The Division of Solid Waste Management (DSWM) issued four Hazardous Waste Orders and one Solid Waste Order between January 17, 2022, and April 18, 2022.

From the previous Board meeting, one Hazardous Waste Order and one Solid Waste Order require updates.
Summary of Hazardous Waste Order HWM21-0012
Fac. ID No. TND000772186/TNHW-103/Tradebe Treatment and Recycling of Tennessee, Shelby County

• Signed February 24, 2022
• Order issued for repeated permit and rule violations including:
  • Failure to store hazardous waste in permitted areas
  • Failure to operate within permitted capacities
  • Failure to maintain aisle space
  • Failure to properly label and manage HW containers
• Upfront Civil Penalty – $149,270.00
• Damages – $15,440.10
• Order was appealed on March 31, 2022, and is under litigation.
Summary of Hazardous Waste Order HWM21-0013
Fac. ID No. TNR000020230/Tradebe Transportation, LLC Shelby County

• Signed February 24, 2022
• Order issued for repeated 10-day transfer station rule violations including:
  • Failure to maintain a log of all inbound and outbound shipments
  • Failure to record the arrival date of inbound shipments
  • Storing hazardous waste for greater than 10 days
  • Failure to properly segregate incompatible wastes
• Upfront Civil Penalty – $120,275.00
• Damages – $2,925.00
• Order was appealed on March 31, 2022, and is under litigation.
Summary of Hazardous Waste Order HWM21-0019
Fac. ID No. TNR000045021/West Star Aviation, Hamilton County

- Signed March 10, 2022
- Order issued for rule violations including:
  - Failure to close HW containers
  - Failure to label HW tanks
  - Failure to obtain PE certification for HW tanks
  - Failure to document daily HW tank inspections
- Upfront Civil Penalty – $18,520.00
- Damages – $1,950.00
- Civil penalty and damages paid April 18, 2022.
Summary of Hazardous Waste Order HWM21-0009
Fac. ID No. TND982109142/Diversified Scientific Services Inc, Roane County

- Signed April 8, 2022
- Order issued for rule violations including:
  - Storage of HW for greater than one year
  - Failure to appropriately label SAA storage containers
  - Failure to track accumulation start date for UW batteries
- Upfront Civil Penalty – $8,420.00
- Damages – $900.00
- Order is still within 30-day response time.
Summary of Solid Waste Order SWM21-0017
Fac. ID No. SWP900001576/Lighting Resources LLC, Washington County

- Signed January 24, 2022
- Order issued for solid waste processing permit-by-rule violations including:
  - Exceeding UW storage capacity limits
  - Storage of UW outside of permitted areas
  - Failure to maintain records of the amount UW stored
  - Failure to maintain adequate financial assurance
- Upfront Civil Penalty – $9,200.00
- Damages – $1,687.50.00
- Civil penalty and damages paid March 8, 2022.
HW Directors Order Update – Closed

Summary of Hazardous Waste Order HWM21-0004
Fac. ID No. TND981023674/Cymer-Dayton, LLC, Rhea County
  • Director's Order Signed November 9, 2021
  • Order issued for rule violations including:
    • Failure to conduct and document tank, pump and valve inspections
    • Exceeding storage time limits for hazardous waste, therefore operating an unpermitted TSDF
  • Upfront Civil Penalty – $9,670.00
  • Damages – $4,360.00
  • Resolution – The civil penalty and damages were referred to Fiscal Services for invoicing on December 28, 2021. Paid on March 7, 2022.
Summary of Solid Waste Consent Order SWM20-0011
Fac. ID No. SNL660000276/ECM of Ridgely, Obion County

• Director's Order signed November 19, 2020
• Order issued for:
  • Leachate and stormwater management
  • Erosion control
  • Over-filling beyond permitted capacity
• Contingent Civil Penalty – $19,305.00 pending completion of CAP by September 30, 2021.
• Update - Awaiting updated Financial Assurance in order to expand airspace in new cell. No change from previous update.
As a reminder, details for all Orders referred to in this presentation are available on the TDEC public facing data-viewer.

TDEC Enforcement Data-viewer

Mark Jordan – (615) 532-0675
Email: mark.a.jordan@tn.gov