

Tuesday, February 22, 2022

Mr. John Sayer
Georgia Environmental Protection Division
Land Protection Branch
2 Martin Luther King Jr. Dr. SE, Suite 1054 East Tower
Atlanta, GA 30334-9000

RE: Public Comment Regarding Public Notice to Issue New Hazardous Waste Facility Permit To Symrise, Permit Number HW-107(D)

Dear Mr. Sayer,

I am writing to you today to share comments and concerns on the proposed Symrise draft hazardous waste facility permit HW-107 (D).

[Please personalize this section including information about 1) why protecting and restoring our environment is important to you, and 2) why it is important for hazardous waste to be appropriately removed in our community]

My specific comments on the draft permit, permit application, and other associated documents are as follows.

1. The EPD should *expand* the monitoring schedule as described in the sampling plan to monitor twice a year *every year*, rather than once a year in even-numbered years and twice a year in odd-numbered years. Four (4) monitoring events in the proposed three-year life of the permit does not seem sufficient for developing the necessary data trends to determine the effectiveness of the modeled natural attenuation that is expected to occur. By increasing monitoring to twice *every year*, you would add two additional sampling events to glean that the modeled natural attenuation is taking place as expected, or not, which may warrant additional remedial investigations or activities. Additionally, the EPD should *not* allow any changes to the required minimum of 30 monitoring wells being sampled during scheduled sampling events as indicated in the sampling plan. If any changes are made to the monitoring network or schedule, an effort should be made to share this with the general public (whether a permit modification is required or not). This will allow the community to understand what changes are being made and the justification of those changes, and provide feedback or ask questions if necessary.
2. I understand that the EPA Consent Decree will terminate upon issuance of the Hazardous Waste Facility Permit. However, EPD should continue to require Symrise to monitor contaminants until they reach background levels rather than utilizing risk-based remedial goals or alternative concentration levels. The natural attenuation at the site may occur as expected, but also may require additional treatment. Either way, Symrise should be required to restore groundwater to background levels rather than leaving contamination behind and causing further blight to Glynn County.
3. Lastly, Symrise should renew its commitment to transparency by hosting annual public meetings and providing status updates to the general community. These public meetings can be arranged with the EPD, the local County Commission via work sessions, or hosted in partnership with the

Glynn Environmental Coalition. Annual informal public participation opportunities allow citizens to learn more about environmental conditions at the site without impending deadlines for public comment. This increased awareness greatly improves citizens' ability to participate when a public comment or public hearings are required in the future.

Glynn County is plagued with numerous legacy hazardous waste sites that have impacted property values, economic development, public health, and overall quality of life for residents in our community. Some of those impacts have persisted for decades and some will continue to have impacts for decades into the future. Symrise has a unique opportunity to monitor the natural attenuation at this site and showcase complete remediation of an environmental hazard and complete restoration of groundwater resources in a manner that has not been seen in Glynn County.

I support the Georgia Environmental Protection Division issuing the Hazardous Waste Facility Permit HW-107(D) with the consideration of the comments included here.

Thank you in advance for your consideration of these comments, and we look forward to additional opportunities for public participation in the future.

Sincerely,

FIRST AND LAST NAME:

MAILING ADDRESS:

CITY, STATE ZIPCODE: