From:	Kyle Radek
To:	Diane Cutler
Subject:	Groundwater Quality Rule comments
Date:	Monday, June 8, 2026 1:24:43 PM

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Diane,

I have the following comments regarding the Groundwater Quality Rule
Please let me know if you have any questions.
Thanks,
Kyle

Comment 1:
Reference:
007. Definitions
10. **Contamination**. The direct or indirect introduction into groundwater of any contaminant caused in whole or in part by human activities. (7-1-26)

Comment: Contaminants sometimes exist in the rock / soil matrix but are not mobilized into the groundwater under natural aquifer conditions. When water of a different quality is introduced, it can bring contaminants out of the rock / soil matrix and into the groundwater. The introduction of nitrates and bicarbonates by human activities has been linked to elevation of uranium levels in groundwater. This is probably true for other contaminants as well, and doesn't seem to be any different than if the contaminants were introduced by human activities. A general statement / phrase about mobilization of contaminants by human activities could satisfy the concern.

Suggestion: Add a phrase like: "*or the mobilization of any contaminants out of the subsurface geologic matrix and into groundwater by human activities*."

Comment 2:
Reference:
200.03. Natural Background Level. If the natural background level of a constituent exceeds the standard in this section, the natural background level will be used as the standard.

Comment: The concern is that in aquifer systems that include confining layers that separate aquifer units with waters of different quality, at any given location, there may be different "Natural Background Levels" of constituents at different depths. Uranium may be present at 55 ug/l in an aquifer unit at 300 feet below ground, but not as high in shallower or deeper units. It would not be appropriate to consider 55 ug/l as the "Natural Background Level" for the entire aquifer at that location. It might be a good idea to clarify that this issue will be considered in this analysis.

Suggestion: Add a sentence like: "In areas where confining layers separate aquifer units with water of different quality at different depths, the natural background levels of constituents in each aquifer unit and the associated depth must be considered."

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