

  
**STATE OF TENNESSEE**  
**DEPARTMENT OF ENVIRONMENT AND CONSERVATION**  
Division of Solid Waste Management  
Fifth Floor, L & C Tower  
401 Church Street  
Nashville, Tennessee 37243 - 1535

July 11, 2006

Certified Mail 7006 0100 0005 5067 0489  
Return Receipt Requested

Mr. Ron Loving, Plant Manager  
Velsicol Chemical Corporation  
1199 Warford Street  
Memphis, Tennessee 38108-0127

Re: Corrective Measures Study Report for Cypress Creek Sub-Area III  
Approval with Conditions  
Velsicol Chemical Corporation  
Memphis, Tennessee  
EPA I.D. No: TND 00 702 4664  
TN Permit No.: TNHW-109

Mr. Ron Loving:

The Division of Solid Waste Management (Division) has completed a review of the Corrective Measures Study (CMS) Report for Cypress Creek Sub-Area III dated May 19, 2006. In the CMS, Velsicol Chemical Corporation (Velsicol) is recommending the following corrective measures: a 1-foot protective soil barrier to human exposure, a remediation action level of 3.0 parts per million (ppm) representative dieldrin, and to initiate a permit modification to define the corrective measures as a final remedy.

The Division approves the Velsicol CMS with the following conditions:

- Whereas Velsicol recommends a cleanup level of 3.0 ppm dieldrin, the Division is approving 2.5 ppm representative, dry weight dieldrin.
- Instead of the 1-foot of soil barrier, the Division will approve a barrier of 1 foot 3 inches.

This will allow for a barrier of clean soil to be backfilled and to allow for a layer of sod. As noted in the CMS, due to the generally flat nature of the subject properties the remedial work will usually include excavation to remove a like depth of contaminated soil in order to match original landforms and not impact drainage conditions.

Mr. Loving,  
Page 2

Velsicol may proceed with initiating a permit modification for the remediation work in Sub-Area III.

Should you have any questions on the technical aspects of this matter, please contact Doug Wright of my staff at (615) 532-0835.

Sincerely,



Mike Apple  
Director

cc: Jon Johnston, Chief, RCRA Programs, U.S EPA, Region 4  
William Krispin, Manager, Permitting Sections, Division -Nashville  
Charlie Burroughs, Manager, Corrective Action, Division -Nashville  
Philip Davis, Division, Memphis Field Office  
Doug Wright, Division-Nashville  
Gary Hermann, Memphis Environmental Center (MEC)  
Chuck Hanson, Memphis Environmental Center (MEC)  
Paul Patterson, City of Memphis  
Norman LaChapelle, Memphis and Shelby County Health Department  
Bonnie Bashor, Tennessee Department of Health, Nashville  
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