



ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

EPD Director's Office

2 Martin Luther King, Jr. Drive
Suite 1456, East Tower
Atlanta, Georgia 30334
404-656-4713

February 6, 2017

Mr. Michael J. Putman
Diamond Crystal Duluth, LLC
3245 North Berkley Lake Road
Duluth, GA 30096

Re: Semi-Annual VRP Progress Reports #s 3, 4 and 5
Diamond Crystal Duluth Property
North Berkeley Lake Road Site
Duluth, Gwinnett County, HSI # 10844

Dear Mr. Putman:

The Environmental Protection Division (EPD) is in receipt of the following documents (the "Reports") for the Diamond Crystal Duluth Property, in Duluth, Gwinnett County.

- 1) December 2016 Voluntary Remediation Program (VRP) Progress Report # 3,
- 2) June 2017 VRP Progress Report # 4, and
- 3) December 2017 VRP Progress Report # 5.

After completing a review of the Reports, EPD has prepared the following comments:

- 1) Previously, the EPD concurred with the receptor-specific health-based goals for arsenic in soil, but requested an evaluation of the leachability pathway as an essential component in the determination of any site-specific soil RRS. Diamond Crystal developed Type 4 soil RRS based on soil leachability in June 2017, presenting the final Type 4 RRS for soil leachability and direct exposure to receptors at the bottom of Table 1 in the December 2017 Progress Report. EPD's review of the proposed Type 1 groundwater RRS finds that acceptable also.

Based on EPD's review of the soil leaching/partitioning equation evaluation for arsenic in soil presented in the June 2017 Progress Report, the methodology employed was acceptable but assumes the adsorptive isotherm is linear. To account for that possibility, EPD is willing to default to the highest concentration in the dataset that did not leach (i.e., the 369 mg/kg value). If Diamond Crystal desires a higher maximum value, it may find a higher arsenic value and analyze it for SPLP. With the final Type 4 soil RRS based on soil leachability modified to 369 mg/kg, EPD concurs with the RRS values in the Reports.

For clarity, however, please provide a table showing, and specify in the narrative, that the final Type 4 non-residential RRS for arsenic at the site will be based on the more protective of the direct exposure value developed as part of the June 2016 VRP Progress Report and the soil leachability value as modified in this comment letter.

- 2) In the December 2017 Progress Report, Diamond Crystal Duluth requests a meeting to discuss the evaluation of corrective action and development of the CAP. EPD is in the midst

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of transitioning on-going VRP sites into a dedicated unit. Please contact Tom Brodell at (404) 657-8600 to set up a time for that meeting.

The above listed comment must be addressed to EPD's satisfaction in order to demonstrate compliance with the provisions, purposes, standards and policies of the Act. Please provide a response to the above listed comment as part of the next scheduled Progress Report submittal. If you should have any questions regarding this matter, please call Tom Brodell of the Response and Remediation Program at (404) 657-8600.

Sincerely,



David Brownlee
Unit Coordinator
Response and Remediation Program

c: Matt Mudge, SynTerra Corporation <mmudge@synterracorp.com>>

File: HSI # 10844, File ID: 226-0342

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