

## GKM monitoring plan comments

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To:GKMmonitoring <GKMmonitoring@epa.gov>;

Mr. Montgomery,

The Arizona Department of Environmental Quality (ADEQ) appreciates the opportunity to review and comment on the draft *Post-Gold King Release Incident: Conceptual Monitoring Plan for Surface Water, Sediments, and Biology*. While direct impacts to Arizona waters have been negligible, ADEQ continues to follow and participate in data collection and analysis post Gold King Mine releases. Our main concerns relate to the sampling of Lake Powell, stormwater sampling, data analysis and stakeholder involvement as described below.

Lake Powell- Please provide justification for only a single site being sampled within the lake. The potential for metals to migrate through the lake, either via the water column or sediment, exists so it seems prudent to sample further downstream of the San Juan River arm. Also, will a single surface sample be collected or will depth specific sampling occur? What is the frequency of sediment and fish tissue samples in relation to the water column sampling? Will they only be collected once with water column sampling occurring 4 times. Table 1 is not clear in the lake sampling frequency.

Table 1- Please clarify what metals sediment, benthos and fish samples will be analyzed for. Are they the same metals listed in footnote 1?

Table 1- It appears that stormwater sampling with only occur "at sites on the Animas in CO, Southern Ute, NM". If stormwater conditions will be remobilizing the contaminated sediment why limit the extent of sampling? Is there some justification that can be provided to support limiting the stormwater sampling to Colorado?

Section V. Assessment Summary- How often will data be analyzed, as collected or at the end of sampling?

The first bullet under General Decision Rules appears to indicate that communication with stakeholders will only occur at the end of data collection. The communication should be ongoing as data are analyzed so that any issues can be addressed as they are recognized. How will EPA communicate results to stakeholders? Will data simply be posted on EPA's website or will a comprehensive report be developed and shared that includes data interpretation?

Please let me know if you have any questions about our comments.

Thanks,  
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