



## **Source Water Assessment**

A Hydrogeologic Susceptibility and Vulnerability Assessment for Williwaw Campground No.1 Drinking Water System, Portage Valley, Alaska PWSID # 215362.001

DRINKING WATER PROTECTION PROGRAM REPORT # 334
Alaska Department of Environmental Conservation

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By URS Corporation

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## Source Water Assessment for Williwaw Campground No.1 Source of Public Drinking Water, Portage Valley, Alaska

By URS Corporation

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

#### **EXECUTIVE SUMMARY**

The Williwaw Campground No.1 is a Class B (transient/non-community) water system consisting of one well located at the Williwaw Campground in north central Portage Valley, Alaska. Identified potential and current sources of contaminants for Williwaw Campground No.1 public drinking water source include: vaulted pit toilets, gravel highways and roads, and campgrounds and RV parks. These identified potential and existing sources of contamination are considered sources of bacteria and viruses, nitrates and/or nitrites, and volatile organic chemicals. Overall, the public water sources for Williwaw Campground No.1 received a vulnerability rating of **Medium** for bacteria and viruses and volatile organic chemicals and a **High** for nitrates and nitrites.

#### INTRODUCTION

The Alaska Department of Environmental Conservation (ADEC) is completing source water assessments for all public drinking water sources in the State of Alaska. The purpose of this assessment is to provide owners and/or operators, communities, and local governments with information they can use to preserve the quality of Alaska's public drinking water supplies. The results of this source water assessment can be used to decide where voluntary protection efforts are needed and feasible, and also what efforts will be most effective in reducing contaminant risks to your water system. URS Corporation has been contracted to perform these assessments under the supervision of ADEC.

This source water assessment combines a review of the natural conditions at the site and the potential and existing contaminant risks. These are combined to determine the overall vulnerability of the drinking water source to contamination.

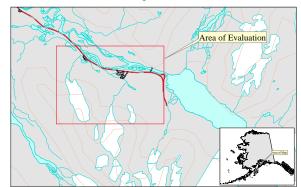
## DESCRIPTION OF PORTAGE VALLEY, ALASKA

#### Location

Portage Valley is located at the eastern edge of Turnagain Arm, which begins where the Cook Inlet divides near Anchorage and extends southeast to the junction of the Kenai Peninsula. The Seward Highway travels along the coast of the arm, connecting Anchorage with the communities of Indian, Bird, Girdwood, and Portage, all located within the Municipality of Anchorage. The communities of Hope and Sunrise are located on the southern side of the Turnagain Arm within the Kenai Peninsula Borough. Most of these communities (Indian, Bird Creek and Girdwood) are also contained within the Chugach State Park. The area north of the arm is bordered by the Chugach Mountains and to the south are the Kenai Mountains. The highest peak, called Turnagain Arm Pass (988 feet) is located almost directly south of Girdwood on the northern portion of the Kenai Peninsula.

Portage Valley and the Turnagain Arm were formed mainly by the erosive force of glaciers.

Figure 1



#### **Precipitation**

Due to the marine air coming from the Gulf of Alaska and Prince William Sound, precipitation tends to be more abundant and winter temperatures warmer in the Turnagain Arm area. Winds are also relatively stronger and more persistent (*Chugach State Park Master Plan*, 1980).

The Kenai Mountains lie in the path of the strong Aleutian lows as they come onshore delivering high precipitation to the coastal areas. A rains shadow effect occurs on the landward side of the mountains (the western side of the ice cap). This results in a mean annual precipitation of 140 inches at sea level on the coastal side of the ice cap, and 60 inches on the landward side of the mountains (Crossen, 1992).

The mean annual temperature, as recorded by weather stations at Whittier and Portage, is 38°F. This includes the area around the northern section of the ice cap from Tebenkov Glacier to Portage Glacier (Crossen, 1992).

#### **Topography and Drainage**

The topography in the site vicinity is typical of valleys formed by glaciation, with a relatively flat to gently sloping valley bottom and steep sidewalls. Relatively steep mountainous terrain comprises more than 90% of the watershed. Elevations range from sea level to just over 3,500 feet.

#### Groundwater

According to the Major Ecosystems of Alaska map (JFSLUPC, 1973), this area lies within the southcentral hydrologic region and the Cook Inlet sub-region. Surface water and groundwater flow is abundant in this area. Based on the USGS, Water Resources Division, groundwater database, groundwater in this area is designated as having existing beneficial uses for domestic and commercial applications.

Although the quality can vary significantly in a short distance, groundwater supplies are abundant in the area. Many homes and businesses in the area rely on individual wells for their water supply. Most of these wells are shallow with depths of 30 feet up to 100 feet. Static water levels in many of these wells are between 4 feet to 20 feet below the surface.

#### **Geology and Soils**

The Kenai Mountains in this area are composed of the Valdez Group, a widely distributed flysch in southcentral Alaska. The group is predominantly dark gray mudstone, siltstone, argillite, and slate, with

sandstone (mostly greywacke) interbeds. The rocks are locally calcareous and highly deformed, showing cleavage development, disrupted beds, and folding. Where sedimentary features are preserved, the sandstones are typically turbidites. The age of the Valdez Group is considered late Cretaceous. The formation consists of clastic debris that is likely shed from an uplifted arc and deposited by turbidity flows in an elongate trench (Crossen, 1992).

The Valdez Group is one of the two rock units making up the Chugach terrane, which is one of the four tectonostratigraphic terranes found in southcentral Alaska. The Kenai Mountains and Kenai Peninsula lie in the present arc-trench gap, between the volcanoes of the Aleutian Range arc and the Aleutian trench. The Kenai-Chugach Range is underlain by an oceanic flysch and mélange accretion complex that records convergent margin history extending back to Triassic time. The Kenai-Chugach Range is largely underlain by subduction rocks and is one of the main topographic features that flank the seaward edge of the forearc basin in southcentral Alaska (Crossen, 1992).

Various Quaternary-age surficial deposits are found in the general area. The origin of these deposits is predominantly glacial, with components of alluvial, colluvial, and lacustrine deposition (Winkler, 1992). The glacier ice mass deposited silt, sand, gravel, cobbles and boulders during multiple glacial advancements and recessions. The soils deposited during the glacial advancements were consolidated by the weight of the ice. During the recessional phase of glaciation, soils consolidated by the ice mass were probably eroded to some degree by melt water, and unconsolidated alluvial materials were deposited.

#### WILLIWAW CAMPGROUND NO.1 PUBLIC DRINKING WATER SYSTEM

Williwaw Campground No.1 is a Class B (transient/non-community) water system. The system consists of one well located west of the Begich Boggs Visitor Center (T8N, R3E, Section 10). This area is at an elevation of approximately 65 feet above sea level.

Based on information contained in a well log completed for Williwaw Campground well No.4, installation of this well is assumed to have occurred in 1993. The well was constructed to a total depth of approximately 42 feet below ground surface in a gravel formation and was completed in 4-inch well casing. The well was installed with a cap providing a sanitary seal. A properly installed sanitary seal may provide protection against contaminants from entering the source waters at the well casing. The land surface is appropriately sloped away from the well providing adequate surface

water drainage. The well was grouted according to ADEC regulations. Proper grouting provides added protection against contaminants traveling along the well casing and into source waters.

This system operates seasonally from May to September and serves more than 40 non-residents through one service connection.

## WILLIWAW CAMPGROUND NO.1 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. Some areas are more likely to allow contamination to reach the well than others. 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 a release of contaminants within the DWPA are most likely to impact the drinking water well, this area will serve as the focus for voluntary protection efforts.

The DWPAs 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. An analytical calculation was used to determine the size and shape of the DWPA. The input parameters describing the attributes of the aquifer in this calculation were adopted from the U.S. Geological Survey (Patrick, Brabets, and Glass, 1989), and State of Alaska Department of Water Resources (Jokela et. al., 1991). Additional methods were also used to take into account any uncertainties in groundwater flow and aquifer characteristics to arrive at a meaningful DWPA (Please refer to the Guidance Manual for Class Bs 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 DWPA zones 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. TOT
В	Less than the 2 year TOT
C	Less Than the 5 year TOT
D	Less than the 10 year TOT
	•

As an example, water moving through the aquifer in Zone B will reach the well in less than 2 years from the time it crosses the outer limit of Zone B.

Zone A also incorporates the area downgradient from the well to take into account the area of the aquifer that is influenced by pumping of the well. Water within the aquifer in Zone A will reach the well in several hours to several months.

## 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 Williwaw Campground No.1 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 assessments, three categories of drinking water contaminants were inventoried. They include:

- Bacteria and viruses;
- Nitrates and/or nitrites; and
- Volatile organic chemicals.

Inventoried potential sources of contamination within Zone A were associated with residential and light industrial type activities. The sources are summarized in the tables in Appendix B.

#### RANKING OF CONTAMINANT RISKS

Once the potential and existing sources of contamination have been identified, they are sorted and ranked 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. Further, contaminant risks are a function of the number and

density of those types of contaminant sources as well as the proximity of those sources to the well.

# VULNERABILITY OF WILLIWAW CAMPGROUND NO.1 DRINKING WATER SOURCE

Vulnerability of a drinking water source to contamination is a combination of two factors:

- Natural susceptibility; and
- Contaminant risks.

Each of the three categories of drinking water contaminants has been analyzed and an overall vulnerability score of 0 to 100 is ultimately assigned:

Natural Susceptibility (0 - 50 points)

+

Contaminant Risks (0 – 50 points)

=

Vulnerability of the Drinking Water Source to Contamination (0 - 100).

A score for the Natural Susceptibility is achieved by analyzing the properties of the well and the aquifer.

Susceptibility of the Wellhead (0 - 25 Points)

+

Susceptibility of the Aquifer (0 - 25 Points)

=

Natural Susceptibility (Susceptibility of the Well) (0-50 Points)

The well for Williwaw Campground No.1 is completed in an unconfined aquifer setting. Because an unconfined aquifer is recharged by surface water and precipitation that migrates downward from the surface, contaminants at the surface have the potential to adversely impact this aquifer. Table 2 shows the Overall Susceptibility score and rating for Williwaw Campground No.1.

Table 2. Natural Susceptibility - Susceptibility of the Wellhead and Aquifer to Contamination

Susceptibility of the	Score 20	Rating Very High
Wellhead Susceptibility of the Aquifer	25	Very High
Natural Susceptibility	45	Very High

Contaminant risks to a drinking water source depend on the type, number or density, and distribution of contaminant sources. This data has been derived from an examination of existing or historical contamination that has been detected at the drinking water source through routine sampling. It also evaluates potential sources of contamination. Table 3 summarizes the Contaminant Risks for each category of drinking water contaminants.

**Table 3. Contaminant Risks** 

Category	Score	Rating
Bacteria and Viruses	12	Low
Nitrates and/or Nitrites	15	Low
Volatile Organic Chemicals	12	Low

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.

Table 3 contains the overall vulnerability scores (0 – 10) 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 of Williwaw Campground No.1 to Contamination by Category

Category Restorie and Virgines	Score	<b>Rating</b> Medium
Bacteria and Viruses Nitrates and Nitrites	55 60	Medium High
Volatile Organic Chemicals	55	Medium

Tables 2 through 5 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.

The vaulted pit toilets, gravel highways and roads, and campgrounds and RV parks create a risk increase for the bacteria and viruses, nitrates and nitrites, and volatile organic chemicals contaminant categories.

Only a small amount of bacteria and viruses are required to endanger public health. Bacteria and viruses (total fecal coliform) were detected during a water sampling of the system at Williwaw Campground No.1 in 1996 and again in 1999. However, re-sampling of the well to confirm the contamination indicted that the bacteria was not present.

Nitrates and/or nitrites are found in natural background concentration at this site, as elsewhere throughout Alaska. Nitrate concentrations in uncontaminated groundwater are typically less than 2 milligrams per liter (mg/L) and are derived primarily from the decomposition of organic matter in soils [Wang, Strelakos, Jokela, 2000].

Sampling history for Williwaw Campground No.1 well indicates that low concentrations of nitrate have been detected (See Chart 5 - Contaminant Risks for Nitrates and/or Nitrites in Appendix D). Existing nitrate concentration is approximately 0.7 mg/L or 7% of the Maximum Contaminant Level (MCL) of 10mg/L. The MCL is the maximum level of contaminant that is allowed to exist in drinking water and still be consumed by humans without harmful health effects. Due to the high solubility and weak retention by soil, nitrates are very mobile, moving at approximately the same rate as water. Though existing nitrate contamination was detected at the site, concentrations remain at very safe levels with respect to human health.

#### **SUMMARY**

A Source Water Assessment has been completed for the sources of public drinking water serving Williwaw Campground No.1. The overall vulnerability of this source to contamination is **Medium** for bacteria and viruses and volatile organic chemicals and **High** for nitrates and nitrites. 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 Williwaw Campground No.1 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 Williwaw Campground No.1 public drinking water source.

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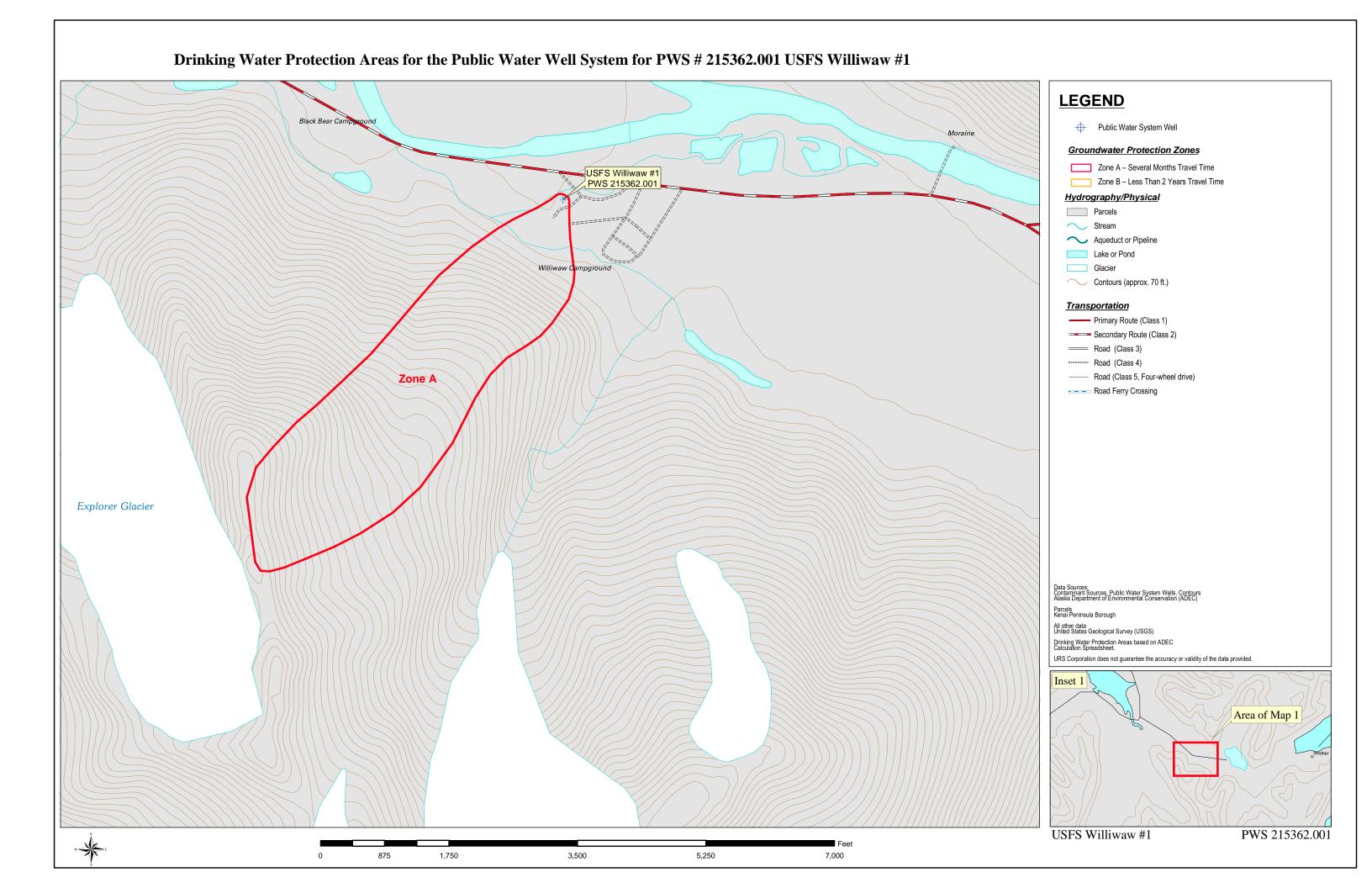
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## **APPENDIX A**

Williwaw Campground No.1 Drinking Water Protection Area (Map 1)



## **APPENDIX B**

## Contaminant Source Inventory and Risk Ranking for Williwaw Campground No.1 (Tables 1-4)

#### Contaminant Source Inventory for USFS Williwaw #1

Contaminant Source Type	Contaminant Source ID	CS ID tag	Zone	Location	Map Number Comments
Pit toilets (vaulted) nonresidential (one or more)	D17	D17-01	A		1
Highways and roads, dirt/gravel	X24	X24-01	A		1
Campgrounds and RV Parks	X35	X35-1	A		1

#### Table 2

## Contaminant Source Inventory and Risk Ranking for USFS Williwaw #1

## Sources of Bacteria and Viruses

Contaminant Source Type	Contaminant Source ID	CS ID tag	Zone	Risk Ranking for Analysis	Overall Rank after Analysis	ap mber Comments
Pit toilets (vaulted) nonresidential (one or more)	D17	D17-01	A	Low	1	1
Campgrounds and RV Parks	X35	X35-1	A	Low	2	1
Highways and roads, dirt/gravel	X24	X24-01	A	Low	3	1

#### Table 3

# Contaminant Source Inventory and Risk Ranking for USFS Williwaw #1

#### Sources of Nitrates/Nitrites

Contaminant Source Type	Contaminant Source ID	CS ID tag	Zone	Risk Ranking for Analysis	Overall Rank after Analysis	Map S Location Number Comments
Pit toilets (vaulted) nonresidential (one or more)	D17	D17-01	A	Low	1	1
Campgrounds and RV Parks	X35	X35-1	A	Low	2	1
Highways and roads, dirt/gravel	X24	X24-01	A	Low	3	1

PWSID 215362.001

#### Table 4

## Contaminant Source Inventory and Risk Ranking for USFS Williwaw #1

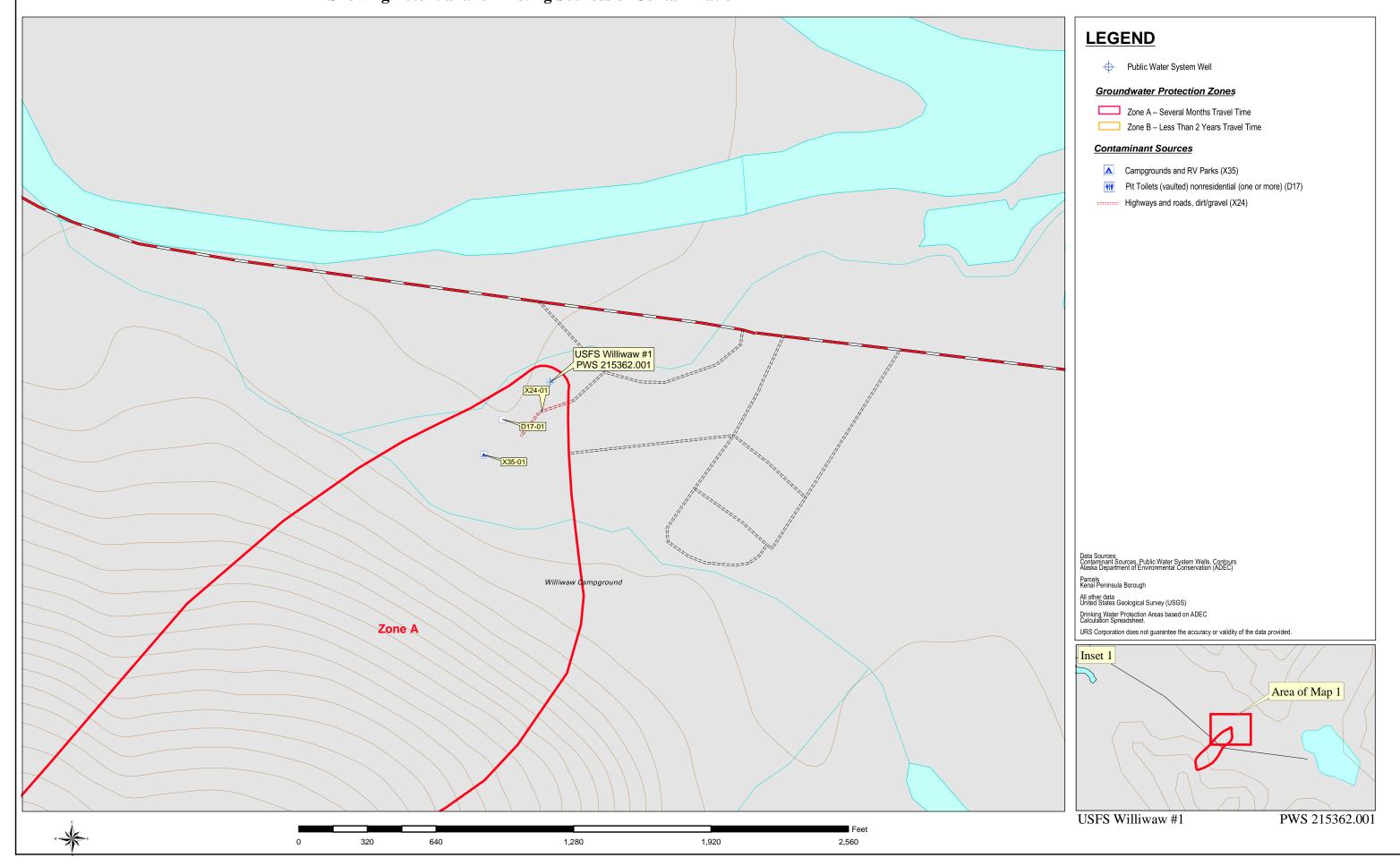
## Sources of Volatile Organic Chemicals

Contaminant Source Type	Contaminant Source ID	CS ID tag	Zone	Risk Ranking for Analysis	Overall Rank after Analysis	Map Location Number	Comments
Highways and roads, dirt/gravel	X24	X24-01	A	Low	1	1	
Campgrounds and RV Parks	X35	X35-1	A	Low	2	1	

#### **APPENDIX C**

Williwaw Campground No.1
Drinking Water Protection Area
and Potential and Existing Contaminant Sources
(Map 2)

# Drinking Water Protection Areas for the Public Water Well System for PWS # 215362.001 USFS Williwaw #1 Showing Potential and Existing Sources of Contamination



## APPENDIX D

# Vulnerability Analysis for Williwaw Campground No.1 Public Drinking Water Source (Charts 1-8)

Chart 1. Susceptibility of the wellhead - USFS Williwaw #1 (215362.001) Susceptibility initially assumed to be low. Susceptibility of wellhead = 0 ptsNO Is the well Increase susceptibility 5 pts + 0 pts properly NO Increase susceptibility 20 pts grouted? Is the well + 0 pts capped? YES YES Susceptibility of wellhead Very High 20 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 high 10 to < 15 pts medium NO < 10 pts low Is the land surface sloped Increase susceptibility 5 pts 0 pts away from the well? YES

Chart 2. Susceptibility of the aquifer - USFS Williwaw #1 (215362.001)

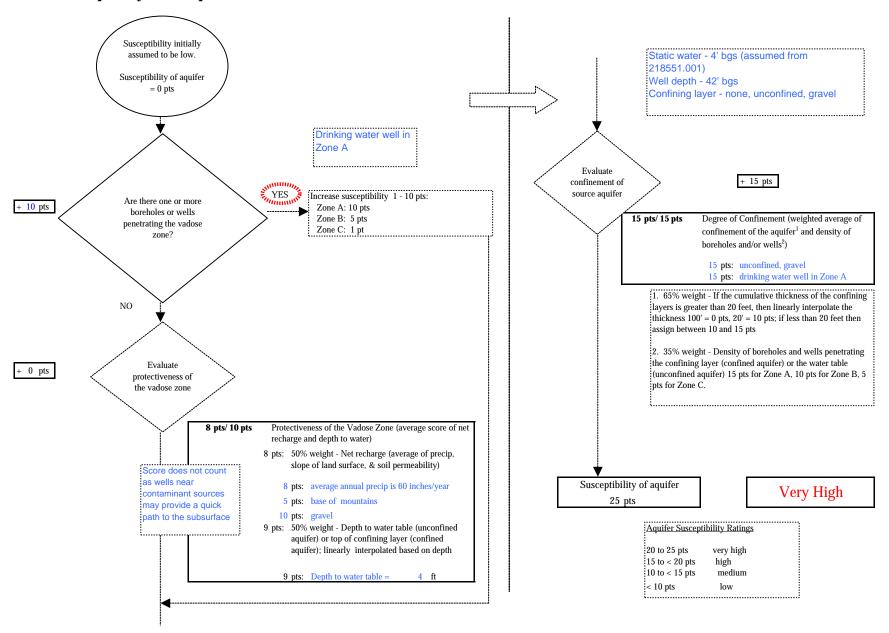
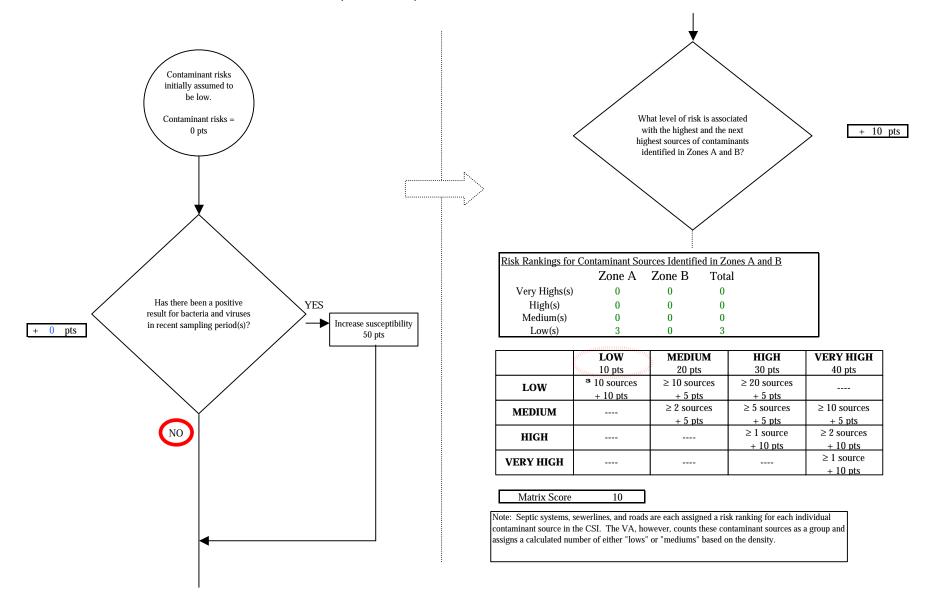
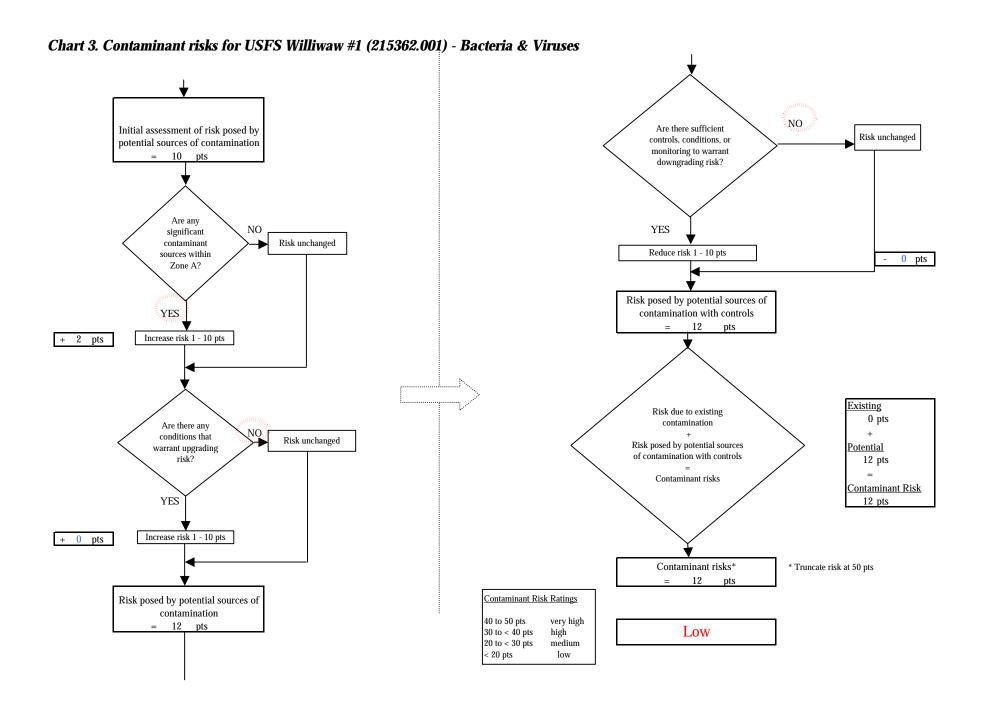


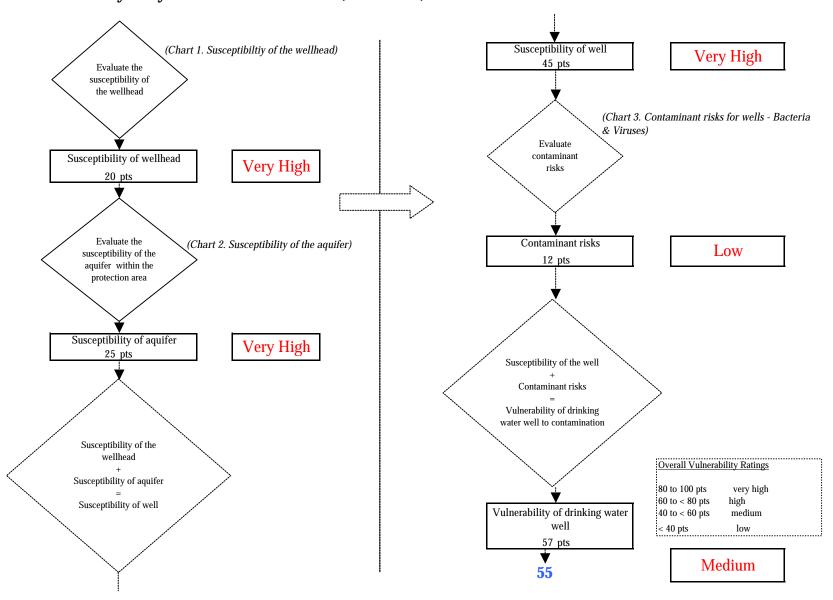
Chart 3. Contaminant risks for USFS Williwaw #1 (215362.001) - Bacteria & Viruses





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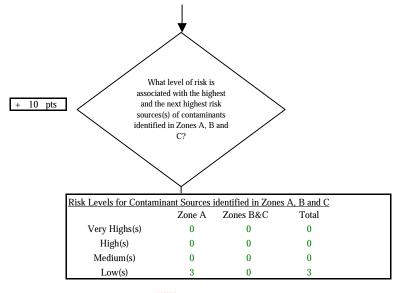
Chart 4. Vulnerability analysis for USFS Williwaw #1 (215362.001) - Bacteria & Viruses



Contaminant risks initially assumed to be low. Current background Evaluate the level of Contaminant risks contamination due to manbackground = 0 ptscontamination from made source(s) natural sources 0 pts NO or Is the concentration of UNKNOWN the contaminant Has nitrates and/or nitrites increasing, decreasing, been detected in the or staying the same? source waters in recent sampling period(s)? Recent Nitrate Sampling Results (mg/L) 6/19/2001 ND 5/22/2000 .67 ND 9/1/1999 ND 7/17/1998 Increasing: risk up 1 - 10 pts YES 9/4/1997 ND Decreasing: risk down 1 - 5 pts 5/13/1996 ND + 0 pts Same: risk unchanged Maximum Contaminant Level (MCL) = 10 mg/LDetected Nitrate Level = Existing contamination points based on Risk due to natural Risk due to existing manlinear interpolation of most recent detect made sources sources [MCL = 50 pts; detect = 0 pts] 0 pts 3 pts Risk due to existing contamination 3 pts Evaluate the level of Was the source of NO. background contamination contamination from natural? man-made sources YES

Chart 5. Contaminant risks for USFS Williwaw #1 (215362.001) - Nitrates and Nitrites

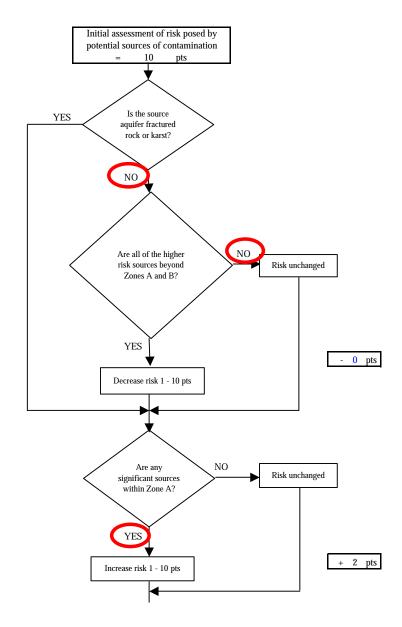
Chart 5. Contaminant risks for USFS Williwaw #1 (215362.001) - Nitrates and Nitrites



	LOW 10 pts	MEDIUM 20 pts	HIGH 30 pts	VERY HIGH 40 pts
LOW	3 10 sources + 10 pts	≥ 10 sources + 5 pts	≥ 20 sources + 5 pts	
MEDIUM		≥ 2 sources + 5 pts	≥ 5 sources + 5 pts	≥ 10 sources + 5 pts
HIGH			≥ 1 source + 10 pts	≥ 2 sources + 10 pts
VERY HIGH				≥ 1 source + 10 pts

Matrix Score 10

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



Existing NO Are there conditions 3 pts Risk unchanged that warrant Risk due to existing upgrading risk? **Potential** contamination 12 pts Risk posed by potential sources of contamination with controls Contaminant Risk YES 15 pts Contaminant risks 0 pts Increase risk 1 - 10 pts Risk posed by potential sources of contamination 12 pts Contaminant risks\* \*Truncate risk at 50 pts 15 Contaminant Risk Ratings Are there sufficient Low controls, conditions, NO Risk unchanged 40 to 50 pts very high or monitoring to 30 to < 40 pts high warrant downgrading 20 to < 30 pts medium < 20 pts low YES 0 pts Decrease risk 1 - 10 pts Risk posed by potential sources of contamination with controls 12 pts

Chart 5. Contaminant risks for USFS Williwaw #1 (215362.001) - Nitrates and Nitrites

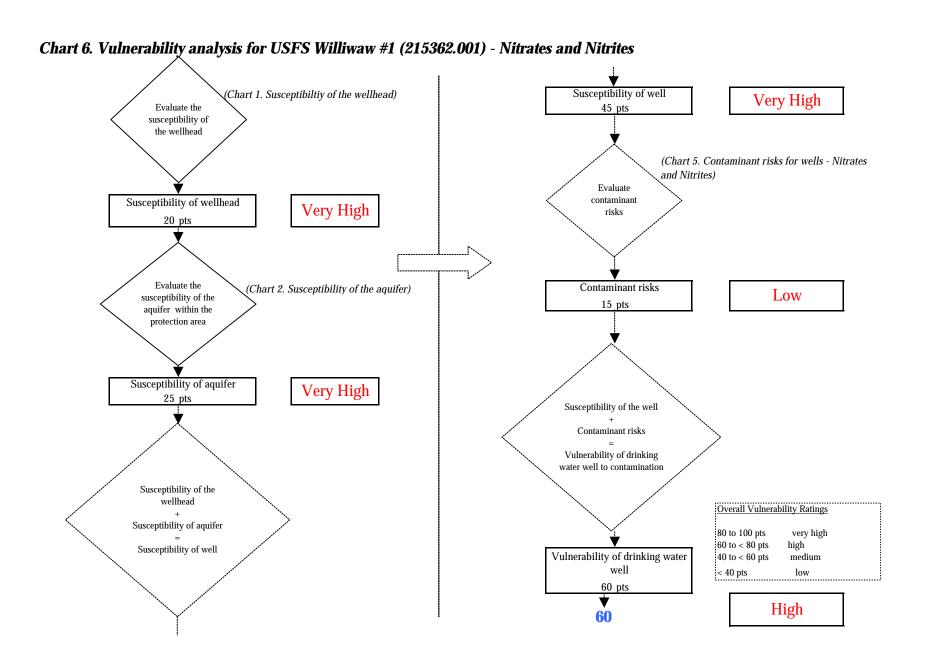
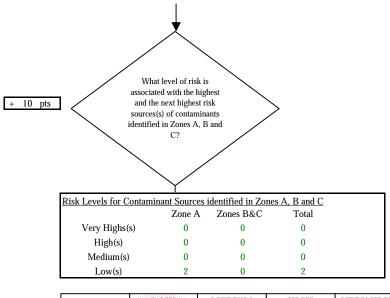


Chart 7. Contaminant risks for USFS Williwaw #1 (215362.001) - Volatile Organic Chemicals Contaminant risks initially assumed to be low. Current background Evaluate the level of Contaminant risks contamination due to manbackground = 0 ptscontamination from made source(s) natural sources 0 pts NO or Is the concentration of the contaminant UNKNOWN Have volatile organic increasing, decreasing, chemicals been detected or staying the same? in the source waters in recent sampling period(s)? Recent VOC Sampling Results (mg/L) Unknown Increasing: risk up 1 - 10 pts YES Decreasing: risk down 1 - 5 pts + 0 pts Same: risk unchanged Maximum Contaminant Level (MCL) = mg/LExisting contamination points based on Risk due to natural Risk due to existing manlinear 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 Evaluate the level of Was the source of NO. background contamination contamination from natural? man-made sources YES

Chart 7. Contaminant risks for USFS Williwaw #1 (215362.001) - Volatile Organic Chemicals



è	LOW 10 pts	MEDIUM 20 pts	HIGH 30 pts	VERY HIGH 40 pts
LOW	3 10 sources + 10 pts	≥ 10 sources + 5 pts	≥ 20 sources + 5 pts	
MEDIUM		≥ 2 sources + 5 pts	≥ 5 sources + 5 pts	≥ 10 sources + 5 pts
HIGH			≥ 1 source + 10 pts	≥ 2 sources + 10 pts
VERY HIGH				≥ 1 source + 10 pts

Matrix Score 10

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

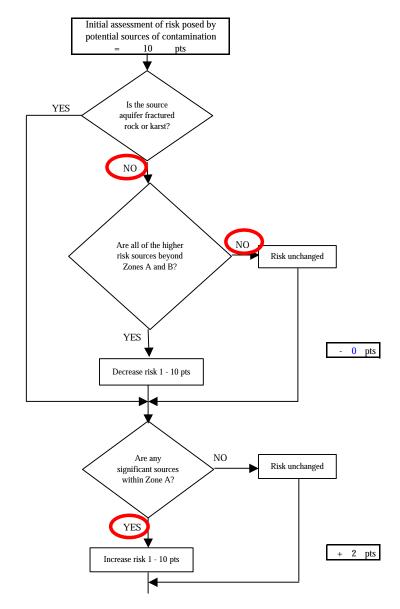


Chart 7. Contaminant risks for USFS Williwaw #1 (215362.001) - Volatile Organic Chemicals Existing NO Are there conditions 0 pts Risk unchanged that warrant Risk due to existing upgrading risk? **Potential** contamination 12 pts Risk posed by potential sources of contamination with controls Contaminant Risk YES 12 pts Contaminant risks 0 pts Increase risk 1 - 10 pts Risk posed by potential sources of contamination 12 pts Contaminant risks\* \*Truncate risk at 50 pts 12 Contaminant Risk Ratings Are there sufficient Low controls, conditions, NO Risk unchanged 40 to 50 pts very high or monitoring to 30 to < 40 pts high warrant downgrading 20 to < 30 pts medium < 20 pts low YES 0 pts Decrease risk 1 - 10 pts Risk posed by potential sources of contamination with controls 12 pts

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Chart 8. Vulnerability analysis for USFS Williwaw #1 (215362.001) - Volatile Organic Chemicals

