

Georgia Department of Natural Resources
Environmental Protection Division

2 Martin Luther King Jr. Drive, Suite 1456, Atlanta, Georgia 30334
Judson H. Turner, Director
(404) 656-4713; Fax. (404) 651-9425

June 12, 2015

FILE COPY

VIA EMAIL & REGULAR MAIL

Michael Putnam, Plant Manager
Diamond Crystal Brands, Duluth, LLC
3245 North Berkeley Lake Road
Duluth, GA 30096

Re: HSI Site Number: 10844
North Berkeley Lake Road Site
Tax Parcel ID #6267-050
Diamond Crystal Brands
3245 North Berkeley Lake Road
Duluth, Gwinnett County, GA

Dear Mr. Putnam:

The Georgia Environmental Protection Division (EPD) has received the May 2015 Voluntary Investigation and Remediation Plan (VIRP), that has been submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act) O.C.G.A. 12-8-100, by SynTerra on behalf of Diamond Crystal Brands Duluth, LLC (Diamond Crystal Brands). After completing its review of the application, EPD has prepared the following comments:

- 1) The submitted application did not include any groundwater sampling data. Please provide EPD with a groundwater sampling plan. A minimum of two groundwater monitoring locations will need to be installed onsite. Please survey and utilize the neighboring properties' groundwater monitoring well locations and associated groundwater level data to construct a groundwater potentiometric map for the site.
- 2) Once the RRS have been established for the applicable exposure pathways, please include an evaluation of the overland run-off route from the site and determine the potential for any offsite impacts to surface water/sediment as the result of surface erosion of impacted soils.
- 3) EPD understands that the VIRP Application has indicated that the groundwater exposure pathway is incomplete based on the data provided, but requests that any environmental covenant that is to be placed on the site property as part of the planned corrective measures incorporate a groundwater use restriction to eliminate any future groundwater exposure potential.

The above listed comments must be addressed to EPD's satisfaction in order to demonstrate compliance with the provisions, purposes, standards and policies of the Act. EPD may, at its sole discretion, review and comment on documents submitted by Diamond Crystal Brands. However, failure of EPD to respond to a submittal within any timeframe does not relieve Diamond Crystal Brands from complying with the provisions, purposes, standards, and policies of the Act. Should you

May 2015 Voluntary Remediation Program Application
North Berkeley Lake Road Site #10844, Diamond Crystal Brands
June 12, 2015
Page 2 of 2

have any additional questions or concerns please contact Ms. Elise Chew of the Response and Remediation Program at (404) 463-7555.

Sincerely,



David Brownlee
Unit Coordinator
Response and Remediation Program

cc: Mark Taylor, SynTerra

File: VRP – North Berkeley Lake Road Site #10844, Diamond Crystal Brands