

Georgia Department of Natural Resources
Environmental Protection Division

2 Martin Luther King Jr., Dr., Suite 1456 East, Atlanta, Georgia 30334
Judson H. Turner, Director
(404) 657-8600; Fax (404) 657-0807

May 13, 2014

VIA EMAIL & REGULAR MAIL

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

Re: February 2014 VRP Progress Report
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 February 2014, 3rd Semi-Annual Progress Report (February 2014 Report), 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 document, EPD has prepared the following comments:

- 1) Based on the established site specific characteristics and justification provided in the February 2014 Report, along with follow-up discussions between EPD and site representatives during a May 8, 2014 meeting, EPD is not requiring that predictive modeling of the plume behavior (*i.e.*, *Biochlor*, *etc.*) be conducted for comparison to future monitoring results. However, EPD will require the submittal of a groundwater demonstration based on empirical site data to illustrate that the contaminants of concern (COC) concentration trends are relatively stable and/or decreasing through time, and will not result in the potential for groundwater impacts to migrate beyond the confines of the established property boundary. Please ensure that additional site-wide groundwater monitoring be completed in support of the demonstration.
- 2) Based on the justification provided in the February 2014 Report and the follow-up discussions between EPD and site representatives during a May 8, 2014 meeting, EPD will not be requiring a revision/modification to the multi-phase extraction (MPE) system design for incorporating the control of off-gases.

In accordance with the schedule provided within the February 2014 Report, the above listed comment(s) may be addressed through the completion of future semi-annual report submittals, which are scheduled to be submitted to EPD every June and December through 2017. If you have any questions, please contact Mr. Kevin Collins 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