

# Georgia Department of Natural Resources

## Environmental Protection Division – Land Protection Branch

2 Martin Luther King Jr., Dr., Suite 1054, Atlanta, Georgia 30334

(404) 657-8600; Fax: (404) 651-9425

Judson H. Turner, Director

March 18, 2016

VIA EMAIL AND REGULAR MAIL

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

Re: Comments: Semi-Annual VRP Progress Report  
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 December 2015 VRP Progress Report (Report) for the Diamond Crystal Duluth Property, in Duluth, Gwinnett County. After completing a review of this report, EPD has prepared the following comments:

- 1) Section 3.0 of the Report indicates Diamond Crystal does not intend to collect any groundwater data from its property. This information is required for the EPD to make a determination that the geologic conditions at the property are definitively similar to the neighboring properties and in order for Diamond Crystal to eventually certify compliance with applicable risk reduction standards for groundwater.

In the comment letter relating to the application, EPD reduced the requirements for groundwater monitoring locations to only two onsite locations, recognizing prior work done at neighboring sites could be utilized, provided Diamond Crystal incorporated data from these neighboring groundwater monitoring wells along with the onsite wells to construct a groundwater potentiometric map for the site. If you choose not to use the neighboring groundwater monitoring wells, then install a minimum of three onsite groundwater monitoring locations in order to provide the information required by EPD.

- 2) The Report indicates that a Preliminary Paving and Site Controls Plan has been completed, and listed Appendix E as containing this Plan. However, only a “conceptual figure outlining the areas being considered for paving/capping” is included as Appendix E.

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. Please provide responses to the above listed comments 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: Mark Taylor, SynTerra Corporation <mtaylor@synterracorp.com>

File: HSI # 10844