



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

August 18, 2023

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

CERTIFIED MAIL
7021 0950 0001 7916 1630
RETURN RECEIPT REQUESTED

RE: Notice of Deficiency
Corrective Action Effectiveness Report No. 38 (May 2022-April 2023)
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: TNHW-158

Dear Mr. Harvell,

The Division of Solid Waste Management (DSWM) has received Corrective Action Effectiveness Report Number 38 (CAER 38) dated June 15, 2023, prepared on your behalf by WPS USA.

Permit condition III.F.3 of TNHW-158 states:

If the time required for completion of interim measures imposed under Subparagraph III.F.1(a) or implemented under Subparagraph III.F.1(b) is greater than one year, the permittee shall provide the Commissioner with progress reports at intervals specified in the approved Work Plan or semiannually for permittee-initiated interim measures.

Past CAER's contained the analytical laboratory reports; CAER 38 did not contain this data. DSWM cannot review the document until the analytical laboratory reports are included. Please send the amended CAER 38 to DSWM by September 29, 2023.

George Harvell
August 18, 2023
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If you have any questions or comments, please contact me by phone at 615-804-3694 or by email at Roger.Donovan@tn.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Roger Donovan", with a stylized flourish at the end.

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

cc: Brian Bastek, EPA, Region 4, Atlanta, GA
Beverly Philpot, Hazardous Waste Program Manager, DSWM
Jim Holt, Memphis Environmental Field Office Manager, DSWM
Brett Harris, Hazardous Waste Permitting/Corrective Action Section Manager, DSWM
Records.SWM@tn.gov
SWMHWP-TND007024664-VELSICOL NOD CAER#38-CA-20230818-CENTRAL-2203