

**Georgia Department of Natural Resources**  
**Environmental Protection Division**

2 Martin Luther King, Jr. Dr., S.E., Suite 1456 East, Atlanta, Georgia 30334  
Judson H. Turner, Director  
(404) 656-4713

November 2, 2015

**VIA EMAIL & REGULAR MAIL**

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

Re: June 2015 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 June 2015, 5<sup>th</sup> Semi-Annual Progress Report (June 2015 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) The VRP Progress Report indicated that no additional groundwater or surface water monitoring would be conducted. Please note that in accordance with the discussions held during an October 14, 2015, meeting between EPD and site representatives, additional monitoring may be necessary in the future depending upon the final certification criteria for the site, specifically regarding the yet to be determined surface water criteria for 1,4-dioxane.
- 2) It was noted that the December 2015 Progress Report would include the data from the final vapor intrusion assessment. Please ensure that the December Report includes the following vapor intrusion assessment information:
  - a. An update to the quality assurance/quality control measures, including the completion of new helium leak testing for the sub-slab soil vapor sampling ports, and summa canister pressure readings at the start and finish of sample collection, and upon receipt at the laboratory.
  - b. Reporting of 1,4-dioxane data as part of the vapor intrusion assessment and associated TO-15 analyses.

Should you have any questions or comments, please contact Mr. Kevin Collins at (404) 657-8660.

Sincerely,



David Brownlee  
Unit Coordinator  
Response and Remediation Program

c: Glen Kirkpatrick, The Johnson Company (email)

File: VRP Application 937335292 – Avery Dennison Site #10578