

Georgia Department of Natural Resources
Environmental Protection Division

2 Martin Luther King, Jr. Dr., S.E., Suite 1066 East, Atlanta, Georgia 30334
Mark Williams, Commissioner
Environmental Protection Division
Judson H. Turner, Director

Reply To:
Response and Remediation Program
2 Martin Luther King, Jr. Drive, S.E.
Suite 1462, East Tower
Atlanta, Georgia 30334-9000
Office 404/657-8600 Fax 404-657-0807

August 8, 2013

VIA EMAIL & REGULAR MAIL

Avery Dennison
c/o Mr. Bruce Martin
130 Walnut Street
Douglas, MA 01516

Re: December 2012 & January 2013 VRP Progress Reports
Avery Dennison, HSI #10578
Flowery Branch, Hall County, GA
Tax Parcel ID 08073 000003D

Dear Mr. Martin:

The Georgia Environmental Protection Division (EPD) has received the December 2012, 1st Semi-Annual Progress Report (December 2012 Report), and the June 2013, 2nd Semi-Annual Progress Report, which have both been submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act) O.C.G.A. 12-8-100, by the Johnson Company on behalf of Avery Dennison. After completing a review of the referenced documents, EPD has prepared the following comments:

- 1) Since 1992, EPD's Air Protection Branch has consistently recommended the use of air emissions control devices for HSRA remediations, even when air emissions were below levels for which an air quality permit is required, because operating these systems without emission control devices would only transfer the contamination from one environmental media to another. Therefore, please revise/modify the multi-phase extraction (MPE) system design to include measures to control off-gases in accordance with a best available control technology.
- 2) According to the June 2013 Report, monitoring locations MW-62, BR-22S, and BR-22D are indicated as the Point of Exposure(s) (POE) for the site, with monitoring locations MW-42, MW-54D, BR-21, and BR-21D being established as the Point of Demonstration (POD) for the site. EPD does not have any objections to the use of these POE's/POD's for the human health exposure pathway via groundwater ingestion, but requires supporting fate and transport modeling to illustrate that the groundwater impacts will not leave the confines of the established property boundary as it will be described in the Uniform Environmental Covenant documentation. In addition, EPD recommends that the unnamed tributary to Mudd Creek and an adequate number of associated surface water/stream bed monitoring locations be established as the POE for the surface water exposure pathway for the site. The surface water POD locations for the site should be based on the fate and transport models for each of the established source areas, and also be used to demonstrate that the groundwater contaminant plumes within each source area will not impact the downgradient POE at concentrations above in-stream water quality standards.

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EPD also reviewed the "Response to EPDs June 5, 2012, VRP Comment Letter," which was included in Appendix B of the December 2012 Report. With the exception of the comments related to information that may be included in future Uniform Environmental Covenant documentation for the site, Avery has appropriately addressed the June 5, 2012, EPD comments.

The above 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 Avery. However, failure of EPD to respond to a submittal within any timeframe does not relieve Avery from complying with the provisions, purposes, standards, and policies of the Act.

Should you have any additional questions or concerns please contact Mr. Kevin Collins of the Response and Remediation Program at (404) 463-0530.

Sincerely,



David Brownlee
Unit Coordinator
Response and Remediation Program

c: Glen Kirkpatrick, The Johnson Company

File: VRP Application 937335292 – Avery Dennison Site #10578

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