

Tennessee Department of Environment and Conservation
Velsicol Chattanooga Information Sheet
February 15, 2011

The Department of Environment and Conservation has required the Velsicol Chemical Company (Velsicol) to investigate the soil and ground water contamination caused by the release of chemicals and waste at its Chattanooga plant while it was an operating facility. As a result of the production process, Velsicol generated hazardous wastes and is subject to our hazardous waste regulations. The Department is requiring Velsicol to determine the extent of soil and ground water contamination due to the release and remediate hazardous wastes released under the authority of the Tennessee Hazardous Waste Management Act, T.C.A. 68-212-101 et. seq. The Department has been delegated authority to implement the federal Resource Conservation and Recovery Act (RCRA) Hazardous Waste regulations in Tennessee by the U. S. Environmental Protection Agency.

The Department has worked with Velsicol for several years; requiring Velsicol to address the release of hazardous wastes. Velsicol has been performed significant work at the site as listed below:

1. The manufacturing buildings and infrastructure have been torn down and removed from the site;
2. More than 24 million pounds of waste and contaminated soil has been removed from the site and disposed;
3. An asphalt cap has been placed over the Riley tar;
4. Ground water monitoring wells have been installed with samples collected and analyzed regularly;
5. Ground water is removed (approximately 1.5 to 2 gallons/minute) from on-site recovery wells to prevent contaminated ground water at the northeast portion of the site from migration off site;
6. The ground water that is collected is discharged to the Chattanooga waste water collection system under permit number 1013 for treatment at the City's waste water treatment plant (WWTP);
7. The flow from Piney Wood spring is collected and discharged to the Chattanooga waste water collection system for treatment at the City's WWTP. The city has approved this discharge;
8. Surface water runoff from site is collected and discharged to the Chattanooga waste water collection system for treatment at the City's WWTP;
9. All ground water and surface water that is collected is sampled before discharge to the Chattanooga waste water collection system. Discharge of these waters has been approved by the city of Chattanooga and the Department.
10. Samples from the ground water, Piney Woods spring and recovery well are collected and analyzed before discharged to the Chattanooga waste water collection system;
11. The site has signs warning people to not enter the private property and the site is secured using fencing to limit public access to the privately owned site;
12. All solvents and drums have been removed from the site; and
13. Coal tar is collected from on-site wells and sumps and disposed of appropriately.

The Hazardous Waste Corrective Action permit application (the plan) submitted by Velsicol proposes additional on-site work. The additional work is required because Velsicol has not completed all environmental remediation work needed at the site. In addition to the actions that have already taken place, the plan includes the additional activities listed below;

1. Continuation of ground water monitoring and remediation;
2. Velsicol will continue to remove coal tar from monitoring wells and sumps;
3. An 18" soil cap will be placed over areas of the site with soil contamination at ground surface. A 12" soil cap will be placed over areas of the site without soil contamination at ground surface. This prevents site surface water runoff from becoming contaminated and eliminates the potential for human exposure with contaminated soil;

4. The property is currently zoned for industrial use. The deed for this property will be changed to restrict the use of the property; eliminating environmental and public health risks. The deed restrictions will not allow the installation of water supply wells on the site. The deed restrictions will not allow any on-site construction that penetrates the soil cap;
5. The site will be placed under a long term monitoring and maintenance program to insure the proposed corrective actions are maintained and effective; and
6. Velsicol will be required to provide financial assurance to the Department that can be used to continue corrective action activities should Velsicol dissolve as a company or become bankrupt.

The Department provided the plan to the U.S. EPA Region 4 (EPA) Hazardous Waste Division for review and comment. At this time, EPA has not provided any comments regarding the plan to the Department. Any comments provided by EPA will be considered by the Department. The Department will review all public comments received by close of business February 11, 2011. The purpose of the Public Notice and Public Comment period is to receive ideas, thoughts and concerns from the public about a proposed activity, in this case the plan submitted by Velsicol for its Chattanooga site.

The Department has determined that a portion of the Velsicol site is in the Federal Emergency Management Agency 500 year flood plain. This will be considered by the Department in its decision to approve/deny the permit application.

Once the Department has completed review of all public comments, it is required to make a permit decision. As a part of the decision making process, the Department prepares a response to comments document that summarizes the comments received and provides responses to each similar comment. The Department will select one of the options below:

1. Determine that the environmental investigation and proposed corrective action for the site does not provide appropriate protection to public health and the environment and require Velsicol to conduct further work; environmental investigation and/or additional corrective action. If this decision is made, the Department will deny the permit application and require Velsicol to submit a permit modification.
2. Determine that additional questions about the site need to be answered before it can make a final corrective action decision. This will require Velsicol to conduct further site work and resubmit a proposed remedy; or
3. Determine that the proposed remedy for this site provides appropriate protection of public health and environment as required by the TN Hazardous Waste Management Act and issue a Hazardous Waste Corrective Action Permit to Velsicol as is or with modifications based on public comments.

If you have further questions or concerns please contact Roger Donovan, the Project Manager, at 615 532-0780 or roger.donovan@tn.gov.