



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
Division of Solid Waste Management
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 14th Floor
Nashville, Tennessee 37243

December 18, 2023

Mr. George Harvell
Vice President
Memphis Environmental Center, Inc.
1199 Warford Street
Memphis, TN 38108-3418

CERTIFIED MAIL
#7021 0950 0001 7916 5409
RETURN RECEIPT REQUESTED

RE: Requirement for Interim Measures Workplan
1215 Springdale Street (Cypress Garden Apartments)
Permittee: Velsicol Chemical LLC
Facility: Velsicol Chemical LLC - Memphis Facility
Owner/Operator: Velsicol Chemical LLC
Location: 1199 Warford Street.
Memphis, Tennessee 38108
Permit Type: Corrective Action
Units: Solid Waste Management Units and Areas of Concern
EPA ID Number: TND007024664
Permit Number: TNH-158

Dear Mr. Harvell:

The Division of Solid Waste Management (DSWM) has received an additional environmental Assessment Report for 1215 Springdale Street (Cypress Garden Apartments) prepared by Tioga Environmental Consultants (Tioga) on February 16, 2023. A risk of Vapor Assessment was performed by Tioga in November 2022. Additional assessment of soil and soil vapor was conducted in November 2022 resulting in the attached report. Cypress Garden Apartments is within the boundaries of Sub-Area 3 of Area of Concern (AOC) Cypress Creek Stormwater Channel. The AOC is listed in Table 4.1-5 of permit TNH-158 as requiring a Corrective Measures Study.

Soil contamination above the 2.5 milligrams per kilogram (mg/kg) remedial action level (RAL) was established by the Environmental Protection Agency Region 4 (EPA), the Memphis/Shelby County Health Department, and the Tennessee Department of Health. This RAL was used by the DSWM to evaluate that soil contamination within Sub-Area 3 had exceedances in subsurface soil samples. Aldrin, Endrin, and Heptachlor also exceeded their respective Regional Screen Levels.

Hexachloro-1,3-butadiene was identified at concentrations above the initial target soil gas concentrations for a residential scenario.

As stated in Permit Condition III.F

The Commissioner may require Interim Measures (IM) if they are necessary to protect human health and the environment (considering specific site conditions and Tennessee Regulations). III-7 Upon notification by the Commissioner, the permittee shall prepare and submit an IM Work Plan for any SWMU or AOC for which the Commissioner determines IM are necessary. IM are necessary in order to minimize or prevent the further migration of contaminants and to limit actual or potential human and environmental exposure to contaminants while long-term corrective action remedies are evaluated and, if necessary, implemented. The IM Work Plan shall be submitted within thirty (30) calendar days of such notification and shall include the elements listed in Subparagraph III.F.1(c). Such interim measures may be conducted concurrently with investigations required under the terms of this permit. Units having an approved IM Work Plan shall comply with Paragraph III.F.2 and beyond to govern implementation of the IM requirements for the unit(s).

The DSWM requires Velsicol to submit an Interim Measures (IM) Work Plan following Permit Condition III.F to address the contamination at the Cypress Gardens Apartments. Velsicol will submit the IM Work Plan to the DSWM by January 7, 2024.

If you have any questions, please contact Brett Harris at 615-393-9221 or by email at Brett.Harris@tn.gov.

Sincerely,



Roger Donovan, LPG, CHMM
Hazardous Waste Permitting/Corrective Action

cc: Brian Bastek, RCRA Branch/EPA, Region 4, Atlanta, GA
Beverly Philpot, Hazardous Waste Permitting Manager, DSWM
Jim Holt, Memphis Environmental Field Office Manager, DSWM
Records.SWM@tn.gov
SWMHWP-TND007024664-VELSICOL CYPRESS GARDEN APTS-IM-20231218-CENTRAL-2203