

Fact Sheet

Intent to Reissue a Hazardous Waste Management Permit

Facility Name: Safety-Kleen Systems, Incorporated

Location: 215 Whitsett Road
Nashville, TN 37210

Owner/Operator: Safety-Kleen Systems, Incorporated

Facility Contacts: Mr. Carl Williams
Sr. Environmental Compliance Manager
Safety-Kleen Systems, Inc.
215 Whitsett Road
Nashville, TN 37210

Permit Type: Hazardous Waste Storage

Units: Container, Tank, and Miscellaneous

EPA Identification Number: TND981474125

Permit Number: TNHW-XXX

Comment Period: Begins: July 22, 2026
Ends: September 4, 2026

Purpose

This fact sheet is prepared pursuant to Tennessee Rule 0400-12-01-.07(7)(d) for the draft Hazardous Waste Permit developed by the Tennessee Department of Environment and Conservation (TDEC) Division of Land Protection (DLP). The purpose of this permitting process is to afford any interested persons the opportunity to evaluate the ability of Safety-Kleen Systems, LLC., to apply the applicable hazardous waste management requirements. The proposal is for the renewal permit to be reissued under the authority of the Tennessee Hazardous Waste Management Act of 1977, as amended, Tennessee Code Annotated, Section 68-212-101 et. seq., and Tennessee Rule Chapter 0400-12-01 Hazardous Waste Management. The draft permit is prepared in accordance with the provisions of Tennessee Rule 0400-12-01-.07.

Facility Description

Safety-Kleen Systems, Inc. (SKS) is an international service-oriented company whose customers are primarily engaged in automotive repair, industrial maintenance, and dry cleaning. Their service center in Nashville, Davidson County, Tennessee began operations February 2, 1981.

The property consists of a 2.01 acre parcel; a 8,160 square-foot warehouse with offices; a 17,600 square-foot warehouse which houses a drum/container storage area; a solvent return and fill station; a wooden building (approximately 400 square-foot) for equipment storage; one 540 square-foot metal storage shelter used for flammable liquids; three single-walled aboveground storage tanks (ASTs): one 15,227.4-gallon vertical tank used to store spent mineral spirits, one 12,000-gallon vertical tank used to store clean mineral spirits, and one 10,000-gallon horizontal tank used to store motor oil.

Permit History

The current permit TNHW-160 was issued September 30, 2014 and was effective for ten years. SKS submitted its permit renewal to DLP on June 4, 2024, six months before the expiration date and revisions of Part B application on September 30, 2024, thus allowing the facility to continue to operate under the current permit until a final decision is made on their application. A public notice announcing receipt of the application was published on March 28, 2024. As part of the pre-application process, SKS held a pre-application public meeting on May 6, 2024, as announced in the March 28, 2024, edition of The Tennessean newspaper and a radio announcement on March 28, 2024, iHeart Media. No members of the public attended the meeting, and no oral or written comments were received.

The current permit, TNHW-160, allows the facility to store a maximum quantity of 15,227.4 gallons in an aboveground storage tank, 6,912 gallons of hazardous waste in the Service Center Warehouse (CSA 1), 2,184 gallons in the Flammable Material Storage Shelter (CSA 2), and 750 gallons in a miscellaneous unit (Return and Fill Station).

The permitted use of the container storage area (CSA 1) in the Service Center Warehouse is for the storage of (1) sediment from cleaning the drum washer in the return and fill station; (2) spent immersion cleaner; (3) dry cleaning wastes; (4) aqueous parts cleaner waste; (5) paint wastes; and (6) branch contaminated debris. The permitted use of the Flammable Material Storage Shelter (CSA 2) is for the storage of paint waste. Other non-hazardous materials, waste that are not regulated, and Safety-Kleen products may also be stored in this area provided the materials are compatible. The southern half of the shelter is permitted; the northern half is not.

At the service center, spent parts cleaner solvent and aqueous cleaner may be accumulated in a nominal 15,227.4-gallon aboveground storage tank via the connected Return and Fill Station. Containers of spent solvent are emptied into the drum washer unit at the Return and Fill Station. The solvent is then pumped into the spent solvent storage tank located in the tank farm. The Return and Fill Station has secondary containment in the form of sloped concrete floors and sumps.

Corrective Action

Included as part of this permit are the corrective action conditions for the solid waste management units (SWMUs) and areas of concern (AOCs) at the facility. SKS is required to investigate any release of hazardous waste or hazardous constituents at the facility, regardless of the time at which waste was placed in a unit, and to take appropriate correct action for any such releases. Presently, there are no SWMUs or AOCs requiring further action in accordance with the corrective action conditions of this permit. The proposed permit also requires notification of imminent hazards, and when applicable compliance with the requirements developed under land disposal restrictions and organic emission standards. Currently there are three SWMUs at the site that require no further action and three SWMUs that will be regulated by this hazardous waste permit.

Proposed Renewal Permit

Based on SKS's application, the DLP has drafted a permit for public review. The permit is proposed to be reissued under the authority of the Tennessee Hazardous Waste Management Act of 1977, as amended, Tennessee Code Annotated, Section 68-212-101 et seq., and Rule Chapter 0400-12-01, Hazardous Waste Management. In accordance with Rule 0400-12-01-.07(7)(e), a public notice is being issued to provide a 45-day comment period, beginning, July 22, 2026. This fact sheet has been prepared to provide additional information. If issued, the permit will be valid for up to 10 years.

If the proposed renewal application is approved, SKS would be permitted for a maximum hazardous waste storage capacity of 6,192 gallons in the Service Center Warehouse (CSA 1), 2,184 gallons in the Flammable Material Storage Shelter (CSA 2), 750 gallons in the Return and Fill Station (miscellaneous unit), and 15,227.4 gallons in the spent mineral spirit tank.

Solid waste management units (SWMUs) and areas of concern (AOCs) at the facility, including previous or ongoing investigations or corrective actions for all releases of hazardous wastes or hazardous constituents. The conditions of this permit will require that any future and existing SWMUs or AOCs be evaluated for potential releases and remediation, as necessary. Currently there are three SWMUs at the site that require no further action and three SWMUs that will be regulated by this hazardous waste permit.

The draft permit also requires notification of imminent hazards, and when applicable, compliance with the requirements developed under land disposal restrictions and organic emissions standards.

Permit Format

The permit format consists of six sections that specify the duties, conditions, and other requirements that Safety-Kleen Systems must meet for compliance with their hazardous waste storage permit. An outline of those sections follows.

I. Standard Conditions

This section provides the authorization and severability of the permit. Definitions, general duties and requirements, document maintenance, maintenance fee, notices, precedence, and permit structure are also provided in this section. The language in this section is consistent in all hazardous waste permits issued by the State of Tennessee.

II. General Facility Conditions

This section provides the general conditions that apply to permitted hazardous waste storage and treatment facilities in the State of Tennessee. This section addresses the following: site security, facility inspections, personnel training, financial assurance, recordkeeping and reporting, land disposal restrictions, organic air emission standards, and restriction on ownership of the facility.

III. Specific Conditions for Storage in Containers

This section provides specific conditions related to container condition; compatibility; container management; inspection; leaks and spill management; special requirements for ignitable, reactive, and incompatible wastes; and for final closure of the container storage unit.

IV. Specific Conditions for Storage in Tank(s)

This section provides specific conditions related to tank management of releases; operating requirements; inspection; leaks and spill management; special requirements for ignitable, reactive, and incompatible wastes; final closure of the tank storage; and air emission standards.

V. Specific Conditions for Storage in Miscellaneous Units

This section provides specific conditions related miscellaneous units operating requirements; management of units; management of releases, leaks and spills;

inspection; special requirements for ignitable, reactive, and incompatible wastes; final closure of the miscellaneous unit storage; and monitoring and inspections.

VI. Specific Conditions for Corrective Action

This section provides specific conditions that apply to solid waste management units and areas of concern, which are located on-site and off-site at the facility. The corrective action conditions describe the process that SK shall follow in addressing any release to the environment, which includes the discovery, reporting requirements of a release and the entire investigation/ remediation process.

The following are the attachments to the permit sections. The attachments provide specific procedures and details as to how Safety-Kleen Systems shall comply with the duties, conditions and other requirements specified in those sections.

ATTACHMENT 1. HAZARDOUS WASTES TO BE MANAGED

ATTACHMENT 2. WASTE ANALYSIS PLAN

ATTACHMENT 3. SECURITY

ATTACHMENT 4. INSPECTION

ATTACHMENT 5. PERSONNEL TRAINING

ATTACHMENT 6. CONTINGENCY PLAN

ATTACHMENT 7. CLOSURE PLAN

ATTACHMENT 8. CONTAINER STORAGE MANAGEMENT

ATTACHMENT 9. TANK MANAGEMENT

ATTACHMENT 10. MISCELLANEOUS UNIT MANAGEMENT

ATTACHMENT 11. SOLID WASTE MANAGEMENT UNITS AND AREAS OF CONCERN

Documents Available for Review

Electronic copies of the draft permit and fact sheet are available online at <https://www.tn.gov/environment/program-areas/solid-waste/hw/pending-permit-docs.html> or at the DLP Central Office located at the Davy Crockett Tower, 7th Floor, 500 James Robertson Parkway, Nashville, TN 37243 (615) 532-0780 and at the TDEC Nashville Environmental Field Office, 711 R.S. Gass Blvd, Nashville, TN 37216 (615) 687-7000. A paper copy of the draft

permit is available for public inspection at the Nashville Public Library Thompson Lane Branch, 380 Thompson Lane, Nashville, TN (615) 862-5873.

Comments

To comment on the proposal, contact Mr. Brett Harris, Hazardous Waste Program Manager, in the DLP's Central Office, Davy Crockett Tower, 7th Floor, 500 James Robertson Parkway, Nashville, TN 37219, by phone at (615) 393-9221, or by email at Brett.Harris@tn.gov.

Comments must be received by September 4, 2026 to ensure consideration.

After considering all comments, DLP will make a final decision to either issue or deny the permit modification. Notice will be given to the applicant and to each person who has submitted written comments or requested notice of the final decision. At the time of a final decision, a Response to Comments addressing all significant input received on the proposed modification will be made available to the public. The final decision shall become effective upon signing by the Director of DLP.

Individuals with disabilities who wish to participate in these proceedings (or review the file record) should contact the DLP Human Resource (HR) liaison Rachel Meredith at (615) 532-0780 or Rachel.E.Meredith@tn.gov to discuss any auxiliary aids or services needed to facilitate such participation. Contact may be in person, by writing, telephone, or other means, and should be made no less than 10 working days prior to the event, to allow time to provide such aid or services. Contact the state's Americans with Disabilities Act (ADA) Coordinator (1-866-253-5827) for further information. Hearing-impaired callers may use the Tennessee Relay Service (1-800-848-0298).

If it is hard for you to read, speak, or understand English, TDEC may be able to provide translation or interpretation services free of charge. Please contact (615) 532-0780 for more information.

If you would like to receive notices like this directly, contact the Public Participation Officer in the DLP's Central Office for a Mailing List Request Form. Email Solid.Waste@tn.gov or call (615) 552-8002.