



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Land Protection Branch
2 Martin Luther King, Jr. Drive
Suite 1054, East Tower
Atlanta, Georgia 30334
404-657-8600

December 5, 2016

VIA EMAIL & REGULAR MAIL

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

Re: June 2016 VRP Progress Report, July 2016 Follow-up/Additional Soil Gas Monitoring and December 2016 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 2016 7th Semi-Annual Progress Report, the Follow-up to June 2016 VRP Progress Report: Additional Soil Gas Monitoring report and the December 2016 8th Semi-Annual Progress 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:

- 1) EPD concurs that there is no risk above 10-5 exposure level for indoor air or sub-slab vapor in the southern source area based on the post-remediation indoor air and sub-slab vapor results.
- 2) EPD previously commented that further surface water sampling may be necessary depending on the final risk assessment criteria for 1,4-dioxane in surface water. EPD has determined that there is no state or national in-stream water quality standard for 1,4-dioxane. The only surface water benchmark for 1,4-dioxane is the USEPA Region 5 ecological screening level of 22 mg/L, which may be considered protective of human health recreationalists exposed while swimming or wading in contaminated surface water bodies. EPD may utilize this benchmark as a comparative tool to evaluate the need for further 1,4-dioxane risk assessment in surface water.

According to the schedule provided within the December 2016 Report, JC has proposed to submit a VRP Compliance Status Report (CSR) prior to February 28, 2017. Should you have any questions or comments, please contact Mr. Barrett Fischer at (404) 463-7555.

Sincerely,

David Brownlee
Unit Coordinator
Response and Remediation Program

c: Glen Kirkpatrick, The Johnson Company (email)
File: VRP Application 937335292 – Avery Dennison Site #10578