

Georgia Department of Natural Resources

Environmental Protection Division-Land Protection Branch

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

(404) 657-8600; Fax (404) 657-0807

Judson H. Turner, Director

April 28, 2016

VIA EMAIL & REGULAR MAIL

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

Re: December 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 December 2015, 6th Semi-Annual Progress Report (December 2015 Report), submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act) O.C.G.A. 12-8-100 by the Johnson Company (JC) on behalf of Avery Dennison. After completing a review of the referenced document, EPD has prepared the following comments:

- According to the December 2015 Report, concentrations of VOCs in sub-slab soil gas from sample locations SV-02S, SV-03S, and SV-12S noticeably increased between the June and August post-shutdown sampling events. As a result of this increase, please collect an additional round of sub-slab soil gas samples from these locations in order to confirm the degree of post-shutdown rebound. The additional site data should be incorporated into the December 2015 Report vapor intrusion pathway exposure evaluation, and include an evaluation of the potential cumulative risk posed from all identified volatile contaminants.

According to the schedule provided within the December 2015 Report, JC has proposed to submit a VRP Compliance Status Report (CSR) in the summer of 2016. EPD understands that the results of the additional vapor intrusion assessment may influence the site's path forward and the proposed completion of the CSR. Should additional time be required to complete the CSR, please ensure that the additional vapor intrusion assessment information is included within a VRP Progress Report submittal, along with an updated schedule, by no later than June 6, 2016. 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