



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
KNOXVILLE ENVIRONMENTAL FIELD OFFICE

3711 MIDDLEBROOK PIKE
KNOXVILLE, TENNESSEE 37921-6538
PHONE (865) 594-6035 STATEWIDE 1-888-891-8332 FAX (865) 594-6105

Date: October 24, 2013

To: Company File

From: Jarrett Rudd *JLR*

Re: Elliott Pet Services
65-0054

The information below is a timeline of events that has occurred with Elliott Pet Services from September 13, 2013 through October 23, 2013. This information was documented by Jarrett Rudd, Environmental Specialist, Tennessee Department of Environment and Conservation, Division of Air Pollution Control.

September 13, 2013 I visited 295 Grouse Ridge Road in Morgan County in response to an odor complaint and discovered a pile of dead animals on this property. I also saw a few bags and a red tote in a different area. I took pictures and later emailed them to the Revendra Awasthi, Tennessee Division of Solid Waste Management, Joe Cole, EPA, Wes Montooth, TN Dept. of Agriculture Division of Regulatory Services, Laura Conner, Health Department Director for Roane and Morgan County, and Dana and Fegan Kenny.

September 16, 2013 David Fugate with the Tennessee Division of Solid Waste Management informed me that he called Cameo Farr and told her it is a violation to dump animals on her property. He said she replied by saying that they do not incinerate them instantly and was not aware of any that needed to be incinerated. He emailed her one of the pictures from September 13, 2013 that I took of the pile of dead animals.

September 17, 2013 David Fugate and Ryan Miller with the Tennessee Division of Solid Waste Management attempted to visit Cameo Farr at 277 Grouse Ridge Road but she was not at home. The notice of violation from the TN Division of Solid Waste Management, dated 9-17-13, and addressed to Cameo Farr states "On September 17, 2013, the Division performed a site visit to the property; no sign of any dumped animals were present. I called you on the phone from your house. You stated they had been incinerated the night before." This notice of violation was written and signed by David Fugate with the Tennessee Division of Solid Waste Management.

September 18, 2013 I visited 295 Grouse Ridge Road in Morgan County and discovered the pile of dead animals from 9/13/13 had been removed and took pictures of this area. However, the area where I previously saw a few bags and a red tote was still there. I took pictures of this area again. I also took pictures of the incinerator.

October 1-2, 2013 On or about October 1-2, 2013, I called Cameo Farr asking if I can see the incinerator in operation. We scheduled my visit for October 4, 2013.

October 3, 2013 I received a call from Cameo Farr and we rescheduled my visit to October 7, 2013.

October 7, 2013 I received a voicemail from Cameo Farr asking to reschedule my visit to October 14, 2013. She said the welder came but it rained on him and he broke the heat probe. She also said she needed to go to Crossville and Karns and needed more time if possible. I called her back the same day and rescheduled my visit to October 14, 2013.

October 10, 2013 I went by Elliott Pet Services unannounced three times while in Morgan County. After the third visit, I called Cameo Farr and asked if she would be home any time soon. She said she would not so I left.

October 14, 2013 I received a voicemail from Cameo Farr that was left at 8:20 PM on October 13, 2013. She said the temperature probe has not yet been received. I received another voicemail at 11:17 AM saying she had to go to Knox County to pick up a service dog and it could not wait because the man's daughter gets out of school at 10:00 AM. She also said her kids are on Fall Break and she had an employee quit. She requested that we reschedule my visit to October 15, 2013. I was leaving to go to a statewide staff meeting on October 15, 2013 so we rescheduled for October 18, 2013.

October 18, 2013 I received a voicemail from Cameo Farr that was left at 8:12 PM on October 17, 2013. She was asking for confirmation that we were still meeting at 9:00 or 9:30 on October 18, 2013. I called her back and we agreed that I visit around 10:00 AM.

October 18, 2013 While I was on my way to Elliott Pet Services, Cameo Farr called my cell phone and said I could still come and watch the incinerator in operation but the log book was in Jimmy Farr's truck and he works in Jefferson County. She said it was in his truck to get it out of the rain.

October 18, 2013 I called Jimmy Farr and we agreed that he would bring the log book to the Knoxville Environmental Field Office on his way home from work. I provided him with both my office address and personal cell phone number. He said it might be around 4:30 PM so he would call me when he was on his way.

October 18, 2013 I visited Elliott Pet Services and conducted a visual emissions evaluation (VEE). During this visit, Cameo Farr said the fuel tank had water in it when she added diesel to it. According to Cameo Farr, the incinerator was running out of diesel fuel and it had to be turned off before it completely ran out to prevent damage to the incinerator. The incinerator was turned off after 24 minutes of VEE readings and Cameo Farr said they did not have any more diesel fuel to add. She then sent a lady to get more diesel fuel but I did not wait for the incinerator to start again. In addition, Cameo Farr said she would contact Jimmy Farr and try to meet him somewhere so she could bring me the logbook herself this same day. I never received a call from Cameo or Jimmy Farr the rest of the day (10/18/13).

October 21, 2013 I received a voicemail from Cameo Farr that was left at 10:19 PM on October 20, 2013. She said that Jimmy Farr had to work until 7:00 PM on October 18, 2013 and therefore could not bring me the log book. She also said that she plans on bringing the logbook to my office as early as possible, hopefully before we open, on Monday morning (10/21/13). I called her back around 8:15 AM and left a message asking her to call me. I left another message around 10:45 AM. My call was not returned so I called again at 12:57 PM, using a coworkers cell phone, and spoke to Cameo Farr. She said she had planned on bringing me the log book after dropping her kids off this morning but had to go to Crossville instead. She said she would be at my office with the log book in about 2 hours. I called Cameo Farr around 5:00 PM and left a message to call me back. I did not hear from her or receive any voicemails the rest of the day.

October 22, 2013 I tried calling Cameo Farr's cell phone from a phone booth in Claiborne County. A lady answered the phone and said Cameo is not at home right now. I gave her my name and phone number and asked that Cameo call me back because I need to see her log book. The lady said Cameo had a doctor's appointment in Knoxville today and would give her my message when she got back. I did not hear from her or receive any voicemails the rest of the day.

October 23, 2013 The Division of Air Pollution Control issued a notice of violation (NOV) to Cameo Farr, Owner of Elliott Pet Services. This NOV cites her for not maintaining logs at the source location as required by Air Pollution Control Permit 066242L. This NOV also requires copies of these logs to be provided to the Knoxville Environmental Office by November 1, 2013. At a minimum, these copies must include logs from the permit issuance date of November 7, 2012 through October 23, 2013. As of October 23, 2013, I have not had any communication with Cameo or Jimmy Farr since October 21, 2013.