

1. Where can a facility get a copy of the annual hazardous waste report webinar workbook? A pdf of the RY2020 annual hazardous waste report workshop workbook can be obtained from the DSWM webpage at <insert link>.
2. When will the session records be published for public access? The annual report webinar recordings have been published to the DSWM website at <insert link>.
3. When should facilities receive their prepopulated 2020 annual report packet? Packets were emailed or mailed out in mid-December to the mailing contact. If a facility has not received its packet, please contact the auditor assigned to the facility.
4. How does a facility obtain a 2020 hazardous waste annual report packet if one has not already been received? E-mail the facility's auditor to request a copy of the its pre-populated annual report package.
5. What is the current permit and report year? The current permit year is 2021 while the annual report year is 2020.
6. Can facilities submit the 2020 annual hazardous waste forms electronically? The completed annual report can be emailed to a facility's designated auditor; however, a wet signature page be mailed to that auditor as well and if payment is included, please include a copy of the fee sheet. At this time, there is no system in place for fully electronic submission of annual reports.
7. We have been classified as CESQG for a few years but have completed the report anyway. If we decide not to complete the report this year, do we need to make any additional notifications? No annual report or additional notification is required if a facility is CESQG and maintained that status for the 2020 report year. However, the facility can use the forms to notify the state of changes in business information, such as mailing contacts, changes in ownership, etc.
8. Can we still pay online with a credit card as in prior years? Yes, please call the Office of Consolidated Fees at 615-532-0065. Note: facilities that want to pay by credit card should not wait until the last minute as staff is working remotely and there may be delays.
9. Can the fee payment be submitted to the 14th floor address instead of the consolidated fee section? Yes. Facilities can send both the annual report and fee payment to the 14th floor address.
10. Should facilities use the credit card payment form included in the annual report workbook for the fee payment? Yes, facilities can use the credit card payment form, but will need to contact the Fees Section directly at 615-532-0065 to pay rather than including the form with the annual report submission.
11. Can you summarize future/pending regulation changes such as Nicotine patches? The generator improvements rulemaking should be adopted in May 2021. The aerosol cans rule should be adopted by the end of August 2021 while the pharmaceuticals rule (which contains the nicotine

patch delisting) should be adopted in October 2021. These dates are estimates and are subject to change.

12. Does an episodic generation event (one time cleanup) still get factored in to a facility's generator status as large or small (depending on quantity)? **Yes, the episodic generator provision in the Generator Improvements Rule has not been adopted by Tennessee yet and so one-time events cannot be excluded from consideration of a facility's generator status for RY2020. It should go into effect in May 2021, if there are no additional delays.**
13. If a facility was an CESQG for most of 2020, and then applied for SQG status near the end of the year, does the facility just report the waste generated once it became a SQG and obtained an EPA ID number? **The facility would report all of the waste generated for 2020, regardless of when it became a SQG.**
14. How does a facility change its generator status on the annual report forms? The facility was a one-time LQG for 2020 and will not be one in 2021. **To change a facility's generator status, mark through the existing status on form HN-EA and then select the new status for your facility. The sum of the monthly maximums of waste generated (as reported in item 1g on form WSR) for all active waste streams will need to match the generator status indicated.**
15. If a facility received an EPA ID in November, is a report required for 2020? **A RY2020 annual hazardous waste report is not required of a facility if they indicated a CESQG generation status and maintained that for the remainder of the report year. If a facility applied for an SQG or LQG status in the original November EPA ID number application, but did not generate at that level, an annual report will be required with data to support that information**
16. If a facility doesn't generate the amounts of waste that they did during prior years due to better record keeping and controlling disposal, how should the change in generation rates be listed in the annual report forms? **If a facility is generating at a lower status, then update the HN-EA forms as well as the monthly maximums on the WSR forms. Yes, if your facility is currently listed as a SQG and needs to change to a CESQG, you should report and change your status.**
17. Can the universal waste generation date on form HN-EA be an estimate? **Yes, the date can be an estimate to the nearest year.**
18. The local 911 center changed a facility's address, and both addresses are listed on the annual report forms. Both addresses are considered valid for the facility to receive mail at – does the facility need to update their site address? **Yes, update the site address to the new address per the 911 emergency services change.**
19. Does a conditionally exempt small quantity generator still need to update the contacts form? **As long as the facility has notified the state of its CESQG status, and has maintained that conditionally exempt status for all of 2020, then that facility is not required to report. However, it is strongly recommended for all facilities to maintain updated contact information.**

20. If an email address is changing, should facilities delete the email and type the new one (using the editable forms), or can it be struck-out with the new one written in (using the pre-filled forms) so the change is obvious? **Either method is fine, so long as the handwriting is legible.**
21. If a facility has closed a waste stream, and needs to reopen it for one-time use (e.g. disposal of expired product), what should be checked for the waste stream status in item 1e on form WSR? **Mark the status as active or reactivated if you are not including a closure date in item 1g (date no longer generated) or if the date is not within the report year; mark it as closed if a closure date during the report year is included in item 1g (date no longer generated).**
22. Is disposal of expired product considered to have an intermittent waste stream frequency (don't know if it will happen again)? **It can be considered intermittent, although it may be easier to close the waste stream until it needed again. There is no fee for reopening an existing waste stream.**
23. For Universities who generate lab pack waste (continuous) and have a lab pack waste stream, the contents (waste codes) of the lab packs vary slightly each year. How should this be handled each year on the annual report? **A facility can change the waste codes on lab pack waste streams from year to year; just mark out the codes that are no longer applicable and replace them with the new codes.**
24. An SQG facility tested a waste material in early 2020 that was causing SQG status and it was deemed nonhazardous. Once the waste report was completed for 2020, the facility shows VSQG levels of generation. Can the facility file as VSQG on this year's filing? **If a waste that has been previously reported as a hazardous waste is re-evaluated and determined to be non-hazardous, then the facility can close the waste stream providing an explanation (and copy of the test results?) for the new determination. The facility generator status can be reduced to VSQG at that time as well.**
25. A facility had a one-time hazardous waste generation incident due to a new worker adding hazardous waste to a nonhazardous waste containing drum. The person was re-trained, and a written description written for what could be put in the drum to prevent this from happening again. Is there any way to take this as a one-time generation? **On the waste stream report form for this, mark that the waste stream frequency as "one-time" and the waste stream status as closed with a closure date in item 1g (Date No Longer Generated). That will allow the waste to be reported on in RY2020 annual report, but will close it so that the waste stream will not appear in future annual report packets unless it is reopened.**
26. If a waste stream was a one-time event and the facility will be changing its status back to CESQG, does the facility still need to complete the hazardous waste reduction goals? **The facility likely will not need to complete item 6 for a one-time event if it is normally CESQG.**
27. How does a facility number new waste streams if the existing numbering provided by the state in the annual report packet is different from the numbering that the facility uses? For example, a facility wants to add two new waste streams as WSR#2 and WSR#3 since it has one active

waste stream, WSR#1, which was included with the annual report packet. However, in the past the facility opened and closed 9 additional waste streams that were not included with the annual report packet. What should the new waste stream number be? **Do not renumber waste streams; if you are adding new waste streams and are unsure of the correct number, please leave that item blank and the report auditor will provide the appropriate number.**

28. If a hazardous waste stream is treated using elementary neutralization can the waste stream be closed? **No, facilities are required to report any hazardous wastewaters that are treated onsite and then discharged to a POTW; however, this waste is not subject to generator fees nor will it affect generator status.**
29. If all of a facility's waste streams are treated and neutralized onsite then shipped out non-hazardous waste, would the facility be considered conditionally exempt or still a large quantity generator? **The facility would likely be considered a conditionally exempt small quantity generator as long as all of the waste streams are treated to be nonhazardous prior to shipping the waste offsite. The facility may edge into LQG status if the wastewaters are shipped offsite for treatment.**
30. If a facility has waste streams that are both mixed, non-mixed, and a combination of the two, how should that be indicated on form WSR? **Please use item 1i to indicate if a waste stream is mixed radiological and hazardous waste. If a waste stream has components that are considered both mixed waste as well as non-mixed, then the entire waste stream should be considered mixed waste.**
31. If the value in 3b from last year's report is listed as gross weight by mistake, does the 2019 report need to be amended or can a notation be made in facility comments on the 2020 report going forward? **Typically, the facility needs to amend the 2019 RY annual report, but check with your Auditor to discuss the situation first.**
32. Where does a facility note that a wastewater was discharged to the POTW? **In item 5 on the facility's waste stream report form (form WSR).**
33. How should a facility calculate the monthly generation of a lab pack that is sent for treatment/disposal once a year? **Facilities need to keep records of when the waste chemicals are declared a hazardous waste on a monthly basis even if the facility only ships the waste offsite once.**
34. If you recycle batteries do you need to list on the universal waste (ie batteries plus) or similar drop off facility? **There are no reporting requirements for universal waste beyond initial notification of activity.**
35. Should a facility retain the original waste stream generation date when reactivating a closed waste stream or change it to the generation start date in 2020? **The facility should keep the original start date.**

36. How can facilities obtain a list of all the active and closed waste streams for their site? **E-mail a request to your Auditor.**
37. How should a facility complete item 1h on form WSR if the waste does not have any EPA hazardous waste codes? **Contact your Auditor to discuss the situation as more information is needed to resolve.**
38. If a facility has a waste stream that is generated from expired raw materials, can the facility use that same waste stream number if the name of the expired material is different (so long as the generation method remains the same)? **Waste streams are determined by the type of waste and the generation process. This material should be a separate waste stream unless the facility has a labpack waste stream for disposal of small amounts of different wastes. The facility may want to contact its assigned auditor for further discussion.**
39. If a facility has a corrosive solution that is treated in an onsite water treatment system, does it need to complete form WSR for that waste stream? **Yes, wastewaters treated onsite need to be reported on form WSR if the original wastewater was hazardous prior to treatment. If the original waste stream is hazardous and must be treated to a non-hazardous state prior to discharge to a POTW, then you will have to report it.**
40. Will that wastewater waste stream make the facility a LQG? **No, wastewaters that are treated onsite and then discharged to a POTW are not counted toward your generator status.**
41. How should a facility report waste from an oil/water separator? The facility has never reported it before and is unsure if it is required. **Any hazardous wastewater that has to be treated to a non-hazardous state prior to discharge to the POTW has to be reported. The question is: Is the facility's oil/water waste being treated as used oil or just general waste? This is a difficult question to answer without a lot of follow up questions to understand the exact nature of the waste.**
42. How specific does the BTU value need to be in item 1m on form WSR? **If a facility is claiming the fuel blending discount on the G-FDS then auditors will be looking for the BTU to be a value or range of values equal to or greater than 5,000BTU.**
43. The hazardous waste reduction goal year is greater than 3 years in workshop example. Is that allowable? **Yes, the goal year for the hazardous waste reduction plan can be as far out as needed to set appropriate goals. A facility has 3 years from the start of generation of hazardous wastes to create a hazardous waste reduction plan.**
44. How can a facility find the state codes and EPA management method codes, for their wastes? Are those located on the hazardous waste manifests? **The EPA management method codes are provided on the hazardous waste manifest while the state disposition codes are included in the instructions with the annual report packet.**

45. Will a 4000lb one-time generation fall under "1000kg (2200lbs) or more" or 4000lb/12 months, "Greater than zero, less than 100kg" on form G-FDS? **As the waste was generated (i.e. declared a waste) all at the same time, it would fall under the generator base fee category of "1000kg (2200lbs) or more."**
46. Would an internal, self-identified corrective action of disposing of a no longer needed hazardous material qualify for Line 7 on form G-FDS? **No, the corrective action would have to be ordered by EPA/TDEC.**
47. Are facilities required to report universal waste generation? **No, there are no reporting requirements for universal waste in TN aside from the initial notification of large quantity handler or destination facility universal waste activities.**
48. Are the quantities for small and large quantity universal waste handler the same as hazardous waste generator amounts? **No, the waste quantity thresholds for universal waste handlers and hazardous waste generators are different. Small quantity handlers of universal waste accumulate less than 5,000 kgs/11,023 lbs of universal waste in a 1 year period, while large quantity handlers of accumulate greater than that amount.**
49. Does a facility have to have a certain amount of broken fluorescent bulbs to report the amount? **All broken fluorescent bulb wastes that are determined to be hazardous waste must be reported on the annual report; there is no minimum reporting threshold. Fluorescent bulbs that are determined to be universal waste do not have any reporting requirements associated with them.**
50. How are crushed bulbs considered universal waste instead of hazardous waste? Is there a special Tennessee regulation that allows it as universal waste? **The Regulations for crushing of Universal Waste Lamps are located at Rule 0400-12-01-.12(8). If the crushed lamps are recycled and managed in accordance with .12(8), then they can be managed as universal waste. However, if a facility ships the lamps to other states for recycling, this may not be true. Check with the receiving state to see what their universal waste regulations are.**
51. In the interim, are intact aerosol cans considered hazardous wastes? Can a facility send them out as recyclable items? **Aerosol cans are regulated as HW when discarded because the propellant in the can is flammable and/or contents of the cans contain listed chemicals regulated as HW. Aerosol cans that have been punctured and drained of any residual contents can be sent off as scrap metal. EPA has introduced a new rule adding aerosol cans to the universal waste program; however, this rule is not effective in Tennessee at this time.**
52. Does Tennessee plan to allow unpunctured aerosol can in landfills or keep them hazardous waste? **EPA's rule/regulation allowing unpunctured aerosol cans to be considered universal waste will be adopted by Tennessee in August 2021, provided there are no additional delays.**
53. The inspector presentation says to make sure to notify TDEC as soon as aerosol puncture devices are put into use. How? Why? **Use this link to find the Environmental Field Office in your**

area (<https://www.tn.gov/correction/cs/field-office-directory.html>). Call the Environmental field office to notify them of the specific device to be used. TDEC can assist with the regulations regarding the device to ensure proper documentation of waste generated.

54. Can facility hazardous waste records be maintained in electronic form with digital signatures and presented to inspectors in electronic form? Facility records can be maintained in either electronic form or hard copy form, so long as they are available for review by inspectors. The electronic records can be digitally signed so long as it is a valid e-signature.
55. What is the difference between 'generates' vs 'accumulates' in terms of one-time material disposals? For a one-time event, generation of a hazardous waste refers to when a material is determined to be a hazardous waste and accumulation refers to the amount of time between generation and removal for treatment/disposal.
56. Related to hazardous waste, what is the difference (or is there) in the terms stored vs. accumulated? There is no practical difference between hazardous waste that is described as stored or accumulated.