



Ethicon, Inc.

Voluntary Remediation Plan

Ethicon, Inc. 655 Ethicon Circle Cornelia, Georgia

August 24, 2010

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1. Objectives and Summary of Work Scope

This Voluntary Remediation Plan (VRP) has been prepared to meet requirements outlined in the Georgia Voluntary Remediation Program Act (VRPA). Information and data contained in this VRP are provided in a streamlined format and additional information, if required, can be provided to the Georgia Environmental Protection Division (EPD) upon request.

The Ethicon, Inc. (Ethicon) facility (site) is located at 655 Ethicon Circle, Cornelia, Georgia. Figure 1 provides the location of the site superimposed on a topographic map of the area. The Voluntary Remediation Plan Application Form and Checklist is provided in Appendix A. The Warranty Deed for the site is provided in Appendix B, and an illustration of the Tax Plat that shows the site, abutting properties, and tax parcel identification numbers is provided in Appendix C.

2. Background Data Summary

The site was initially operated by Chicopee Manufacturing Company (Chicopee). Chicopee manufactured a variety of polymer-coated woven fabrics for a range of uses, from shade protection for plants to trampolines. The Chicopee operations were closed in 1979. The facility was acquired in 1980 by Ethicon, Inc., a division of Johnson & Johnson, and refitted for "clean-room" production of surgical wound closure products. The Cornelia facility currently specializes in the production of Vicryl® monofilament surgical sutures.

In 1992, Ethicon discovered groundwater impacts surrounding an abandoned septic tank and notified the EPD in a letter dated September 1992 of a release of 1,1,2-trichloroethane (1,1,2-TCA) and associated degradation products. At that time, Ethicon initiated voluntary assessment and corrective action to remediate the site, including removal of the septic tank. Terra Vac of Marietta, Georgia, conducted an investigation and reported results in a Contamination Assessment of the Septic Tank Vicinity Report (June 1992). Ethicon also contracted Terra Vac to install and operate a remediation system. The system began operation in 1992. Soil was treated in-situ using a vacuum extraction system. Extracted groundwater was treated by air-stripping to reduce solvent concentrations to below Ethicon's Pretreatment Permit levels before discharging to the Cornelia sewer system. An Initial Release Notification was submitted to Georgia EPD on March 10, 1994. The EPD issued a letter of non-listing to Ethicon in July 1994. Remediation was completed in 1995. However, as a result of subsequent rescoring of

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the site, the EPD issued a letter on October 26, 2004, listing the site on the Hazardous Site Inventory.

Additional on-site septic tanks were noted during a review of historic documents. These documents indicate that the tanks were tested for hazardous constituents, found to be clean, filled with sand, and closed in place. The apparent leach fields and influent lines for the tanks are identified in the historic documentation.

In October 1994, the six underground storage tanks (USTs) in the tank farm located downgradient of the former septic tank area were closed and replaced with aboveground storage tanks (ASTs). The capacities of the removed tanks ranged from 2,600 to 8,000 gallons. Ethyl acetate in virgin, spent, and recovered forms was contained in three tanks, respectively. Two tanks contained the xylol (xylene) supply and spent xylol. The sixth tank contained general waste from the plant. The Underground Storage Tank Closure Report (June 1995) and the May 20, 1997 EPD letter of No Further Action for the tank closure are included in Appendix B. The underground piping between the building and the former tank farm was removed at the time of the closure of the USTs. A new stainless-steel, double-walled pipe was installed to convey general solvent waste from the building to the new AST farm. As part of this investigation, the double-walled pipe was air tested to determine integrity. The leak test verified that the pipe was airtight.

3. Preliminary Conceptual Site Model

3.1 Introduction

Groundwater investigations began in 1989 with the installation of four on-site monitoring wells indicating elevated concentrations of xylenes. In 1992, elevated concentrations of 1,1,2-TCA were detected on site. Subsequent subsurface investigations have been ongoing and are summarized in the Compliance Status Report (2006) and the Revised Compliance Status Report (2008) previously submitted by ARCADIS on behalf of Ethicon.

Horizontal and vertical delineation of impacts to groundwater was accomplished by drilling and installing wells to depths entirely within the thick saprolite zone. A site map including all monitoring well locations is included as Figure 2. Cross-sectional interpretations of the subsurface parallel and transverse to the plume axis were prepared (locations of cross sections are provided on Figure 3, and cross sections are

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provided on Figures 4 and 5), and include concentrations in key monitoring wells and potentiometric surface measurements from the March 2010 sampling event.

3.2 Hydraulic Conductivity

The evaluation of horizontal hydraulic conductivity was performed by ARCADIS on December 13, 2005, utilizing slug test data collected from wells MW-13 and MW-15. For each well, a solid slug of known volume was lowered into the well, the water table was allowed to equilibrate, and the slug was rapidly removed from the well while groundwater recovery data were recorded with a Hermit 2000 electronic data-logger. The groundwater recovery data were analyzed using the Bouwer and Rice Method for unconfined aquifers on a graphical worksheet. Hydraulic conductivities of 0.16 foot/day (MW-13) and 0.07 foot/day (MW-15) were calculated.

3.3 Hydraulic Gradient

The most recent gauging event of all monitoring wells occurred on March 16, 2010. The March 2010 data as well as historical groundwater elevation readings are summarized in Table 1. A groundwater potentiometric surface map was prepared using the March 16, 2010 data and is included as Figure 6.

Groundwater elevations present a relatively consistent flow direction from a high on the northeast side of the site to the south-southwest with smaller components of flow to the southeast and west. The hydraulic gradient (i) was calculated by dividing the difference in head between two wells by the horizontal distance between the two wells. A hydraulic gradient for the site of 0.015 ft/ft was calculated using wells TW-20 and MW-12, representative of an average gradient across the site.

3.4 Topography

The site topography is highest (approximately 1,460 feet above mean sea level) on the eastern side of the site adjacent to Highway 441 and slopes to lower elevations (approximately 1,440 feet above mean sea level) on the south, west, and east by a combination of commercial, industrial, and residential properties.

3.5 Geology

The Ethicon site is located in the northeastern Piedmont Physiographic Province referred to as the Inner Piedmont. The Inner or Southern Piedmont is separated from

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the Northern Piedmont by the Brevard Fault Zone of highly sheared rock. Faults associated with the Brevard Zone and foliation of the metamorphic rocks in this area trend northeasterly. The Inner Piedmont is characterized by high-grade metamorphic competent bedrock overlain by layers of soil derived from weathering of the parent rock. The unweathered bedrock grades upward through a partially weathered rock (PWR) zone and then into the thoroughly weathered zone of saprolitic soil. The age of these rocks is uncertain, but believed to be late Pre-Cambrian to early Paleozoic. The site is located in the northernmost portion of the Inner Piedmont, less than half a mile south of the Brevard Zone.

According to Hatcher's (1971) detailed geologic map of Rabun and Habersham counties, the bedrock underlying the site and vicinity as far south as Cornelia and Mount Airy is identified as Inner Piedmont gneiss, schist, and amphibolite. These rocks are high-grade crystalline rocks, including coarse-grained biotite-microcline gneiss, muscovite-biotite schist, and amphibolite and amphibolite gneiss.

The unweathered crystalline bedrock in the area possesses very little principal porosity or permeability. The permeability in the rocks is predominantly restricted to intersecting faults and fractures. Significant groundwater flow within the unweathered bedrock is typically restricted to these fractures. The fractures and openings within the bedrock are recharged with water filtering down from the overlying weathered saprolite and PWR and directly from rainfall where the bedrock fractures are exposed at the surface. Groundwater flow directions in Piedmont fractured bedrock are controlled by the fracture system developed and may not be in the direction of the surface slope.

The saturated zone within the unconsolidated weathered material above the bedrock, commonly referred to as the water table aquifer, is typically recharged by rainfall. Groundwater flow directions within this shallow aquifer are typically controlled by the topographic slope.

3.6 Hydrogeology

The site's hydrogeology was investigated using published technical literature, previous consultants' work, and the current consultant's work. This investigation focused on characterizing the site and identifying the physical conditions or features that are relevant to the evaluation of groundwater quality and groundwater migration.

The site is located in the Piedmont, where the typical succession of hydrologic zones or aquifers from the surface is saprolite, the PWR zone, and upper fractured bedrock.

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However, only one hydrogeologic zone was encountered during the current subsurface investigations at the Ethicon site.

The uppermost groundwater-bearing zone is the only one encountered at the site. Samples from borings indicate that it is a fairly thick, unconfined layer of fine, sandy, micaceous silt. The amount of fine sand and silt changes with lateral and vertical position. Some clays and sandy clays were encountered near the Ethicon building at shallow depths, some of which may be fill. None of the clay encountered was considered continuous or thick enough to be considered a confining unit.

Direct push refusal was encountered across the site at depths ranging from 50 feet below ground surface (bgs) at TW-24 to 77 feet bgs at TW-27. However, using an auger rig to install wells representative of the deeper portion of the aquifer, partially weathered bedrock refusal was not encountered at any drilling location during the events from November 2005 to March 2006. The deepest boring installed was advanced to 95 feet bgs to attempt to identify the depth to the PWR; however, when not encountered at a depth of 95 feet bgs at TW-28, the deeper monitoring wells were installed to 5 feet below the direct push refusal depth.

Horizontal and vertical delineation of impacts to groundwater was accomplished by drilling and installing wells to depths entirely within the thick saprolite zone. All constituents of concern (COCs) were delineated to background, or the laboratory reporting limit. Cross-sectional interpretations of the subsurface parallel and transverse to the plume axis were prepared (locations of cross sections are provided on Figure 3, and cross sections are provided on Figures 4 and 5), and include concentrations in key monitoring wells and potentiometric surface measurements for the March 2006 gauging event.

3.7 Constituents of Concern

The following is a list of COCs encountered on site:

1,1-dichloroethane	cis-1,2-dichloroethene	m,p-xylene	benzene
1,1-dichloroethene	1,1,2-trichloroethane	o-xylene	ethylbenzene
1,2-dichloroethane	Vinyl chloride	xylenes, total	toluene
chloroform	acetone	1,1,1-trichloroethane	isopropylbenzene

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3.8 Formerly Identified Potential Source Areas

There are three potential source areas for the soil and groundwater impacts identified at the site. Two potential source areas are related to 1,1,2-TCA impacts, including its degradation products. The third potential source area is related to xylene impacts at the site.

The first potential source area for 1,1,2-TCA impacts is in the vicinity of TW-20 and MW-34. According to site sources, this area of the facility was formerly a shipping and receiving area. In the past, 1,1,2-TCA was used in drum quantities as part of the facility's Vicryl® coating process. It is possible that this source was created by a release(s) during loading and unloading activities. The use of 1,1,2-TCA was eliminated from the Vicryl® coating process in 1996.

It is unlikely that the 1,1,2-TCA in this area is from one of the laboratories or Vicryl® coating rooms. The quality assurance/quality control (QA/QC) laboratories in the southwest portion of the building are on the second floor of the facility. The other QA/QC laboratories in the facility and Vicryl® coating rooms are located in the northeast (opposite) portion of the building. 1,1,2-TCA has been used only in small quantities in the QA/QC laboratories. This material was of reagent-grade quality purchased in 4-liter bottles or smaller. In addition, soil samples collected in November 2006 inside the building between the former shipping and receiving area and the Vicryl® coating rooms were below detection limits for all volatile organic compounds (VOCs).

A second potential 1,1,2-TCA source area is in the vicinity of RW-1. RW-1 was installed in the middle of the former septic tank area, as shown on a historical Utilities Site Plan (Sheet U-1, 2/24/83, included in Appendix B). A report issued by Terra Vac (June 1992) indicates that this septic tank was removed in 1992. A soil sample collected below the septic tank vault during tank closure activities revealed the presence of VOCs, including 1,1,2-TCA and its degradation products. When the tank was in use, it received waste from the facility QA/QC laboratories, where 1,1,2-TCA was used in quality control testing of the facility products.

The potential xylene source area for impacts detected at monitoring well MW-12 and soil boring SB-1 appears to be associated with two former xylol USTs and their affiliated underground piping. Sheet U-1 shows that prior to 1984, a 3,000-gallon and a 5,000-gallon xylol tank were located approximately 50 feet south of the building, east of the current liquid nitrogen plant. Three lines originally ran north from these tanks to the

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building. During the installation of a new series of USTs in 1984, underneath what is now the liquid nitrogen plant, the two xylol tanks and lines in this area were removed.

With the installation of a new tank farm system located to the southwest of the building, three new xylol lines were installed that ran northwest from the UST farm pit to the same entry point on the building as the pre-1984 lines. Additional detail of the underground lines can be found on drawing P-22. All of the USTs and underground piping were removed in 1994 when they were replaced with an AST farm system. A new stainless-steel, double-walled pipe was installed to convey general solvent waste from the building to the AST farm. There are no longer any xylol tanks on the site, and xylol is currently shipped in and recovered in drum quantities. MW-12 and SB-1 are located in the vicinity of these former underground lines. As part of this investigation, the double-walled pipe was air tested to determine integrity. The leak test verified that the pipe was airtight. All piping inside the building is above ground.

3.9 Migration Pathway Assessment and Potential Receptors

During the June 1992 Terra Vac assessment investigation of the abandoned septic tank, a water well survey was conducted. No water supply wells were identified within a 0.5-mile radius of the Ethicon facility. Ten wells, listed as water supply wells for the towns of Demorest and Baldwin, were identified within a 3-mile radius of the facility. According to a representative of Cornelia Water Works, at that time the City of Cornelia obtained its drinking water from a reservoir located 1.6 miles northeast of the town center on Camp Creek. At the time of the investigation, the City had no groundwater supply wells.

An updated water supply survey was conducted by ARCADIS in April 2006. No public water supply wells were identified within 1 mile of the site, and no non-public water supply wells were identified within ¼ mile of the site. In addition, a drive-through reconnaissance survey was conducted for the streets surrounding the site within a ¼-mile radius. No evidence of any domestic water wells was found throughout the neighborhoods. The site is located in an area of low groundwater pollution susceptibility, as defined by the 1992 Groundwater Pollution Susceptibility Map of Georgia.

The U.S. Geological Survey (USGS) database for drinking water wells included in the Georgia Environmental Atlas was searched. No water supply wells were identified within a 1-mile radius of the site.

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A search of Georgia Environmental Protection Division, Water Resources Branch records of Drinking Water and Public Water System Permittees and of Drinking Water Sources was conducted for Habersham County. This search identified two surface water sources on Camp Creek and Hazel Creek as public water supply sources, with City Park Well #105 used only for emergency backup. However, ARCADIS was not able to obtain confirmation of these records with Cornelia Water Works, because of stringent security practices imposed after September 11, 2001. All surface water intakes are located more than a mile from the Ethicon facility and across one or more surface water divides.

The nearest possible surface water receptors are two tributaries to North Fork Creek located approximately 1,000 feet south and 750 feet west-southwest of the site, respectively (Figure 1). According to the groundwater flow directions identified during the ongoing investigations, groundwater flow from the site is predominantly toward the tributary to the south, with a lesser component of flow toward the west-southwest tributary.

City or county water is available to all properties within 1 mile of the site.

The closest surface water bodies to the site are unnamed tributaries to North Fork Creek to the south and to the west of the site. The uppermost aquifer is believed to discharge to the closest Fork Creek tributaries in the area. Since groundwater has been delineated in both the shallow and deep saprolite portions of the aquifer, no surface water samples were collected.

4. Initial Remediation Plan

Based on historic and current investigations, soil concentrations of VOCs are vertically limited from the ground surface to the top of saturated soils, and are horizontally delineated to background concentrations. None of the COCs in soil exceeds its respective Type 1 Risk Reduction Standard (RRS) (Table 2). There is no risk of human exposure to soils impacted with VOCs above residential standards. Groundwater quality maps summarizing groundwater analytical results from March 2006 through March 2010 for shallow and deep groundwater are included as Figure 7 and Figure 8, respectively.

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4.1 Institutional Controls

Based on the site-wide delineation of COCs to background levels and the limited exposure pathways present on site, institution controls will be utilized at the site to eliminate any possible exposure pathways. A deed notice will be placed on the subject property to include the following:

- Direct use or extraction of groundwater from anywhere on site will be prohibited.
- The removal, destruction, or alteration of the concrete floor in the site buildings in such a way as to make any of the underlying impacted soil accessible will be prohibited, unless such controls are replaced in a manner so as to constitute a functionally equivalent engineering control.
- Excavation, construction, utility installation or maintenance, and similar land disturbing activities in soil below the water table will be prohibited in the areas where groundwater is impacted, unless such work is performed by informed and properly trained contractors such that human exposure to potentially hazardous materials does not occur.
- Residential use on the ground level of any existing or future buildings on site will be prohibited.
- All improvements located in whole or in part on any portion of the subject site must comply with the institutional controls.

4.2 Semiannual Groundwater Monitoring

To monitor plume stability and to ensure that no exposure pathways develop, groundwater sampling will be conducted semiannually for a period of two years or as to be determined by the director of the VRP and to be agreed upon by Ethicon. Semiannual monitoring will consist of the collection of water level measurements from 22 on-site wells and the collection of groundwater samples from ten monitoring wells (MW-1, MW-10, MW-12, MW-32D, MW-34, MW-35D, MW-36, MW-37, RW-1, and TW-20). These groundwater samples will be analyzed for VOCs by EPA Method 8260B.

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4.3 Groundwater Modeling

Groundwater modeling is not anticipated to be needed given the extensive historical groundwater quality data showing reducing concentrations and extent, and the vertical and horizontal delineation to background levels.

4.4 Completion of the VRP

If at the end of two years of semiannual groundwater sampling, no exposure pathways exist and proper institutional controls are in place, the corrective action portion of the VRP will be considered complete for the site. Upon completion of the corrective action, a Compliance Status Report (CSR) will be prepared (if required) by Ethicon confirming the consistency of the corrective action with the provisions, purposes, standards, and policies of the VRP. Within 90 days of the director's written concurrence of the CSR, the director shall remove the property from the Hazardous Site Inventory.

5. Cost Estimate

An initial cost estimate for elements of the work proposed under this VRP is provided in Table 3. Costs for any future out of scope investigative activities at the site are not included in the preliminary estimate.

6. Schedule

A project schedule for work elements outlined in this VRP is provided in Table 4. The actual date for the start of work outlined in this schedule will depend on the receipt date of EPD Plan approval. The schedule may either advance or extend based upon that date.

7. Reporting

Semiannual status reports will be submitted to the director updating the progress and implementation of the VRP throughout the program. The semiannual status reports may include an updated conceptual site model (CSM) if warranted by site data. Additionally, the projected milestone schedule will be updated to show progress on VRP objectives.

A Compliance Status Report Update will be prepared (if required) for submittal to the EPD following the conclusion of data collection and interpretation activities outlined in

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this VRP. The CSR will confirm the completion of the corrective action specified in the VRP and certify compliance of the site with the applicable cleanup standards.

Appendix A

Voluntary Remediation Plan Application Form and Checklist

		VRP	APPLICANT INF	ORMATION		
COMPANY NAME	Ethicon, Inc.					
CONTACT PERSON/TITLE	Guy C. Rechtoris					
ADDRESS	655 Ethicon Circle, C	Cornelia, GA 30	531			
PHONE	706-776-5457	FAX	706-776-5497	E-MAIL	grechtor@	its.jnj.com
GEORGIA CEI	RTIFIED PROFESS	SIONAL GEO	DLOGIST OR PRO	OFESSIONA	L ENGINEE	R OVERSEEING CLEANUP
NAME	Evan B. Clark			GA PE/PG	NUMBER	P.E. 23871
COMPANY	ARCADIS					
ADDRESS	2849 Paces Ferry Ro	d., Suite 400, A	tlanta, GA 30339			
PHONE	770-384-6673	FAX	770-435-2666	E-MAIL	Evan.clark	@arcadis-us.com
		APF	PLICANT'S CERT	IFICATION		
In order to be considered a qu	ualifying property for th	e VRP:				

- (A) Listed on the federal National Priorities List pursuant to the federal Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. Section 9601.
- (B) Currently undergoing response activities required by an order of the regional administrator of the federal Environmental Protection Agency; or
- (C) A facility required to have a permit under Code Section 12-8-66.
- (3) Qualifying the property under this part would not violate the terms and conditions under which the division operates and administers remedial programs by delegation or similar authorization from the United States Environmental Protection Agency.
- (4) Any lien filed under subsection (e) of Code Section 12-8-96 or subsection (b) of Code Section 12-13-12 against the property shall be satisfied or settled and released by the director pursuant to Code Section 12-8-94 or Code Section 12-13-6.

In order to be considered a participant under the VRP:

- (1) The participant must be the property owner of the voluntary remediation property or have express permission to enter another's property to perform corrective action.
- (2) The participant must not be in violation of any order, judgment, statute, rule, or regulation subject to the enforcement authority of the director.

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.

l also certify that this property is eligible for the Voluntary Remediation Program (VRP) as defined in Code Section 12-8-105 and I am eligible as a participant as defined in Code Section 12-8-106.

APPLICANT'S SIGNATURE	Shelia John		
APPLICANT'S NAME/TITLE (PRINT)	SHELLA JOHNSON (MANINGER) FOR MIKE B	BECK DATE	8-24-10

7	QUALIFY	ING PROPERTY INFORMATION		
TAX PARCEL ID	085A009	PROPERTY SIZE (ACRES)	152.11	
PROPERTY ADDRESS	655 Ethicon Circle			
CITY	Cornelia	COUNTY	Habersham	
LATITUDE	34° 31′ 50"	LONGITUDE	83° 32' 00"	
PROPERTY OWNER(S)	Ethicon, Inc.	PHONE #	706-778-2281	
MAILING ADDRESS	655 Ethicon Circle			***
CITY	Cornelia	STATE/ZIP GA 30531		****
ITEM #	DESCRIPTION	NOF REQUIREMENT	Location in VRP (i.e. pg., Table #, Figure #, etc.)	For EPD Comment Only (Leave Blank)
1.	\$5,000 APPLICATION FEE IN THE FO		Inside Report Cover	
2.	WARRANTY DEED(S) FOR QUALIFY		Appendix A	
3.	TAX PLAT OR OTHER FIGURE INCLI BOUNDARIES, ABUTTING PROPERT NUMBER(S).	UDING QUALIFYING PROPERTY IES, AND TAX PARCEL IDENTIFICATION	Appendix B	
4.	ONE (1) PAPER COPY AND TWO (2) VOLUNTARY REMEDIATION PLAN IN FORMAT (PDF).	Inside Report Cover		
5.	The VRP participant's initial plan ar reasonably available current inform application, a graphic three-dimens (CSM) including a preliminary reme standards, brief supporting text, chatotal) that illustrates the site's surfact suspected source(s) of contaminating the environment, the potential human complete or incomplete exposure preliminary CSM must be updated a progresses and an up-to-date CSM status report submitted to the direct MILESTONE SCHEDULE for investant as a participant, mannual status report to the director during the preceding period. A Garmilestone schedule. The following four (4) generic miles the results reported in the participant the director. The director may exter milestones in the participant, that a lo	Project Milestone Schedule is Table 4		

5.a.	Within the first 12 months after enrollment, the participant must complete horizontal delineation of the release and associated constituents of concern	Page 7	
	on property where access is available at the time of enrollment;	Figures 7 and 8	
5.b.	Within the first 24 months after enrollment, the participant must complete horizontal delineation of the release and associated constituents of concern extending onto property for which access was not available at the time of enrollment;	N/A; Release is limited to site	
5.c.	Within 30 months after enrollment, the participant must update the site CSM to include vertical delineation, finalize the remediation plan and provide a preliminary cost estimate for implementation of remediation and associated continuing actions; and	Pages 10-13 Figures 4 and 5 Table 3	
5.d.	Within 60 months after enrollment, the participant must submit the compliance status report required under the VRP, including the requisite certifications.	Pending	
6.	SIGNED AND SEALED PE/PG CERTIFICATION AND SUPPORTING DOCUMENTATION: "I certify under penalty of law that this report and all attachments were prepared by me or under my direct supervision in accordance with the Voluntary Remediation Program Act (O.C.G.A. Section 12-8-101, etseq.). I am a professional engineer/professional geologist who is registered with the Georgia State Board of Registration for Professional Engineers and Land Surveyors/Georgia State Board of Registration for Professional Engineers and Land Surveyors/Georgia State Board of Registration for Professional Geologists and I have the necessary experience and am in charge of the investigation and remediation of this release of regulated substances. Furthermore, to document my direct oversight of the Voluntary Remediation Plan development, implementation of corrective action, and long term monitoring, I have attached a monthly summary of hours invoiced and description of services provided by me to the Voluntary Remediation Program participant since the previous submittal to the Georgia Environmental Protection Division. The information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties to submitting false information, including the possibility of fine and imprisonment for knowing violations. Evan B Clark P S 23871 Printed Name and GAPE/PG/Number Date Signature and Stamp		

Appendix B

Warranty Deed

*98 SEP 25 PM 12 11
BOOK PACE RECORDED
ERNEST W. NATIONS JR

STATE OF GEORGIA COUNTY OF HABERSHAM

THIS INDENTURE, made this 23rd day of September in the year of our Lord Nineteen Hundred and Ninety Eight between THE HABERSHAM COUNTY DEVELOPMENT AUTHORITY, a public body corporate and politic created and existing under the laws of the State of Georgia, of the County of Habersham, of the first part, and ETHICON, INC., of the County of Habersham, of the second part:

Witnesseth that the said THE HABERSHAM COUNTY DEVELOPMENT AUTHORITY, of the first part, for and in consideration of the sum of ONE AND NO/100 (\$1.00) Dollars in hand paid, the receipt whereof is acknowledged has bargained, sold and by these presents do remise, release and forever quitclaim to the said ETHICON, INC., its successors and assigns, all the right, title, interest, claim or demand THE HABERSHAM COUNTY DEVELOPMENT AUTHORITY has or may have had in and to

TRACT NO. 1:

All that tract or parcel of land, together with improvements thereon, situate, lying and being in Land Lot No. 114 of the Tenth Land District of Habersham County, Georgia, and being a portion of Tract 1 on a plat of property of Chicopee Manufacturing Corporation prepared by Hubert Lovell, Registered Surveyor, dated September 22, 1978, and being more particularly described as follows:

COMMENCE at a point where the Northeasterly right-of-way of Tallulah Falls Railroad (100 foot right-of-way) intersects the Northwesterly right-of-way of a paved street (30 foot right-of-way) which paved street is more fully shown on the above-described survey; thence from said point of beginning North 34 degrees 7 minutes West along the Northeasterly right-of-way of Tallulah Falls Railroad 1,408.2 feet to a point; thence North 33 degrees 7 minutes West 56.2 feet to a point; thence North 31 degrees 16 minutes West 67.5 feet to a point; thence North 28 degrees 21 minutes West 57.7 feet to a point; thence North 25 degrees 59 minutes West 50.8 feet to a concrete monument; thence leaving the Northeasterly right-of-way of Tallulah Falls Railroad and continuing North 75 degrees 47 minutes East 413.2 feet to an iron pin corner; thence South 41 degrees 52 minutes East 679.0 feet to a concrete monument; thence South 20 degrees

ADAMS, ELLARD & FRANKUM, P.C. P. O. BOX 1255 CORNELIA, GA 30531 Habi ishaili Hangir Hangir Real Estate Transfer Tay Paril S — A S — 9 W — Paril S — Pa 39 minutes East 865.0 feet to a concrete monument located along the Northwesterly right-of-way of said paved street; thence along the Northwesterly right-of-way of said paved street South 58 degrees 39 minutes West 73.3 feet to a point; thence South 60 degrees 00 minutes West 61.7 feet to a point; thence South 58 degrees 45 minutes West 70.4 feet to a point; thence South 58 degrees 16 minutes West 63.6 feet to a point; thence South 57 degrees 45 minutes West 27.1 feet to the point of beginning.

TRACT NO. 2:

All that tract or parcel of land, together with improvements thereon, situate, lying and being in Land Lot 139 of the 10th Land District of Habersham County, Georgia, and being designated as Tract 2 on a plat of the property of Chicopee Manufacturing Corporation prepared by Hubert Lovell, Registered Surveyor, dated September 22, 1978, and being more particularly described as follows:

COMMENCE at a point where the Northeasterly right-of-way of Tallulah Falls Railroad (100 foot right-of-way) intersects the Southeasterly right-of-way of a paved street (30 foot right-of-way) which paved street is more fully shown on the above-described survey; thence from said point of beginning along the Southeasterly right-of-way of said paved street North 57 degrees 45 minutes East 25.8 feet to a point; thence North 58 degrees 16 minutes East 63.6 feet to a point; thence North 58 degrees 45 minutes East 67.8 feet to a concrete monument; thence leaving the Southeasterly right-of-way of said paved street and continuing South 30 degrees 37 minutes East 196.9 feet to a concrete monument; thence South 59 degrees 34 minutes West 144.3 feet to a concrete monument located along the Northeasterly right-of-way of Tallulah Falls Railroad; thence North 34 degrees 25 minutes West along the Northeasterly right-of-way of Tallulah Falls Railroad; thence North 34 degrees 25 minutes West along the Northeasterly right-of-way of Tallulah Falls Railroad; beginning.

TRACT NO. 3:

All that tract or parcel of land, together with improvements thereon, situate, lying and being in Land Lots 114, 115, 138, and 139 of the 10th Land District of Habersham County, Georgia, and being designated as Tract 3 on a plat of the property of Chicopee Manufacturing Corporation prepared by Hubert Lovell, Registered Surveyor, dated September 22, 1978, and being more particularly described as follows:

COMMENCE at a concrete monument where the Southerly right-of-way of V. F. W. Road intersects the Westerly right-of-way of U.S. Highway 23 and 441; thence from said point of beginning along the Westerly right-of-way of U.S. Highway 23 and 441 South 36 degrees 9 minutes East 455.6 feet to a concrete monument; thence South 62 degrees 18 minutes East 170.1 feet to a concrete monument; thence South 34 degrees 5 minutes East 1,669.7 feet to a concrete monument; thence leaving the Westerly right-of-way of U.S. Highway 23 and 441 and continuing thence South 58 degrees 43 minutes West 460 feet to a concrete monument; thence South 58 degrees 43 minutes West 544.5 feet to a concrete monument; thence South 2 degrees 35 minutes East 25 feet to a concrete monument, thence South 2 degrees 35 minutes East 139 feet to a concrete monument; thence South 2 degrees 49 minutes East 236.9 feet to a concrete monument; thence South 4 degrees 45 minutes East 217 feet to a concrete monument; thence South 26 degrees 55 minutes East 141.1 feet to a concrete monument; thence South 26



degrees 55 minutes East 8.5 feet to the center line of a branch; thence along the center line of said branch the following courses and distances: South 58 degrees 52 minutes West 34.4 feet to a point, South 80 degrees 45 minutes West 16.4 feet to a point, North 50 degrees 36 minutes West 30.7 feet to a point, South 76 degrees 43 minutes West 17.5 feet to a point, South 67 degrees 35 minutes West 95.6 feet to a point, North 26 degrees 37 minutes West 22.2 feet to a point, North 01 degrees 09 minutes East 27.2 feet to a point, North 07 degrees 33 minutes West 21.1 feet to a point, North 53 degrees 56 minutes West 23.5 feet to a point, South 74 degrees 04 minutes West 41.4 feet to a point, South 49 degrees 56 minutes West 25.1 feet to a point, North 77 degrees 03 minutes West 20.1 feet to a point, North 40 degrees 19 minutes West 35.9 feet to a point, North 22 degrees 39 minutes West 41.9 feet to a point, North 62 degrees 01 minutes West 25.6 feet to a point, North 11 degrees 50 minutes East 31.2 feet to a point, North 40 degrees 27 minutes West 20.8 feet to a point, North 82 degrees 17 minutes West 28.3 feet to a point, South 66 degrees 00 minutes West 33.9 feet to a point, South 70 degrees 35 minutes West 43.1 feet to a point, North 75 degrees 15 minutes West 49.8 feet to a point, North 63 degrees 57 minutes West 19.2 feet to a point, South 18 degrees 07 minutes West 14.2 feet to a point, South 26 degrees 50 minutes West 26.4 feet to a point, South 48 degrees 05 minutes West 56 feet to a point, North 71 degrees 28 minutes West 44.1 feet to a point, North 27 degrees 04 minutes West 35.9 feet to a point, North 36 degrees 11 minutes West 31.9 feet to a point, South 05 degrees 41 minutes East 14.0 feet to a point; North 89 degrees 12 minutes West 67.9 feet to a point, North 77 degrees 13 minutes West 32.8 feet to a point, South 60 degrees 46 minutes West 43.8 feet to a point, South 38 degrees 40 minutes West 58.2 feet to a point, South 41 degrees 55 minutes East 21.6 feet to a point, South 14 degrees 49 minutes West 30.0 feet to a point, South 36 degrees 17 minutes West 42.6 feet to a point, South 60 degrees 09 minutes West 44.4 feet to a point, North 57 degrees 29 minutes West 19.6 feet to a point, North 54 degrees 46 minutes West 88.7 feet to a point, South 57 degrees 51 minutes West 45.4 feet to a point, North 29 degrees 19 minutes West 37.8 feet to a point, South 45 degrees 58 minutes West 52.2 feet to a point, South 82 degrees 47 minutes West 15.3 feet to a point, North 30 degrees 28 minutes West 23.1 feet to a point, North 13 degrees 03 minutes East 23.6 feet to a point, North 49 degrees 48 minutes West 69.7 feet to a point, South 78 degrees 01 minutes West 15.6 feet to a point, South 22 degrees 22 minutes West 36.0 feet to a point, North 84 degrees 34 minutes West 111.4 feet to a point, North 12 degrees 24 minutes West 74.4 feet to a point, South 70 degrees 05 minutes West 55.5 feet to a point, South 20 degrees 17 minutes West 29.8 feet to a point, South 16 degrees 57 minutes East 40.0 feet to a point, South 41 degrees 57 minutes West 33.5 feet to a point, thence leaving the center line of said branch South 30 degrees 8 minutes East 79.1 feet to an iron pin corner: thence South 61 degrees 53 minutes West 404.9 feet to an iron pin corner; thence South 83 degrees 9 minutes West 74.5 feet to a concrete monument; thence North 49 degrees 20 minutes West 425.3 feet to a concrete monument; thence North 36 degrees 25 minutes West 201.6 feet to a concrete monument; thence North 00 degrees 12 minutes East 52.6 feet to a concrete monument; thence North 89 degrees 21 minutes East 10 feet to a point located along the Easterly right-of-way of U.S. Highway 441 Cornelia By-Pass; thence along the Easterly rightof-way of U. S. Highway 441 Cornelia By-Pass the following courses and distances: North 00 degrees 39 minutes West 447.4 feet to a concrete monument; thence North 6 degrees 35 minutes

East 151.5 feet to a concrete monument; thence North 00 degrees 32 minutes West 299.8 feet to a concrete monument; thence North 7 degrees 31 minutes West 251.6 feet to a concrete monument; thence North 00 degrees 38 minutes West 478.6 feet to a concrete monument; thence leaving the Easterly right-of-way of U.S. Highway 441 Cornelia By-Pass and continuing South 31 degrees 35 minutes East 615.2 feet to a concrete monument; thence North 29 degrees 59 minutes East 338.8 feet to an iron pin corner; thence North 31 degrees 35 minutes West 705.7 feet to a concrete monument; thence North 59 degrees 27 minutes East 100 feet to a concrete monument; thence South 31 degrees 36 minutes East 316.7 feet to a concrete monument; thence North 60 degrees 4 minutes East 132.3 feet to a concrete monument; thence North 28 degrees 40 minutes West 315.6 feet to a concrete monument; thence North 28 degrees 40 minutes West 3.9 feet to a point located along the Southerly right-of-way of V. F. W. Road: thence along the Southerly right-of-way of V. F. W. Road North 58 Degrees 50 minutes East 557.4 feet to a point; thence North 59 degrees 54 minutes East 370.7 feet to a point; thence North 60 degrees 15 minutes East 335.6 feet to a point; thence South 28 degrees 49 minutes East 25 feet to a concrete monument; thence North 61 degrees 3 minutes East 237.2 feet to the point of beginning.

TRACT NO. 4:

All that tract or parcel of land, together with improvements thereon, situate, lying and being in Land Lot 115 of the 10th Land District of Habersham County, Georgia, and being designated as Tract 4 on a plat of the property of Chicopee Manufacturing Corporation prepared by Hubert Lovell, Registered Surveyor, dated September 22, 1978, and being more particularly described as follows:

COMMENCE at a concrete monument located where the Westerly right-of-way of U.S. Highway 441 Cornelia By-Pass intersects the Southerly right-of-way of a county road (30 foot right-of-way); thence from said point of beginning along the Southerly rightof-way of said county road South 60 degrees 18 minutes West 473.2 feet to a point; thence South 48 degrees 7 minutes East 238.2 feet to a concrete monument; thence South 41 degrees 42 minutes West 99.8 feet to a concrete monument; thence North 48 degrees 12 minutes West 301.2 feet to a concrete monument; thence leaving the Southerly right-of-way of said county road and continuing thence South 59 degrees 58 minutes West 632.9 feet to a concrete monument; thence South 59 degrees 58 minutes West 10 feet to a point; thence South 52 degrees 33 minutes West 110.6 feet to a concrete monument; thence South 47 degrees 11 minutes East 196.4 feet to a concrete monument; thence South 27 degrees 55 minutes East 302.3 feet to a concrete monument; thence South 80 degrees 34 minutes East 254.5 feet to a concrete monument; thence South 55 degrees 1 minute East 288.8 feet to a concrete monument; thence South 43 degrees 47 minutes East 306.2 feet to a concrete monument; thence North 55 degrees 13 minutes East 89.9 feet to a concrete monument; thence North 55 degrees 13 minutes East 9.1 feet to a point; thence South 27 degrees 17 minutes East 102.2 feet to a point; thence North 59 degrees 11 minutes East 24 feet to a concrete monument; thence North 59 degrees 11 minutes East 70.4 feet to a concrete monument; thence North 11 degrees 28 minutes East 58.4 feet to a concrete monument located along the Westerly right-of-way of U.S. Highway 441 Cornelia By-Pass; thence North 00 degrees 32 minutes West 1099.7 feet to a concrete monument; thence North 4 degrees 53 minutes West 315.3 feet to the point of beginning.

TRACT NO. 5:

All that tract or parcel of land, together with improvements thereon, situate, lying and being in Land Lots 114 and 115 of the 10th Land District of Habersham County, Georgia, and being designated as Tract 5 on a plat of the property of Chicopee Manufacturing Corporation prepared by Hubert Lovell, Registered Surveyor, dated September 22, 1978, and being more particularly described as follows:

COMMENCE at a concrete monument where the Northerly right-of-way of V.F.W. Road intersects the Westerly right-of-way of U.S. Highway 23 and 441; thence from said point of beginning North 43 degrees 11 minutes West 471.5 feet to a concrete monument; thence North 31 degrees 14 minutes West 299.2 feet to a concrete monument; thence North 31 degrees 14 minutes West 5.1 feet to a concrete monument; thence South 64 degrees 57 minutes West 171.8 feet to a concrete monument; thence North 29 degrees 57 minutes West 154 feet to an iron pin corner; thence North 30 degrees 16 minutes West 169.1 feet to a concrete monument located along the Southeasterly right-of-way of U.S. Highway 441 Cornelia By-Pass; thence along the Southeasterly right-of-way of U.S. Highway 441 Cornelia By-Pass the following courses and distances: South 44 degrees 32 minutes West 618.9 feet to a concrete monument; thence South 37 degrees 10 minutes West 183.1 feet to a point; thence South 33 degrees 31 minutes West 42.2 feet to a point; thence South 30 degrees 57 minutes West 46.1 feet to a point; thence South 27 degrees 51 minutes West 63.1 feet to a point; thence South 24 degrees 59 minutes West 39.8 feet to a point; thence South 21 degrees 58 minutes West 64.9 feet to a point; thence South 19 degrees 4 minutes West 55.6 feet to a point; thence South 15 degrees 37 minutes West 65.7 feet to a point; thence South 12 degrees 6 minutes West 59.6 feet to a point; thence South 8 degrees 30 minutes West 130.4 feet to a concrete monument; thence South 4 degrees 58 minutes West 60.7 feet to a concrete monument; thence leaving the Southeasterly right-of-way of U.S. Highway 441 Cornelia By-Pass and continuing thence South 29 degrees 6 minutes East 481 feet to a concrete monument located along the Northerly right-of-way of V.F.W. Road; thence along the Northerly right-of-way of V.F.W. Road the following courses and distances: North 58 degrees 50 minutes East 590.7 feet to a point; thence North 59 degrees 54 minutes East 371.1 feet to a point; thence North 60 degrees 19 minutes East 336.2 feet to a point; thence North 28 degrees 49 minutes West 25 feet to a concrete monument; thence North 61 degrees 4 minutes East 220.5 feet to the point of beginning.

TRACT NO. 6:

All that tract or parcel of land, together with improvements thereon, situate, lying and being in Land Lot 114 of the 10th Land District of Habersham County, Georgia, and being designated as Tract 6 on a plat of the property of Chicopee Manufacturing Corporation prepared by Hubert Lovell, Registered Surveyor, dated September 22, 1978, and being more particularly described as follows:

COMMENCE at a concrete monument where the Westerly right-of-way of Old Highway 441 intersects the Easterly right-of-way of U.S. Highway 23 and 441; thence from said point of beginning North 34 degrees 3 minutes West 657.0 feet to a concrete monument; thence North 64 degrees 57 minutes East 109.1 feet to an iron pin

corner; thence North 64 degrees 40 minutes East 185.3 feet to a concrete monument; thence North 64 degrees 40 minutes East 8.4 feet to a point located along the Westerly right-of-way of Old Highway 441; thence along the Westerly right-of-way of Old Highway 441 the following courses and distances: South 11 degrees 49 minutes East 55.1 feet to a point; thence South 9 degrees 53 minutes East 55.6 feet to a point; thence South 6 degrees 43 minutes East 63.3 feet to a point; thence South 7 degrees 15 minutes East 62 feet to a point; thence South 7 degrees 29 minutes East 444.2 feet to the point of beginning.

The above referenced property is the same property conveyed to THE HABERSHAM COUNTY DEVELOPMENT AUTHORTY by JOHNSON & JOHNSON, in a Warranty Deed, dated December 1, 1979, and recorded in the Office of the Clerk of Superior Court, Habersham County, Georgia, in Deed Book 169, page 557.

This Quitclaim Deed is executed pursuant to Section 11.1(b) of a Lease Agreement, dated as of December 1, 1979, between The Habersham County Development Authority, Grantor herein, and Ethicon, Inc., Grantee herein, said Lease Agreement being recorded in the Office of the Clerk of Superior Court, Habersham County, Georgia, in Deed Book 182, pages 131-180.

with all the rights, members and appurtenances to the above described property in anywise appertaining or belonging. have and hold said described property to the said ETHICON, INC., so that neither THE HABERSHAM COUNTY DEVELOPMENT AUTHORITY nor its successors or assigns, nor any other person claiming under THE HABERSHAM COUNTY DEVELOPMENT AUTHORITY shall at any time, by any means or ways, have claim, or demand any rights, title, interest or equity in or to said property, or its appurtenances, or any rights therein.

In Witness Whereof, the said party of the first part has hereunto set its hand and affixed its seal the day and year first above written.

THE HABERSHAM COUNTY DEVELOPMENT

AUTHORITA

Signed, sealed and delivered in the presence of

Keny (SEAL) BY: DEAN C

ATTEST:

ecretary

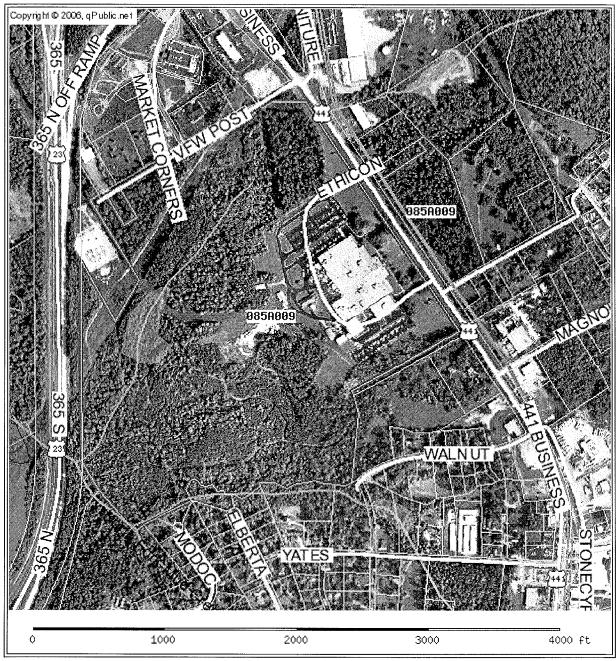
Notary Public

My Commission Expires 6/26/02

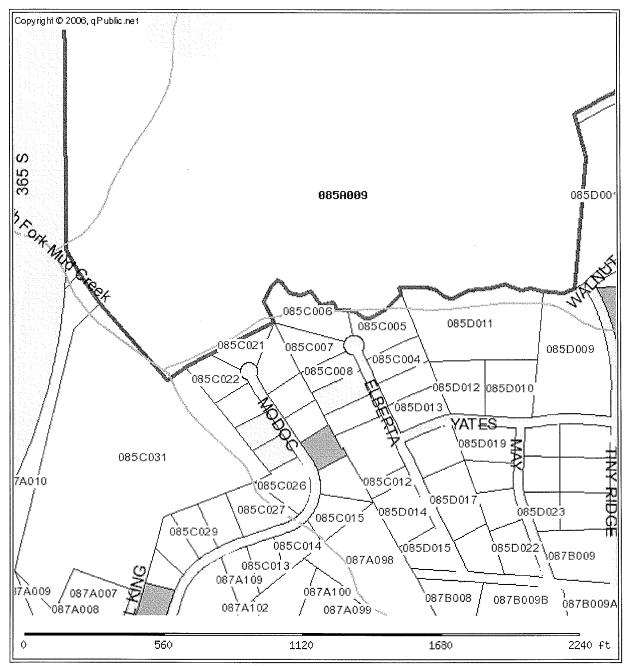
COMPORATE SEAL

Appendix C

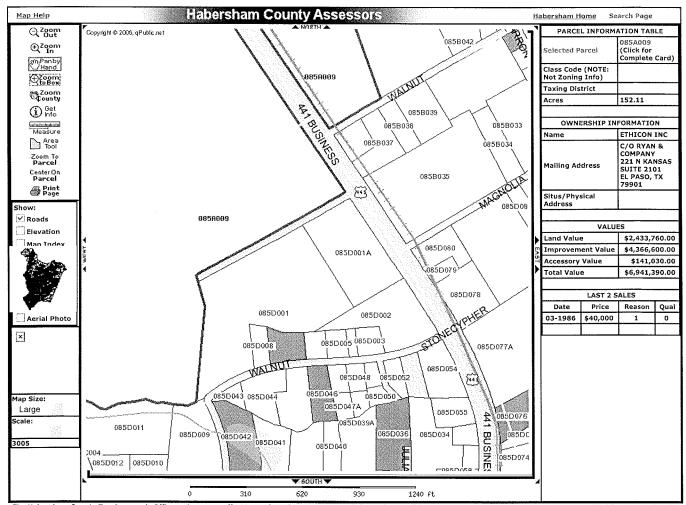
Tax Plat



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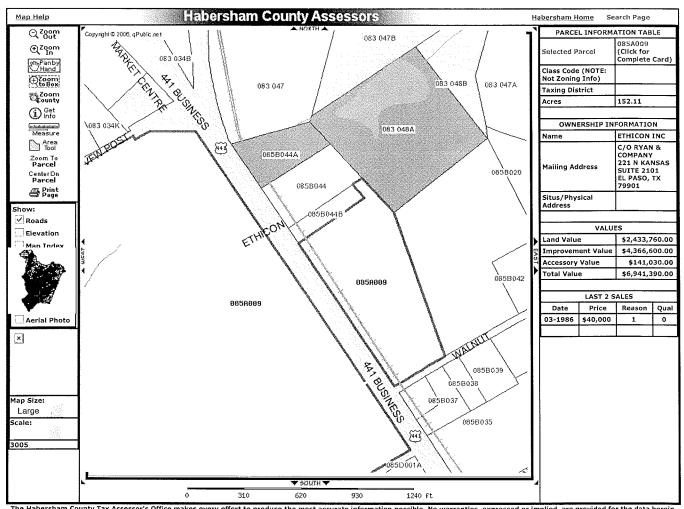


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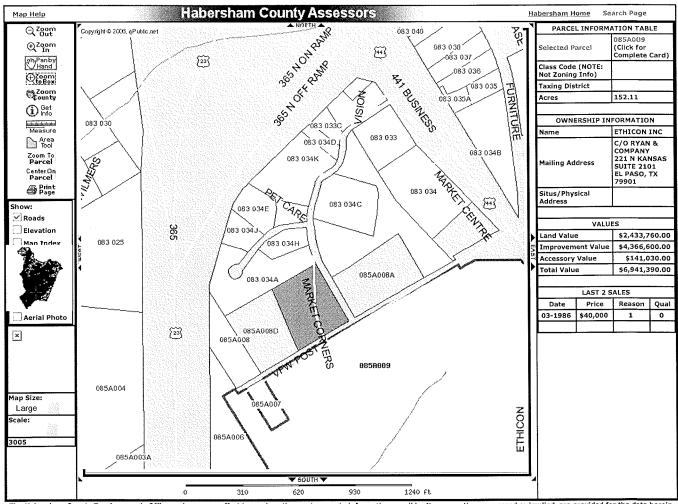
The Habersham County Tax Assessor's Office makes every effort to produce the most accurate information possible. No warranties, expressed or implied, are provided for the data herein, its use or interpretation. The assessment information is from the last certified taxroll. All data is subject to change before the next certified taxroll.

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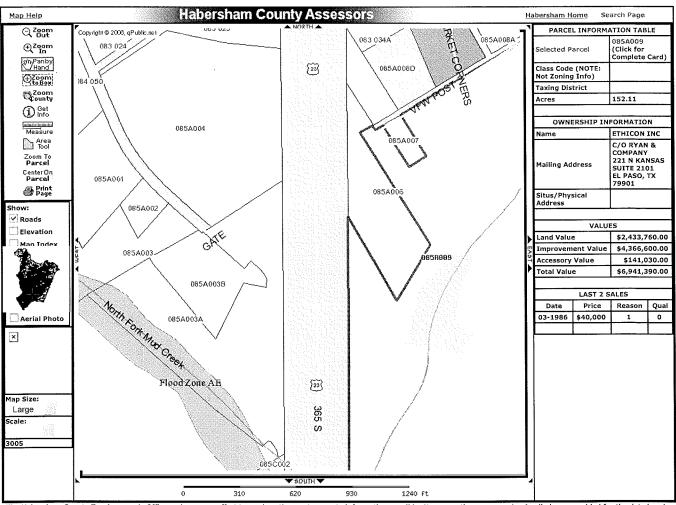


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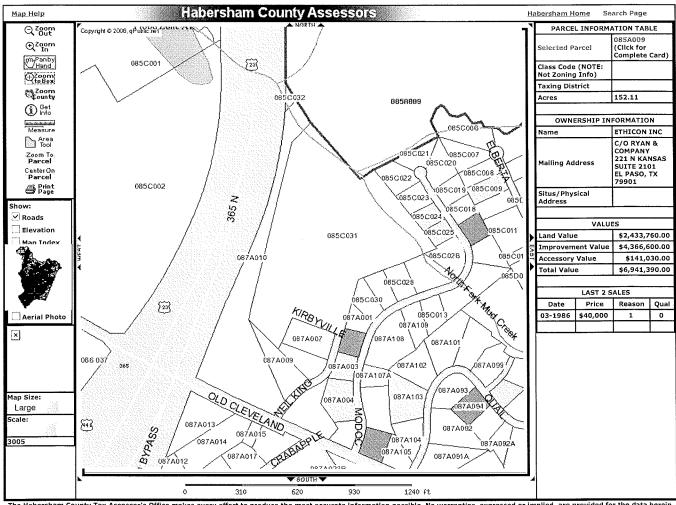


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Table 1 Ethicon, Inc.
Monitoring Well Construction Details

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)	Well Diameter (inches)
RW-1	4/1/92	33.2	33.2 - 8.2	*		4.0
MW-1	7/1/88	40.3	40.3 - 30.3	27.3	26.1	2.0
MW-1D	4/1/92	39.6	39.6 - 34-6			2.0
MW-7	4/1/92	27.1	27.1 - 12.1			2.0
MW-10	6/1/92	20.5	20.5 - 10.5			2.0
MW-12	12/5/05	30.5	30.0 - 20.0	14.0	8.0	2.0
MW-13	12/6/05	28.3	28.5 - 18.5	16.0	10.0	2.0
MW-14	12/6/05	20.5	20.5 - 10.5	7.7	4.6	2.0
MW-15	12/6/05	30.5	30.5 - 20.5	16.0	10.0	2.0
TW-20	1/12/06	35.0	35.0 - 30.0	28.0	2.0	0.75
TW-21	1/12/06	25.0	25.0 - 20.0	18.0	2.0	0.75
TW-22	1/12/06	35.0	35.0 - 30.0	28.0	2.0	0.75
TW-23	1/13/06	35.0	35.0 - 30.0	28.0	2.0	0.75
TW-24	1/13/06	30.0	30.0 - 25.0	23.0	2.0	0.75
TW-27	1/16/06	35.0	35.0 - 30.0	28.0	2.0	0.75
TW-28	1/16/06	35.0	35.0 - 30.0	28.0	2.0	0.75
MW-29D	3/15/06	67.0	67.0 - 62.0	60.0	58.0	2.0
MW-30D	3/17/06	75.0	75.0 - 70.0	68.0	66.0	2.0
MW-31D	3/17/06	59.0	59.0 - 54-0	52.0	50.0	2.0
MW-32D	3/16/06	69.0	69.0- 64.0	62.0	60.0	2.0
MW-33D	3/17/06	55.0	55.0 - 50.0	48.0	46.0	2.0
MW-34	3/15/06	35.0	35.0 - 30.0	28.0	26.0	2.0
MW-35D	11/29/06	75.0	75.0-70.0	70.0	68.0	2.0
MW-36	5/4/09	55.0	55.0-45.0	41.0	39.0	2.0
MW-37	5/20/09	44.0	44.0-34.0	31.0	29.0	2.0

bgs = below ground surface
* --- = unknown

Italic indicates well destroyed

Table 2 Risk Reduction Standards Corneila, Georgia

Groundwater

	Type 3/4
	RRS
Constituent	(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

	Type 1/3
	RRS
Constituent	(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

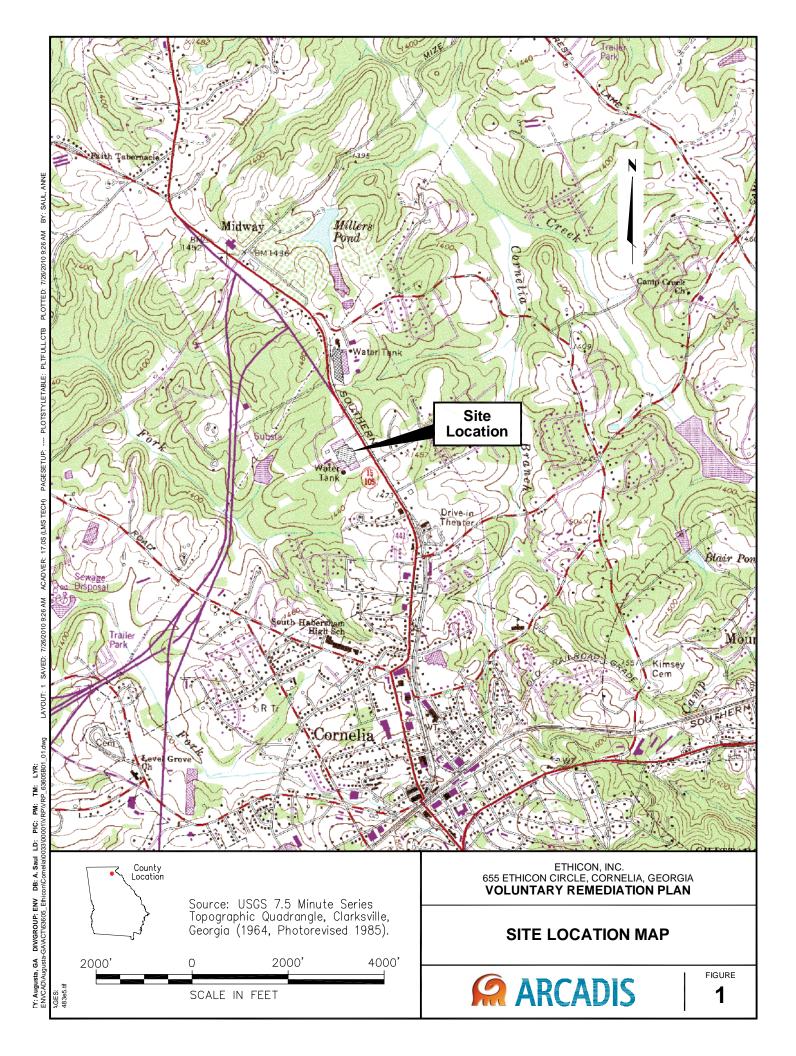
For groundwater, the greater of the Type 1/Type 2, and Type 3/Type 4, are shown

Table 3 Preliminary VRP Cost Estimate Cornelia, Georgia

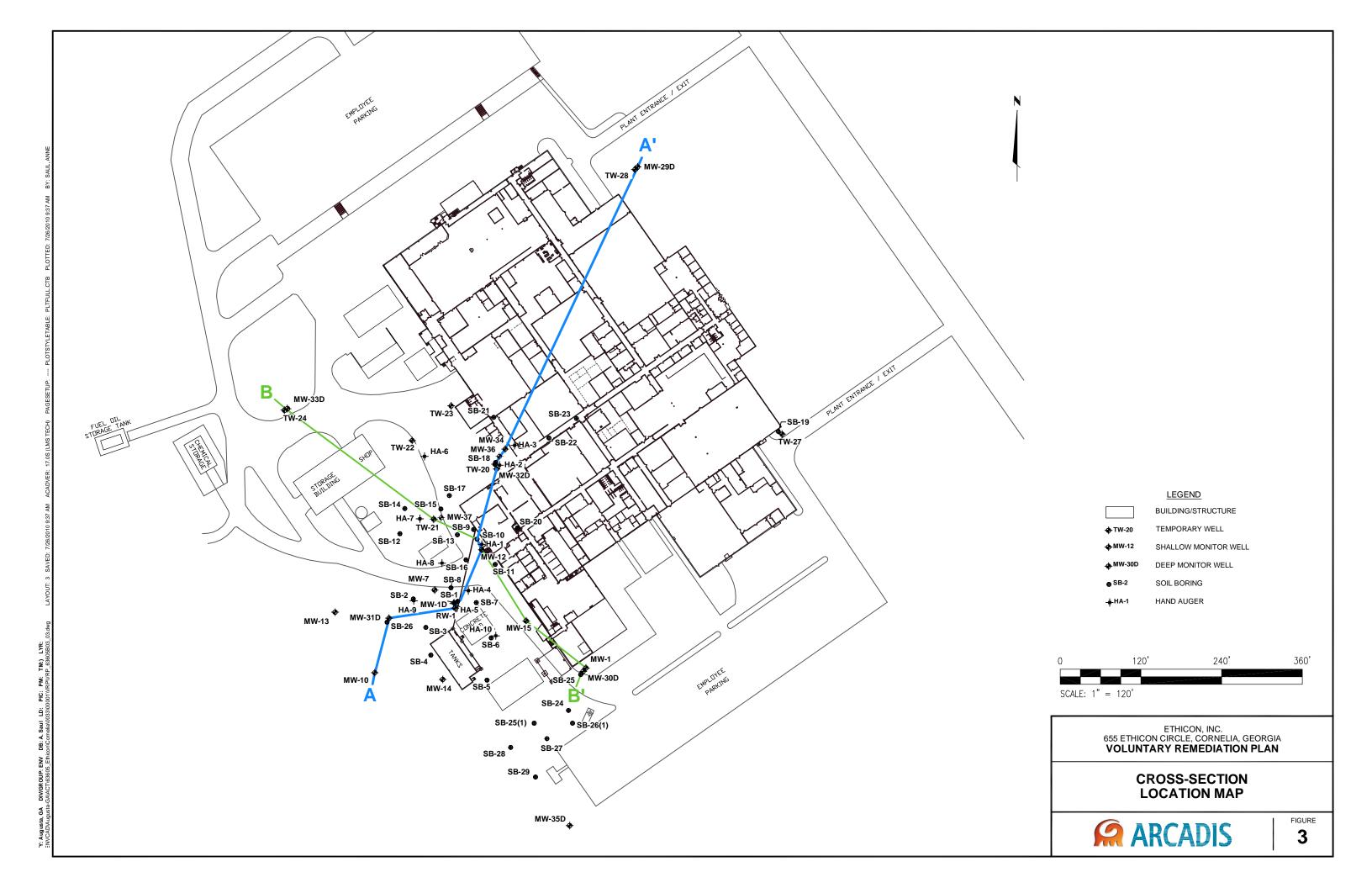
Task	Subtotal	Total
VRP Application	\$19,500.00	\$19,500.00
Semiannual Groundwater Sampling		\$18,000.00
First Sampling Event	\$4,500.00	
Second Sampling Event	\$4,500.00	
Third Sampling Event	\$4,500.00	
Fourth Sampling Event	\$4,500.00	
Semiannual Groundwater Monitoring Report		\$16,000.00
First Semiannual Report	\$4,000.00	
Second Semiannual Report	\$4,000.00	
Third Semiannual Report	\$4,000.00	
Fourth Semiannual Report	\$4,000.00	
Total Prelin	I ninary Cost Estimate:	\$53,500.00

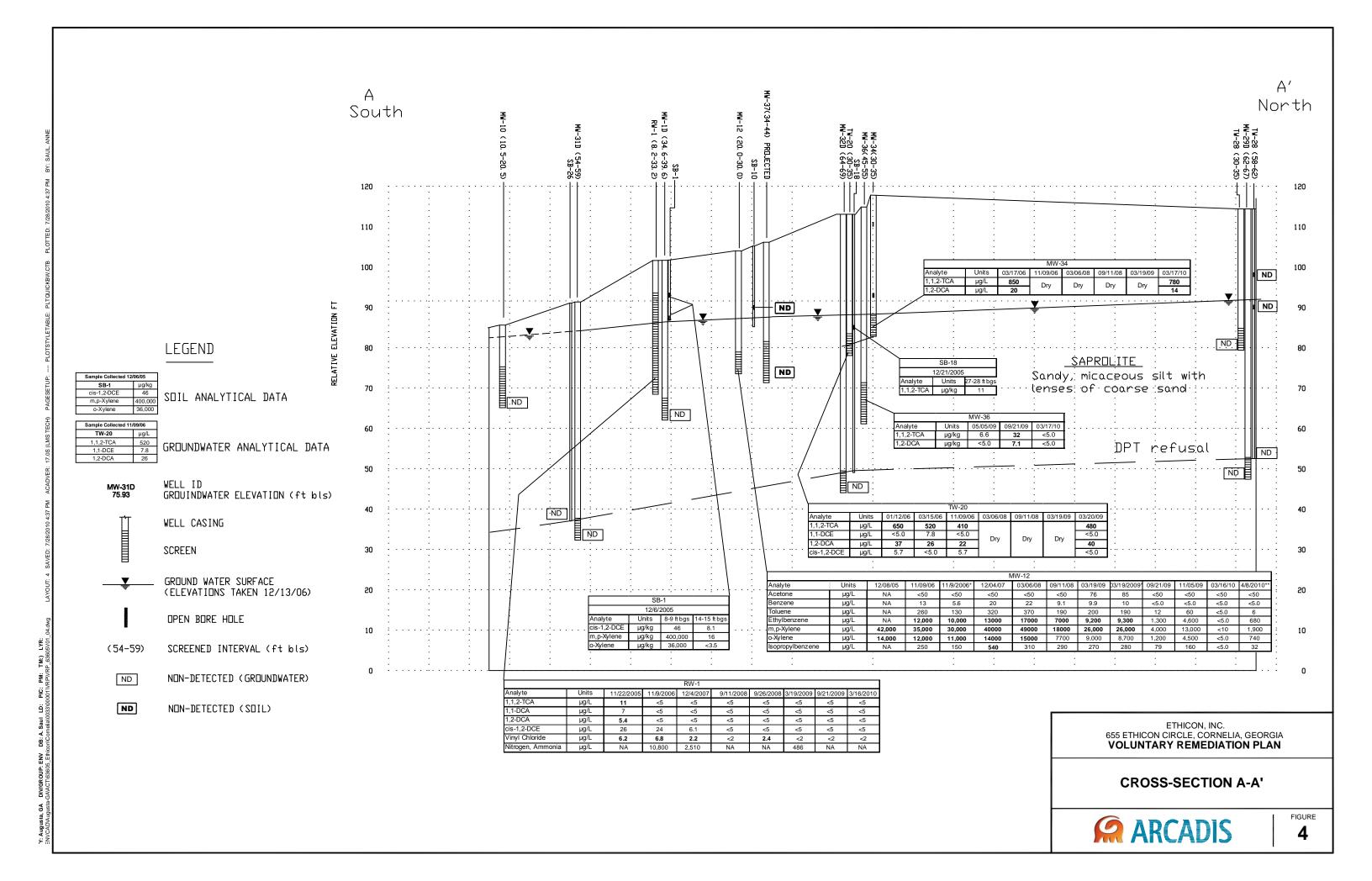
Table 4 VRP Project Milestone Schedule Cornelia, Georgia

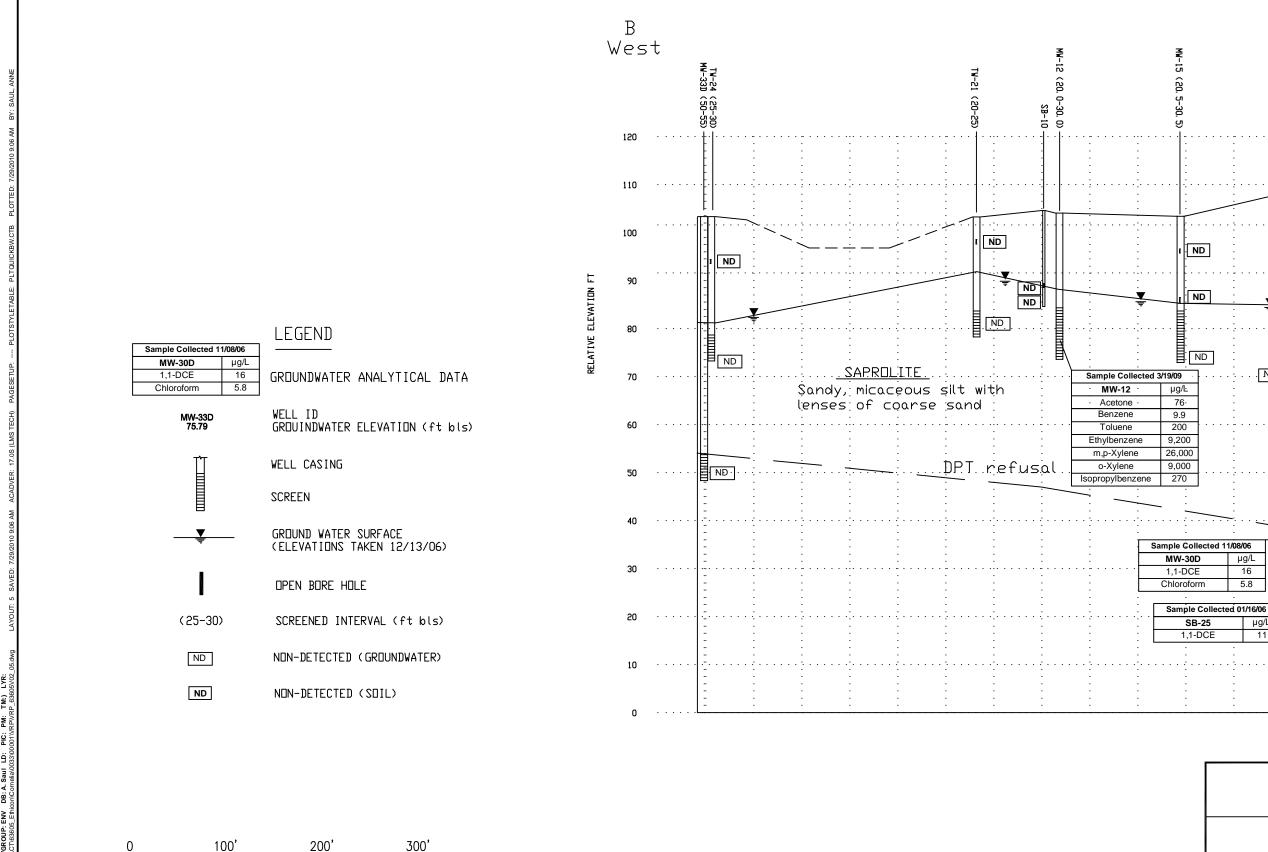
Date	Task
August 27, 2010	Submittal of VRP Application
September 30, 2010	EPD Approval of VRP Application
November 1, 2010	First Semi-Annual Groundwater Sampling
January 1, 2011	Submittal of First Semi-Annual Groundwater Monitoring Report
May 1,2011	Second Semi-Annual Groundwater Sampling
July 1, 2011	Submittal of Second Semi-Annual Groundwater Monitoring Report
November 1, 2011	Third Semi-Annual Groundwater Sampling
January 1, 2012	Submittal of Third Semi-Annual Groundwater Monitoring Report
May 1, 2012	Forth Semi-Annual Groundwater Sampling
July 1, 2012	Submittal of Forth Semi-Annual Groundwater Monitoring Report
October 1, 2012	Submittal of CSR Update (if required)
January 1, 2013	Removal of the site from the EPD Hazardous Site Inventory











ETHICON, INC. 655 ETHICON CIRCLE, CORNELIA, GEORGIA **VOLUNTARY REMEDIATION PLAN**

CROSS-SECTION B-B'



 \mathbb{B}'

120

110

100

East

SB-25 -MV-30D (70-75) -MV-1 (30, 3-40, 3) -

. ND.

ND

ND

E: ND

SB-25

1,1-DCE

μg/L

5

SCALE: 1" = 100'

