



STATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
Division of Solid Waste Management  
Columbia Environmental Field Office  
1421 Hampshire Pike  
Columbia, TN. 38401

October 18, 2018

Mayor Pat Ford  
City of Pulaski, Mayor  
P.O. Box 633  
Pulaski, TN 38478

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**  
9489 0090 0027 6072 8792 43

Mr. Terry Harrison  
City of Pulaski, City Administrator  
P.O. Box 633  
Pulaski, TN 38478

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**  
9489 0090 0027 6072 8793 28

**RE: COMPLAINT INVESTIGATION**  
**City of Pulaski, Street Department, 410 Block St**

Dear Mayor Ford:

On October 5, 2018, in response to a complaint, personnel of the Division of Solid Waste Management (Division), Tennessee Department of Environment and Conservation conducted an investigation at a property located directly adjacent of the City of Pulaski Water and Street Departments. Based on current tax records the site in question is owned by the City of Pulaski as identified on Maps 096E, Parcel 006.00, and carries an address of S. 5<sup>th</sup> St., Pulaski, TN.

During the course of the investigation, Division personnel discovered the disposal of solid waste onto the ground. Facility personnel stated that this waste accumulation was not typical and a part of Giles County's Semi-Annual "Amnesty Week." Based on the July 9, 2015 Compliance Plan (see attached) Immediate Goal 3 states that, "The county will host a free trash collection day once monthly using open roll-off containers at a central location." Compliance does not allow waste to be placed on the ground and must be managed in roll-offs or other containers that aid in compliance with this goal.

The site investigation also found a pile of 15-20 tires that were not covered and being improperly managed. According to Rule 0400-11-01-(2)(k)3.(i)II.,

*Tire piles shall be restricted to the following dimensions - 200 feet long, 50 feet wide, and 15 feet high. Whole tires shall be covered by a material sufficient to shield the tires from precipitation or an effective insect vector and rodent control program shall be established.*

A large pile of scrap metal was also observed that contained white goods (household appliances) at the south-west corner of the property. The white goods need to be removed from the pile and recycled to avoid any potential contamination from any lingering refrigerants. Facility personnel also stated that the pile had been there for quite a long time. Rule 0400-11-01-.02(1)3.(xvi) states:

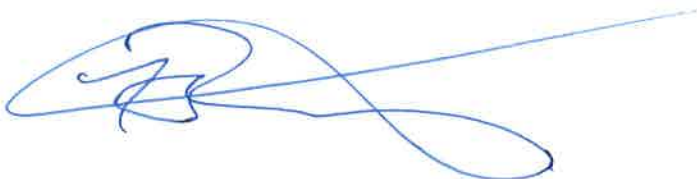
*The storage of solid waste that is incidental to its recycling, reuse, reclamation or salvage provided that upon request of the Commissioner, the operator demonstrates to the satisfaction of the Commissioner that there is a viable market for all stored waste and provided that all waste is stored in a manner that minimizes the potential for harm to the public and the environment. Material may not be stored for more than one (1) year without written approval from the Division.*

Further North on the property, was another pile that Street Department personnel stated belonged to the Water Department. This pile, too, had scrap metal and white goods in it. These materials must also be managed as the above Rule 0400-11-01-.02(1)3.(xvi). A 270-gal unlabeled tote was also observed near this pile containing an unknown liquid. The City of Pulaski must determine what the liquid is, and properly manage and dispose of it.

Management of the wastes described above must be improved within thirty (30) days of the receipt of this letter. A follow-up site visit to verify proper management will be conducted subsequent to this date.

If you have any questions concerning this correspondence, please contact me by email at [bart.marston@tn.gov](mailto:bart.marston@tn.gov) or by phone at (931) 380-5218. You may also contact Beverly Philpot by phone at (931) 840-4162.

Sincerely,



Bart Marston  
Environmental Consultant  
Division of Solid Waste Management

Reviewed by,



Beverly Philpot  
Environmental Field Office Manager  
Division of Solid Waste Management

cc: Ashley Holt, Deputy Director, DSWM





