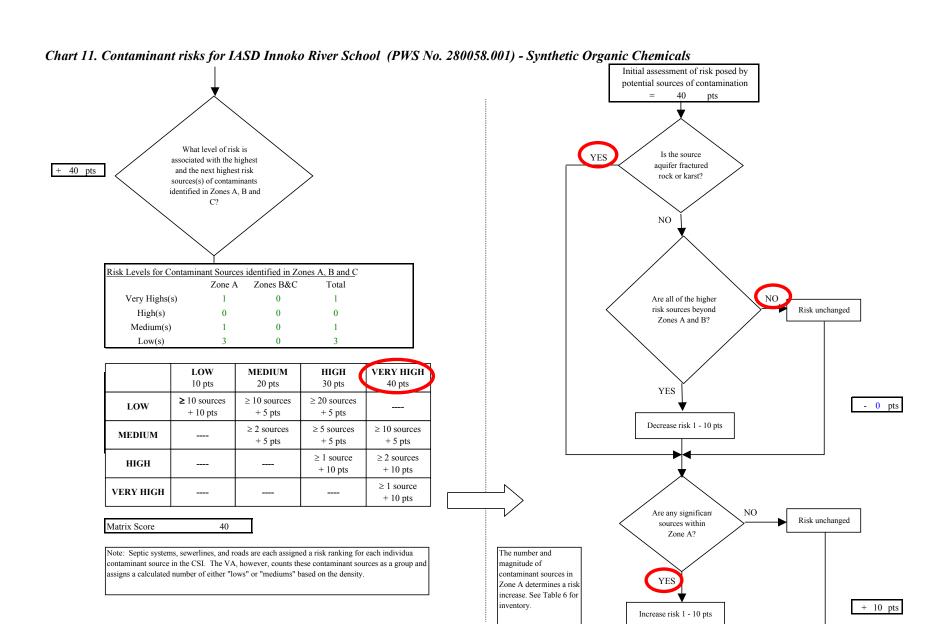
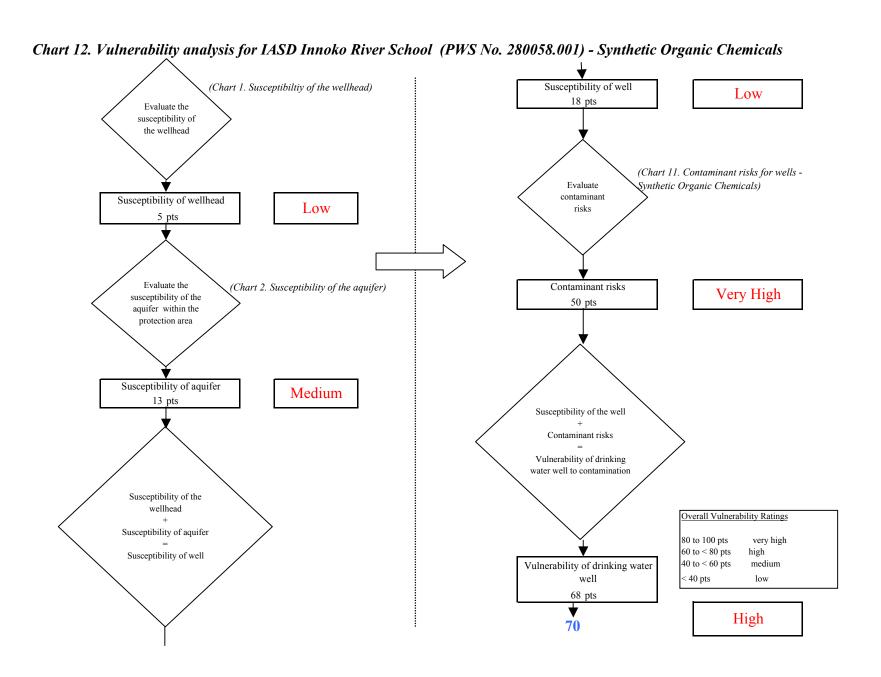


Chart 11. Contaminant risks for IASD Innoko River School (PWS No. 280058.001) - Synthetic Organic Chemicals Existing NO Are there conditions 0 pts Risk unchanged that warrant upgrading risk? Risk due to existing Potential contamination 50 pts The number and magnitude of Risk posed by potential sources contaminant sources in of contamination with controls Contaminant Risk Zone D determines a risk YES 50 pts increase. See Table 6 for Contaminant risks inventory. 0 pts Increase risk 1 - 10 pts Risk posed by potential sources of contamination 50 pts *Truncate risk at 50 pts Contaminant risks* 50 Contaminant Risk Ratings Are there sufficient Very High controls, conditions, NO. Risk unchanged or monitoring to 40 to 50 pts very high warrant downgrading 30 to < 40 pts 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 20 of 25



Page 21 of 25

Chart 13. Contaminant risks for IASD Innoko River School (PWS No. 280058.001) - Other Organic Chemicals Contaminant risks initially assumed to be low. Current level of Evaluate the level of Contaminant risks background contamination due to man-= 0 ptscontamination from made source(s) natural sources 0 pts NO or Is the concentration of Have other organic UNKNOWN the contaminant chemicals been detected increasing, decreasing, in the source waters in or staying the same? recent sampling period(s)? Recent OOC Sampling Results (mg/L) No recent OOC sampling data was available in ADEC records for this PWSID Increasing: risk up 1 - 10 pts YES Decreasing: risk down 1 - 5 pts + 0 pts Same: risk unchanged Existing contamination points based on linear interpolation of most recent detect [MCL = 50 pts; detect = 0 pts]Risk due to natural Risk due to existing mansources made sources 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 22 of 25

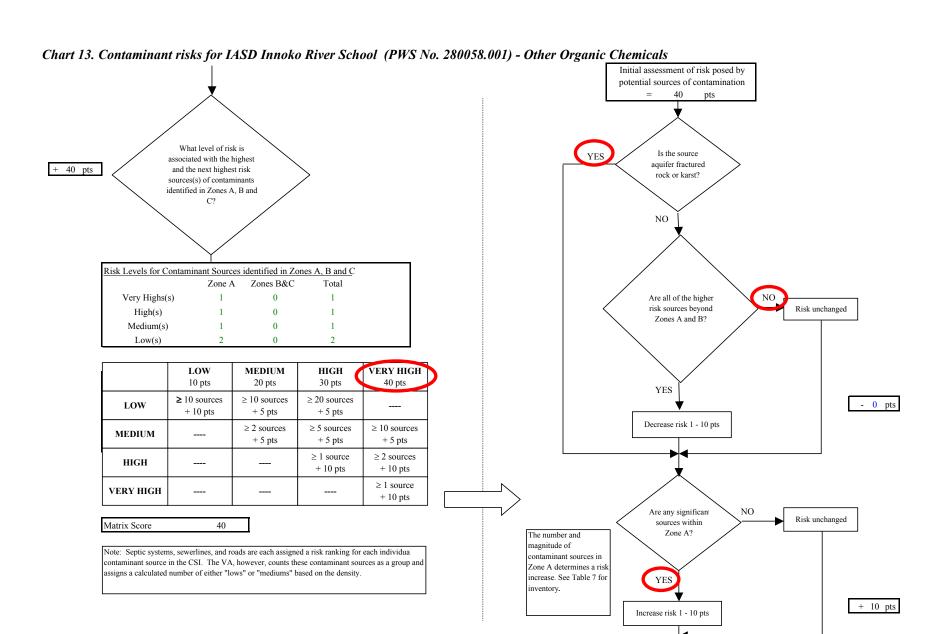


Chart 13. Contaminant risks for IASD Innoko River School (PWS No. 280058.001) - Other Organic Chemicals Existing NO Are there conditions 0 pts Risk unchanged that warrant upgrading risk? Risk due to existing Potential contamination 50 pts The number and magnitude of Risk posed by potential sources contaminant sources in of contamination with controls Contaminant Risk Zone D determines a risk YES 50 pts increase. See Table 7 for Contaminant risks inventory. 0 pts Increase risk 1 - 10 pts Risk posed by potential sources of contamination 50 pts *Truncate risk at 50 pts Contaminant risks* 50 Contaminant Risk Ratings Are there sufficient Very High controls, conditions, NO. Risk unchanged or monitoring to 40 to 50 pts very high warrant downgrading 30 to < 40 pts 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

