



"Philip Davis"
 <Philip.Davis@state.tn.us>
 06/28/2007 08:13 AM

2 1 0001
 SITE: Am Drum + Pallet
 BREAK: 2.1
 OTHER: _____

To Steve Spurlin/R4/USEPA/US@EPA
 cc "Angela Horton" <Angela.Horton@state.tn.us>, "Glenn Birdwell" <Glenn.Birdwell@state.tn.us>, "Herb Nicholson" <Herb.Nicholson@state.tn.us>, "Mike Apple"
 bcc
 Subject Fwd: am drum memo

Steve:

Thanks for discussing this site with me yesterday. Attached is a memo from Angela Horton outlining our inspection observations. Attachments 1 and 3 are not included because of size limitations on our email system. If you need these, let me know and I can mail you copies.

We (TDEC Division of Solid Waste Management) have not received a complete response to our information request, therefore we are not capable of making a definitive statement on whether hazardous waste is present in the containers on-site or if there is a threat to human health or environment. However, given the condition of the containers and uncontained waste located on-site, we are concerned about the potential for a release to the environment. Determining the presence of hazardous substances on-site and the mitigating the threat of a release is heightened given the fact that there are residential properties adjacent and across the street from the site.

Please let me know if we can provide you with any additional information.

Thanks,

Philip

Philip J. Davis, P.G.
 Environmental Field Office Manager
 Memphis Environmental Field Office
 Division of Solid Waste Management
 Tennessee Department of Environment and Conservation

----- Message from "Angela Horton" <Angela.Horton@state.tn.us> on Wed, 27 Jun 2007 14:55:20 -0500 -----

To: "Philip Davis" <Philip.Davis@state.tn.us>
 Subject: am drum memo

Philip,

Here is the memo from our site visit in March. Additionally, here is a map that details where we saw most of the stuff. Most of the containers about the site have now been staged together outside, and some of the debris piles have been sorted out.

The latest info I got was that there were over 120 drums of material at the site.



Angela



AmDrummemo.doc



AmDrumprop.doc



Philip Davis.vcf

TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION

2 1 0003

OFFICE CORRESPONDENCE

FROM	TO	DATE

DATE: May 31, 2007

TO: File: TND 00 702 9200

FROM: Angela Horton

SUBJECT: March 19, 2007, Inspection of American Drum and Pallet Co.
 806 Walnut Street
 Memphis, TN 38106
 TND 00 702 9200

On February 22, 2007, personnel with the Division of Solid Waste Management (DSWM) in the Memphis Environmental Field Office (MEFO) received a complaint from a building inspector with the Memphis Fire Department regarding American Drum and Pallet Company (ADPC), located at 806 Walnut Street, Memphis, TN, 38106. The complaint pertained to the storage of unknown materials and concern about conditions observed at the facility. Specifically, the inspector mentioned observing an estimated fifty 15-gallon plastic containers stored at the site. At least one of these containers was labeled with a DOT "Poison - 6" label for "Methyl Parathion." Additionally, the inspector mentioned an estimated fifty drums with labels describing a herbicide product, "Rice Shot."

Sometime after receiving the complaint, DSWM personnel contacted Mr. Johnnie Williams, sales manager at ADPC, to inquire about the containers described by the complainant. Mr. Williams stated that all of these containers were empty, and that the 15-gallon plastic containers had already been sent off-site to be grinded by a company called "CBS Polymers." During this phone call, Mr. Williams indicated that there were drums on-site that contained material left behind by prior operators at the site.

DSWM personnel visited the site on March 19, 2007, to conduct a hazardous waste inspection. In addition to the building located at 806 Walnut, ADPC occupies two buildings on contiguous property located at 0 Heiskell Place. A walkthrough was conducted within the buildings and outside areas. During the inspection, DSWM staff observed three piles of material (referred to as Debris Piles 1, 2, and 3) placed on the ground outside of the buildings. Materials observed within these piles included plastic 55-gallon and 200-gallon totes, fibreboard drums, metal 55-gallon drums, lids, rags and wooden pallets. Facility personnel indicated that these piles were present at the facility as a result of a facility clean up. In addition to the debris piles, DSWM personnel observed an estimated 118 containers holding material stored at several areas inside of the buildings and within a trailer. At the time of the site visit, facility personnel were not certain of the contents of the containers and material contained in the debris piles.

In order to evaluate ADPC's compliance with applicable requirements of the rules and regulations promulgated pursuant to the Hazardous Waste Management Act, T.C.A. 68-212-101, the DSWM issued an Information Request, dated April 5, 2007. As of the date of this memo, the DSWM has not received a response that adequately addressed all questions contained in the Information Request.

- Attachment 1: describes the storage areas and the debris piles observed by DSWM personnel at the time of the site visit.
- Attachment 2: outlines areas of the site where the materials described at Attachment 1 were located.
- Attachment 3: includes photos of these areas, as taken by DSWM personnel at the time of the site visit.

c: Philip Davis, DSWM - Memphis
 Herb Nicholson, DSWM - Memphis
 Angela Horton, DSWM - Memphis