

Ethicon, Inc.

Voluntary Remediation Program

Compliance Status Report

Ethicon, Inc.
655 Ethicon Circle
Cornelia, Georgia

December 16, 2013



A handwritten signature in blue ink, reading "Ch R. Miller", written over a horizontal line.

Christopher R. Miller, PG
Project Geologist

A handwritten signature in blue ink, reading "Evan B. Clark", written over a horizontal line.

Evan B. Clark, PE
Project Manager

**Voluntary Remediation
Program**

Compliance Status Report

Ethicon, Inc.
655 Ethicon Circle
Cornelia, Georgia

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Ethicon, Inc.

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Date:
December 16, 2013

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A handwritten signature in blue ink, reading "Evan B. Clark".

Evan B. Clark, PE
Senior Project Manager

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VRP Compliance Status Report


Ethicon, Inc.
655 Ethicon Circle
Cornelia, Georgia

Professional Engineer/Geologist Certification

I certify that this report and all attachments were prepared under my direction in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. The information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

I certify that I am a qualified groundwater scientist who has received a baccalaureate or postgraduate degree in the natural sciences or engineering, and have sufficient training and experience in groundwater hydrology and related fields, as demonstrated by state registration and completion of accredited university courses, that enable me to make sound professional judgments regarding groundwater monitoring and contaminant fate and transport. I further certify that this report was prepared by myself or by a subordinate working under my direction.



Evan B. Clark, PE
Senior Project Manager
Georgia Registration No. 23871

12/16/13

Date

**VRP Compliance
Status Report**

Ethicon, Inc. Cornelia,
Georgia
HSI Site Number 10793

Responsible Party Compliance Status Certification

I certify under penalty of law that this report and all attachments were prepared under my direction in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Based upon my review of the findings of this report with respect to the risk reduction standards of the Rules for Hazardous Site Response, Rule 391-3-19-.07, I have determined that the site is in compliance with Type 1 Risk Reduction Standards for soil and with Type 1 Risk Reduction Standards with controls for groundwater.

Signature Mike Beck
Name: MIKE BECK
Title: PLANT MANAGER

Ethicon, Inc.

Date 12/13/2013

1. Introduction

This Compliance Status Report (CSR) has been prepared pursuant to Section 12-8-107(e) of the Georgia Voluntary Remediation Program Act. Data in this CSR provides a summary of remedial actions completed since enrollment in the Voluntary Remediation Program (VRP), and provides certification of compliance to Type 1 Risk Reduction Standards (RRS) with controls.

2. Regulatory History

A Voluntary Remediation Plan was prepared and submitted on behalf of Ethicon, Inc. (Ethicon) on August 24, 2010 for the Ethicon facility located at 655 Ethicon Circle, Cornelia, Georgia (site). Figure 1 provides the location of the site superimposed on a topographic map of the area. The Voluntary Remediation Plan concluded that based on the results of previous investigations, the site was in compliance with Type 1 RRS for soil. The remediation portion of the Voluntary Remediation Plan for groundwater recommended semiannual groundwater monitoring, groundwater modeling, and institutional controls to eliminate exposure pathways. The site was accepted into the VRP, and the Voluntary Remediation Plan was approved by the Georgia Environmental Protection Division (EPD) in a letter dated October 15, 2010.

Following acceptance into the VRP, two semiannual groundwater sampling events were conducted and Semiannual VRP Status Updates (Status Updates) were prepared and submitted to EPD in 2011. In a letter dated March 23, 2012, EPD agreed that monitoring well MW-10 was the Point of Demonstration (POD) and a point 1,000 feet downgradient of RW-1 was the Point of Exposure (POE). Figure 2 is a site map showing the monitoring well locations. In addition, EPD stated that if the March 2012 groundwater sampling event and April 2012 Status Update continued to indicate that no exposure pathways were present, Ethicon would have demonstrated that the groundwater plume has no impact on the established POE and that the remediation portion of the Voluntary Remediation Plan would be complete following the filing and approval of a Uniform Environmental Covenant (UEC) for the site.

Subsequent to the EPD letter and submittal of the April 2012 Status Update, two additional Status Updates were prepared and submitted in October 2012 and April 2013. In a letter dated May 8, 2013, EPD agreed that based on the groundwater results presented in the April 2012 VRP Status Update, the Voluntary Remediation Plan remediation requirements had been satisfied and no additional groundwater monitoring would be required.

For purposes of this CSR, the data and conclusions presented within the Voluntary Remediation Plan and subsequent Status Updates are incorporated by reference herein. Please refer to these documents for additional information regarding the results of soil and groundwater sampling conducted at the site.

3. Corrective Action Implementation and Current Conditions

3.1 Groundwater

This section provides a summary of the results of the remediation plan and its implementation as outlined in the initial Voluntary Remediation Plan. The proposed remediation consisted of semiannual groundwater monitoring and implementation of institutional controls. Following the completion of three semiannual monitoring events (March 2011, September 2011, and March 2012), it was determined by EPD that the plume is stable, delineated, and will not impact the POE.

The most recent groundwater monitoring event was completed in March 2012 and analytical results were presented in the April 2012 Status Update. To monitor plume stability and to ensure that no exposure pathways developed, groundwater sampling was conducted semiannually between March 2010 and March 2012. Semiannual monitoring consisted of the collection of water level measurements from 22 on-site monitoring wells and the collection of groundwater samples from 10 of the wells (MW-1, MW-10, MW-12, MW-32D, MW-34, MW-35D, MW-36, MW-37, RW-1, and TW-20). During the March 2012 sampling event, MW-34 was not sampled because of an insufficient amount of water in the well. The remaining nine monitoring wells were sampled and analyzed for volatile organic compounds (VOCs) by United States Environmental Protection Agency Method 8260B.

Analytical results from the March 2012 groundwater sampling event indicate an overall stable trend in concentrations of site-wide constituents of concern. These results are summarized below:

- Six of the nine monitoring wells sampled were below detection limits for VOCs. TW-20 and MW-35 contained 1,1,2-trichloroethane (TCA) and 1,2-dichloroethane (DCA) at concentrations above the Type 3/4 RRS in March 2012. These wells are in the loading dock area.
- RW-1 slightly exceeded the Type 3/4 RRS for vinyl chloride (VC) in the former tank farm area.

- MW-34 was dry in March 2012 but exceeded the Type 3/4 RRS for 1,1,2-TCA and 1,2-dichloroethene (DCE) in March 2011.
- These results are consistent with previous sampling results, and the wells exceeding Type 3/4 RRS are upgradient of the POD well for the site.
- MW-10 (the POD well) has always been non-detect.

A cross-section location map and cross-sections AA' and BB' summarizing the groundwater sampling results from the March 2010 data included in the Voluntary Remediation Plan through the final March 2012 semiannual sampling event for shallow and deep groundwater are included as Figures 3, 4, and 5. Monitoring well construction details are provided in Table 1.

A groundwater potentiometric surface map for March 2012 is included as Figure 6 and is consistent with previous results. Groundwater elevations are provided in Table 2.

Groundwater quality maps summarizing groundwater analytical results from the March 2010 data included in the Voluntary Remediation Plan through the final March 2012 semiannual sampling event for shallow and deep groundwater are included as Figure 7 and Figure 8. A non-detect contour is shown on the shallow groundwater map (Figure 7). A non-detect contour is not shown on the deep groundwater map (Figure 8) since both deep wells sampled in March 2010 were non-detect.

Groundwater sampling logs and laboratory analytical data from the March 2012 sampling event were provided in the April 2012 Status Update. A summary of approved RRS is included as Table 3. A summary of historical groundwater analytical data is included in Table 4.

In a letter dated May 8, 2013, EPD agreed that based on the groundwater results presented in the April 2012 VRP Status Update, the Voluntary Remediation Plan remediation requirements had been satisfied and no additional groundwater monitoring would be required.

3.2 Vapor Intrusion

An evaluation of vapor intrusion was previously conducted and the results submitted in the first Status Update (April 2011) to assess the potential exposure of site workers to constituents migrating from the subsurface into indoor air and thus establishing a point

of exposure. EPD's letter dated March 23, 2012, *VRP Semi-Annual Status Report, April 14, 2011 and October 17, 2011*, states that Ethicon has successfully established that vapor intrusion is not a complete exposure pathway.

3.3 Soil

As described in the approved Voluntary Remediation Plan, soil concentrations of VOCs are vertically delineated from the ground surface to the top of saturated soils, and are horizontally delineated to background concentrations. All soils at the site are in compliance with Type 1 RRS (Table 3). There is no risk of human exposure to soils impacted with VOCs above residential standards.

3.4 Institutional Controls

Pursuant to Section 12-8-107(h) of the VRP Act, a UEC was prepared and approved by EPD on October 18, 2013 for a 35-acre portion of the site. The fully executed UEC was filed in the records of the Habersham County Clerk on November 6, 2012. A file-stamped copy of the Environmental Covenant is provided in Appendix A.

Figure 9 illustrates the 35-acre portion of the site restricted by the UEC. As depicted on Figure 9, all of the monitoring wells that have been installed at the site are located within this area.

The following use restrictions are included within the UEC for the affected portion of the site (referred to as the "Property"):

- The use or extraction of groundwater beneath the Property for drinking water or any other non-remedial purposes shall be prohibited, and;
- Any residential use of the Property shall be prohibited until such time as EPD has concurred that the vapor intrusion pathway has been addressed for residential use.

The only groundwater detections at the site exceeding Type 4 RRS in 2012 were in the shallow groundwater in the loading dock area and former tank farm area. As shown by the non-detect groundwater contour on Figure 7, all of the wells outside this contour are non-detect and in compliance with Type 1 RRS. As shown on Figure 8, all of the deep monitoring wells are non-detect. The 35-acre portion of the site subject to the controls specified in the UEC includes all site monitoring wells, including the wells exceeding Type 4 RRS and the POD well. All remaining portions of the site are in

compliance with Type 1 RRS. Therefore, groundwater at the site is in compliance with Type 1 RRS with controls.

A copy of the executed UEC is included as Appendix A.

4. Summary and Conclusions

Based on both historical and recent groundwater analytical data, there are no exposure pathways present that would risk human exposure to impacted media.

Soil concentrations are in compliance with Type 1 RRS, are vertically delineated from the ground surface to the top of saturated soils, and are horizontally delineated to background concentrations.

Based on previous analysis of vapor intrusion in site buildings, the vapor intrusion pathway will not pose significant risks to human health.

Groundwater modeling performed for the site indicates the lack of exposure pathways. While the POE was established at a point 1,000 feet downgradient of RW-1, the groundwater modeling indicates that the plume is not expected to migrate past RW-1. VOCs were detected in three monitoring wells sampled during the final March 2012 sampling event, and these wells and other site monitoring wells are all located within the 35-acre portion of the site covered by the UEC.

Based on these results, comments provided by EPD in letters dated March 23, 2012, and May 8, 2013, and the previously submitted Status Updates, the remediation portion of the Voluntary Remediation Plan is complete. A UEC for the site was completed and executed restricting groundwater use inside a 35-acre area encompassing all on-site areas of soil and groundwater impact. There are no open exposure pathways present and this CSR certifies compliance with Type 1 RRS for soil and Type 1 RRS for groundwater with controls. Therefore, we respectfully request EPD's concurrence and delisting of the site from the Hazardous Site Inventory (HSI).

Table 1
Monitoring Well Construction Details
Ethicon, Inc.
Cornelia, Georgia

Well ID	Date Installed	Total Depth (feet bgs)	Screened Interval Depth (feet bgs)	Depth to Top of Sand (feet bgs)	Depth to Top of Bentonite (feet bgs)
RW-1	4/1/92	33.2	33.2 - 8.2	---*	---
MW-1	7/1/88	40.3	40.3 - 30.3	27.3	26.1
MW-1D	4/1/92	39.6	39.6 - 34.6	---	---
MW-7	4/1/92	27.1	27.1 - 12.1	---	---
MW-10	6/1/92	20.5	20.5 - 10.5	---	---
MW-12	12/5/05	30.5	30.0 - 20.0	14.0	8.0
MW-13	12/6/05	28.3	28.5 - 18.5	16.0	10.0
MW-14	12/6/05	20.5	20.5 - 10.5	7.7	4.6
MW-15	12/6/05	30.5	30.5 - 20.5	16.0	10.0
TW-20	1/12/06	35.0	35.0 - 30.0	28.0	2.0
TW-21	1/12/06	25.0	25.0 - 20.0	18.0	2.0
TW-22	1/12/06	35.0	35.0 - 30.0	28.0	2.0
TW-23	1/13/06	35.0	35.0 - 30.0	28.0	2.0
<i>TW-24</i>	<i>1/13/06</i>	<i>30.0</i>	<i>30.0 - 25.0</i>	<i>23.0</i>	<i>2.0</i>
TW-27	1/16/06	35.0	35.0 - 30.0	28.0	2.0
TW-28	1/16/06	35.0	35.0 - 30.0	28.0	2.0
MW-29D	3/15/06	67.0	67.0 - 62.0	60.0	58.0
MW-30D	3/17/06	75.0	75.0 - 70.0	68.0	66.0
MW-31D	3/17/06	59.0	59.0 - 54.0	52.0	50.0
MW-32D	3/16/06	69.0	69.0 - 64.0	62.0	60.0
MW-33D	3/17/06	55.0	55.0 - 50.0	48.0	46.0
MW-34	3/15/06	35.0	35.0 - 30.0	28.0	26.0
MW-35D	11/29/06	75.0	75.0 - 70.0	70.0	68.0
MW-36	5/4/09	55.0	55.0 - 45.0	41.0	39.0
MW-37	5/20/09	44.0	44.0 - 34.0	31.0	29.0

bgs = below ground surface

* --- = unknown

Italic indicates well destroyed

Table 2
Groundwater Elevation
Ethicon, Inc.
Cornelia, Georgia

Well ID	Date Measured	Top of Casing Elevation (feet)	Depth to Groundwater from Top of Casing (feet)	Calculated Groundwater Elevation (feet)	Screen Interval (feet amsl) Bottom of Screen denotes Bottom of well	
RW-1	11/21/05	99.48	18.50	80.98	91.28	66.28
	12/8/05	99.48	17.31	82.17		
	12/13/05	99.48	17.23	82.25		
	1/16/06	99.48	16.70	82.78		
	3/21/06	99.48	16.79	82.69		
	11/8/06	99.48	21.09	78.39		
	12/13/06	99.48	22.22	77.26		
	12/3/07	99.48	26.01	73.47		
	9/11/08	99.48	30.03	69.45		
	3/19/09	99.48	22.74	76.74		
	03/16/10	99.48	13.65	85.83		
	03/02/11	99.48	20.26	79.22		
	09/01/11	99.48	22.34	77.14		
	03/05/12	99.48	19.96	79.52		
MW-1	11/21/05	108.45	28.69	79.76	78.15	68.15
	12/8/05	108.45	29.18	79.27		
	12/13/05	108.45	29.02	79.43		
	1/16/06	108.45	28.61	79.84		
	3/21/06	108.45	27.60	80.85		
	11/8/06	108.45	33.39	75.06		
	12/13/06	108.45	33.71	74.74		
	3/19/09	108.45	35.33	73.12		
	3/16/10	108.45	25.10	83.35		
	3/2/11	108.45	31.67	76.78		
	9/1/11	108.45	32.35	76.10		
	3/5/12	108.45	31.96	76.49		
MW-1D	11/21/05	99.95	22.66	77.29	65.35	60.35
	12/8/05	99.95	20.41	79.54		
	12/13/05	99.95	19.65	80.30		
	1/16/06	99.95	18.24	81.71		
	3/21/06	99.95	17.93	82.02		
	12/13/06	99.95	22.16	77.79		
	12/3/07	99.95	25.40	74.55		
	3/19/09	99.95	24.22	75.73		
	3/16/10	99.95	19.62	80.33		
	3/2/11	99.95	20.92	79.03		
	9/1/11	99.95	22.98	76.97		
	3/5/12	99.95	21.44	78.51		

Table 2
Groundwater Elevation
Ethicon, Inc.
Cornelia, Georgia

Well ID	Date Measured	Top of Casing Elevation (feet)	Depth to Groundwater from Top of Casing (feet)	Calculated Groundwater Elevation (feet)	Screen Interval (feet amsl) Bottom of Screen denotes Bottom of well	
MW-7	11/21/05	100.00	18.85	81.15	87.90	72.90
	12/8/05	100.00	17.50	82.50		
	12/13/05	100.00	17.47	82.53		
	1/16/06	100.00	16.92	83.08		
	11/9/06	100.00	21.41	78.59		
	12/13/06	100.00	22.51	77.49		
	12/3/07	100.00	26.32	73.68		
	3/19/09	100.00	22.86	77.14		
	3/16/10	100.00	14.17	85.83		
	3/1/11	100.00	22.84	77.16		
	3/5/12	100.00	20.13	79.87		
MW-10	11/21/05	85.76	6.72	79.04	75.26	65.26
	12/8/05	85.76	5.41	80.35		
	12/13/05	85.76	6.52	79.24		
	1/16/06	85.76	5.36	80.40		
	3/21/06	85.76	3.22	82.54		
	11/9/06	85.76	9.29	76.47		
	12/13/06	85.76	10.69	75.07		
	12/3/07	85.76	14.57	71.19		
	3/19/09	85.76	7.57	78.19		
	3/16/10	85.76	3.45	82.31		
	3/16/10	85.76	8.22	77.54		
	9/1/11	85.76	13.19	72.57		
	3/5/12	85.76	7.72	78.04		

Table 2
Groundwater Elevation
Ethicon, Inc.
Cornelia, Georgia

Well ID	Date Measured	Top of Casing Elevation (feet)	Depth to Groundwater from Top of Casing (feet)	Calculated Groundwater Elevation (feet)	Screen Interval (feet amsl) Bottom of Screen denotes Bottom of well	
MW-12	12/8/05	102.45	19.46	82.99	82.45	71.95
	12/13/05	102.45	19.13	83.32		
	1/16/06	102.45	18.84	83.61		
	3/21/06	102.45	18.66	83.79		
	11/8/06	102.45	23.06	79.39		
	12/13/06	102.45	23.91	78.54		
	12/3/07	102.45	27.54	74.91		
	3/6/08	102.45	25.35	77.10		
	3/20/08	102.45	24.65	77.80		
	6/4/08	102.45	25.92	76.53		
	9/11/08	102.45	25.97	76.48		
	12/17/08	102.45	28.10	74.35		
	3/19/09	102.45	25.62	76.83		
	6/24/09	102.45	23.19	79.26		
	3/16/10	102.45	16.69	85.76		
	6/7/10	102.45	17.54	84.91		
	3/2/11	102.45	21.71	80.74		
	9/1/11	102.45	23.36	79.09		
	3/5/12	102.45	22.59	79.86		
MW-13	12/8/05	86.68	8.00	78.68	68.18	58.18
	12/13/05	86.68	8.24	78.44		
	1/16/06	86.68	7.09	79.59		
	3/21/06	86.68	6.45	80.23		
	11/8/06	86.68	11.54	75.14		
	12/13/06	86.68	12.20	74.48		
	12/3/07	86.68	16.16	70.52		
	3/19/09	86.68	10.88	75.80		
	3/16/10	86.68	4.73	81.95		
	3/2/11	86.68	10.26	76.42		
	9/1/11	86.68	15.36	71.32		
	3/5/12	86.68	8.78	77.90		

Table 2
Groundwater Elevation
Ethicon, Inc.
Cornelia, Georgia

Well ID	Date Measured	Top of Casing Elevation (feet)	Depth to Groundwater from Top of Casing (feet)	Calculated Groundwater Elevation (feet)	Screen Interval (feet amsl) Bottom of Screen denotes Bottom of well	
MW-14	12/8/05	96.39	14.52	81.87	85.89	75.89
	12/13/05	96.39	14.46	81.93		
	1/16/06	96.39	13.62	82.77		
	3/21/06	96.39	13.82	82.57		
	11/8/06	96.39	19.05	77.34		
	12/13/06	96.39	19.74	76.65		
	12/3/07	96.39	19.85	76.54		
	3/19/09	96.39	19.78	76.61		
	3/16/10	96.39	9.55	86.84		
	3/2/11	96.39	17.51	78.88		
	9/1/11	96.39	19.99	76.40		
	3/5/12	96.39	16.84	79.55		
MW-15	12/8/05	101.74	21.40	80.34	81.24	71.24
	12/13/05	101.74	21.24	80.50		
	1/16/06	101.74	20.88	80.86		
	3/21/06	101.74	20.03	81.71		
	11/8/06	101.74	25.22	76.52		
	12/13/06	101.74	25.77	75.97		
	12/3/07	101.74	29.05	72.69		
	3/7/08	101.74	25.97	75.77		
	6/4/08	101.74	25.17	76.57		
	9/11/08	101.74	27.37	74.37		
	12/17/08	101.74	29.23	72.51		
	3/19/09	101.74	27.31	74.43		
	6/24/09	101.74	24.43	77.31		
	3/16/10	101.74	17.58	84.16		
	3/2/11	101.74	23.89	77.85		
	9/1/11	101.74	24.66	77.08		
	3/5/12	101.74	24.29	77.45		

Table 2
Groundwater Elevation
Ethicon, Inc.
Cornelia, Georgia

Well ID	Date Measured	Top of Casing Elevation (feet)	Depth to Groundwater from Top of Casing (feet)	Calculated Groundwater Elevation (feet)	Screen Interval (feet amsl) Bottom of Screen denotes Bottom of well	
TW-20	1/16/06	113.14	28.10	85.04	83.14	78.14
	3/21/06	113.14	27.62	85.52		
	11/8/06	113.14	32.11	81.03		
	12/13/06	113.14	32.74	80.40		
	12/3/07	113.14	DRY			
	3/6/08	113.14	DRY			
	6/4/08	113.14	DRY			
	9/11/08	113.14	DRY			
	12/17/08	113.14	DRY			
	3/19/09	113.14	DRY			
	6/24/09	113.14	32.97	80.17		
	3/16/10	113.14	27.33	85.81		
	6/7/10	113.14	26.89	86.25		
	3/2/11	113.14	31.11	82.03		
	9/1/11	113.14	31.68	81.46		
	3/5/12	113.14	32.21	80.93		
TW-21	1/16/06	102.33	16.49	85.84	82.33	77.33
	3/21/06	102.33	17.44	84.89		
	11/8/06	102.33	19.96	82.37		
	12/13/06	102.33	22.99	79.34		
	3/19/09	102.33	19.28	83.05		
	3/16/10	102.33	10.93	91.40		
	3/2/11	102.33	21.00	81.33		
	9/1/11	102.33	23.34	78.99		
	3/5/12	102.33	18.43	83.90		
TW-22	1/16/06	109.26	23.85	85.41	79.26	74.26
	3/21/06	109.26	24.28	84.98		
	11/8/06	109.26	28.22	81.04		
	12/13/06	109.26	29.10	80.16		
	3/19/09	109.26	30.50	78.76		
	3/16/10	109.26	21.39	87.87		
	3/2/11	109.26	27.18	82.08		
	9/1/11	109.26	29.38	79.88		
	3/5/12	109.26	27.34	81.92		

Table 2
Groundwater Elevation
Ethicon, Inc.
Cornelia, Georgia

Well ID	Date Measured	Top of Casing Elevation (feet)	Depth to Groundwater from Top of Casing (feet)	Calculated Groundwater Elevation (feet)	Screen Interval (feet amsl) Bottom of Screen denotes Bottom of well	
TW-23	1/16/06	113.13	27.59	85.54	83.13	78.13
	3/21/06	113.13	27.18	85.95		
	11/8/06	113.13	31.73	81.40		
	12/13/06	113.13	32.21	80.92		
	3/19/09	113.13	34.09	79.04		
	3/16/10	113.13	26.41	86.72		
	3/2/11	113.13	30.66	82.47		
	9/1/11	113.13	30.95	82.18		
	3/5/12	113.13	31.38	81.75		
TW-24	1/16/06	102.39	24.35	78.04	77.39	72.39
	3/21/06	102.39	DESTROYED			
TW-27	1/16/06	114.18	26.66	87.52	84.18	79.18
	3/21/06	114.18	25.51	88.67		
	11/8/06	114.18	31.74	82.44		
	12/13/06	114.18	32.32	81.86		
	3/19/09	114.18	34.28	79.90		
	3/16/10	114.18	22.57	91.61		
	3/2/11	114.18	29.45	84.73		
	9/1/11	114.18	30.02	84.16		
	3/5/12	114.18	30.91	83.27		
TW-28	1/16/06	114.45	25.82	88.63	84.45	79.45
	3/21/06	114.45	24.71	89.74		
	11/8/06	114.45	30.34	84.11		
	12/13/06	114.45	30.98	83.47		
	3/19/09	114.45	34.21	80.24		
	3/16/10	114.45	23.54	90.91		
	3/2/11	114.45	28.95	85.50		
	9/1/11	114.45	29.54	84.91		
	3/5/12	114.45	29.83	84.62		
MW-29D	3/21/06	114.39	25.01	89.38	52.39	47.39
	11/8/06	114.39	30.32	84.07		
	12/13/06	114.39	30.75	83.64		
	3/19/09	114.39	34.34	80.05		
	3/16/10	114.39	23.70	90.69		
	3/2/11	114.39	28.23	86.16		
	9/1/11	114.39	28.90	85.49		
	3/5/12	114.39	30.32	84.07		

Table 2
Groundwater Elevation
Ethicon, Inc.
Cornelia, Georgia

Well ID	Date Measured	Top of Casing Elevation (feet)	Depth to Groundwater from Top of Casing (feet)	Calculated Groundwater Elevation (feet)	Screen Interval (feet amsl) Bottom of Screen denotes Bottom of well	
MW-30D	3/21/06	106.57	26.90	79.67	36.57	31.57
	11/8/06	106.57	32.11	74.46		
	12/13/06	106.57	32.24	74.33		
	3/19/09	106.57	33.62	72.95		
	3/16/10	106.57	23.45	83.12		
	3/2/11	106.57	30.28	76.29		
	9/1/11	106.57	31.10	75.47		
	3/5/12	106.57	30.55	76.02		
MW-31D	3/21/06	89.44	9.60	79.84	35.44	30.44
	11/8/06	89.44	13.12	76.32		
	12/13/06	89.44	13.51	75.93		
	3/19/09	89.44	13.43	76.01		
	3/16/10	89.44	6.06	83.38		
	3/2/11	89.44	12.08	77.36		
	9/1/11	89.44	13.63	75.81		
	3/5/12	89.44	11.98	77.46		
MW-32D	3/21/06	112.97	27.91	85.06	48.97	43.97
	11/8/06	112.97	32.51	80.46		
	12/13/06	112.97	32.67	80.30		
	3/7/08	112.97	35.07	77.90		
	12/17/08	112.97	37.48	75.49		
	3/19/09	112.97	35.40	77.57		
	6/24/09	112.97	32.88	80.09		
	3/16/10	112.97	26.65	86.32		
	6/7/10	112.97	26.82	86.15		
	3/2/11	112.97	30.98	81.99		
	9/1/11	112.97	31.49	81.48		
	3/5/12	112.97	31.81	81.16		
MW-33D	3/21/06	102.50	21.94	80.56	52.50	47.50
	11/8/06	102.50	26.84	75.66		
	12/13/06	102.50	26.71	75.79		
	3/19/09	102.50	27.88	74.62		
	3/16/10	102.50	19.27	83.23		
	3/2/11	102.50	25.19	77.31		
	9/1/11	102.50	27.84	74.66		
	3/5/12	102.50	24.84	77.66		

Table 2
Groundwater Elevation
Ethicon, Inc.
Cornelia, Georgia

Well ID	Date Measured	Top of Casing Elevation (feet)	Depth to Groundwater from Top of Casing (feet)	Calculated Groundwater Elevation (feet)	Screen Interval (feet amsl) Bottom of Screen denotes Bottom of well	
MW-34	3/21/06	117.78	31.97	85.81	87.78	82.78
	11/8/06	117.78	34.66	83.12		
	12/13/06	117.78	DRY			
	12/3/07	117.78	DRY			
	3/6/08	117.78	DRY			
	6/4/08	117.78	DRY			
	9/11/08	117.78	DRY			
	12/17/08	117.78	DRY			
	3/19/09	117.78	DRY			
	6/24/09	117.78	34.32	83.46		
	3/16/10	117.78	31.80	85.98		
	6/7/10	117.78	30.91	86.87		
	3/2/11	117.78	34.46	83.32		
	9/1/11	117.78	34.48	83.30		
	3/5/12	117.78	34.70	83.08		
MW-35D	12/3/07	103.39	33.93	69.46	33.39	28.39
	3/6/08	103.39	31.37	72.02		
	6/4/08	103.39	30.57	72.82		
	9/11/08	103.39	31.43	71.96		
	12/17/08	103.39	34.30	69.09		
	3/19/09	103.39	31.74	71.65		
	6/24/09	103.39	28.96	74.43		
	3/16/10	103.39	21.46	81.93		
	3/2/11	103.39	28.65	74.74		
	9/1/11	103.39	29.73	73.66		
	3/5/12	103.39	28.61	74.78		
MW-36	5/5/09	116.09	37.02	79.07	71.09	61.09
	6/24/09	116.09	35.78	80.31		
	3/16/10	116.09	30.10	85.99		
	3/2/11	116.09	33.98	82.11		
	9/1/11	116.09	34.80	81.29		
	3/5/12	116.09	35.10	80.99		
MW-37	5/21/09	105.21	24.72	80.49	71.21	61.21
	6/24/09	105.21	25.12	80.09		
	3/16/10	105.21	17.81	87.40		
	3/2/11	105.21	24.02	81.19		
	9/1/11	105.21	25.93	79.28		
	3/5/12	105.21	23.24	81.97		

Note: Elevations are measured in AMSL.

Table 3
Risk Reduction Standards Summary
Ethicon, Inc.
Corneila, Georgia

Groundwater

Constituent	Type 3/4 RRS (mg/L)
1,1-Dichloroethane	4
1,2-Dichloroethane	0.005
1,1-Dichloroethene	0.55
cis-1,2-Dichloroethene	1
trans-1,2-Dichloroethene	2
Tetrachloroethene	0.005
1,1,1-Trichloroethane	5.3
1,1,2-Trichloroethane	0.005
Vinyl chloride	0.002
m&p-Xylene	10
o-Xylene	10

Soil

Constituent	Type 1/3 RRS (mg/kg)
1,1-Dichloroethane	400
1,2-Dichloroethane	0.5
1,1-Dichloroethene	0.7
cis-1,2-Dichloroethene	0.5
trans-1,2-Dichloroethene	10
Tetrachloroethene	0.5
1,1,1-Trichloroethane	20
1,1,2-Trichloroethane	0.5
Vinyl chloride	0.2
m&p-Xylene	630
o-Xylene	890

Type 1 - Residential Look Up

Type 2 - Residential Risk-Based

Type 3 - Industrial Look Up

Type 4 - Industrial Risk-Based

For groundwater, the greater of the Type 1/Type 2, and Type 3/Type 4, are shown

Table 4
Groundwater Analytical Summary- VOC's
Ethicon, Inc
Cornelia, Georgia

			1,1,2-TCA	1,1-DCA	1,1-DCE	1,2-DCA	cis-1,2-DCE	Acetone	Benzene	Toluene	Ethylbenzene	m,p-Xylene	o-Xylene	Isopropylbenzene	Chloroform	Vinyl Chloride	Nitrogen, Ammonia (As N)
Type 3/4 RRS (µg/L)			5	4,000	550	5	1,000	—	—	—	—	10,000	10,000	—	—	2	—
Boring/ Well ID	Screen Interval	Collection Date															
RW-1	8.2 - 33.2	11/22/05	11	7	<5.0	5.4	26	--	--	--	--	<10	<5.0	--	--	6.2	--
	8.2 - 33.2	11/09/06	<5.0	<5.0	<5.0	<5.0	24	<50	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	6.8	10800 J
	8.2 - 33.2	12/04/07	<5.0	<5.0	<5.0	<5.0	6.1	<50	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	2.2	2,510
	8.2 - 33.2	09/11/08	<5.0	<5.0	<5.0	<5.0	<5.0	<50	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<2.0	--
	8.2 - 33.2	09/26/08	<5.0	<5.0	<5.0	<5.0	<5.0	<50	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	2.4	--
	8.2 - 33.2	03/19/09	<5.0	<5.0	<5.0	<5.0	<5.0	<50	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<2.0	486
	8.2 - 33.2	09/21/09	<5.0	<5.0	<5.0	<5.0	<5.0	<50	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<2.0	--
	8.2 - 33.2	03/16/10	<5.0	<5.0	<5.0	<5.0	<5.0	<50	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<2.0	--
	8.2 - 33.3	03/02/11	<5.0	<5.0	<5.0	<5.0	<5.0	<50	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<2.0	--
MW-1	8.2 - 33.3	09/01/11	<5.0	<5.0	<5.0	<5.0	<5.0	<50	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	2.8	--
	8.2 - 33.3	03/06/12	<5.0	<5.0	<5.0	<5.0	<5.0	<50	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<2.0	--
	30.3 - 40.3	11/22/05	<5.0	<5.0	<5.0	<5.0	<5.0	--	--	--	--	<10	<5.0	--	--	<2.0	--
	30.3 - 40.3	03/19/09	<5.0	<5.0	<5.0	<5.0	<5.0	<50	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<2.0	--
	30.3 - 40.3	03/16/10	<5.0	<5.0	<5.0	<5.0	<5.0	<50	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<2.0	--
	Duplicate	03/16/10	<5.0	<5.0	<5.0	<5.0	<5.0	<50	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<2.0	--
	30.3 - 40.3	03/03/11	<5.0	<5.0	<5.0	<5.0	<5.0	<50	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<2.0	--
MW-1D	30.3 - 40.3	09/02/11	<5.0	<5.0	<5.0	<5.0	<5.0	<50	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<2.0	--
	30.3 - 40.3	03/05/12	<5.0	<5.0	<5.0	<5.0	<5.0	<50	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<2.0	--
	34-6 - 39.6	11/22/05	<5.0	<5.0	<5.0	<5.0	<5.0	--	--	--	--	<10	<5.0	--	--	<2.0	--
MW-7	34-6 - 39.6	12/04/07	--	--	--	--	--	--	--	--	--	--	--	--	--	--	<200
	12.1 - 27.1	11/22/05	<5.0	<5.0	<5.0	<5.0	<5.0	--	--	--	--	<10	<5.0	--	--	<2.0	--
MW-10	12.1 - 27.1	11/09/06	<5.0	<5.0	<5.0	<5.0	<5.0	<50	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<2.0	--
	10.5 - 20.5	11/22/05	<5.0	<5.0	<5.0	<5.0	<5.0	--	--	--	--	<10	<5.0	--	--	<2.0	--
	10.5 - 20.5	11/09/06	<5.0	<5.0	<5.0	<5.0	<5.0	<50	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<2.0	--
	10.5 - 20.5	12/04/07	--	--	--	--	--	--	--	--	--	--	--	--	--	--	<200
	10.5 - 20.5	03/19/09	<5.0	<5.0	<5.0	<5.0	<5.0	<50	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<2.0	--
	10.5 - 20.5	03/16/10	<5.0	<5.0	<5.0	<5.0	<5.0	<50	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<2.0	--
	10.5 - 20.5	03/03/11	<5.0	<5.0	<5.0	<5.0	<5.0	<50	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<2.0	--
MW-10	10.5 - 20.5	09/01/11	<5.0	<5.0	<5.0	<5.0	<5.0	<50	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<2.0	--
	10.5 - 20.5	03/06/12	<5.0	<5.0	<5.0	<5.0	<5.0	<50	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<2.0	--

Table 4
Groundwater Analytical Summary- VOC's
Ethicon, Inc
Cornelia, Georgia

			1,1,2-TCA	1,1-DCA	1,1-DCE	1,2-DCA	cis-1,2-DCE	Acetone	Benzene	Toluene	Ethylbenzene	m,p-Xylene	o-Xylene	Isopropylbenzene	Chloroform	Vinyl Chloride	Nitrogen, Ammonia (As N)
Type 3/4 RRS (µg/L)			5	4,000	550	5	1,000	—	—	—	—	10,000	10,000	—	—	2	—
Boring/ Well ID	Screen Interval	Collection Date															
MW-12	20.0 - 30.0	12/08/05	<5.0	<5.0	<5.0	<5.0	<5.0	--	--	--	--	42,000	14,000	--	--	<2.0	--
	20.0 - 30.0	11/09/06	<5.0	<5.0	<5.0	<5.0	<5.0	<50	13	260	12,000	35,000	12,000	250	<5.0	<2.0	--
	Duplicate	11/09/06	<5.0	<5.0	<5.0	<5.0	<5.0	<50	5.6	130	10,000	30,000	11,000	150	<5.0	<2.0	--
	20.0 - 30.0	12/04/07	<5.0	<5.0	<5.0	<5.0	<5.0	<50	20	320	13,000	40,000	14,000	540	<5.0	<2.0	<200
	20.0 - 30.0	03/06/08	<5.0	<5.0	<5.0	<5.0	<5.0	<50	22	370	17,000	49,000	15,000	310	<5.0	<2.0	--
	20.0 - 30.0	09/11/08	<5.0	<5.0	<5.0	<5.0	<5.0	<50	9	190	7,000	18,000	7,700	290	<5.0	<2.0	--
	20.0 - 30.0	03/19/09	<5.0	<5.0	<5.0	<5.0	<5.0	76	9.9	200	9,200	26,000	9,000	270	<5.0	<2.0	--
	Duplicate	03/19/09	<5.0	<5.0	<5.0	<5.0	<5.0	85	10	190	9,300	26,000	8,700	280	<5.0	<2.0	--
	20.0 - 30.0	09/21/09	<5.0	<5.0	<5.0	<5.0	<5.0	<50	<5.0	12	1,300	4,000	1,200	79	<5.0	<2.0	--
	Duplicate	09/21/09	<5.0	<5.0	<5.0	<5.0	<5.0	<50	<5.0	13	1,500	4,600	1,400	78	<5.0	<2.0	--
	20.0 - 30.0	11/05/09	<5.0	<5.0	<5.0	<5.0	<5.0	<50	<5.0	60	4,600	13,000	4,500	160	<5.0	<2.0	--
	20.0 - 30.0	03/16/10	<5.0	<5.0	<5.0	<5.0	<5.0	<50	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<2.0	--
	20.0 - 30.0	04/08/10	<5.0	<5.0	<5.0	<5.0	<5.0	<50	<5.0	5.6	680	1,900	740	32	<5.0	<2.0	--
	20.0 - 30.0	03/02/11	<5.0	<5.0	<5.0	<5.0	<5.0	<50	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<2.0	--
	20.0 - 30.0	09/01/11	<5.0	<5.0	<5.0	<5.0	<5.0	<50	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<2.0	--
	20.0 - 30.0	03/06/12	<5.0	<5.0	<5.0	<5.0	<5.0	<50	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<2.0	--
MW-13	18.5 - 28.5	12/08/05	<5.0	<5.0	<5.0	<5.0	<5.0	--	--	--	--	<10	<5.0	--	--	<2.0	--
	18.5 - 28.5	11/10/06	<5.0	<5.0	<5.0	<5.0	<5.0	<50	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<2.0	--
	18.5 - 28.5	12/04/07	--	--	--	--	--	--	--	--	--	--	--	--	--	--	<200
MW-14	10.5 - 20.5	12/08/05	<5.0	<5.0	<5.0	<5.0	<5.0	--	--	--	--	<10	<5.0	--	--	<2.0	--
	10.5 - 20.5	11/09/06	<5.0	<5.0	<5.0	<5.0	<5.0	<50	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<2.0	--
MW-15	20.5 - 30.5	12/08/05	<5.0	<5.0	<5.0	<5.0	<5.0	--	--	--	--	<10	<5.0	--	--	<2.0	--
	20.5 - 30.5	11/10/06	<5.0	<5.0	<5.0	<5.0	<5.0	<50	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<2.0	--
	20.5 - 30.5	12/04/07	--	--	--	--	--	--	--	--	--	--	--	--	--	--	230
	20.5 - 30.5	03/07/08	--	--	--	--	--	--	--	--	--	--	--	--	--	--	<200
	20.5 - 30.5	06/04/08	--	--	--	--	--	--	--	--	--	--	--	--	--	--	<200
	20.5 - 30.5	09/11/08	--	--	--	--	--	--	--	--	--	--	--	--	--	--	1,400
	20.5 - 30.5	12/17/08	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
	20.5 - 30.5	03/19/09	---	---	---	---	---	---	---	---	---	---	---	---	---	---	<200
	20.5 - 30.5	09/21/09	---	---	---	---	---	---	---	---	---	---	---	---	---	---	<200
SB-9	20-24*	12/20/05	<5.0	<5.0	<5.0	<5.0	<5.0	--	--	--	--	<10	<5.0	--	--	<2.0	--
SB-10	20-24*	12/20/05	<5.0	<5.0	<5.0	<5.0	<5.0	--	--	--	--	<10	<5.0	--	--	<2.0	--
SB-11	20-24*	12/20/05	<5.0	<5.0	<5.0	<5.0	<5.0	--	--	--	--	<10	<5.0	--	--	<2.0	--
SB-12	15-19*	12/20/05	<5.0	<5.0	<5.0	<5.0	<5.0	--	--	--	--	<10	<5.0	--	--	<2.0	--
SB-13	20-24*	12/20/05	<5.0	<5.0	<5.0	<5.0	<5.0	--	--	--	--	<10	<5.0	--	--	<2.0	--
SB-14	15-19*	12/20/05	<5.0	<5.0	<5.0	<5.0	<5.0	--	--	--	--	<10	<5.0	--	--	<2.0	--
SB-15	20-24*	12/21/05	<5.0	<5.0	<5.0	<5.0	<5.0	--	--	--	--	<10	<5.0	--	--	<2.0	--
SB-16	20-24*	12/21/05	<5.0	<5.0	<5.0	<5.0	<5.0	--	--	--	--	<10	<5.0	--	--	<2.0	--

Table 4
Groundwater Analytical Summary- VOC's
Ethicon, Inc
Cornelia, Georgia

			1,1,2-TCA	1,1-DCA	1,1-DCE	1,2-DCA	cis-1,2-DCE	Acetone	Benzene	Toluene	Ethylbenzene	m,p-Xylene	o-Xylene	Isopropylbenzene	Chloroform	Vinyl Chloride	Nitrogen, Ammonia (As N)
Type 3/4 RRS (µg/L)			5	4,000	550	5	1,000	—	—	—	—	10,000	10,000	—	—	2	—
Boring/ Well ID	Screen Interval	Collection Date															
SB-17	20-24*	12/21/05	<5.0	<5.0	<5.0	<5.0	<5.0	--	--	--	--	<10	<5.0	--	--	<2.0	--
SB-18	30-34*	12/21/05	200	<5.0	<5.0	5.8	<5.0	--	--	--	--	<10	<5.0	--	--	<2.0	--
SB-19	30-34*	12/21/05	<5.0	<5.0	<5.0	<5.0	<5.0	--	--	--	--	<10	<5.0	--	--	<2.0	--
SB-25	66-70*	01/16/06	<5.0	<5.0	11	<5.0	<5.0	--	--	--	--	<10	<5.0	--	--	<2.0	--
SB-26	50-54*	01/16/06	<5.0	<5.0	<5.0	<5.0	<5.0	--	--	--	--	<10	<5.0	--	--	<2.0	--
TW-20	30-35*	01/12/06	650	<5.0	<5.0	37	5.7	--	--	--	--	<10	<5.0	--	--	<2.0	--
	30-35	03/15/06	520	<5.0	7.8	26	<5.0	--	--	--	--	<10	<5.0	--	--	<2.0	--
	30-35	11/09/06	410	<5.0	<5.0	22	5.7	<50	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<2.0	--
	30-35	03/06/08	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
	30-35	09/11/08	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
	30-35	03/19/09	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
	30-35	03/17/10	480	<5.0	<5.0	40	<5.0	<50	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<2.0	--
	30-35	03/02/11	240	<5.0	<5.0	17	<5.0	<50	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<2.0	--
TW-20	30-35	09/02/11	260	<5.0	<5.0	18	<5.0	<50	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	--
	30-35	03/06/12	280	<5.0	<5.0	24	<5.0	<50	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	--
TW-20	60-64*	01/12/06	<5.0	<5.0	<5.0	<5.0	<5.0	--	--	--	--	<10	<5.0	--	--	<2.0	--
TW-21	20-25*	01/12/06	<5.0	<5.0	<5.0	<5.0	<5.0	--	--	--	--	<10	<5.0	--	--	<2.0	--
	20-25	03/15/06	<5.0	<5.0	<5.0	<5.0	<5.0	--	--	--	--	<10	<5.0	--	--	<2.0	--
	20-25	11/10/06	<5.0	<5.0	<5.0	<5.0	<5.0	<50	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<2.0	--
TW-22	30-35*	01/13/06	<5.0	<5.0	<5.0	<5.0	<5.0	--	--	--	--	<10	<5.0	--	--	<2.0	--
	30-35	03/15/06	<5.0	<5.0	<5.0	<5.0	<5.0	--	--	--	--	<10	<5.0	--	--	<2.0	--
	30-35	11/10/06	<5.0	<5.0	<5.0	<5.0	<5.0	<50	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<2.0	--
TW-23	30-35*	01/13/06	<5.0	<5.0	<5.0	<5.0	<5.0	--	--	--	--	<10	<5.0	--	--	<2.0	--
	30-35	03/14/06	<5.0	<5.0	<5.0	<5.0	<5.0	--	--	--	--	<10	<5.0	--	--	<2.0	--
	30-35	11/10/06	<5.0	<5.0	<5.0	<5.0	<5.0	<50	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<2.0	--
TW-24	25-30*	01/13/06	<5.0	<5.0	<5.0	<5.0	<5.0	--	--	--	--	<10	<5.0	--	--	<2.0	--
	46-50*	01/13/06	<5.0	<5.0	<5.0	<5.0	<5.0	--	--	--	--	<10	<5.0	--	--	<2.0	--
TW-27	72-77*	01/16/06	<5.0	<5.0	<5.0	<5.0	<5.0	--	--	--	--	<10	<5.0	--	--	<2.0	--
	30-35	03/15/06	<5.0	<5.0	<5.0	<5.0	<5.0	--	--	--	--	<10	<5.0	--	--	<2.0	--
TW-28	30-35*	01/16/06	<5.0	<5.0	<5.0	<5.0	<5.0	--	--	--	--	<10	<5.0	--	--	<2.0	--
	58-62*	01/16/06	<5.0	<5.0	<5.0	<5.0	<5.0	--	--	--	--	<10	<5.0	--	--	<2.0	--
	30-35	03/16/06	<5.0	<5.0	<5.0	<5.0	<5.0	--	--	--	--	<10	<5.0	--	--	<2.0	--
	30-35	11/10/06	<5.0	<5.0	<5.0	<5.0	<5.0	<50	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<2.0	--
MW-29D	62-67	03/16/06	<5.0	<5.0	<5.0	<5.0	<5.0	--	--	--	--	<10	<5.0	--	--	<2.0	--
MW-30D	70-75	03/21/06	<5.0	<5.0	21	<5.0	<5.0	--	--	--	--	<10	<5.0	--	--	<2.0	--
	70-75	11/08/06	<5.0	<5.0	16	<5.0	<5.0	<50	<5.0	<5.0	<5.0	<10	<5.0	<5.0	5.8	<2.0	--

Table 4
Groundwater Analytical Summary- VOC's
Ethicon, Inc
Cornelia, Georgia

			1,1,2-TCA	1,1-DCA	1,1-DCE	1,2-DCA	cis-1,2-DCE	Acetone	Benzene	Toluene	Ethylbenzene	m,p-Xylene	o-Xylene	Isopropylbenzene	Chloroform	Vinyl Chloride	Nitrogen, Ammonia (As N)
Type 3/4 RRS (µg/L)			5	4,000	550	5	1,000	—	—	—	—	10,000	10,000	—	—	2	—
Boring/ Well ID	Screen Interval	Collection Date															
MW-31D	54-59	03/21/06	<5.0	<5.0	<5.0	<5.0	<5.0	--	--	--	--	<10	<5.0	--	--	<2.0	--
MW-32D	64-69	03/21/06	<5.0	<5.0	<5.0	<5.0	<5.0	--	--	--	--	<10	<5.0	--	--	<2.0	--
	64-69	03/19/09	<5.0	<5.0	<5.0	<5.0	<5.0	<50	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<2.0	--
	64-69	03/17/10	<5.0	<5.0	<5.0	<5.0	<5.0	<50	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<2.0	--
	64-69	03/03/11	<5.0	<5.0	<5.0	<5.0	<5.0	<50	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<2.0	--
	64-69	09/01/11	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<2.0	--
	64-69	03/06/12	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<2.0	--
MW-33D	50-55	03/21/06	<5.0	<5.0	<5.0	<5.0	<5.0	--	--	--	--	<10	<5.0	--	--	<2.0	--
MW-34	30-35	03/17/06	850	<5.0	<5.0	20	<5.0	--	--	--	--	<10	<5.0	--	--	<2.0	--
	30-35	11/09/06	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
	30-35	03/06/08	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
	30-35	09/11/08	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
	30-35	03/19/09	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
	30-35	03/17/10	780	<5.0	<5.0	14	<5.0	<50	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<2.0	--
MW-35D	30-35	03/03/11	670	<5.0	<5.0	9.2	<5.0	<50	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<2.0	--
	70-75	12/01/06	<5.0	6.0	<5.0	<5.0	<5.0	<50	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<2.0	--
	70-75	12/13/06	<5.0	7.0	<5.0	<5.0	<5.0	<50	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<2.0	--
	70-75	12/04/07	--	<5.0	--	--	--	--	--	--	--	--	--	--	--	--	--
	70-75	03/06/08	--	<5.0	--	--	--	--	--	--	--	--	--	--	--	--	--
	70-75	06/04/08	--	6.1	--	--	--	--	--	--	--	--	--	--	--	--	--
	70-75	09/11/08	--	6.4	--	--	--	--	--	--	--	--	--	--	--	--	--
	70-75	12/17/08	--	5.3	--	--	--	--	--	--	--	--	--	--	--	--	--
	70-75	03/19/09	<5.0	<5.0	<5.0	<5.0	<5.0	<50	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<2.0	--
	70-75	03/16/10	<5.0	<5.0	<5.0	<5.0	<5.0	<50	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<2.0	--
	70-75	03/03/11	<5.0	<5.0	<5.0	<5.0	<5.0	<50	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<2.0	--
	70-75	09/02/11	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<2.0	--
	70-75	03/05/12	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<2.0	--

Table 4
Groundwater Analytical Summary- VOC's
Ethicon, Inc
Cornelia, Georgia

			1,1,2-TCA	1,1-DCA	1,1-DCE	1,2-DCA	cis-1,2-DCE	Acetone	Benzene	Toluene	Ethylbenzene	m,p-Xylene	o-Xylene	Isopropylbenzene	Chloroform	Vinyl Chloride	Nitrogen, Ammonia (As N)
Type 3/4 RRS (µg/L)			5	4,000	550	5	1,000	—	—	—	—	10,000	10,000	—	—	2	—
Boring/ Well ID	Screen Interval	Collection Date															
MW-36	45-55	05/05/09	6.6	<5.0	<5.0	<5.0	<5.0	<50	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<2.0	--
	45-55	09/21/09	32	<5.0	<5.0	7.1	<5.0	<50	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	2.4	--
	45-55	03/17/10	<5.0	<5.0	<5.0	<5.0	<5.0	<50	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<2.0	--
	45-55	03/03/11	53	<5.0	<5.0	11	<5.0	<50	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<2.0	--
	45-55	09/02/11	54	<5.0	<5.0	12	<5.0	<50	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	--
	45-55	03/05/12	17	<5.0	<5.0	5.1	<5.0	<50	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	--
MW-37	34-44	05/21/09	<5.0	<5.0	<5.0	<5.0	<5.0	<50	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<2.0	--
	34-44	03/16/10	<5.0	<5.0	<5.0	<5.0	<5.0	<50	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<2.0	--
	34-44	03/02/11	<5.0	<5.0	<5.0	<5.0	<5.0	<50	<5.0	<5.0	<5.0	<10	<5.0	<5.0	<5.0	<2.0	--
	34-44	09/01/11	<5.0	<5.0	<5.0	<5.0	<5.0	<50	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<2.0	--
	34-44	03/06/12	<5.0	<5.0	<5.0	<5.0	<5.0	<50	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<2.0	--

Units are µg/L

Detections in **Boldface**

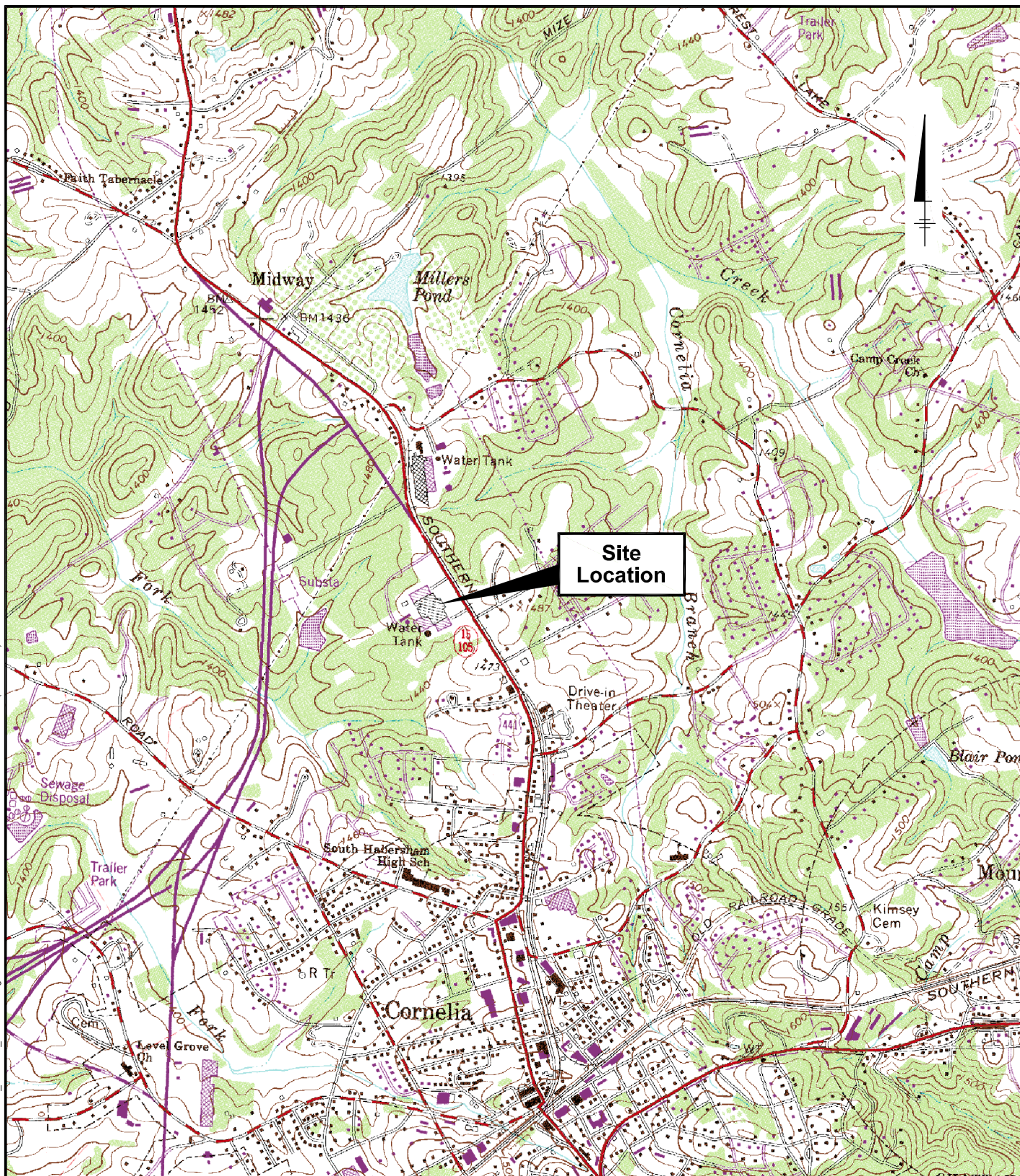
20 Detection exceeds Type 3/4 Groundwater Standard

* Direct Push Discrete Groundwater Sample

-- Not Analyzed

--- No sample collected; well was dry

J - Value is estimated; Matrix Spike samples were biased low



Source: USGS 7.5 Minute Series
Topographic Quadrangle, Clarksville,
Georgia (1964, Photorevised 1985).



ETHICON, INC.
655 ETHICON CIRCLE, CORNELIA, GEORGIA
**VOLUNTARY REMEDIAL PROGRAM COMPLIANCE
STATUS REPORT**

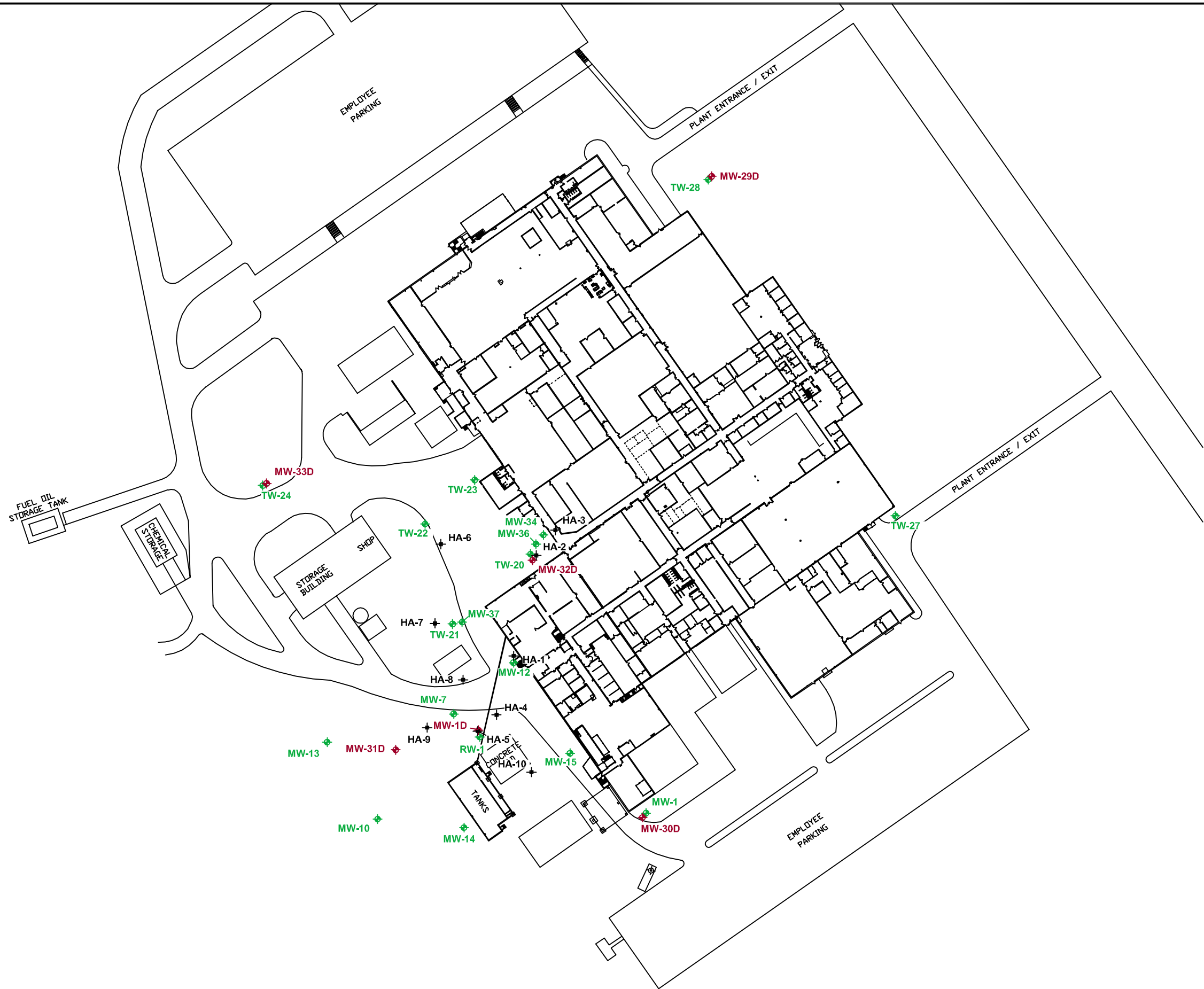
SITE LOCATION MAP



FIGURE

1

CITY: Augusta, GA DIV/GROUP: ENV DB: A. Saul LD: PIC: PM: LTR: G:\ENV\AD\Augusta-GA\ACT\GA063605\Cornelia\005800001\REV\CSR02.dwg LAYOUT: 2 SAVED: 12/5/2013 1:21 PM ACADVER: 18.1S (LMS TECH) PAGESETUP: -- PLOTSTYLETABLE: MONOCHROME.ctb PLOTTED: 12/5/2013 1:21 PM BY: SAUL, ANNE



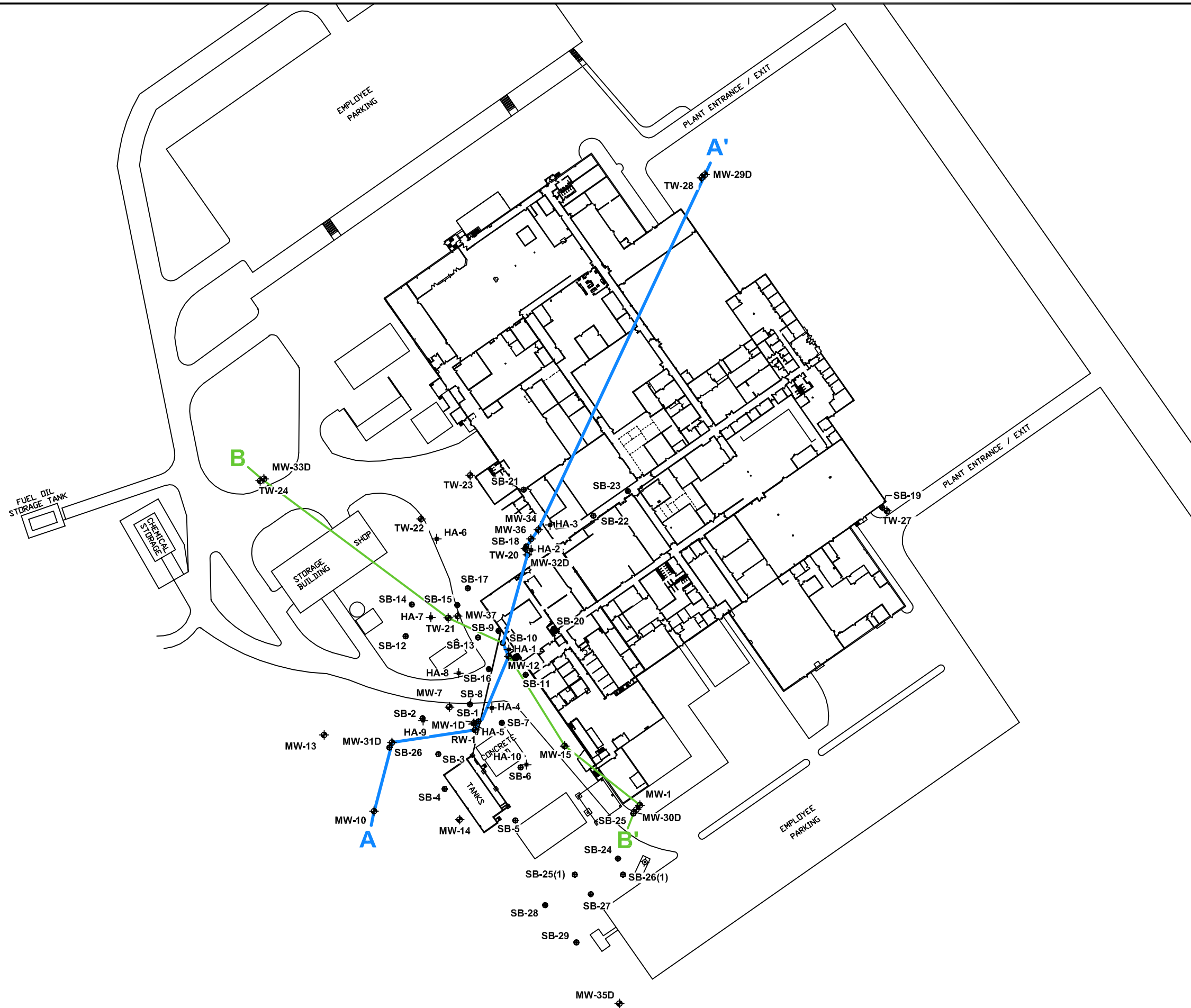
ETHICON, INC.
655 ETHICON CIRCLE, CORNELIA, GEORGIA
**VOLUNTARY REMEDIATION PROGRAM
COMPLIANCE STATUS REPORT**

SITE MAP

ARCADIS

FIGURE
2

CITY: Augusta, GA DIV/GROUP: ENV DB: A. Saul LD: PIC: PM: TM: LVR: G:\ENV\AD\Augusta-GA\ACT\G063605\Cornelia\005800001\REV\CSR03_REV\CSR_63605B03.dwg LAYOUT: 3 SAVED: 12/5/2013 1:22 PM ACADVER: 18.1 (LMS TECH) PAGESETUP: -- PLOTSTYLETABLE: MONOCHROME.ctb PLOTTED: 12/5/2013 1:24 PM BY: SAUL, ANNE



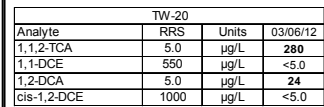
LEGEND

	BUILDING/STRUCTURE
	TEMPORARY WELL
	SHALLOW MONITOR WELL
	DEEP MONITOR WELL
	SOIL BORING
	HAND AUGER
	CROSS SECTION LOCATION FOR A - A'
	CROSS SECTION LOCATION FOR B - B'

0 120' 240' 360'

SCALE: 1" = 120'

ETHICON, INC. 655 ETHICON CIRCLE, CORNELIA, GEORGIA VOLUNTARY REMEDIATION PROGRAM COMPLIANCE STATUS REPORT	
CROSS-SECTION LOCATION MAP	
	FIGURE 3



GROUNDWATER ANALYTICAL DATA

MW-31D	WELL ID
75.93	GROUNDWATER ELEVATION (ft bls)
75.93	75.93

WELL ID
GROUNDWATER ELEVATION (ft b/s)

WELL CASING

SCREEN

GROUND WATER SURFACE
(ELEVATIONS TAKEN 3/2/2011)

OPEN BORE HOLE

(54-59) SCREENED INTERVAL (ft b/s)

ND NON-DETECTED (GROUNDWATER)

ND* NON-DETECT PRIOR TO ACCEPTANCE INTO VRP

NS NOT SAMPLED SINCE ACCEPTANCE INTO VRP

NOTES:

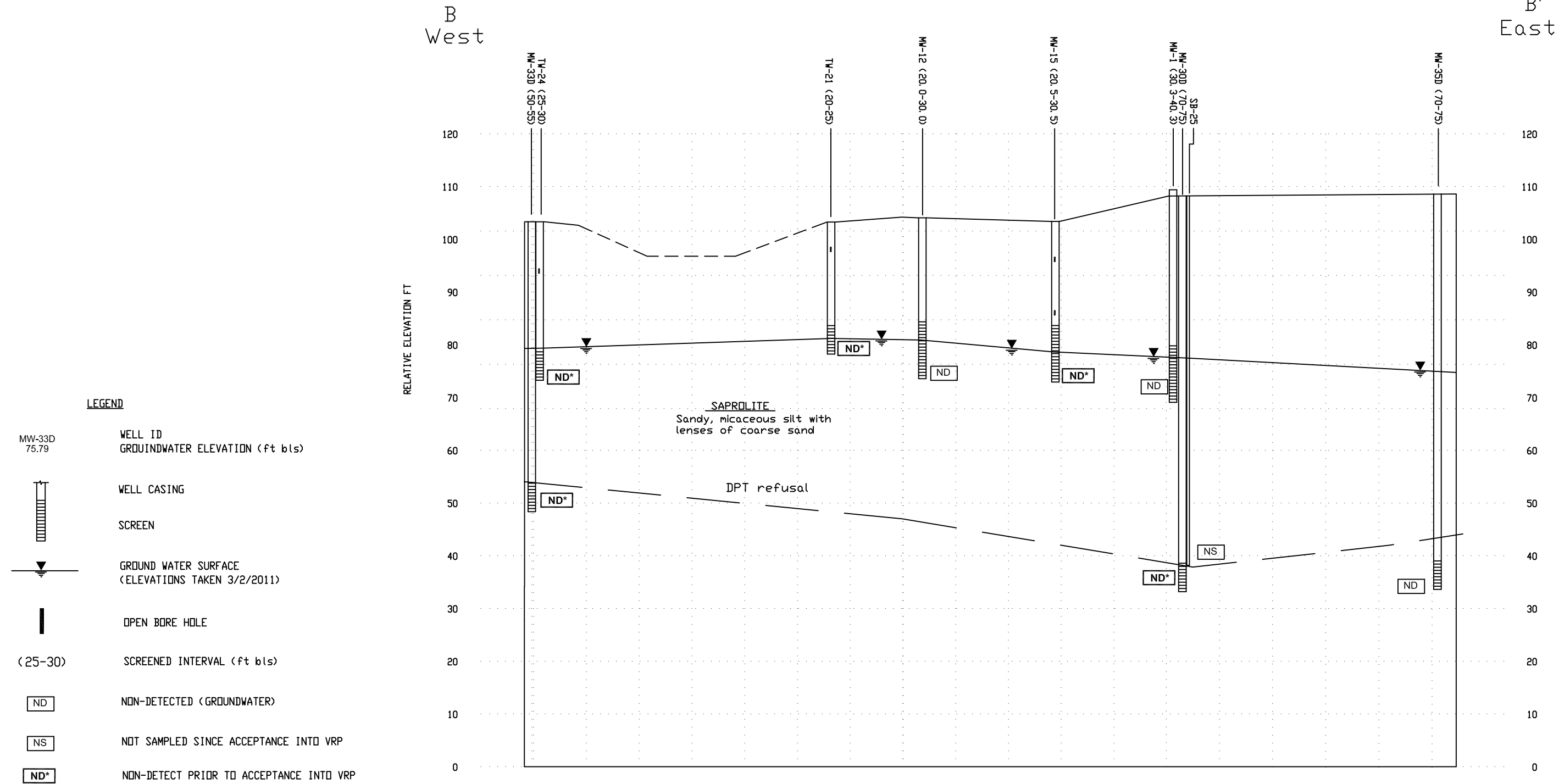
1. DETECTIONS IN BOLD INDICATE DETECTION IS ABOVE THE TYPE 4 RRS (GROUNDWATER).

ETHICON, INC.
655 ETHICON CIRCLE, CORNELIA, GEORGIA
**VOLUNTARY REMEDIATION PROGRAM
COMPLIANCE STATUS REPORT**

CROSS-SECTION A-A'
MARCH 2012



FIGURE

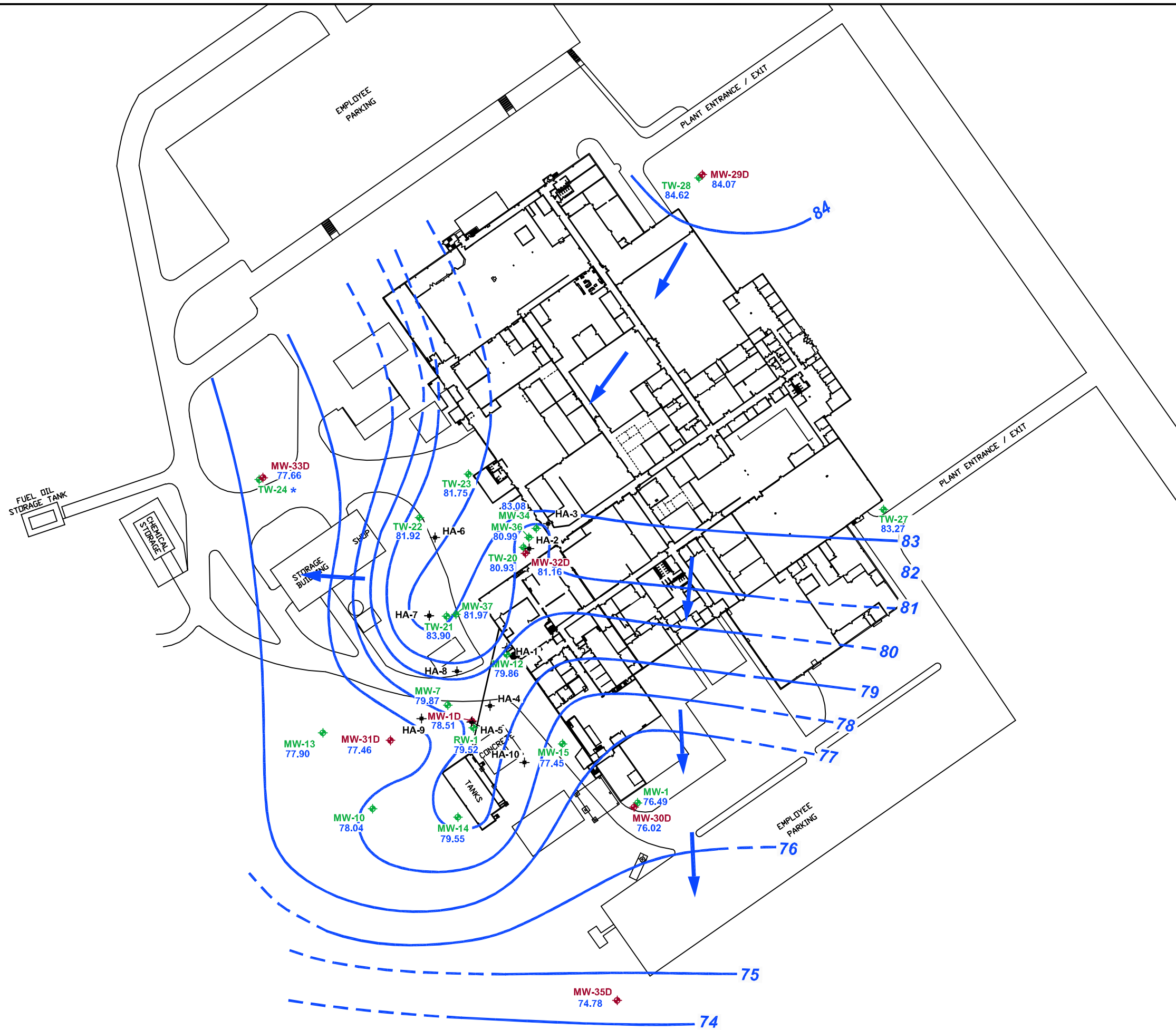


ETHICON, INC.
655 ETHICON CIRCLE, CORNELIA, GEORGIA
VOLUNTARY REMEDIATION PROGRAM
COMPLIANCE STATUS REPORT

CROSS-SECTION B-B'
MARCH 2012



CITY: Augusta, GA DIV/GROUP: ENV DB: A. Saul LD: PIC: PM: TMR LTR: G:\ENV\CAD\Augusta-GA\ACT1\GA063605\Cornelia\0058\0001\REV-C\SR06_63605\001.dwg LAYOUT: 6 SAVED: 12/6/2013 8:48 AM ACADVER: 18.1 (LMS TECH) PAGES: 10 PLOTSTYLETABLE: MONOCHROME.ctb PLOTTED: 12/6/2013 8:54 AM BY: SAUL, ANNE



LEGEND

	BUILDING/STRUCTURE
	TEMPORARY WELL
	SHALLOW MONITOR WELL
	DEEP MONITOR WELL
	HAND AUGER
	WATER LEVEL ELEVATION (FT)
	POTENTIOMETRIC CONTOUR
	GROUNDWATER FLOW DIRECTION
	DESTROYED

MW-12						
Analyte	RRS	Units	03/16/10	4/8/2010**	03/02/11	9/1/2011
Acetone		µg/L	<5.0	<5.0	<5.0	<5.0
Benzene		µg/L	<5.0	<5.0	<5.0	<5.0
Toluene		µg/L	<5.0	6	<5.0	<5.0
Ethylbenzene		µg/L	<5.0	680	<5.0	<5.0
m,p-Xylene	10000	µg/L	<10	1,900	<10	<5.0
o-Xylene	10000	µg/L	<5.0	740	<5.0	<5.0
Isopropylbenzene		µg/L	<5.0	32	<5.0	<5.0

MW-34				
Analyte	RRS	Units	03/17/10	03/03/11
1,1,2-TCA	5.0	µg/L	780	670
1,2-DCA	5.0	µg/L	14	9.2

MW-36					
Analyte	RRS	Units	03/17/10	03/03/11	09/02/11
1,1,2-TCA	5.0	µg/kg	<5.0	53	54
1,2-DCA	5.0	µg/kg	<5.0	11	12

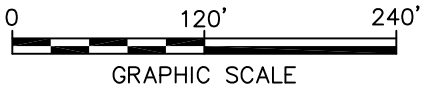
TW-20					
Analyte	RRS	Units	03/17/10	03/02/11	09/01/11
1,1,2-TCA	5.0	µg/L	480	240	260
1,1-DCE	550	µg/L	<5.0	<5.0	<5.0
1,2-DCA	5.0	µg/L	40	17	18
cis-1,2-DCE	1000	µg/L	<5.0	<5.0	<5.0

RW-1					
Analyte	RRS	Units	3/16/2010	3/2/2011	9/1/2011
1,1,2-TCA	5.0	µg/L	<5	<5	<5
1,1-DCA	4000	µg/L	<5	<5	<5
1,2-DCA	5.0	µg/L	<5	<5	<5
cis-1,2-DCE	1000	µg/L	<5	<5	<5
Vinyl Chloride	2.0	µg/L	<2	<2	2.8
Nitrogen, Ammonia		µg/L	NA	NA	NA

GROUNDWATER ANALYTICAL DATA			
MW-12			
Analyte	RRS	Units	3/6/2012
Acetone		µg/L	<5.0
Benzene		µg/L	<5.0
Toluene		µg/L	<5.0
Ethylbenzene		µg/L	<5.0
m,p-Xylene	10000	µg/L	<5.0
o-Xylene	10000	µg/L	<5.0
Isopropylbenzene		µg/L	<5.0

- LEGEND
- BUILDING/STRUCTURE
 - SHALLOW MONITOR WELL
 - DEEP MONITOR WELL
 - DUPLICATE SAMPLE
 - RESAMPLE
 - NON-DETECT ISOCONCENTRATION CONTOUR
 - NS NOT SAMPLED SINCE ACCEPTANCE INTO VRP
 - ND* ND* NON-DETECT PRIOR TO ACCEPTANCE INTO VRP
 - ND NON-DETECT SINCE ACCEPTANCE INTO VRP

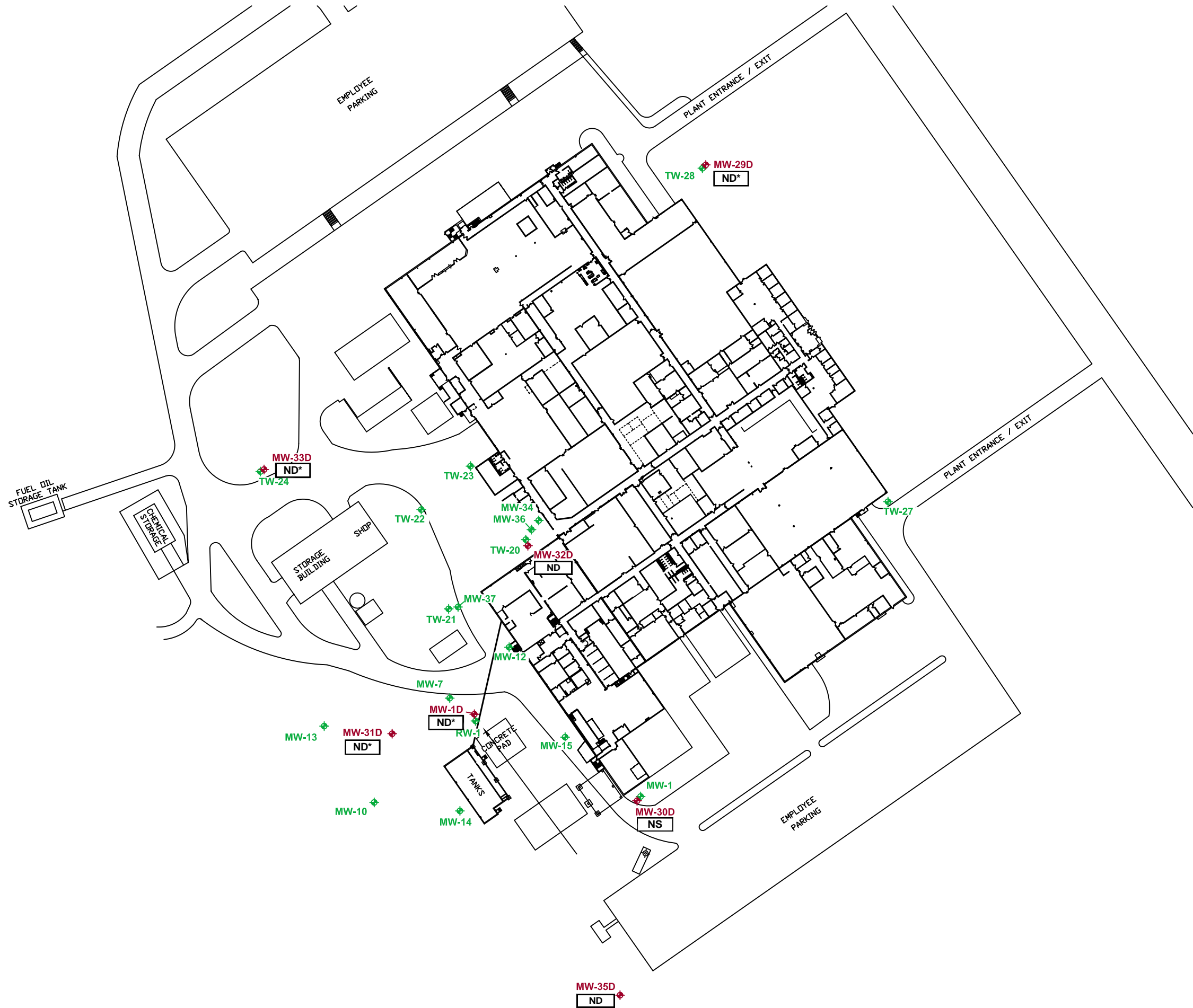
- NOTES:
- All concentrations reported in micrograms per liter (µg/L).
 - Detections in **BOLD** indicate detection is above the Type 4 RRS.



ETHICON, INC.
655 ETHICON CIRCLE, CORNELIA, GEORGIA
**VOLUNTARY REMEDIATION PROGRAM
COMPLIANCE STATUS REPORT**

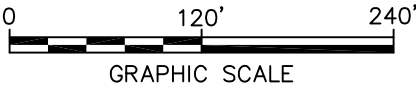
**VOLATILE ORGANIC COMPOUNDS IN
SHALLOW GROUNDWATER
MARCH 2010 - MARCH 2012**





LEGEND	
	BUILDING/STRUCTURE
	SHALLOW MONITOR WELL
	DEEP MONITOR WELL
NS	NOT SAMPLED SINCE ACCEPTANCE INTO VRP
ND	NON-DETECT SINCE ACCEPTANCE INTO VRP
ND*	NON-DETECT PRIOR TO ACCEPTANCE INTO VRP

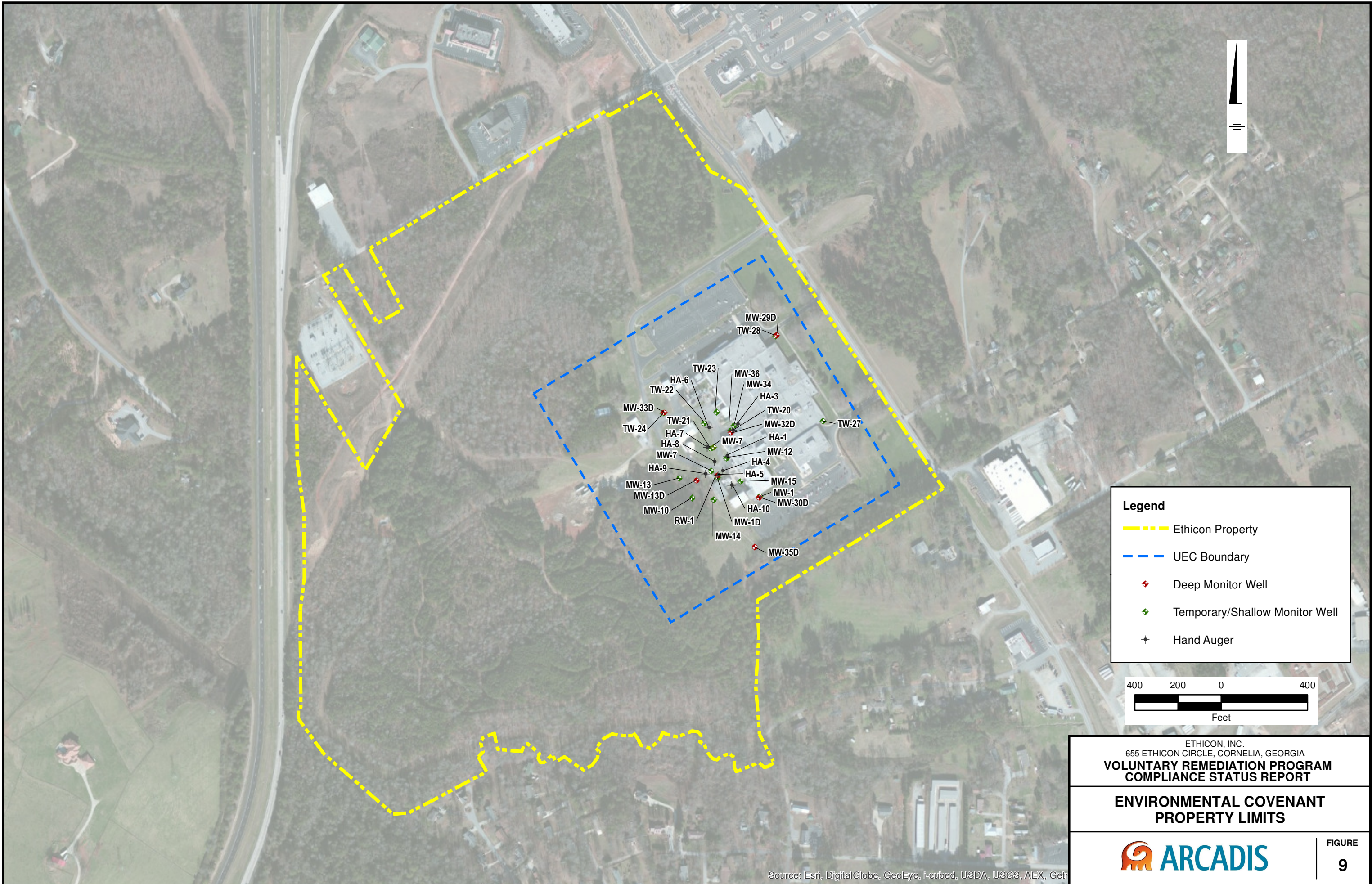
- NOTES:
- All concentrations reported in microgram per liter (µg/L).
 - All March 2012 Deep Groundwater Analytical Results Below Laboratory Detection Limits.



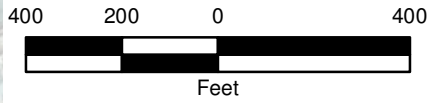
ETHICON, INC.
655 ETHICON CIRCLE, CORNELIA, GEORGIA
**VOLUNTARY REMEDIATION PROGRAM
COMPLIANCE STATUS REPORT**

**VOLATILE ORGANIC COMPOUNDS
IN DEEP GROUNDWATER
MARCH 2010 - MARCH 2012**





- Legend**
- Yellow dashed line: Ethicon Property
 - Blue dashed line: UEC Boundary
 - Red diamond: Deep Monitor Well
 - Green diamond: Temporary/Shallow Monitor Well
 - Black cross: Hand Auger



ETHICON, INC.
655 ETHICON CIRCLE, CORNELIA, GEORGIA
**VOLUNTARY REMEDIATION PROGRAM
COMPLIANCE STATUS REPORT**

**ENVIRONMENTAL COVENANT
PROPERTY LIMITS**





Appendix A

Uniform Environmental Covenant

2013 NOV -6 AM 10: 41

1042 286-2916

Book Page Recorded
David C Wall

After Recording Return to:

Andrea L. Rimer, Esq.
Troutman Sanders LLP
Bank of America Plaza
600 Peachtree Street, Suite 5200
Atlanta, Georgia 30334

Environmental Covenant

This instrument is an Environmental Covenant executed pursuant to the Georgia Uniform Environmental Covenants Act, OCGA § 44-16-1, *et seq.* This Environmental Covenant subjects the Property identified below to the activity and/or use limitations specified in this document. The effective date of this Environmental Covenant shall be the date upon which the fully executed Environmental Covenant has been recorded in accordance with OCGA § 44-16-8(a).

Fee Owner of Property/Grantor:

Ethicon, Inc.
655 Ethicon Circle
Cornelia, GA 30531

Grantee/Holder:

Ethicon, Inc.
655 Ethicon Circle
Cornelia, GA 30531

**Grantee/Entity with
express power to enforce:**

State of Georgia
Department of Natural Resources
Environmental Protection Division
2 Martin Luther King Jr. Drive, SE
Suite 1054 East Tower
Atlanta, GA 30334

Parties with interest in the Property:

Georgia Power Company
Legal Services
Attn: Stacey Turner
241 Ralph McGill Boulevard
Atlanta, GA 30308

Property:

The property subject to this Environmental Covenant is the Ethicon, Inc. (hereinafter "Ethicon") property, located at 655 Ethicon Circle in Cornelia, Habersham County, Georgia (hereinafter the "Property"). The Property was conveyed on September 25, 1998 from the Habersham County

Development Authority to Ethicon, Inc. and recorded in Deed Book 414, Pages 36-41 of the Habersham County Records. The area is located in Land Lots 114, 115, 138 and 139 of the 10th District of Habersham County, Georgia. The Property consists of approximately 35 acres, developed with a medical supply manufacturing facility. A complete legal description of the area is attached as Exhibit A and a map of the area is attached as Exhibit B.

Tax Parcel Number(s):

Tax Parcel 085A 009 of Habersham County, Georgia

Name and Location of Administrative Records:

The corrective action at the Property that is the subject of this Environmental Covenant is described in the following documents:

- Voluntary Investigation and Remediation Plan and Application, August 24, 2010.
- VRP Semi-Annual Status Updates, dated April 14, 2011, October 17, 2011, April 13, 2012, October 15, 2012 and April 11, 2013.
- March 23, 2012 and May 8, 2013 correspondence from EPD to Ethicon, Inc. concerning VRP Semi-Annual Status Updates.

These documents are available at the following locations:

Georgia Environmental Protection Division
Response and Remediation Program
2 MLK Jr. Drive, SE, Suite 1054 East Tower
Atlanta, GA 30334
M-F 8:00 AM to 4:30 PM excluding state holidays

Ethicon, Incorporated
Attn: EH&S Manager
655 Ethicon Circle
Cornelia, Georgia 30531
Please call 706-778-2281 to schedule a time to review during business hours

Description of Contamination and Corrective Action:

This Property has been listed on the state's hazardous site inventory and has been designated as needing corrective action due to the presence of hazardous wastes, hazardous constituents, or hazardous substances regulated under state law. Contact the property owner or the Georgia Environmental Protection Division for further information concerning this Property. This notice is provided in compliance with the Georgia Hazardous Site Response Act.

This Declaration of Covenant is made pursuant to the Georgia Uniform Environmental Covenants Act, O.C.G.A. § 44-16-1 *et seq.* by Ethicon, Inc., its successors and assigns, and the State of Georgia, Department of Natural Resources, Environmental Protection Division (hereinafter "EPD"), its successors and assigns. This Environmental Covenant is required because a release of regulated substances, including 1,1-dichloroethane; 1,1-dichloroethene; 1-2, dichloroethane; chloroform; cis-1,2-

dichloroethene; 1,1,2-trichloroethane; vinyl chloride; acetone; m,p-xylene; o-xylene; total xylenes; 1,1,1-trichloroethane; benzene; ethylbenzene; toluene; and isopropylbenzene, occurred on the Property. These chemicals are "regulated substances" as defined under the Georgia Hazardous Site Response Act, O.C.G.A. § 12-8-90 *et seq.*, and the rules promulgated thereunder (hereinafter "HSRA" and "Rules", respectively). The Corrective Action consists of the installation and maintenance of institutional controls (restrictions on use of groundwater and limitation of use to non-residential) to protect human health and the environment.

Grantor, Ethicon, Inc. (hereinafter "Ethicon"), hereby binds Grantor, its successors and assigns to the activity and use restriction(s) for the Property identified herein and grants such other rights under this Environmental Covenant in favor of Ethicon and EPD. EPD shall have full right of enforcement of the rights conveyed under this Environmental Covenant pursuant to HSRA, O.C.G.A. § 12-8-90 *et seq.*, and the rules promulgated thereunder. Failure to timely enforce compliance with this Environmental Covenant or the use or activity limitations contained herein by any person shall not bar subsequent enforcement by such person and shall not be deemed a waiver of the person's right to take action to enforce any non-compliance. Nothing in this Environmental Covenant shall restrict EPD from exercising any authority under applicable law.

Ethicon makes the following declaration as to limitations, restrictions, and uses to which the Property may be put and specifies that such declarations shall constitute covenants to run with the land, pursuant to O.C.G.A. § 44-16-5(a); is perpetual, unless modified or terminated pursuant to the terms of this Covenant pursuant to O.C.G.A. § 44-16-9; and shall be binding on all parties and all persons claiming under them, including all current and future owners of any portion of or interest in the Property (hereinafter "Owner"). Should a transfer or sale of the Property occur before such time as this Environmental Covenant has been amended or revoked then said Environmental Covenant shall be binding on the transferee(s) or purchaser(s).

The Environmental Covenant shall inure to the benefit of Ethicon and EPD, and their respective successors and assigns and shall be enforceable by the Director or his agents or assigns, Ethicon or its successors and assigns, and other party(ies) as provided for in O.C.G.A. § 44-16-11 in a court of competent jurisdiction.

Activity and/or Use Limitation(s)

1. Registry. Pursuant to O.C.G.A. § 44-16-12, this Environmental Covenant and any amendment or termination thereof, may be contained in EPD's registry for environmental covenants.
2. Notice. The Owner of the Property must give thirty (30) day advance written notice to EPD of the Owner's intent to convey any interest in the Property. No conveyance of title, easement, lease, or other interest in the Property shall be consummated by the Owner without adequate and complete provision for continued monitoring, operation, and maintenance of the Corrective Action.
3. Notice of Limitation in Future Conveyances. Each instrument hereafter conveying an interest in the Property subject to this Environmental Covenant shall contain a notice of the activity and use limitations set forth in this Environmental Covenant and shall provide the recorded location of the Environmental Covenant.
4. Periodic Reporting. The Owner shall inspect the Property and applicable property instruments at least annually to ensure compliance with this document. Annually, by no later than September 15th, following the effective date of this Environmental Covenant, the Owner shall complete and submit

to EPD the VRP Annual Property Evaluation Form attached to this document as Exhibit C. This report will document whether or not the activity and use limitations in this Environmental Covenant are being abided by.

5. Activity and/or Use Limitations. The current use of the Property is non-residential, as defined in Section 391-3-19-.02 of the Rules and defined in and allowed under the Habersham County zoning regulations as of the date of this Environmental Covenant. Any residential use of the Property shall be prohibited until such time as EPD has concurred that the vapor intrusion pathway has been addressed for residential use. Any activity on the Property that may result in the release or exposure to the regulated substances that were contained as part of the Corrective Action, or create a new exposure pathway, is prohibited.
6. Groundwater Limitation. The use or extraction of groundwater beneath the Property for drinking water or for any other non-remedial purposes shall be prohibited.
7. Right of Access. In addition to any rights already possessed by EPD and/or Ethicon, the Owner shall allow authorized representatives of EPD and/or Ethicon the right to enter the Property at reasonable times for the purpose of evaluating the Corrective Action; to take samples, to inspect the Corrective Action conducted at the Property, to determine compliance with this Environmental Covenant, and to inspect records that are related to the Corrective Action.
8. Recording of Environmental Covenant and Proof of Notification. Within thirty (30) days after the date of the Director's signature, the Owner shall file this Environmental Covenant with the Recorders of Deeds for each County in which the Property is located, and send a file stamped copy of this Environmental Covenant to EPD within thirty (30) days of recording. Within that time period, the Owner shall also send a file-stamped copy to each of the following: (1) Ethicon as Holder, (2) each person holding a recorded interest in the Property subject to the covenant, (3) each person in possession of the real property subject to the covenant, (4) each municipality, county, consolidated government, or other unit of local government in which real property subject to the covenant is located, and (5) each owner in fee simple whose property abuts the property subject to the Environmental Covenant.
9. Termination or Modification. The Environmental Covenant shall remain in full force and effect in accordance with O.C.G.A. § 44-5-60, unless and until the Director determines that the Property is in compliance with applicable Risk Reduction Standards, as defined in Georgia Rules of Hazardous Site Response (Rules) Section 391-3-19-.07, whereupon the Environmental Covenant may be amended or revoked in accordance with Section 391-3-19-08(7) of the Rules and O.C.G.A. § 44-16-1 *et seq.*
10. Severability. If any provision of this Environmental Covenant is found to be unenforceable in any respect, the validity, legality, and enforceability of the remaining provisions shall not in any way be affected or impaired.
11. No Property Interest Created in EPD. This Environmental Covenant does not in any way create any interest by EPD in the Property that is subject to the Environmental Covenant. Furthermore, the act of approving this Environmental Covenant does not in any way create any interest by EPD in the Property in accordance with O.C.G.A. § 44-16-3(b).

Representations and Warranties.

Grantor hereby represents and warrants to the other signatories hereto:

- a) That the Grantor has the power and authority to enter into this Environmental Covenant, to grant the rights and interests herein provided and to carry out all obligations hereunder;

- b) That the Grantor is the sole owner of the Property and holds fee simple title which is free, clear and unencumbered;
- c) That the Grantor has identified all other parties that hold any interest (e.g., encumbrance) in the Property and notified such parties of the Grantor's intention to enter into this Environmental Covenant;
- d) That this Environmental Covenant will not materially violate, contravene, or constitute a material default under any other agreement, document or instrument to which Grantor is a party, by which Grantor may be bound or affected;
- e) That the Grantor has served each of the people or entities referenced in Activity 8 above with an identical copy of this Environmental Covenant in accordance with O.C.G.A. § 44-16-4(d).
- f) That this Environmental Covenant will not materially violate or contravene any zoning law or other law regulating use of the Property; and
- g) That this Environmental Covenant does not authorize a use of the Property that is otherwise prohibited by a recorded instrument that has priority over the Environmental Covenant.

Notices.

Any document or communication required to be sent pursuant to the terms of this Environmental Covenant shall be sent to the following persons:


Georgia Environmental Protection Division
Branch Chief, Land Protection Branch
2 Martin Luther King Jr. Drive SE
Suite 1054 East Tower
Atlanta, GA 30334

Ethicon, Inc.
Plant Manager
655 Ethicon Circle
Cornelia, Georgia 30531

Grantor has caused this Environmental Covenant to be executed pursuant to The Georgia Uniform Environmental Covenants Act, on the 18th day of September, 2013.

[Signatures on next page]

GRANTOR
ETHICON, INC.

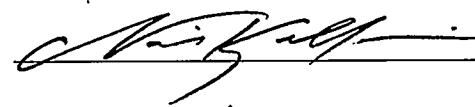


Name: NEIL KULKARNI

Title: VICE PRESIDENT OF MANUFACTURING

Dated: SEPTEMBER 18, 2013

HOLDER
ETHICON, INC.



Name: NEIL KULKARNI

Title: VICE PRESIDENT OF MANUFACTURING

Dated: SEPTEMBER 18, 2013

STATE OF GEORGIA
ENVIRONMENTAL PROTECTION DIVISION



Name: Judson H. Turner

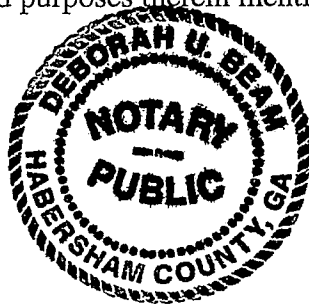
Title: Director

Dated: 10/17/13

INDIVIDUAL ACKNOWLEDGMENT

STATE OF Georgia
COUNTY OF Habersham

On this 18th day of September, 2013, I certify that NEIL KULKARNI personally appeared before me, and acknowledged that **he/she** is the individual described herein and who executed the within and foregoing instrument and signed the same at **his/her** free and voluntary act and deed for the uses and purposes therein mentioned.

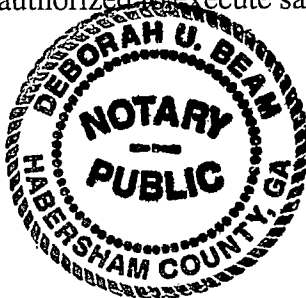


Deborah U. Beam
Notary Public in and for the State of
Georgia, residing at Mt. Airy, GA.
My appointment expires 7-7-2016.

CORPORATE ACKNOWLEDGMENT

STATE OF Georgia
COUNTY OF Habersham

On this 18th day of September, 2013, I certify that NEIL KULKARNI personally appeared before me, acknowledged that **he/she** is the VICE PRESIDENT OF MANUFACTURING of the corporation that executed the within and foregoing instrument, and signed said instrument by free and voluntary act and deed of said corporation, for the uses and purposes therein mentioned, and on oath stated that **he/she** was authorized to execute said instrument for said corporation.

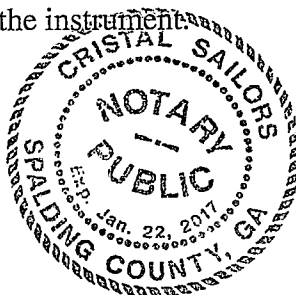


Deborah U. Beam
Notary Public in and for the State of
Georgia, residing at Mt. Airy, GA.
My appointment expires 7-7-2016.

REPRESENTATIVE ACKNOWLEDGMENT

STATE OF GEORGIA
COUNTY OF FULTON

On this 17 day of October, 2013, I certify that Judson H. Turner personally appeared before me, acknowledged that **he/she** signed this instrument, on oath stated that **he/she** was authorized to execute this instrument, and acknowledged it as the Director of the Georgia Environmental Protection Division to be the free and voluntary act and deed of such party for the uses and purposes mentioned in the instrument.



Cristal Sailors
Notary Public in and for the State of
Georgia, residing at Spalding.
My appointment expires 1/22/17.

Exhibit A

Legal Description

All that tract or parcel of land lying or being in Land Lots 114, 115, 138 and 139, 10th Land District of Habersham County, Georgia, being known as 35.00 acre Uniform Environmental Covenant Area, and being more particularly described as follows:

Beginning at an Aluminum Monument Set being located South 33 degrees 29 minutes 53 seconds East for a distance of 912.75 feet from the most NW Right of Way intersections of US Hwy. 441 Business and VFW Road being the Point Of Beginning.

Thence South 30 Degrees 59 Minutes 48 Seconds East for a distance of 1234.75 feet to an Aluminum Monument Set;

Thence South 59 Degrees 00 Minutes 12 Seconds West for a distance of 1234.75 feet to an Aluminum Monument Set;

Thence North 30 Degrees 59 Minutes 48 Seconds West for a distance of 1234.75 feet to an Aluminum Monument Set ;

Thence North 59 Degrees 00 Minutes 12 Seconds East for a distance of 1234.75 feet to an Aluminum Monument Set which is the POINT OF BEGINNING. Said property contains 35.00 acres.

Exhibit B

Property Map

*See attached survey entitled Uniform Environmental Covenant Plan
for Ethicon, dated August 19, 2013*

Exhibit C

VRP ANNUAL PROPERTY EVALUATION FORM
Ethicon, Inc. Property, HSI Site No. 10793
655 Ethicon Circle, Cornelia, Habersham County, Georgia
Tax Parcel 085A 009

TYPE	No.	CRITERIA RESPONSE	YES	NO
Land Use	1	Does this VRP property meet the definition of non-residential property as defined in Section 391-3-19.02(2) of the Rules? "Non-residential property means any property or portion of a property not currently being used for human habitation or for other purposes with a similar potential for human exposure, at which activities have been or are being conducted that can be categorized in one of the 1987 Standard Industrial Classification major group..."		
	1a	If no to 1, provide an explanation including a residential vapor intrusion exposure pathway evaluation to the EPD.		
Exposure	2	Has groundwater beneath the property been used or extracted for drinking water or any other non-remedial purpose?		
	2a	If yes to 2, use should be immediately terminated and a revised corrective action plan (CAP) that describes the actions necessary to bring the site's groundwater into compliance with appropriate risk reduction standards provided to EPD within 30 days.		
Property Instruments	3	Do all leases or other property instruments for the site have the applicable deed notice language inserted into them?		
	3a	If no to 3, provide a written explanation (attached) to the EPD.		

Certification:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

NAME (Please type or print)

TITLE

SIGNATURE

DATE