CROWN PACIFIC (PWS 1280061)
SOURCE WATER ASSESSMENT REPORT

April 10, 2001

State of Idaho
Department of Environmental Quality

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Executive Summary

Under the Safe Drinking Water Act Amendments of 1996, all states are required by the U.S. Environmental Protection Agency to assess every source of public drinking water for its relative sensitivity to contaminants regulated by the act. This assessment is based on a land use inventory of the designated assessment area, sensitivity factors associated with the wells, and aquifer characteristics.

This report, *Source Water Assessment for Crown Pacific (PWS 1280061)*, describes the public water system, the boundaries of the zones of water contribution, and the associated potential contaminant sources located within these boundaries. This assessment should be used as a planning tool, taken into account with local knowledge and concerns, to develop and implement appropriate protection measures for this source. **The results should <u>not be</u> used as an absolute measure of risk and they should <u>not be</u> used to undermine public confidence in the water system.**

The Crown Pacific water system consists of two wells. No significant ground water problems have been identified. Water samples for total coliform bacteria have been negative since at least 1992. Similarly, water samples have not revealed the presence of volatile organic or synthetic organic chemicals in either well. In recent years, a variety of inorganic chemicals have been detected in each well. In 1995, the fluoride level in a water sample taken from the Powerhouse Well was measured at .05mg/L. The maximum contaminant level for fluoride is 4.0mg/L. During the same year the fluoride level was measured at .04mg/L in the Field Well. Additionally, in 1995, cyanide was detected in the Field Well at a level of .003mg/L, which is below the maximum contaminant level of .02mg/L. In 1998, a water sample taken from the Powerhouse Well revealed barium at .01mg/L, well below the maximum contaminant level of 2.0mg/L. Testing of the Field Well in 1998 showed barium to be at .03mg/L, while cadmium was detected at .002mg/L. The maximum contaminant level for cadmium is .005mg/L. The same test revealed chromium at a level of .01mg/L, under the maximum contaminant level of .1mg/L. Nitrate levels in the wells are extremely low.

This assessment should be used as a basis for determining appropriate new protection measures or re-evaluating existing protection efforts. No matter what ranking a source receives, protection is always important. Whether the source is currently located in a "pristine" area or an area with numerous industrial and/or agricultural land uses that require education and surveillance, the way to ensure good water quality in the future is to act now to protect valuable water supply resources.

Crown Pacific should focus source water protection activities on implementation of practices aimed at maintaining the quality of their water. This might include investigating the source of the inorganic chemicals detected in water samples taken in 1995 and 1998. Crown Pacific should also develop a source water protection plan that includes an employee education component to educate mill workers of the proper use, storage and disposal of chemicals within the wells' source water assessment areas. The source water assessment plan should also contain a contingency component that outlines the steps to be taken in the event of a water emergency, including identifying an alternate source of water. Partnerships with state and local agencies and industry groups should be established and are critical to success. Due to the time involved with the movement of ground water, source water protection activities should be aimed at long-term management strategies even though these strategies may not yield results in the near term. A community with a fully developed source water protection program will incorporate many strategies. For assistance in developing protection strategies, please contact your regional Idaho Department of Environmental Quality office or the Idaho Rural Water Association.

SOURCE WATER ASSESSMENT FOR CROWN PACIFIC

Section 1. Introduction- Basis for Assessment

The following sections contain information necessary to understand how and why this assessment was conducted. **It is important to review this information to understand what the ranking of this source means.** A map showing the delineated source water assessment area and the inventory of significant potential sources of contamination identified within that area are attached.

Level of Accuracy and Purpose of the Assessment

The Idaho Department of Environmental Quality (DEQ) is required by the U.S. Environmental Protection Agency (EPA) to assess the over 2,900 public drinking water sources in Idaho for their relative susceptibility to contaminants regulated by the Safe Drinking Water Act. This assessment is based on a land use inventory of the delineated assessment area, sensitivity factors associated with the wells, and aquifer characteristics. All assessments must be completed by May of 2003. The resources and time available to accomplish assessments are limited. Therefore, an in-depth, site-specific investigation to identify each significant potential source of contamination for every public water system is not possible. **This assessment should be used as a planning tool, taken into account with local knowledge and concerns, to develop and implement appropriate protection measures for this source. The results should <u>not be</u> used as an absolute measure of risk and they should <u>not be</u> used to undermine public confidence in the water system.**

The ultimate goal of this assessment is to provide data to local communities to develop a protection strategy for their drinking water supply system. The Idaho Department of Environmental Quality (DEQ) recognizes that pollution prevention activities generally require less time and money to implement than treating a public water supply system once it has been contaminated. DEQ encourages communities to balance resource protection with economic growth and development. The decision as to the amount and types of information necessary to develop a source water protection program should be determined by the local community based on its own needs and limitations. Wellhead or source water protection is one facet of a comprehensive growth plan, and it can complement ongoing local planning efforts.

Section 2. Conducting the Assessment

General Description of the Source Water Quality

Crown Pacific serves an employee population of approximately 110 people, in Huetter, Idaho (Figure 1). The Crown Pacific public water system is comprised two wells, the Powerhouse Well and the Field Well.

Crown Pacific is currently not facing significant water quality issues. Water from each well is tested separately. All contaminants detected upon routine sampling have been below maximum contaminant levels.

Defining the Zones of Contribution- Delineation

The delineation process establishes the physical area around a well that will become the focal point of the assessment. The process includes mapping the boundaries of the zone of contribution into time of travel zones (zones indicating the number of years necessary for a particle of water to reach a well) for water in the aquifer. DEQ used a refined computer model approved by the EPA in determining the three-year (Zone 1B), six-year (Zone 2), and ten-year (Zone 3) times-of-travel (TOT) for water associated with the Rathdrum Prairie aquifer in the vicinity of Huetter, Idaho. The computer model used site specific data, assimilated by DEQ from a variety of sources including the city and other local well logs. The delineated source water assessment areas for the Crown Pacific wells can best be described as short, 200' wide polygons that extend from the wellheads in a southeasterly direction to the Spokane River. The actual data used by DEQ in determining the source water assessment delineation area are available upon request.

Identifying Potential Sources of Contamination

A potential source of contamination is defined as any facility or activity that stores, uses, or produces, as a product or by-product, the contaminants regulated under the Safe Drinking Water Act and has a sufficient likelihood of releasing such contaminants at levels that could pose a concern relative to drinking water sources. The goal of the inventory process is to locate and describe those facilities, land uses, and environmental conditions that are potential sources of ground water contamination. The locations of potential sources of contamination within the delineation area were obtained by field surveys conducted by DEQ and from available databases.

The dominant land use in the area surrounding the Crown Pacific wellheads is urban/commercial.
It is important to understand that a release may never occur from a potential source of contamination provided best management practices are used at the facility. Many potential sources of contamination are regulated at the federal level, state level, or both to reduce the risk of release. Therefore, when a business, facility, or property is identified as a potential contaminant source, this should not be interpreted to mean that this business, facility, or property is in violation of any local, state, or federal environmental law or regulation. What it does mean is that the potential for contamination exists due to the nature of the business, industry, or operation. There are a number of methods that water systems can use to work cooperatively with potential sources of contamination, such as educational visits and inspections of stored materials. Many owners of such facilities may not even be aware that they are located near a public water supply well.

Contaminant Source Inventory Process

A two-phased contaminant inventory of the study area was conducted during February and March of 2001. The first phase involved identifying and documenting potential contaminant sources within the Crown Pacific source water assessment areas through the use of computer databases and Geographic Information System maps developed by DEQ. The second, or enhanced, phase of the contaminant inventory involved contacting the operator to validate the sources identified in phase one and to add any additional potential sources in the area. This task was undertaken with the assistance of K.C. Hansen.

One potential contaminant site is located within the delineated source water areas (Table 1).

Table 1. Crown Pacific Potential Contaminant Inventory

SITE #	Source Description	TOT Zone[1](years)	Source of Information	Potential Contaminants[2]
1	Lumber Yard and Railroad	6	Database Search	IOC, VOC, SOC

[1]TOT = time of travel (in years) for a potential contaminant to reach the wellhead

[2]IOC = inorganic chemical, VOC = volatile organic chemical, SOC = synthetic organic chemical

Figure 1. Geographic Location of the Crown Pacific Wells

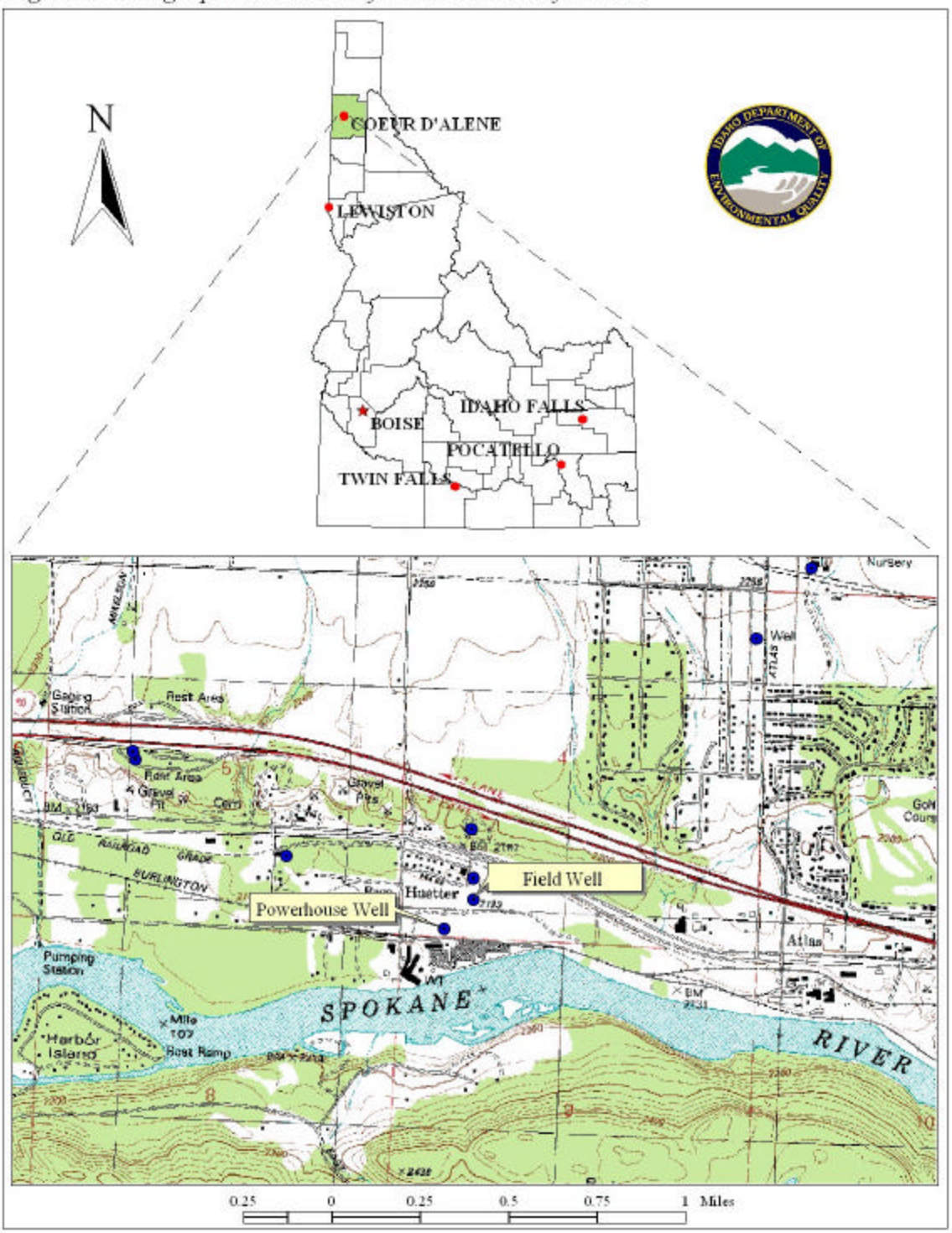


Figure 2. Crown Pacific Powerhouse Well Delineation Map and Potential Contaminant Source Locations

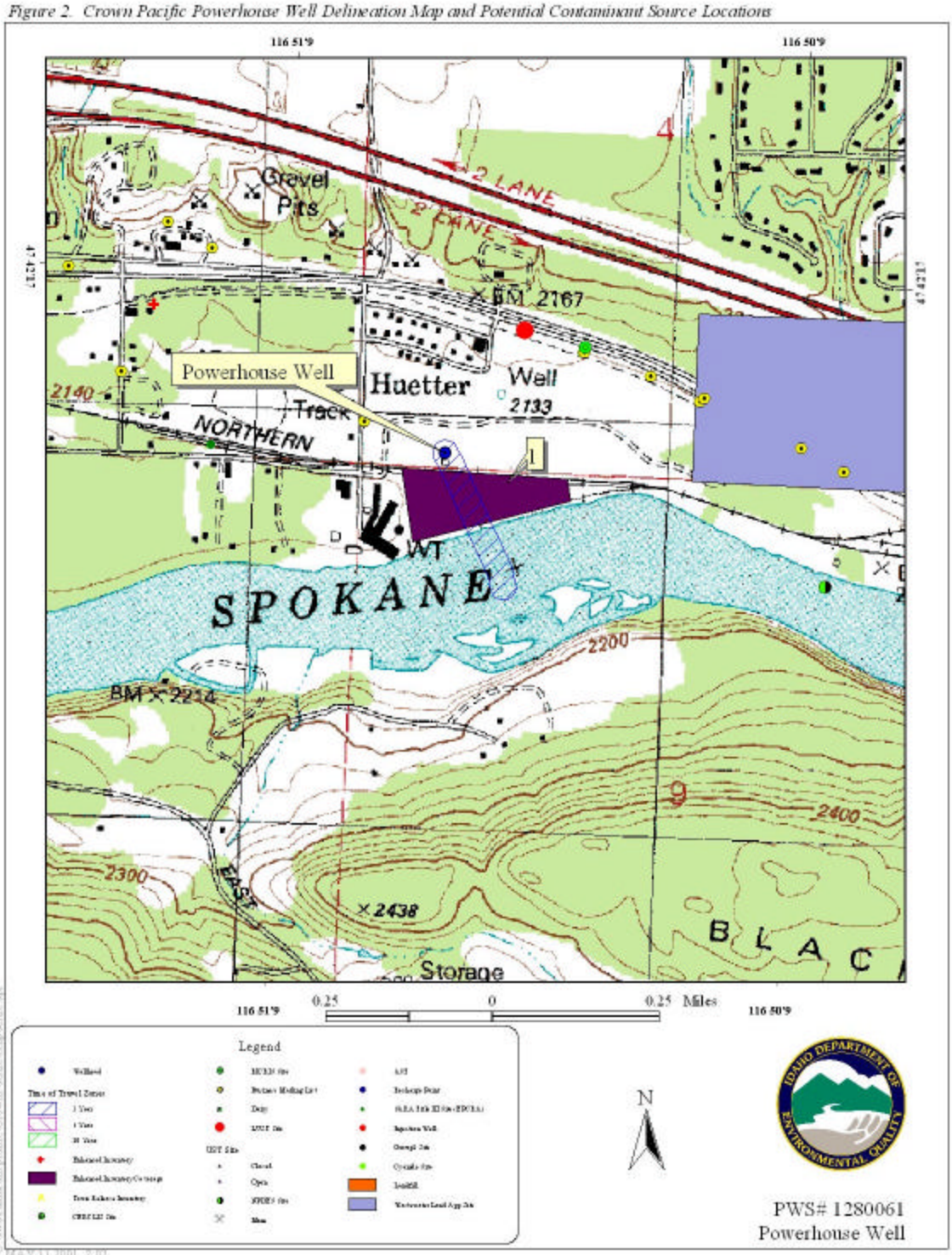
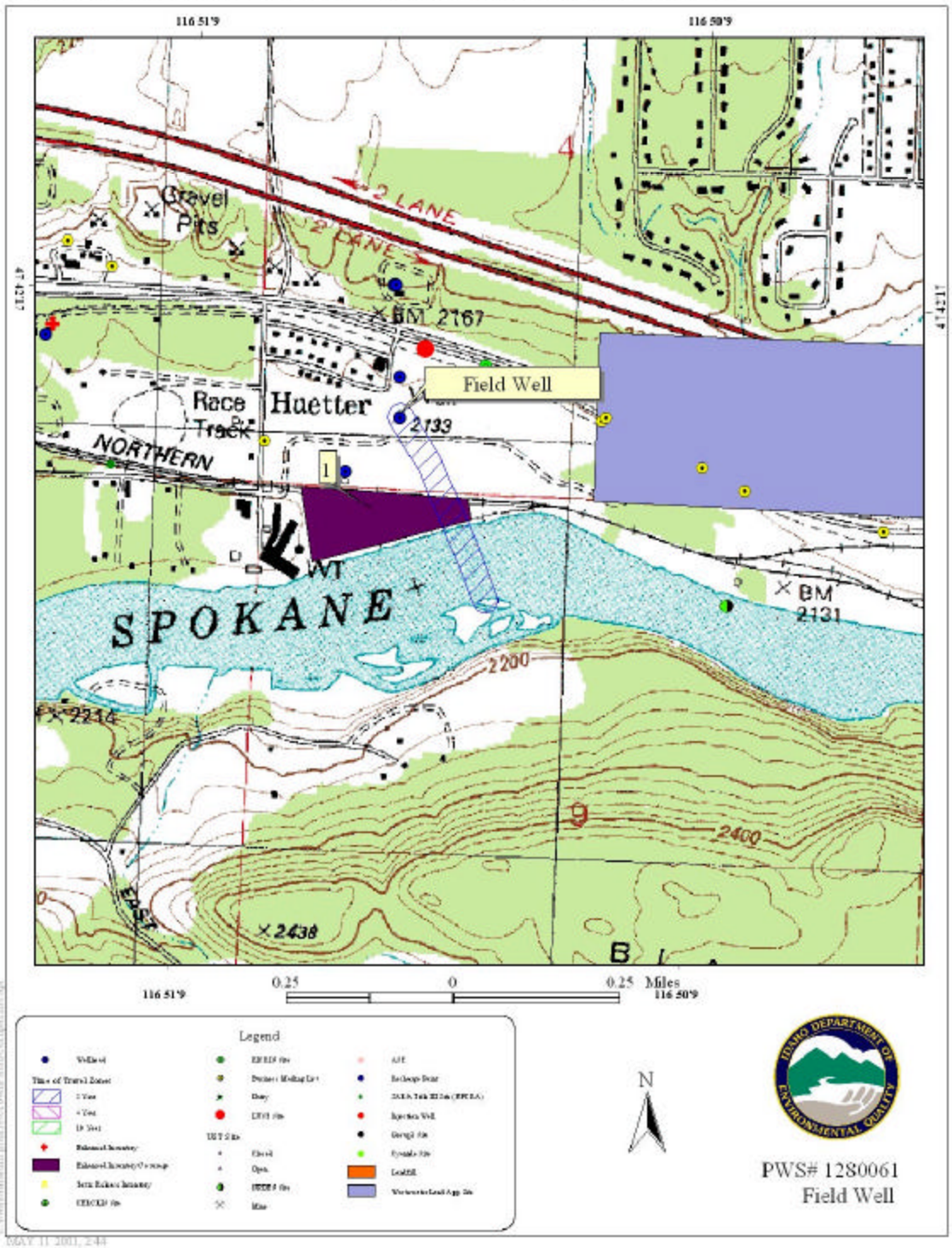


Figure 3. Crown Pacific Field Well Delineation Map and Potential Contaminant Source Locations



Section 3. Susceptibility Analysis

The susceptibility of the source to contamination was ranked as high, moderate, or low risk according to the following considerations: hydrologic characteristics, physical integrity of the well, land use characteristics, and potentially significant contaminant sources. The susceptibility rankings are specific to a particular potential contaminant or category of contaminants. Therefore, a high susceptibility rating relative to one potential contaminant does not mean that the water system is at the same risk for all other potential contaminants. The relative ranking that is derived for each well is a qualitative, screening-level step that, in many cases, uses generalized assumptions and best professional judgement. The following summaries describe the rationale for the susceptibility ranking.

Although the wells do not share identical source water assessment areas, because of their close proximity their susceptibility scores are the same.

Hydrologic Sensitivity

Hydrologic sensitivity for the wells is high. This reflects the porous nature of the soils associated with the Rathdrum Prairie aquifer and the lack of significant confining layers retarding the vertical transport of contaminants.

Well Construction

Well construction directly affects the ability of the wells to protect the aquifer from contaminants. Lower scores imply a system that can better protect the water. The Crown Pacific water system consists of two wells that extract ground water for domestic and industrial uses. Water extraction from individual wells is monitored and managed by the system operator. The wells' system construction scores are moderate. The Powerhouse Well was drilled in 1966 and does not meet today's construction standards. The Idaho Department of Water Resources (IDWR) *Well Construction Standards Rules (1993)* require all public water systems (PWSs) follow DEQ standards as well. IDAPA 58.01.08.550 requires that PWSs follow the *Recommended Standards for Water Works (1997)* during construction. Various aspects of the standards can be assessed from well logs. Table 1 of the *Recommended Standards for Water Works (1997)* states that 10-inch steel casing requires a thickness of 0.365 inches. The Powerhouse Well uses 0.279-inch thick casing. Casing thickness for the Field well could not be determined. It was drilled in 1948 and no well driller's report is available. The wells do have intact sanitary seals and are located outside of the 100-year floodplain.

Potential Contaminant Source and Land Use

The wells rated in the low category for all chemical classes because of the low density (one) of potential contaminant sources located within their source water assessment areas.

Final Susceptibility Ranking

In terms of the total susceptibility score, it can be seen from Table 2 that the wells showed an overall moderate susceptibility in all chemical classes.

Table 2. Summary of Crown Pacific Susceptibility Evaluation

	Susceptibility Scores[1]									
	Hydrologic Sensitivity	Contaminant Inventory				System Construction	**Final Susceptibility Ranking**			
Well		IOC	VOC	SOC	Microbials		IOC	VOC	SOC	Microbials
1	H	L	L	L	L	M	M	M	M	M
2	H	L	L	L	L	M	M	M	M	M

[1]H = High Susceptibility, M = Moderate Susceptibility, Low Susceptibility
IOC = inorganic chemical, VOC = volatile organic chemical, SOC = synthetic organic chemical

Susceptibility Summary

The Crown Pacific water system is currently not threatened by significant potential contaminant sites, but should take source water protection precautions because of its wells' hydrologic sensitivity and system construction characteristics.

Section 4. Options for Source Water Protection

The susceptibility assessment should be used as a basis for determining appropriate new protection measures or re-evaluating existing protection efforts. No matter what the susceptibility ranking a source receives, protection is always important. Whether the source is currently located in a "pristine" area or an area with numerous industrial and/or agricultural land uses that require education and surveillance, the way to ensure good water quality in the future is to act now to protect valuable water supply resources.

An effective source water protection program is tailored to the particular local source water protection area. A system with a fully-developed source water protection program will incorporate many strategies. Crown Pacific should focus source water protection activities on determining the source of inorganic chemicals detected during recent, routine water sampling. This action should be taken to ensure that inorganic contaminants do not rise to harmful levels in drinking water provided by the system. The water system operator should also consider developing an employee education program to educate mill workers about the location of the wells' source water assessment areas and to provide them with information regarding the proper handling, storage and disposal of chemicals within these areas.

Lastly, a contingency plan should be developed that identifies an alternative source of water and to guide emergency response activities should the water system ever become contaminated.
Partnerships with state and local agencies and industry groups should be established and are critical to success. Due to the time involved with the movement of ground water, wellhead protection activities should be aimed at long-term management strategies even though these strategies may not yield results in the near term.

Assistance

Public water supplies and others may call the following IDEQ offices with questions about this assessment and to request assistance with developing and implementing a local protection plan. In addition, draft protection plans may be submitted to the IDEQ office for preliminary review and comments.

Coeur d'Alene Regional IDEQ Office (208) 769-1422

State IDEQ Office (208) 373-0502

Website: http://www.deq.state.id.us

Water suppliers serving fewer than 10,000 persons may contact John Bokor, Idaho Rural Water Association, at 1-800-962-3257 for assistance with wellhead protection strategies.

References Cited

Great Lakes-Upper Mississippi River Board of State and Provincial Public Health and Environmental Managers, 1997. "Recommended Standards for Water Works."

Idaho Department of Environmental Quality, 1997. Design Standards for Public Water systems. IDAPA 58.01.08.550.01.

Idaho Department of Water Resources, 1993. Administrative Rules of the Idaho Water Resource Board: Well Construction Standards Rules. IDAPA 37.03.09.

Attachment A

Crown Pacific
Susceptibility Analysis
Worksheets

The final scores for the susceptibility analysis were determined using the following formulas:

1) VOC/SOC/IOC Final Score = Hydrologic Sensitivity + System Construction + (Potential Contaminant/Land Use x 0.2)

2) 2) Microbial Final Score = Hydrologic Sensitivity + System Construction + (Potential Contaminant/Land Use x 0.35)

Final Susceptibility Scoring:

0 - 5 Low Susceptibility

6 - 12 Moderate Susceptibility

> 13 High Susceptibility

Ground Water Susceptibility Report Public Water System Name : CROWN PACIFIC Well# : POWER HOUSE

Public Water System Number 1280061 4/9/01 3:28:10 PM

1. System Construction		SCORE
Drill Date	12/22/66	
Driller Log Available	YES	
Sanitary Survey (if yes, indicate date of last survey)	YES	1996
Well meets IDWR construction standards	NO	1
Wellhead and surface seal maintained	YES	0
Casing and annular seal extend to low permeability unit	NO	2
Highest production 100 feet below static water level	NO	1
Well located outside the 100 year flood plain	YES	0
Total System Construction Score		4

2. Hydrologic Sensitivity		
Soils are poorly to moderately drained	NO	2
Vadose zone composed of gravel, fractured rock or unknown	YES	1
Depth to first water > 300 feet	NO	1
Aquitard present with > 50 feet cumulative thickness	NO	2
Total Hydrologic Score		6

3. Potential Contaminant / Land Use - ZONE 1A		IOC Score	VOC Score	SOC Score	Microbial Score
Land Use Zone 1A	URBAN/COMMERCIAL	2	2	2	2
Farm chemical use high	NO	0	0	0	
IOC, VOC, SOC, or Microbial sources in Zone 1A	NO	NO	NO	NO	NO
Total Potential Contaminant Source/Land Use Score - Zone 1A		2	2	2	2
Potential Contaminant / Land Use - ZONE 1B					
Contaminant sources present (Number of Sources)	YES	1	1	1	0
(Score = # Sources X 2) 8 Points Maximum		2	2	2	0
Sources of Class II or III leachable contaminants or	YES	1	1	1	
4 Points Maximum		1	1	1	
Zone 1B contains or intercepts a Group 1 Area	NO	0	0	0	0
Land use Zone 1B	Less Than 25% Agricultural Land	0	0	0	0
Total Potential Contaminant Source / Land Use Score - Zone 1B		3	3	3	0
Cumulative Potential Contaminant / Land Use Score		5	5	5	2
4. Final Susceptibility Source Score		11	11	11	11
5. Final Well Ranking		Moderate	Moderate	Moderate	Moderate

Ground Water Susceptibility Report Public Water System Name : CROWN PACIFIC Well# : Field

Public Water System Number 1280061 4/9/01 3:33:22 PM

1. System Construction		SCORE			
Drill Date	1948				
Driller Log Available	NO				
Sanitary Survey (if yes, indicate date of last survey)	YES	1996			
Well meets IDWR construction standards	N/A	1			
Wellhead and surface seal maintained	YES	0			
Casing and annular seal extend to low permeability unit	N/A	2			
Highest production 100 feet below static water level	NO	1			
Well located outside the 100 year flood plain	YES	0			
Total System Construction Score		4			
2. Hydrologic Sensitivity					
Soils are poorly to moderately drained	NO	2			
Vadose zone composed of gravel, fractured rock or unknown	YES	1			
Depth to first water > 300 feet	NO	1			
Aquitard present with > 50 feet cumulative thickness	NO	2			
Total Hydrologic Score		6			
3. Potential Contaminant / Land Use - ZONE 1A		IOC Score	VOC Score	SOC Score	Microbial Score
Land Use Zone 1A	URBAN/COMMERCIAL	2	2	2	2
Farm chemical use high	NO	0	0	0	
IOC, VOC, SOC, or Microbial sources in Zone 1A	NO	NO	NO	NO	NO
Total Potential Contaminant Source/Land Use Score - Zone 1A		2	2	2	2
Potential Contaminant / Land Use - ZONE 1B					
Contaminant sources present (Number of Sources)	YES	1	1	1	0
(Score = # Sources X 2) 8 Points Maximum		2	2	2	0
Sources of Class II or III leachable contaminants or	YES	1	1	1	
4 Points Maximum		1	1	1	
Zone 1B contains or intercepts a Group 1 Area	NO	0	0	0	0
Land use Zone 1B	Less Than 25% Agricultural Land	0	0	0	0
Total Potential Contaminant Source / Land Use Score - Zone 1B		3	3	3	0
Cumulative Potential Contaminant / Land Use Score		5	5	5	2
4. Final Susceptibility Source Score		11	11	11	11
5. Final Well Ranking		Moderate	Moderate	Moderate	Moderate

POTENTIAL CONTAMINANT INVENTORY
LIST OF ACRONYMS AND DEFINITIONS

AST (Aboveground Storage Tanks) – Sites with aboveground storage tanks.

Business Mailing List – This list contains potential contaminant sites identified through a yellow pages database search of standard industry codes (SIC).

CERCLIS – This includes sites considered for listing under the **Comprehensive Environmental Response Compensation and Liability Act (CERCLA)**. CERCLA, more commonly known as ASuperfund@ is designed to clean up hazardous waste sites that are on the national priority list (NPL).

Cyanide Site – DEQ permitted and known historical sites/facilities using cyanide.

Dairy – Sites included in the primary contaminant source inventory represent those facilities regulated by Idaho State Department of Agriculture (ISDA) and may range from a few head to several thousand head of milking cows.

Deep Injection Well – Injection wells regulated under the Idaho Department of Water Resources generally for the disposal of stormwater runoff or agricultural field drainage.

Enhanced Inventory – Enhanced inventory locations are potential contaminant source sites added by the water system. These can include new sites not captured during the primary contaminant inventory, or corrected locations for sites not properly located during the primary contaminant inventory. Enhanced inventory sites can also include miscellaneous sites added by the Idaho Department of Environmental Quality (DEQ) during the primary contaminant inventory.

Floodplain – This is a coverage of the 100year floodplains.

Group 1 Sites – These are sites that show elevated levels of contaminants and are not within the priority one areas.

Inorganic Priority Area – Priority one areas where greater than 25% of the wells/springs show constituents higher than primary standards or other health standards.

Landfill – Areas of open and closed municipal and non-municipal landfills.

LUST (Leaking Underground Storage Tank) – Potential contaminant source sites associated with leaking underground storage tanks as regulated under RCRA.

Mines and Quarries – Mines and quarries permitted through the Idaho Department of Lands.)

Nitrate Priority Area – Area where greater than 25% of wells/springs show nitrate values above 5mg/l.

NPDES (National Pollutant Discharge Elimination System) – Sites with NPDES permits. The Clean Water Act requires that any discharge of a pollutant to waters of the United States from a point source must be authorized by an NPDES permit.

Organic Priority Areas – These are any areas where greater than 25 % of wells/springs show levels greater than 1% of the primary standard or other health standards.

Recharge Point – This includes active, proposed, and possible recharge sites on the Snake River Plain.

RICRIS – Site regulated under **Resource Conservation Recovery Act (RCRA)**. RCRA is commonly associated with the cradle to grave management approach for generation, storage, and disposal of hazardous wastes.

SARA Tier II (Superfund Amendments and Reauthorization Act Tier II Facilities) – These sites store certain types and amounts of hazardous materials and must be identified under the Community Right to Know Act.

Toxic Release Inventory (TRI) – The toxic release inventory list was developed as part of the Emergency Planning and Community Right to Know (Community Right to Know) Act passed in 1986. The Community Right to Know Act requires the reporting of any release of a chemical found on the TRI list.

UST (Underground Storage Tank) – Potential contaminant source sites associated with underground storage tanks regulated as regulated under RCRA.

Wastewater Land Applications Sites – These are areas where the land application of municipal or industrial wastewater is permitted by DEQ.

Wellheads – These are drinking water well locations regulated under the Safe Drinking Water Act. They are not treated as potential contaminant sources.

NOTE: Many of the potential contaminant sources were located using a geocoding program where mailing addresses are used to locate a facility. Field verification of potential contaminant sources is an important element of an enhanced inventory.

Where possible, a list of potential contaminant sites unable to be located with geocoding will be provided to water systems to determine if the potential contaminant sources are located within the source water assessment area.