

## **ENVIRONMENTAL PROTECTION DIVISION**

## Richard E. Dunn, Director

**Land Protection Branch** 

2 Martin Luther King, Jr. Drive Suite 1054, East Tower Atlanta, Georgia 30334 404-657-8600

November 10, 2017

City of Duluth c/o Mr. James Riker City Manager 3167 Main Street Duluth, GA 30096

Re: Comments:

Semi-Annual VRP Progress Report #3

Former Duluth Dry Cleaners Tax Parcel ID # 6293.402

Duluth, Gwinnett County, HSI # 10892

Dear Mr. Riker:

The Environmental Protection Division (EPD) is in receipt of the October 31, 2017, VRP Progress Report (Report) #3 for the Former Duluth Dry Cleaners, in Duluth, Gwinnett County. After completing a review of this report, EPD has prepared the following comment:

• In reviewing the sampling log, EPD observes that the wells were purged using the "Low Flow-Low Stress" method. However, turbidity measurements were not taken during purging. According to the USEPA Operating Procedure (OP) "Procedure SESDPROC-301-R4, Groundwater Sampling," effective April 26, 2017, which can be found on the internet at www.epa.gov/sites/production/files/2017-07/documents/groundwater\_sampling301\_af.r4.pdf a well should be sampled without interruption after field parameters are stable and low turbidity is achieved. Please address this during future sampling events.

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: Katie Ross, P.G., Wenck Associates <a href="mailto:kross@wenck.com">kross@wenck.com</a>

File: HSI # 10892