Update Agenda

- Training Vision and Philosophy
- Legacy Programs
- New Programs
  - Internal
  - Regulated Community
- Community Reaction
- Training Schedule
DSWM Training Update

Training ?
DSWM Training Update

Why does DSWM Train?

• Our Responsibility
• We are all diversely educated
• Statewide consistency
• Liability and risk management

We all need to be smart
Training Goals

- Discipline-specific certifications (e.g. landfill operator, asbestos, lead...)
- DSWM Program-specific
- Achieve a baseline for *Us*
- Achieve a baseline for *Regulated Community*

The Result is

- Quality and Consistency
- Liability and Risk Mgmt
Solid Waste Management

The mission of the Division of Solid Waste Management (DSWM) is to protect, improve, and promote health and environmental quality through the responsive, effective oversight of waste management activities and the beneficial use of recovered materials.

Solid waste may be defined as any useless, unused, unwanted, or discarded materials. Hazardous waste, problem waste, toxic substances, and recyclables may be distinguished from other solid waste. DSWM has established focused programs to address each of these.

You may contact DSWM at SolidWaste@tn.gov or 615-532-0780. If you need to reach a particular staff member, please see our contact list and be sure to consult our organization chart.
DSWM Training Update – Training Page

DSWM Training Opportunities

**Landfill Operators Certification Training**
A certified Landfill Operator must be present at a municipal solid waste landfill during all hours of operation.

**Statewide Uniform Inspection Training (SUIT)**
The State Uniform Inspection Training Program is designed to provide Class I Landfill Operators with a basic knowledge of Tennessee’s facility inspection program.

**Hazardous Waste Annual Report**
Hazardous waste generators are required to file annual hazardous waste reports. Free workshops are held annually to assist generators in preparing these reports.

**Hazardous Waste Inspector Training**
DSWM is exploring expanding our Hazardous Waste Inspector Training program to the public - let us know what you think.

**Lead Certification**
Anyone engaged in lead-based paint (LBP) activities in "target housing" and "child-occupied facilities" must be certified.

**Asbestos Accreditations**
Anyone who performs asbestos activities in schools or public and commercial buildings must be accredited by the State.

**APR Workshops**
Authors of the county Annual Progress Reports can

**Grant Workshops**
Grant workshops are an opportunity for applicants to

**Environmental Show of the South**
The Environmental Show of the South conference and
Landfill Operators Certification Training (LOCT)

How to run a landfill

- 30 Hours Field and Classroom
  - Regulations
  - Landfill Math, Surveying
  - Landfill Plans and Daily Operations
  - Waste Acceptance and Inspections
  - Gas, Groundwater, Leachate
  - Closure and Compliance

- Valid for 3 years
  - Recertification with Training
Asbestos Accreditations – Website Training

- Accreditations Requirements
- Firm and LEA Applications
- Individual and LEA Applications
- Accreditation Fee Schedules
- Accredited Asbestos Professionals
- Asbestos Program DSWM Rules

Accreditations for Asbestos Professionals

The Asbestos Accreditation Requirements are applicable to all persons and firms who perform asbestos activities in schools or public and commercial buildings, as well as training providers who offer asbestos training courses to individuals who have or seek accreditation in Tennessee.

These Rules stipulate that only accredited persons shall perform asbestos activities inclusive of developing management plans in schools, project designs, conducting response actions, inspections, and collecting clearance air samples to confirm the completion of a response action involving friable and non-friable asbestos-containing materials and asbestos-containing building materials in schools or public and commercial buildings.

Asbestos Accreditation Applications

***IMPORTANT NOTICE: Application processing changes for individuals who perform asbestos activities in schools or public and commercial building in Tennessee effective July 3, 2017

- Firm and LEA Application to Conduct Asbestos Activities (CN-1299)
- Individual and LEA Employees (require 2 forms):
  - "EVEA" form - Eligibility Verification for Entitlements Attestation form (CN-1497)
    (An "EVEA" form with valid ID(s) must accompany all individual and LEA employee applications)
  - Application to Conduct Asbestos Activities for Individuals and LEA Employees (CN-1300)
Lead Certification – Website Training

How to Become a Certified:

- Firm
- Individual Inspector
- Project Designer
- Risk Assessor
- Supervisor
- Training Provider
- Worker

-------------

- Rules
- Study Guides
DSWM Workshops – EFOs Live and Online

Hazardous Waste Annual Reporting
- Calculating Quantities
- Preventing Common mistakes
- Avoiding Violations

Annual Progress Report Workshops
- Online Assistance
- Interactive Guidance

Grant Workshops
- Offerings and Requirements
- Grant Manual and Instructions Review
- Process and Timeline
Environmental Show of the South – ESOS

The Environmental Show of the South Returns to Chattanooga
May 16-18, 2018
DSWM Training - Update – Legacy Programs

Environmental Show of the South – ESOS

“Great Networking” . . . “Excellent Technical Presentations”

Professional and Continuing Education

**Professional Engineers** can earn 13.5 hours of professional development. Engineers should keep their own records, including a marked copy of the agenda, paid receipt, and badge.

**Attorneys** can earn Continuing Legal Education (CLE) credits through the Tennessee Bar Association. Select the CLE option during registration.

**Certified Landfill Operators** can earn up to 9 hours of continuing education at no additional charge. Be sure to sign in at your session.

**SWANA Members** can earn Continuing Education Units (CEUs) for relevant topics. Pick up a CEU form at the TN SWANA booth.

**Certified Hazardous Materials Managers/Practitioners** can earn up to 5 Certification Maintenance Points (CMPs) per day. CHHMs and CHMPs should keep their badges and agendas.

**Professional Geologists** in TN do not need continuing education, but those licensed in other states may earn credit.
New DSWM Training

- Statewide Uniform Inspection Training – SUIT
  - Geared toward consistency in Solid Waste facility inspection

- Hazardous Waste Inspector Training – HWIT
  - Geared toward consistency in Hazardous Waste facility inspection

- Sampling and Analysis Training – SAT
  - EMSAT – Environmental Media 101
  - SSATT – Soils/Subsurface Investigation and Testing 101
Statewide Uniform Inspection Training – SUIT

• Developed by Team of DSWM Inspectors
• Input from Regulated Community
• Led and implemented by Jerry Branham - DSWM Environmental Consultant
• Goal – Consistency in Compliance Interpretation
• Tie to LOCT with Continuing Education Credits
Statewide Uniform Inspection Training – SUIT

- Separate Training Modules for
  - Class I, II, III/IV Landfills
  - Transfer and Processing Facilities
  - Convenient Centers
- Training for DSWM Staff – Since 2015
  - Ensures consistency between DSWM staff and Field Offices
- Training for Regulated Community – Since 2016
  - Ensures consistency between DSWM and O/Os
SUIT Content
Line Item Inspection / Compliance Instruction

Three components

- Citation Reference (e.g. 0400-11-01.04(2)(a)4 General Facility and Performance Standard
- “Green Box” Policy Information – Rules of Thumb
- Clarification and Discussion - Photos
Let's look at some SUIT Sample Content

Line Item Inspection / Compliance Instruction

- Inadequate Artificial or Natural Barrier – 8030
- Inadequate Erosion Control – 8180
8030: INADEQUATE ARTIFICIAL OR NATURAL BARRIER
SLIDE 1 OF 2

Citation Reference: 0400-11-01-.04(2)(b)1

General Facility Standards – Control of Access and Use - The facility must have an artificial or natural barrier which completely surrounds the active portion of the facility and must have a means to control entry, at all times, through the gate or other entrances to the active portion of the facility.
The required barrier is intended to prohibit vehicular traffic (or easy foot traffic) from entering the active portion of the landfill when the site is not in operation. “Natural barriers” are usually described on plans or addressed in permit. “Artificial barriers” includes gates, cables, fencing, or other artificial means of controlling access (and are also usually described on plans or addressed in permit). A violation can be noted if there exists evidence of access (e.g., ATV or 4x4 tracks, etc.) to controlled portions of the landfill; there should be clear indications of non-controlled access. If a breach in barrier by more natural means (e.g., tree fallen on fence, etc.) is observed, a written comment or AOC can be made and a chance given to avoid a V1 violation. If nothing is corrected upon follow-up or next inspection, a V1 violation should be cited.
8030: INADEQUATE ARTIFICIAL OR NATURAL BARRIER
SLIDE 3 OF 5

Barriers

Thick natural barrier. This is not easily passed through

Fencing. Artificial barrier.
8030: INADEQUATE ARTIFICIAL OR NATURAL BARRIER
SLIDE 4 OF 5

Barrier

Thick natural barrier.
VIOLATION

NO
8030: INADEQUATE ARTIFICIAL OR NATURAL BARRIER
SLIDE 5 OF 5

Barriers

Natural barrier

Artificial barrier
8180: INADEQUATE EROSION CONTROL

Citation Reference: 0400-11-01-.04(2)(i)6

*Run-on, Run-off, and Erosion Control* - The operator must take other erosion control measures (e.g., temporary mulching or seeding, silt barriers) as necessary to control erosion of the site.

Citation Reference: 0400-11-01-.04(8)(c)4(ii)

*Closure and Post-Closure Standards* - Closure Requirements - The final surface of the disposal facility or disposal facility parcel shall be graded and/or provided with drainage facilities in a manner that minimizes erosion of cover material (e.g., no steep slopes).
The facility must take permit-specified action for minimizing erosion. Erosion on side slopes should be evaluated. Minor erosion rills occurring on recently completed slopes where grass has yet to be established may not be a violation as long as Best Management Practices (BMPs) are being utilized to minimize and correct the erosion. When BMPs are not being consistently implemented and there are obvious signs of erosion (such as hard channelizing or uncovering of waste) are present, a V1 violation should be issued. If a discharge causing an objectionable contrast to receiving waters or visible loss of sediment from a site is observed, the Division of Water Resources (DWR) should also be notified (as described in MOA guidance, PN084). More clarification on erosion and sediment control practices will be found in a future developed Policy for Controlling Erosion at Operational Areas of a Landfill.
Deep ruts.

Hard channeling

VIOLATION

YES
Is that exposed waste?
Washout of Waste?

VIOLATION?

YES

Deep rills.

VIOLATION?

YES
## TENNESSEE DIVISION OF SOLID WASTE MANAGEMENT
### CLASS I FACILITY INSPECTION CHECKLIST

<table>
<thead>
<tr>
<th>Facility</th>
<th>Permit Number</th>
<th>Location</th>
<th>Date</th>
<th>Time</th>
<th>Weather</th>
<th>Inspector</th>
<th>EFO</th>
</tr>
</thead>
</table>

*SEE DISCLAIMER ON LAST PAGE

### VIOLATION | REGULATION | OBSERVATION

<table>
<thead>
<tr>
<th>#</th>
<th>BUFFER ZONE STANDARDS FOR SITING LANDFILLS</th>
</tr>
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<tbody>
<tr>
<td>8310</td>
<td>BUFFER ZONE STANDARD VIOLATED</td>
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### COMMENTS

<table>
<thead>
<tr>
<th>#</th>
<th>COLLECTED LEACHATE</th>
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<tbody>
<tr>
<td>8330</td>
<td>LEACHATE IMPROPERLY MANAGED</td>
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</table>
**TENNESSEE DIVISION OF SOLID WASTE MANAGEMENT**

**CLASS I FACILITY INSPECTION CHECKLIST**

<table>
<thead>
<tr>
<th>VIOLATION</th>
<th>REGULATION</th>
<th>OBSERVATION</th>
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</thead>
<tbody>
<tr>
<td>BUFFER ZONE STANDARD VIOLATED</td>
<td>0400-11-01-04(3)(a)</td>
<td>?</td>
</tr>
</tbody>
</table>

**COMMENTS**

"This violation will typically accompany another violation involving leachate (e.g., 8330, 8340, 8350) since maintenance of leachate..."

**COLLECTED LEACHATE**

Violation 8330

Violation Policy X
What’s new with SUIT?
# DSWM Training Update – SUIT Schedule

## 2019 West Tennessee Schedule
TDEC Environmental Field Office  
1625 Hollywood Drive, Jackson, TN

<table>
<thead>
<tr>
<th>Date</th>
<th>Location</th>
<th>Time</th>
</tr>
</thead>
<tbody>
<tr>
<td>January 22</td>
<td>Convenience Center</td>
<td>10:00 a - 11:30 a</td>
</tr>
<tr>
<td></td>
<td>Transfer Station</td>
<td>12:30 p - 2:00 p</td>
</tr>
<tr>
<td></td>
<td>Convenience Center</td>
<td>2:30 p - 4:00 p</td>
</tr>
<tr>
<td>January 23</td>
<td>Convenience Center</td>
<td>8:00 a - 9:30 a</td>
</tr>
<tr>
<td></td>
<td>Transfer Station</td>
<td>10:00 a - 11:30 a</td>
</tr>
<tr>
<td></td>
<td>Convenience Center</td>
<td>12:30 p - 2:00 p</td>
</tr>
<tr>
<td></td>
<td>Transfer Station</td>
<td>2:30 p - 4:00 p</td>
</tr>
<tr>
<td>January 24</td>
<td>Class 3 Landfill</td>
<td>8:00 a - 4:30 p</td>
</tr>
<tr>
<td>January 25</td>
<td>Class 3 Landfill</td>
<td>8:00 a - 4:30 p</td>
</tr>
<tr>
<td>July 30</td>
<td>Class 1 Landfill</td>
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<tr>
<td>July 31</td>
<td>Class 1 Landfill</td>
<td>8:00 a - 4:30 p</td>
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## 2019 Middle Tennessee Schedule
Montgomery Bell State Park  
Burns, TN

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<tr>
<td></td>
<td>Transfer Station</td>
<td>12:30 p - 2:00 p</td>
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<td></td>
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<td></td>
<td>Transfer Station</td>
<td>10:00 a - 11:30 a</td>
</tr>
<tr>
<td></td>
<td>Convenience Center</td>
<td>12:30 p - 2:00 p</td>
</tr>
<tr>
<td></td>
<td>Transfer Station</td>
<td>2:30 p - 4:00 p</td>
</tr>
<tr>
<td>January 10</td>
<td>Class 3 Landfill</td>
<td>8:00 a - 4:30 p</td>
</tr>
<tr>
<td>January 11</td>
<td>Class 3 Landfill</td>
<td>8:00 a - 4:30 p</td>
</tr>
</tbody>
</table>

## 2019 East Tennessee Schedule
TDEC Environmental Field Office  
3711 Middlebrook Pike, Knoxville, TN

<table>
<thead>
<tr>
<th>Date</th>
<th>Location</th>
<th>Time</th>
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</thead>
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<td>Convenience Center</td>
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</tr>
<tr>
<td></td>
<td>Transfer Station</td>
<td>12:30 p - 2:00 p</td>
</tr>
<tr>
<td></td>
<td>Convenience Center</td>
<td>2:30 p - 4:00 p</td>
</tr>
<tr>
<td>January 16</td>
<td>Convenience Center</td>
<td>8:00 a - 9:30 a</td>
</tr>
<tr>
<td></td>
<td>Transfer Station</td>
<td>10:00 a - 11:30 a</td>
</tr>
<tr>
<td></td>
<td>Convenience Center</td>
<td>12:30 p - 2:00 p</td>
</tr>
<tr>
<td></td>
<td>Transfer Station</td>
<td>2:30 p - 4:00 p</td>
</tr>
<tr>
<td>January 17</td>
<td>Class 3 Landfill</td>
<td>8:00 a - 4:30 p</td>
</tr>
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<td>January 18</td>
<td>Class 3 Landfill</td>
<td>8:00 a - 4:30 p</td>
</tr>
<tr>
<td>August 6</td>
<td>Class 1 Landfill</td>
<td>8:00 a - 4:30 p</td>
</tr>
<tr>
<td>August 7</td>
<td>Class 1 Landfill</td>
<td>8:00 a - 4:30 p</td>
</tr>
</tbody>
</table>

### Benefits

- August 13: Class 1 Landfill  | 8:00 a - 4:30 p
- August 14: Class 1 Landfill  | 8:00 a - 4:30 p

*Landfill Operator Certification Training is also available*
Hazardous Waste Inspector Training – HWIT

Do you find RCRA Confusing?

- How do the regulations apply to me?
- Is my container of hazardous waste properly closed?
- How do I manage my satellite accumulation areas?
- How do I properly manage my pharmaceutical waste?
- What is a hazardous secondary material?
- What if my generator status changes?
- What about solvent wipes?
Hazardous Waste Inspector Training – HWIT

• Led and implemented by Janet Dutto - DSWM Environmental Consultant

• Goals
  – Inspection Consistency
  – Reporting Consistency
  – Rule Changes and Frequent Issues
  – Consistent Permittee Expectations
  – Outreach to
Lets look at some
HWIT Sample Content

- Regulatory Update – January 2018
- Common Hazardous Waste Generator Violations
DSWM Training Update - HWIT

Regulatory Update

Janet Dutto, TDEC - DSWM

January 25, 2018
Major Elements – DSW Rule*

Major elements include:

- New Terms and Definitions
- Adds 3 new reclamation exclusions
- Modifications to existing variances & Non-waste determinations
- A procedure for verifying reclamation and intermediate facilities
- Definition of the legitimacy criteria for recycling (4 factors)
- Notification requirements
- Prohibition of sham recycling
- Expanded Documentation Regarding Speculative Accumulation

* See Rule for all regulatory requirements
New Definitions

- Analogous raw material
- Contained
- Intermediate facility
- Land-based unit
- Remanufacturing
- Hazardous secondary material (HSM)
- Hazardous secondary material acceptance plan
- Hazardous secondary material generator
- Intermediate

Speculative Accumulation labeling/recording dates provision added which will apply to anyone subject to speculative accumulation

* See Rule for all regulatory requirements
Common Hazardous Waste Generator Violations

Hazardous Waste Inspector Training

Janet Dutto – March 2018
Failure to Determine

Failure to Make a Hazardous Waste Determination

- Is the material a solid waste?
- Is the material a hazardous waste?
Hazardous Waste Determination Violation

How to Avoid This Violation

1. Make a determination on ALL waste generated on-site

2. Treat unknown material as a HW during the determination process (label, close, date, etc.)

3. Keep necessary documentation for both hazardous and non-hazardous waste
Failure to Perform Weekly Inspections

Both Small Quantity Generators and Large Quantity Generators are required to perform a *weekly (within 7 days) inspection* of the hazardous waste container storage areas.

These inspections must also be documented.
Failure to Properly Label

Used Oil Containers and Tanks

Any Container
or Tank holding used oil
must be labeled as “Used Oil”
Failure to Close Containers

Containers holding hazardous waste must be closed except when adding or removing waste.

Definition of “Closed”?
What’s new with HWIT?

Rolled out “RCRA 101 Generator Workshop” to Regulated Community - September 2018
- Chattanooga - SOLD OUT

RCRA 101 Generator Workshops - April 2018
- Columbia
- Chattanooga - SOLD OUT

RCRA 101 Generator Workshops - April 2018
- Columbia
Contact Information

Janet Dutto, CHMM, Environmental Consultant
Division of Solid Waste Management
Chattanooga Field Office
1301 Riverfront Parkway, Suite 206
Chattanooga, TN  37402
423-634-5775
janet.dutto@tn.gov
Sampling and Analysis Training (SAT)

- Environmental Media (**EMSAT**)
  - Environmental Media Sampling 101

- Soils and Soil Testing (**SSATT**)
  - Soils / Subsurface Investigation and Geotechnical Testing 101
EMSAT Modules

- Quality Assurance / Quality Control
- Sampling Planning
- Reading and Interpreting Laboratory Analytical Reports
- Common Statistical Methods for Groundwater Analytical Data
- Special Topics
  - Spotting “Lousy Data”
  - TCLP
  - Filtering Water Samples for Inorganics Analysis
What to Expect of this module

- Resources
- Institutional QA/QC – who thinks about this stuff?
- Quality Assurance vs. Quality Control
- Elements of Quality Assurance
- Elements of Quality Control
- Data Verification vs Data Validation
- Quality Control in Sampling Planning
  - Quality Control Level
  - Examples
    - Quality Assurance Plans
    - Quality Control Plans
DSWM Training Update - SAT

Sampling Planning

What to Expect of this module

- Why bother with the sampling?
- Key concepts
  - Representativeness
  - Accuracy
  - Precision
- Resources
- Data Quality Objectives
- Details of Sampling Planning
  - Sampling design
  - Scope determination
  - Sampling and Analysis Plan Contents
- Example Case
Sampling Planning – Equipment & Procedures

Sampling Equipment
(EPA Science and Ecosystem Support Division Training, 2014)

Groundwater
- Peristaltic pump
- Bailer
- Submersible
Sampling Planning – Equipment & Procedures

Sampling Equipment
(EPA Science and Ecosystem Support Division Training, 2014)

Surface water, soil, sediment
- Coliwasa
- Dippers
- Direct flow
What to Expect From This Module

- The Chain-of-Custody
  - Sample Information
  - Analytical Methods and How to Order Them
  - Sample Custody

- The Lab Report:
  - Reporting “Levels”
  - The Case Narrative
  - Units
  - Non-Detects, Detections, and Limits
  - Dilutions
  - Quality Control Data from the Lab
  - Data Flags
Lab Report Review “Summary Sheet”

- Intended to provide a reference for the relatively “detailed” stuff:
  - COC Checklist
  - Common Units
  - Detection / Reporting Limits
  - Sig. Fig.’s
  - Lab QC samples
  - Data flags
  - Let’s look at the sheet
How is it that data gets to be lousy?

- Bad from the start – poor planning, not representative
- Contaminated – decon, order of work, laboratory issues
- Improperly obtained, contained, labelled
- Improperly preserved
- Improperly packaged and shipped
- Improperly manifested and documented
- Data quality unknown
- Poor lab practice
DSWM Training Update - SAT

Soil Sampling and Testing Training (SSATT)

Patrick J. Mulligan, P.G., Patrick J. Flood, P.E., 2018
SSATT Modules

- Introduction and History
- Soil sampling methods and Applications – PJM, P.G.
  - Drilling and Sampling Methods
  - Field logging and log usage
- Soil testing methods and Applications – PJF, P.E.
  - Unified Soil Classification System
  - Tests for engineering properties of soil types

American Society for Testing Materials (ASTM) methods I
the basis
Introduction – Soil Sampling and Testing Training

Goals of The Program

**Primary Goal**
- Common Baseline Understanding - for the purpose of Review and Decision Making on:
  - Landfill Siting
  - Hydrogeologic Investigations
  - Landfill Design
  - Liner, cap, cover source materials
  - Settlement

**Secondary Goal**
- Have available references and resources to quickly answer soil sampling and geotechnical data-related questions
Introduction – Soil Sampling

What to Expect of The Sampling Portion

- Soil Sampling Basics
  - Engineering vs Agricultural applications?
  - Terminology
  - Limitations
- Soil Sampling / Geotechnical Resources
- Soil Sampling Investigations Planning
- Drilling methods / applications
  - Auger / Casing drilling
  - Hydraulic push piston
  - Others
- Sampling types
  - Split spoons
  - Tubes
  - Rock cores
- Field Logging and Classification
DSWM Training Update - SAT

Soil Sampling and Testing Training

Soil Testing
Introduction – Soil Testing

What to Expect of The Testing Portion

- Commonly used ASTM Test Procedures for Soil
- Test data
- Test data applications

-----------------------------

- Grain size Distribution
- Atterberg Limits
- Moisture Content
- Soil Classification
- Standard and Modified Proctor
- Permeability / Hydraulic Conductivity
- Compressive Strength
- Consolidation
What’s new with SAT?

**EMSAT Rolled out to Regulated Community - April 2019**
- Jackson
- Columbia
- Knoxville – **SOLD OUT**

**SSATT Roll out to Regulated Community – October 2019**
- Columbia
- Knoxville

**Groundwater Reporting and Statistical Analysis – 2020**
- TBD
What people are saying?

• “Excellent RCRA 101 Workshop”

• “I thought it was outstanding....I am very pleased with the quality of the training and the discussions that the training elicited among our staff following the class.”
  
  – Heather Lutz
  
  TDEC Division of Remediation
What people are saying?

• “I wish I had had this training before delving into our data sets last year. This would have been very helpful.”
  – anonymous

• “…best training bargain around….”
  – anonymous

• “…I'm looking forward to the stats and validation classes! And thanks for getting my brain engaged!!”
  – Bob Wojciak
    APECS Environmental Consultants