



Department of
**Environment &
Conservation**

Solid Waste Permitting/Program Update

Financial Assurance for Permit-By-Rule Facilities

- Remove the 1000 cubic yard exclusion from the PBR financial assurance requirement with an implementation schedule.
- ~~(XX) The owner/operator of a solid waste processing facility which has a solid waste storage capacity of 1000 cubic yards or greater shall file Prior to receiving solid waste for processing, or within 90 days of the effective date of these rules, if authorized and operating on the effective date of these rules:~~
 - I. File with the Commissioner a performance bond or equivalent cash or securities, payable to the State of Tennessee. ~~Such financial assurance is intended to ensure that adequate financial resources are available to~~ in an amount determined by the Commissioner to ~~insure~~ be sufficient to ensure the proper operation, closure, and post closure care of the facility;

Financial Assurance for Permit-By-Rule Facilities

- DSWM has begun to examine the entire universe of Solid Waste Processors to search for any shortfalls in financial assurance.
 - Currently, 67 operating permits.
 - Under old Rules, 31 met the “under 1000” cubic yard requirement.
 - A few of the remaining 36 facilities may need F/A adjustments, and are under review.

Annual Engineering Report Update

- 2022 Goal: Develop & administer a formal annual/triennial engineering review process.
 - Identify roles of Central Office and EFOs in the review process and establish a draft policy documents memorializing roles and duties.
 - Identify all deviations from approved permits, create priority lists for corrective action in conjunction with EFOs.
 - Currently, compiling a small list of potential landfills that seem to have construction deviations from their approved permit.

2021 Year-to-Date, Inspections with Major Violations

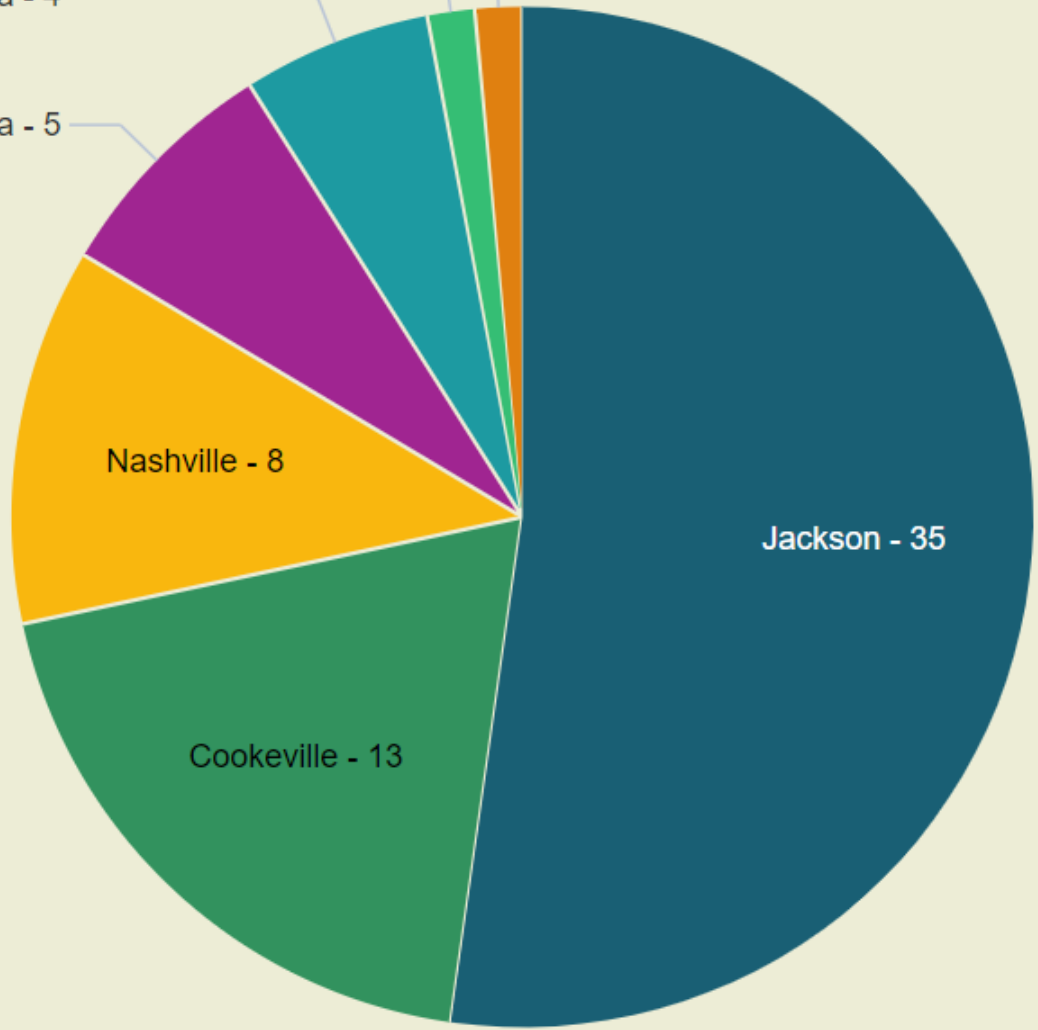
Knoxville - 1
Johnson City - 1
Chattanooga - 4

Columbia - 5

Nashville - 8

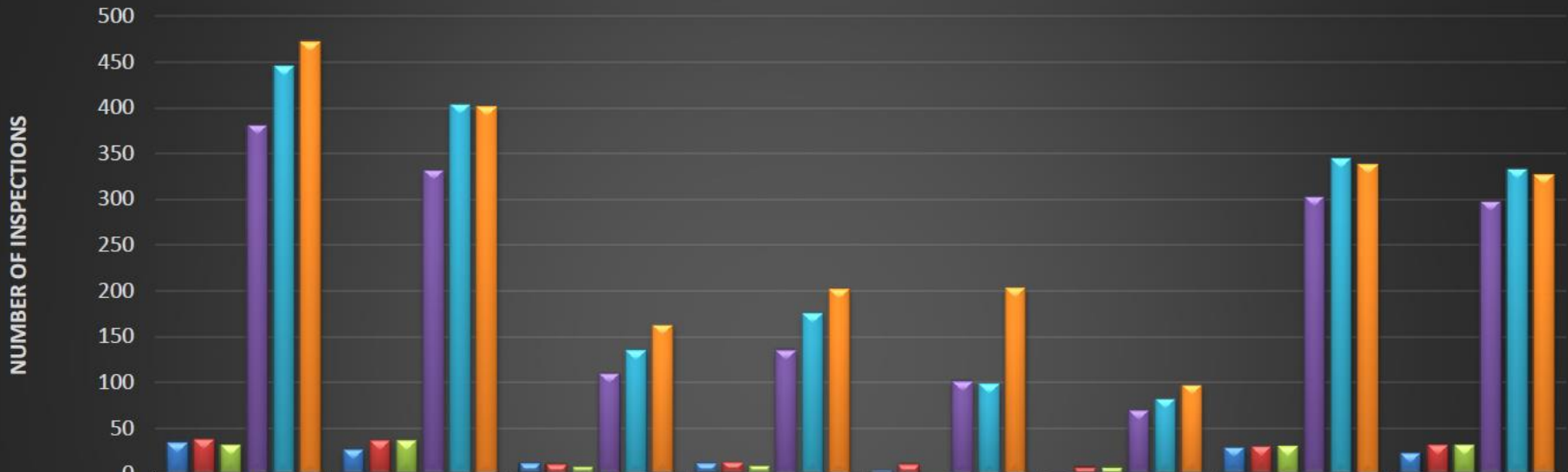
Cookeville - 13

Jackson - 35



Public/Private Landfill Inspection Trends

A Comparison of Public & Private Landfill Violations

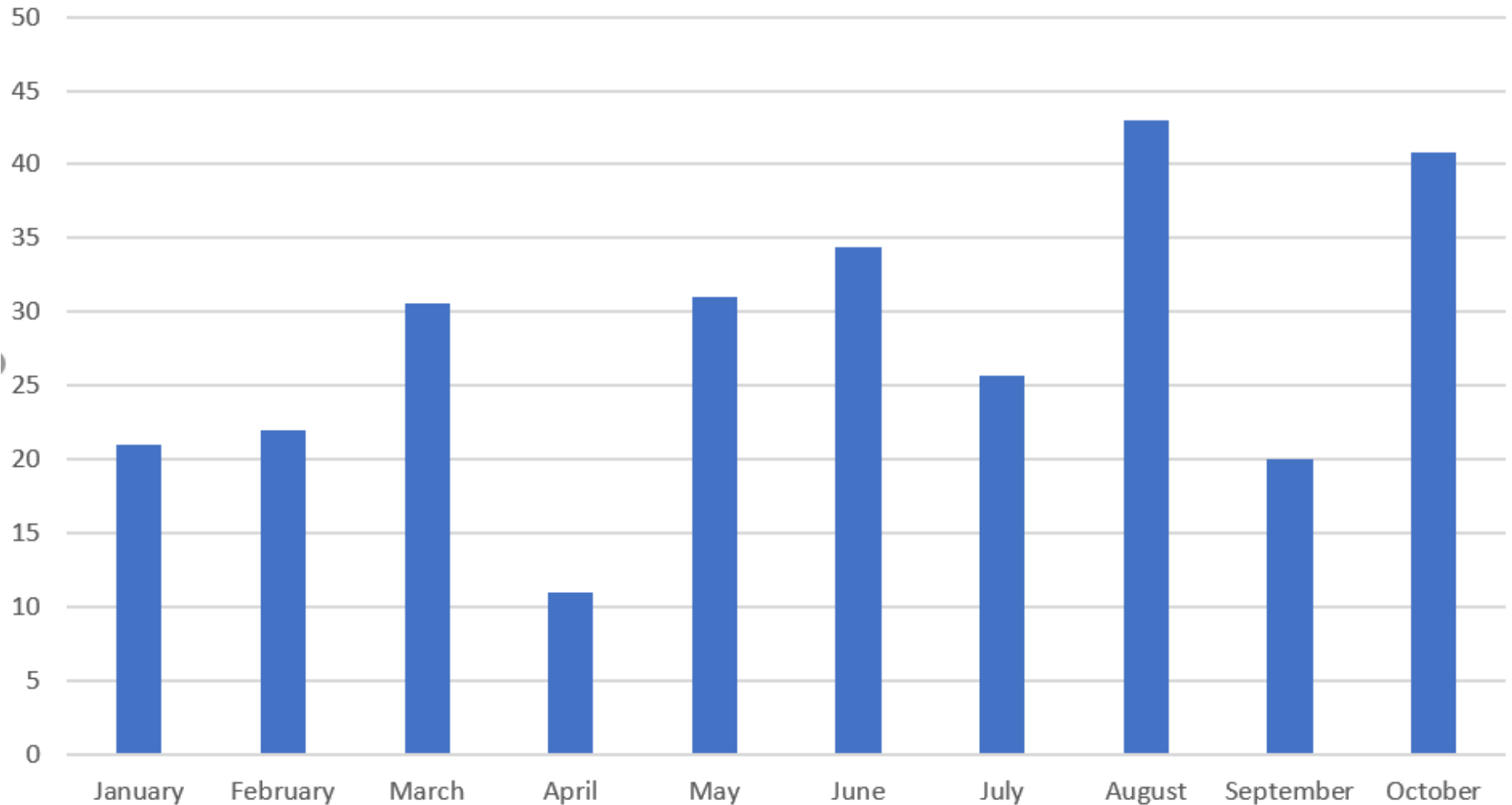


| | Public | Private | Public | Private | Public | Private | Public | Private |
|-----------|-------------|---------|------------------|---------|------------------|---------|---------------|---------|
| | Inspections | | Major Violations | | Minor Violations | | No Violations | |
| October | 35 | 27 | 12 | 12 | 4 | 2 | 29 | 23 |
| September | 38 | 37 | 11 | 13 | 11 | 7 | 30 | 32 |
| August | 32 | 37 | 8 | 9 | 1 | 7 | 31 | 32 |
| 2021 YTM | 381 | 332 | 110 | 136 | 102 | 70 | 303 | 298 |
| 2020 | 446 | 404 | 136 | 176 | 99 | 82 | 345 | 333 |
| 2019 | 473 | 402 | 163 | 203 | 204 | 97 | 339 | 327 |

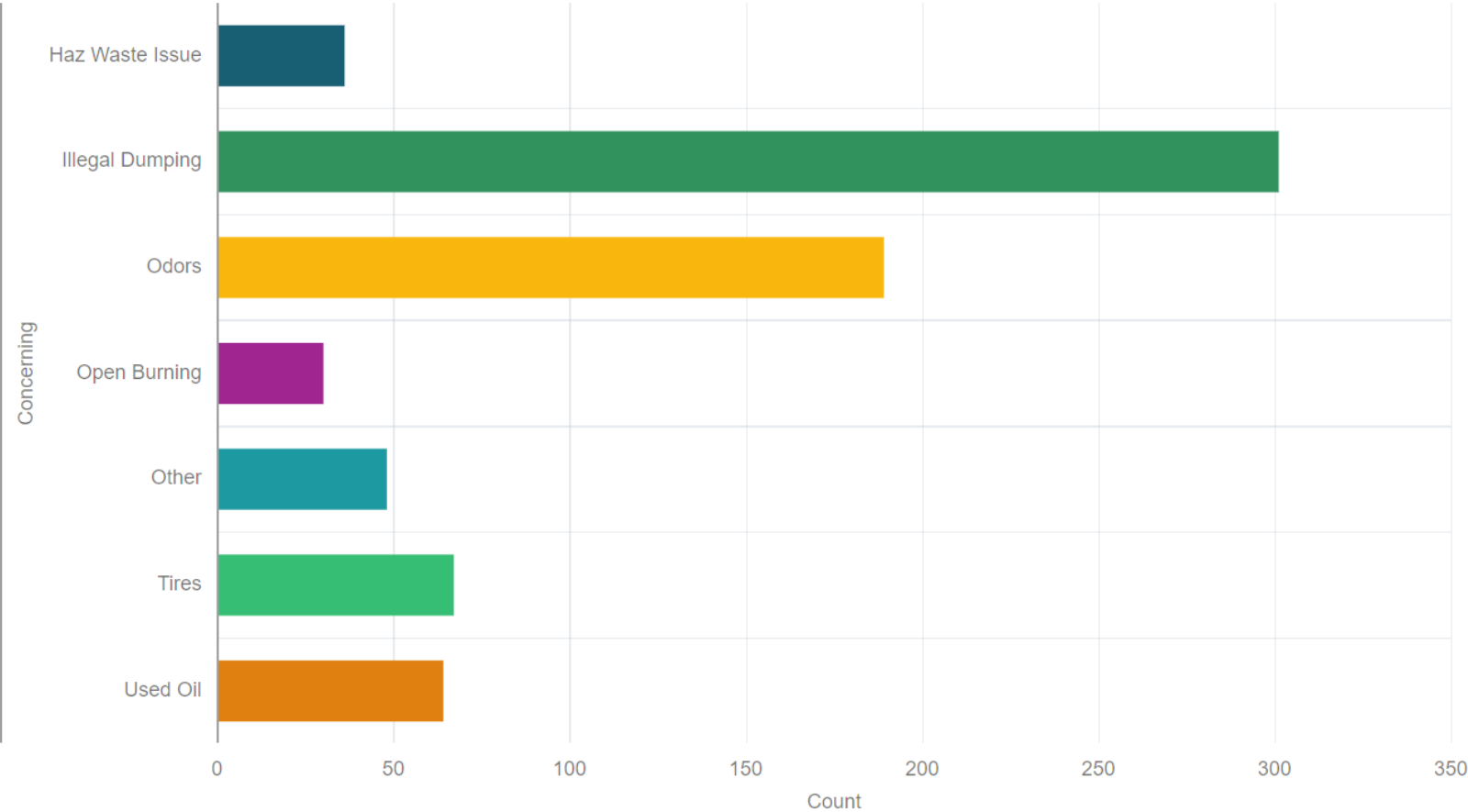
Improved Minor Mod Permit Tracking

| Review Days | | | | | | | | | |
|-------------|----------|-------|-------|-----|------|------|--------|-----------|---------|
| January | February | March | April | May | June | July | August | September | October |
| 35 | 40 | 47 | 11 | 31 | 25 | 27 | 43 | 12 | 37 |
| 7.0 | 11.0 | 24.0 | | | 7.0 | 7 | | 14 | 6 |
| | 15 | 26 | | | 71 | 3 | | 13 | 57 |
| | | 65 | | | | 21 | | 18 | 30 |
| | | 25 | | | | 13 | | 59 | 74 |
| | | 3 | | | | 33 | | 4 | |
| | | 3 | | | | 59 | | | |
| | | 86 | | | | 42 | | | |
| | | 48 | | | | | | | |
| | | 14 | | | | | | | |
| | | 8 | | | | | | | |
| | | 18 | | | | | | | |

2021 Average Days to Review Minor Mods



2021 Complaints Received



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