

CITY OF ST. CLOUD SOURCE WATER PROTECTION PLAN

PART 1: DELINEATED SOURCE WATER PROTECTION AREA

AND

SENSITIVITY AND SUSCEPTIBILITY ANALYSIS

MAY 2005

CHAPTER 1

BACKGROUND

Congress amended the Safe Drinking Water Act (SDWA) in 1996, requiring states to prepare source water assessments for all public water supplies by May 2003. In Minnesota, the Minnesota Department of Health (MDH) was charged with the responsibility for preparing source water assessments for all ground or surface water-based public water supplies. The MDH convened an advisory workgroup to prepare an Environmental Protection Agency-required program description that detailed Minnesota's approach to the preparation of source water assessments. This report can be accessed at www.health.state.mn.us/divs/eh/water/swp/swa/index.htm.

The MDH completed assessments for all public water suppliers by the required May 2003 deadline. Source water assessments are intended to inform users of public water supply systems of the source of their drinking water, the susceptibility of the source water to contamination, potential contaminants of concern to the source water intake and to the extent practical, the sources of the potential contaminants of concern.

Source water assessments were prepared collaboratively for St. Cloud, St. Paul and Minneapolis with financial support from a Minnesota Pollution Control Agency (MPCA) Clean Water Partnership Grant. The St. Cloud Source Water Assessment can be accessed at www.health.state.mn.us/divs/eh/water/swp/swa/index.htm.

Although not required by the SDWA, several public water suppliers in Minnesota that use surface water expressed interest in preparing a source water protection plan following completion of the source water assessment. Because of this interest and the lack of federal guidance, the MDH convened an advisory workgroup to develop guidance for source water protection. This workgroup's report, "Recommendations and Guidance Pertaining to the Development and Implementation of Source Water Protection Plans for Public Water Supplies Relying on Surface Waters," can be accessed at http://www.health.state.mn.us/divs/eh/water/swp/index.htm.

A source water protection plan will assist the public utilities with a means of reducing the risk of contamination of drinking water supplies by managing the potential sources of contamination within the area that supplies water to a public well or surface water intake. The source water protection plan is intended to build on the source water assessment by delineating a "source water <u>protection</u> area," based on the source water <u>assessment</u> area, responding to the contamination risks to the public water supply that were identified in the assessment, developing implementation strategies and management practices designed to reduce the risk to the public water supply and raising awareness of the source of and risk to the public water supply.

The City of St. Cloud, in cooperation with the Cities of St. Paul and Minneapolis began work in 2002 to prepare a Source Water Protection Plan, based in part on the Source Water Assessment. The preparation of these plans is accomplished through the "Upper Mississippi River Source Water Protection Project," funded in part by a Clean Water Act Section 319 Grant

through the MPCA. Part 1 of the Source Water Protection Plan documents the delineation of the source water protection area and the sensitivity and susceptibility analysis.

As a first step, an interagency "scoping" panel was convened by the MDH to identify the appropriate delineation criteria and data necessary to delineate source water protection areas and conduct the sensitivity and susceptibility analyses. The associated "Scoping Letter" from MDH to St. Cloud is attached as Appendix 1. This Scoping Letter lists the data elements and delineation criteria that St. Cloud will use to delineate Priority Areas A and B and the associated "Drinking Water Supply Management Areas" ("DWSMA"), delineate the Source Water Protection Watershed and conduct the sensitivity and susceptibility analyses. The City of St. Cloud established a Source Water Protection Team (SWP) Team and a Source Water Protection Area Delineation Subcommittee to delineate the areas and conduct the sensitivity and susceptibility analyses.

CHAPTER 2

THE SOURCE WATER PROTECTION AREA DELINEATION

The Source Water Protection Area provides the geographic focus for developing and implementing strategies to protect the public water supply intake from contamination. The Source Water Protection Area for St. Cloud is comprised of the following delineated areas: 1) "Priority Area A" and its associated DWSMA 2) "Priority Area B" and its associated DWSMA and 3) the Source Water Protection Watershed, a delineated portion of the Mississippi River Watershed upstream of the St. Cloud water intake.

The boundaries for Priority Areas A and B generally follow natural topographic boundaries, such as watershed boundaries. These boundaries often will not be easily visible and will frequently cross a parcel of land in such a manner that it is difficult to inventory and manage potential contaminant sources. The boundaries of the DWSMA are geographic or cultural features such as road or railroad rights of way, U.S. Public Land Survey lines, property or fence lines, public utility lines, and water features. The DWSMA boundaries follow the Priority A and B area boundaries as closely as possible. The boundaries of the Source Water Protection Watershed are the boundaries of the Mississippi River watershed upstream of the intake.

St. Cloud's Source Water Assessment Area, which is included in St. Cloud's Source Water Assessment, will be revised to incorporate the Source Water Protection Area boundaries delineated by the St. Cloud Source Water Protection Team.

St. Cloud Source Water Setting

The City of St. Cloud obtains its water supply from the Mississippi River. The entire Mississippi River watershed upstream of the St. Cloud intake is the source of surface water for the St. Cloud public water supply. The Mississippi River drainage basin upstream of St. Cloud has a watershed area of 13,329 square miles. Average draw from the river by the water utility is 7.25 million gallons per day; typical Mississippi River flow is approximately 3.4 billion gallons per day.

A second source of raw water exists for the City of St. Cloud in the form of a single well which is in place for limited, emergency use purposes. This well is capable of providing approximately 10 percent of the City's needs. The St. Cloud Source Water Protection Plan applies to the surface water source only.

The St. Cloud Source Water Protection Area

Delineation criteria

The source water protection area delineation criteria are listed in the Scoping Letter. The data needed for the delineation criteria were readily available except the time of travel estimates in the Mississippi River and tributaries. Because time of travel is the main criterion for delineating the source water protection area, the Upper Mississippi River Source Water Protection Project provided time of travel estimates prepared by the U.S. Army Corps of Engineers for the main stem of the Mississippi River and by the U.S. Geological Survey for several Mississippi River tributaries. This information is summarized in a "Time of Travel Synopsis," attached as Appendix 2.

Data elements

A panel of natural resource professionals was convened to analyze and interpret the data elements for the Cities of St. Cloud, St. Paul and Minneapolis. The work of this panel is summarized in "Guidance to the St. Cloud, St. Paul, and Minneapolis Source Water Protection Teams on the Delineation of Source Water Protection Areas." This report is attached as Appendix 3.

Priority Area A and the Associated DWSMA

The delineated Priority Area A and associated DWSMA are shown in Figure 1. The purpose of the Priority Area A delineation is to assist the St. Cloud Water Utility in identifying, inventorying and managing potential sources of contamination that present an acute (immediate) health concern to water users. The release of such a contaminant within Priority Area A could require the closure of the water intake.

The delineation of St. Cloud's Priority Area A started with an 8-hour time of travel (assuming high flow conditions) up the Mississippi River and Sauk River, measured from the St. Cloud water intake. The 8-hour time of travel was selected to provide for enough notification in the event that the utility would need to close the intake. (Eight hours will provide time for the water utility to maximize storage of potable water.) It is recognized that a contaminant release within the delineated Priority Area A could result in a travel time to the intake of less than eight hours. The boundaries indicated by the 8-hour time of travel locations were then adjusted outward from the 8-hour time of travel points, based on a review of the data elements and delineation criteria described in the Scoping Letter and Delineation Guidance Document. Because of the presence of known contaminant sources and the lack of time of travel information on the Watab River, the St. Cloud teams determined that portions of the Watab River should also be included in the Priority Area A delineation. The teams also considered sub-watershed boundaries, the previously delineated source water assessment areas and knowledge of known potential point and non-point contaminant sources.

In delineating Priority Area A, the St. Cloud Delineation and SWP Teams took particular consideration of the delineation criteria and data elements identified in the Scoping Letter and the advice of the panel of natural resource professionals. Various maps that were prepared for the teams to review are attached as Appendix 4.

The St. Cloud Priority Area A DWSMA boundary is described in Appendix 5. The Priority Area A DWSMA comprises an area of approximately 136 square miles.

Priority Area B and the Associated DSWMA

The delineated Priority Area B and associated DWSMA are shown in Figure 2. Management of this area is designed to protect water users from chronic (long-term) health effects related to low levels of chemical contamination or the periodic presence of contaminants at low levels in the source water. Management of this area should also protect users from contaminants such as pathogens that may be usually found at treatable levels in the source water, but occasionally present an acute health concern within the delineated Priority Area B.

In delineating Priority Area B, the St. Cloud SWP Team considered the delineation criteria and data elements identified in the Scoping Letter and the advice of the panel of natural resource

professionals. Various maps that were prepared for the teams to review are attached in Appendix 6.

The St. Cloud Priority Area B DWSMA boundary is described in Appendix 7. The Priority Area B DWSMA comprises an area of approximately 2,432 square miles.

Source Water Protection Watershed

The Source Water Protection Area Watershed is shown in Figure 3 and includes the entire Mississippi River drainage basin above the St. Cloud water intake, an area of approximately 13,329 square miles. In delineating the Source Water Protection Watershed, the St. Cloud SWP Team considered the delineation criteria and data elements identified in the Scoping Letter and the advice of the panel of natural resources professionals.

CHAPTER 3

THE SENSITIVITY AND SUSCEPTIBILITY ANALYSES

The Sensitivity and Susceptibility of St. Cloud's Source Water to Contamination

In determining the sensitivity of St. Cloud's source water, the intrinsic physical properties of the geologic setting or landscape within the watershed must be considered. The large quantity of water in the Mississippi River and flow velocity in the river can help to attenuate the contaminants. However, the river also can deliver contaminants to the water intake rapidly. Seasonal changes influence the sensitivity of the river to contamination. Other factors influencing the river include topography, hydrology, geology, vegetation and the distribution of various soil types within the watersheds of the Mississippi River. The closer the potential source of contamination to the water intake, the greater the potential impact on the source water at the intake. The farther the potential contaminant source from the intake, the more likely the river volumes and flows will attenuate the movement or concentration of contaminants at the intake.

There are numerous point and non-point sources of potential chemical and pathogenic contaminants upstream of the St. Cloud water intake. These sources include oil and chemical storage sites, industrial, stormwater, and wastewater discharges, and agricultural runoff, including animal feedlots. The Sauk River Watershed is an important factor in the sensitivity of St. Cloud's source water in terms of quality and quantity.

The sensitivity of St. Cloud's source water is considered to be high, based on the sensitivity factors.

Susceptibility is defined as the likelihood that a contaminant will enter a public water supply at a level which may result in an adverse human health impact. The susceptibility of any surface water-based water supplier is determined to be high because there is no practical means of preventing all potential contaminant releases into the surface waters. However, a susceptibility determination for a specific public water supply system is based on comparing the sensitivity of the surface water intake to the presence of a source which may release a contaminant of concern. This secondary analysis allows for differentiation among surface water-based public water supply systems.

Based on a comparison of the sensitivity of the surface water intake to the presence of potential contaminant sources, the susceptibility of St. Cloud's intake is considered high for a surface water-based public water supply system. While the St. Cloud source water is highly susceptible to contamination, the St. Cloud Public Utilities historically has effectively treated the source water to meet or exceed safe drinking water standards.

To analyze the sensitivity and susceptibility of the City's source water, the St. Cloud SWP Team considered the data elements identified in the Scoping Letter and the advice of the panel of natural resource professionals.

SUMMARY

Protecting the drinking water is a wise and relatively inexpensive investment in St. Cloud's future. The overall intent of the Part 1 of the Source Water Protection Plan is to identify the geographic areas of interest that may impact the source of St. Cloud's drinking water, the Mississippi River.

The next step in source water protection is to prepare Part 2 of the Source Water Protection Plan. This part will include an inventory of potential sources of contamination within St. Cloud's Source Water Protection Areas and will identify practices and management strategies to address these sources.

The final step in source water protection will be to implement the Source Water Protection Plan developed by the City of St. Cloud.

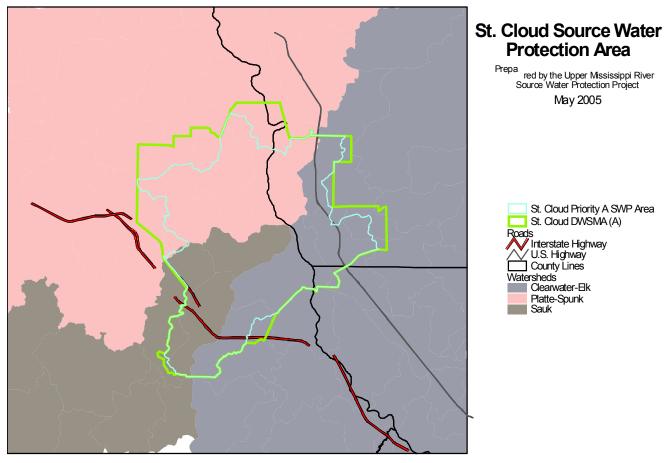


FIGURE 1

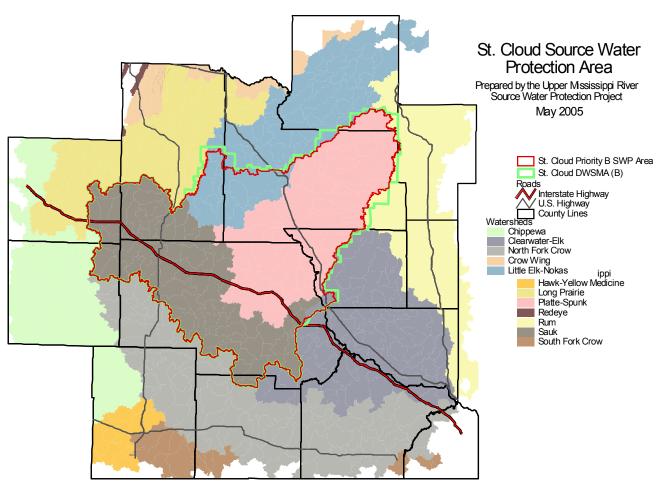


FIGURE 2

St. Cloud Source Water Protection Watershed Prepared by the Upper Mississippi Source Water Protection Project

