

PANGEAN-CMD



ASSOCIATES, INC.  
AN **ecs** COMPANY

October 30, 2014

TN DEPT OF ENVIRONMENT  
AND CONSERVATION  
NOV 04 2014  
DIV OF WATER RESOURCES  
RECEIVED

UST NOT Processing  
Tennessee Department of Environment and Conservation  
Enforcement and Compliance Section  
Division of Water Resources – 11<sup>th</sup> Floor  
William L. Snodgrass Tennessee Tower  
312 Rosa L. Parks Avenue  
Nashville, Tennessee 37243

**Re: Notice of Termination  
Archie's Residence  
Greenfield, Weakley County, Tennessee  
NPDES Permit TNG830020  
TDEC Facility ID Number: 7-929006**

To Whom It May Concern:

The Tennessee Department of Environment and Conservation, Division of Underground Storage Tanks (TDEC-DUST), is the operator for the referenced permit. On October 28, 2014, Ms. Geina Skinner of TDEC-DUST issued a Notice to Proceed (NTP) stating that all wells at the site be abandoned and that decommission of the corrective action system (CAS) be commenced. TDEC-DUST further stated that Pangean-CMD Associates (Pangean-CMD) should request termination of the NPDES Permit with the Division of Water Resources prior to December 22, 2014. A copy of the NTP is attached.

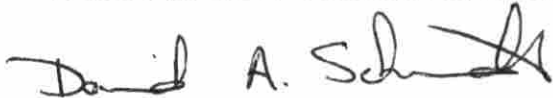
Pangean-CMD is proceeding with the well abandonment and decommission of the CAS. On behalf of TDEC-DUST, Pangean-CMD respectfully submits this Notice of Termination of NPDES permit number TNG830020 to the Division of Water Resources.

I certify under penalty of law that all discharges of treated groundwater associated with underground storage tank remediation from the identified site that are authorized by an NPDES general permit have been eliminated. I understand that by submitting this notice of termination, that I am no longer authorized to discharge treated groundwater associated with underground storage tank remediation under this general permit, and that discharging pollutants associated with treated groundwater associated with underground storage tank remediation to waters of the state is unlawful under the Clean Water Act where the discharge is not authorized by an NPDES permit. I also understand that the submittal of this notice of termination does not release an operator from liability for any violations of this permit or the Clean Water Act.

Please contact me (telephone 901-259-2362, extension 114 or email dschmidt@ecsconsult.com) if you have any questions regarding this notice.

Sincerely,

**PANGEAN-CMD ASSOCIATES, INC., AN ECS COMPANY**

A handwritten signature in black ink that reads "David A. Schmidt". The signature is written in a cursive style with a large, stylized "S" at the end.

David A. Schmidt, P.E.  
Branch Manager

P:\TDEC LT & LT-SL\REGION 4 & 5\4-560064 (Rocky Mound)\DMRs\2014-07-01 TN 4-560064 Terminate NPDES.doc

Attachment

cc: Ms. Geina Skinner – TDEC DUST  
Mr. Gregg Overstreet – TDEC Water Resources, Jackson EFO



STATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
Division of Underground Storage Tanks  
312 Rosa L. Parks Ave., 12<sup>th</sup> Floor, WRS TN Tower  
Nashville, Tennessee 37243

October 28, 2014

Mr. David Schmidt  
Pangean-CMD Associates, Inc.  
3144 Stage Post Drive #112  
Bartlett, Tennessee 38133

Re: **Notice to Proceed (NTP) #14-10-02**  
**Monitoring Well Abandonment and Corrective Action System Decommissioning**  
Archie's Residence  
2881 Greenfield Highway 54, Greenfield  
Facility ID #7-929006, Weakley County

Dear Mr. Schmidt:

The Division of Underground Storage Tanks (Division) has reviewed the Corrective Action Closure Monitoring Report September 8, 2014 and Addendum dated October 2, 2014 for the referenced facility. Based on available information, additional monitoring and/or corrective action are not required. The Division requires that Pangean-CMD perform the following tasks at the above referenced site:

**Task 1**  
**Monitoring Well Abandonment**  
Subtask # 5.1.a, 5.1.b, 5.1.c, 6.22

Pangean-CMD is required to properly abandon all monitoring and recovery wells in accordance with Section II.M. of the 2006 Environmental Assessment Guidelines. Before this case can be closed a monitoring well abandonment report shall be submitted listing the wells abandoned, the driller license number, and before and after pictures showing that the manhole/vaults and well pads were removed. The Monitoring Well Abandonment Report shall be submitted by **December 22, 2014**.

Please note that an authorization to properly close and abandon the Archie Old Well (RW-3) is attached and this well should be abandoned first. Care shall be taken to avoid any damage to the property or yard for any property a well is located. Additionally, the surface completion of each well shall match the surrounding surface cover.

**Task 2**  
**Corrective Action System Decommissioning**  
Subtask # 4.4.d.3, 4.4.d.5

Pangean-CMD shall properly decommission the corrective action system (CAS) and complete the enclosed CAS Decommission Checklist after all wells have been properly abandoned. The CAS Decommission Checklist shall be submitted with the Monitoring Well Abandonment Report by **December 22, 2014**.

Please prepare the required termination request for the NPDES permit and submit for signatures **prior to December 22, 2014**.

**Please note that the Division will request electric termination after Pangean-CMD advises that all wells have been properly abandoned.** This request will include removing the meter, rolling back the lines, and terminating the account. Pangean-CMD shall not conduct CAS Decommissioning activities until after the electric has been disconnected.

**Task 3**  
**Concrete Pad Removal (only if written request by property owner provided)**  
Subtask # 4.4.d.9

In the event the property owner provides a written request for the concrete pad removal, the written request shall be provided to the Division and then task 4.4.d.9 shall be conducted.

**Task 4**  
**Site Restoration**  
Subtask # 5.2a, 5.2.b, 5.2.c

Site restoration activities are approved as it is anticipated that some reseeding and straw will be required regardless of the care taken. Please note that rutting of any area shall be avoided if at all possible.

**Schedule**  
**Notice to Proceed #14-10-02**

**The division must be notified the Friday before any field work activity** (all field work activity notifications shall be submitted each Friday by 12:00 CST for the following week). **Notification shall be provided to the case manager, Geina Skinner, as well as the Jackson Environmental Field Office Manager, Ronda Johnson. Pangean-CMD is also responsible for notifying the property owner(s) at least three (3) days prior to site activities.** Please note, in accordance with Rule 0400-18-01-.06, field work conducted and submitted for reimbursement that has not had proper notification to the Division in accordance with this rule may be subject to denial for fund reimbursement.

Task 1 Report shall be submitted by December 22, 2014.

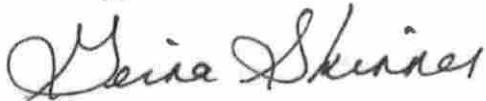
Task 2 Checklist shall be submitted by December 22, 2014.

Task 3 Shall be completed within 30 days following removal of CAS from the site if documentation from the property owner is provided.

Task 4 Shall be completed within 30 days following removal of CAS from the site.

If you have any questions, please contact me at (615) 532-0981.

Sincerely,

A handwritten signature in cursive script that reads "Geina Skinner".

Geina Skinner  
Technical Section  
Division of Underground Storage Tanks

cc: Technical File # 7-929006