



THE STATE
of **ALASKA**
GOVERNOR MICHAEL J. DUNLEAVY

Department of Environmental Conservation

DIVISION OF ENVIRONMENTAL HEALTH
Drinking Water Program

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March 18, 2025

Phil Zavadil
Saint Paul Public Water System
P.O. Box 901
Saint Paul, AK 99660

Re: Saint Paul Public Water System 2024 Revised Sanitary Survey Response Letter
PWSID #: AK2260286 Class: Community; Source: Groundwater

Dear Phil Zavadil,

This letter is the Drinking Water Program's follow-up to the August 07, 2024, sanitary survey inspection of the Saint Paul public water system conducted by Sierra Wylde with Alaska Native Tribal Health Consortium. Their report is included with this letter for your reference.

The purpose of a sanitary survey is to provide an on-site evaluation of the capacity of the water system to consistently provide safe drinking water to the public according to State and Federal drinking water regulations. Based on the onsite inspection, it has been determined that this system has a deficiency, which is outlined in this letter.

Within 30 days you must contact the Drinking Water Program staff to discuss corrective actions or provide a corrective action plan with a timeline for the significant deficiency listed below. The significant deficiency listed must be corrected by July 16, 2025. If you are unable to make these corrections by July 16, 2025, you will need to provide an alternative timeline in the corrective action plan. **Following completion of corrective action, written verification, including photo documentation where applicable, must be submitted to the Drinking Water Program as verification that the listed deficiencies have been corrected.**

Please be aware that if deficiencies are not addressed within the outlined timeline, or according to an approved corrective action schedule, violations will be issued. These violations can place the water system on the Environmental Protection Agency's (EPA) Enhanced Targeting Tool (ETT) list of water systems with significant compliance issues. Placement on the ETT list can lead to formal enforcement action.

Significant Deficiency

(A corrective action plan must be submitted to Drinking Water Program within 30 days or deficiencies corrected within 120 days)

1. ***Unused Well not in Sanitary Condition (ABND)*** – The electrical port on the well cap for the inactive well, WL 6 / Fredrika 4, was not sealed. Because the unused well is connected to the drinking water system, this port must be sealed to ensure that the sanitary seal for the well is intact. If this well is to be abandoned entirely, the Drinking Water Program recommends decommissioning the well according to the “Alaska Best Management Practices for Maintaining or Decommissioning Water Wells and Boreholes” guidance.

Findings

(These items are not significant deficiencies, though you are encouraged to address them)

1. ***No Source of Back-up Power*** – There is no source of back-up power for this water system. The DEC recommends that all public water systems have an alternate source of power so potable water can be produced if the primary power source is inoperable.
2. ***No Operator Certified to Class 1 Water Distribution*** – This public water system is a Class 1 Water Treatment system and a Class 1 Water Distribution system. Currently, no operator at this system holds a Class 1 Water Distribution certification. An operator for this system should become certified to the level of Class 1 Water Distribution.
3. ***Alternative to Grout Approved for UngROUTed Wells*** – Public drinking water wells are required to be grouted. However, there is no documentation that WL 1, WL 2, WL 3, and WL 4, are grouted in accordance with drinking water regulations. An alternative to grouting review was conducted by Drinking Water Program staff and alternative to grouting has been approved for these wells based on well and soil characteristics, historical sample results, and proximity to potential sources of contamination. If any changes occur to these factors or if any work is performed on or around the well casing in the future, the Drinking Water Program must be contacted to re-evaluate this decision.
4. ***Inoperable Check Valve for WL 1 / South Well*** – The surveyor reported that the check valve on the raw water line for WL 1 / South Well needed to be replaced. This check valve should be replaced, and the system should maintain a supply of critical spare parts to shorten down time for repairs.
5. ***Inoperable Pump for WL 3 / Frederika 1*** – The well pump for WL 3 / Fredrika 1 was reported to be inoperable and was thought to have a burnt-out motor. The Drinking Water Program recommends repairing or replacing this pump so this well can be returned to service, and then properly managing the wiring for the pump control box.
6. ***Inoperable Pump for WL 5 / Frederika 3*** – WL 5 / Fredrika 3 was not being used at the time of the survey due to an issue with the well pump. The Drinking Water Program recommends diagnosing the issue with the pump and making repairs so the well can be returned to service.

7. ***Insufficient Screen on Tank A*** – The vent for potable water Tank A was covered with slats that do not prevent the entrance of insects or debris. This vent should be screened to prevent the entrance of pests and debris. The EPA recommends a 24-mesh stainless steel screen for storage tank vents.
8. ***Not Conducting Routine Maintenance on Storage Tank A*** – Tank A had not been cleaned or inspected in since 2016. The DEC recommends that storage tanks be inspected every year and cleaned every 3 years.
9. ***Possible Leak in Distribution System*** – The surveyor reported that water usage for this system was significantly higher than typical, and that the operators did not have leak detection equipment to identify a leak. An operator for this system reported in a March 03, 2025 phone call that the system had repaired a leak in a housing unit since the inspection and he had not seen any indications of a significant leak. The Drinking Water Program encourages you to continue to monitor water demand to watch for leaks, and to obtain leak detection equipment if necessary.

Please be advised that modifications to the drinking water system, other than routine maintenance and emergency repair, may first require approval by the Drinking Water Program. As the public water system owner, it is your responsibility to ensure that all replacement parts, piping, and equipment meet drinking water standards and regulations. Please contact a Drinking Water Program engineer before making any changes to the system to determine if engineered plans need to be submitted for approval.

Drinking water regulation 18 AAC 80.430 establishes that a Community public water system must have a sanitary survey conducted every three years. **Your next sanitary survey will be due in the 2027 calendar year.**

If you have any questions about this survey or its findings, please contact me at 907-269-7598 or at michael.hyde@alaska.gov.

Sincerely,



Mike Hyde
Engineering Assistant 2
Drinking Water Program, Anchorage Office

Enclosure: Sanitary Survey Report

cc: DEC Operator Certification Program
DEC Capacity Development Program
Monty Baker, Operator
Adrian Dirks, Operator
Sierra Wylde, Surveyor

Chris Pletnikoff, P.E., DEC Drinking Water Program
Elizabeth Nakanishi, DEC Drinking Water Program
Dawn Bodyfelt, DEC Drinking Water Program
John Rukovishnikoff, Aleutian Pribilof Islands Association