

Tennessee Mobile Household Hazardous Waste Collection Service Policy Guide

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Introduction

The Tennessee Department of Environment and Conservation (TDEC) has been providing the Tennessee Household Hazardous Waste Mobile Collection Service to counties since the program's inception in 1993. To date, there have been over 1,500 one-day collections with over 383,000 Tennessee families safely disposing of over 25 million pounds of household hazardous waste (HHW).

HHW is as any unwanted or spent household product that can catch fire easily (flammable), eat away at or irritate living tissue (corrosive), react violently with water or other chemicals (reactive), or is poisonous to humans and animals (toxic). Usable household products may exhibit hazardous properties but until they become a waste, they are not appropriate for the HHW program.

The Mobile Collection Service is open to any Tennessee resident. The program is limited to households. Businesses, institutions, schools, and agri-business operations may not use this service.

The TDEC, Division of Solid Waste Management (SWM) has written this guide for any county planning a HHW Collection Event to describe the responsibilities of the State, the host county, and the State's HHW contractor. These responsibilities are based on Federal and State laws, regulations, and policies concerning the management of HHW. The criteria are set forth to maintain the integrity of the HHW Mobile Collection Service.

These criteria, including the information in all the attachments, are subject to change based on the needs of the program and the needs of the counties being served. A county may request variances from this policy guide by requesting and justifying a variance in writing to the HHW Coordinator. SWM reserves the right to refuse collection service to any county that does not put forth a reasonable effort to meet these criteria.

County Responsibilities:

As set forth in the Solid Waste Management Act of 1991 (SWMA), a county government has three responsibilities to fulfill prior to and during a HHW Event. These responsibilities concern location, advertising, and a site representative.

Location: The county will arrange a temporary site for the collection event. If the site is not county-owned, then the county will be responsible for all leasing arrangements. The leasing arrangements must be in writing and submitted to the HHW Coordinator prior to requesting the event. The county may be asked to allow the coordinator to perform a site-walk at the location to finalize plans for the collection event. All locations must be approved by the HHW Coordinator. The HHW Coordinator can also assist in choosing a location.

The temporary site should meet the following minimum requirements:

- * Be accessible by paved, gravel, or well-maintained roads.
- * Be located conveniently to a majority of county residents.
- * Have a flat, asphalt or concrete working area of 50 ft X 50 ft minimum.
- * Have a clean water source within the working area.
- * Have toilet facilities (portable or permanent) within approximately 200 ft of the working area.

The county should have a potential site solidified when it submits a request in writing to the State for the collection service. The request should identify any deviations from the above criteria. Deviation from the

above criteria may possibly be arranged. The State reserves the right to disapprove a site that does not meet all the above criteria.

At the site, the county must provide one or more waste containers for the collection of non-hazardous household waste and provide for the proper disposal of such waste. The county may also be required to empty the waste containers, at the county's expense, during the hours of operation of the collection event, if necessary. The county will coordinate the location of the solid waste containers with the state contractor to be convenient to the contractor and inaccessible to the general public.

The county may place restrictions on the use of the waste containers necessary to protect county interests, e.g. location, use, material sorting, etc. The county site representative should be prepared to make decisions during the event regarding what materials participants may throw in the container if their wastes are determined to be non-hazardous by the State or the collection contractor. Since participants often bring in non-hazardous materials that the county routinely collects, such as household trash, recyclables, rubbish, scrap metal, white goods, and tires, the county representative should expect to direct and assist participants with disposal of these items on site or refer them to the proper local facility. Additionally, the county may wish to provide a container for cardboard.

The collection contractor is not responsible for any household hazardous waste or other wastes found in the containers after the collection contractor's departure from the site. The county is responsible for inspecting the waste containers during the site clean-up for questionable waste.

Advertising: To provide the service most cost efficiently, the events should be well utilized. A collection event cannot be successful without advertisement. The county must advertise in one or more newspapers of general circulation prior to the event. A substantive news article may replace a paid advertisement. To qualify as newspapers of general circulation, newspapers generally have to be published more for their news content rather than for their ads and have a paid subscription.

All advertisements for the event must include the following information:

- The DATE; the LOCATION; and the HOURS of OPERATION.
- Acknowledgement that costs are paid by the TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION.
- A list of **excluded** items: MEDICAL and INFECTIOUS WASTES (EXCEPT NEEDLES AND SHARPS IN PUNCTURE-PROOF CONTAINERS), AMMUNITION and EXPLOSIVES, RADIOACTIVE WASTES, INCLUDING SMOKE DETECTORS, ANY EMPTY CONTAINERS.
- Very Small Quantity Generator Waste (i.e. wastes from non-household sources such as businesses, schools, farms, churches, etc.) is acceptable by appointment only. Call 615-643-3170 to request a price quote and schedule an appointment.
- Instructions on how residents are to recycle/dispose of paint and electronics.

The county must send a copy of the proposed ad, the name(s) the newspapers in which it will appear, and the advertisement date(s) to the household hazardous waste coordinator prior to the proposed advertisement date for approval and no later than one month prior to the event.

SWM encourages the county to educate its citizens year-round concerning the proper use and disposal of HHW. The county should use all available means to communicate the characteristics of HHW, the consequences of improper disposal, and the basic concept of reducing, reusing, and recycling HHW whenever possible.

SWM is committed to assisting the county with its educational campaign. SWM has educational materials available for use by the county such as ad/flyer templates and poster designs. SWM staff may

also be available for talks and seminars such as teacher in-services, conservation camps, home demonstration clubs, etc.

Site Representative: A county representative must be on-site at least thirty minutes prior to the start of the event, during the collection event, and during site clean-up. Often the public has questions regarding recycling, disposal of white goods, tires and rubbish, composting, etc., which are best answered by a local representative. The site representative may be either a county employee or a person designated to represent the county during the collection event. The county is responsible for paying any wages and expenses incurred by the site representative. There are no minimum qualifications for the site representative; however, the person should be someone who can manage questions and/or problems that may arise during the collection event. The county should be confident in this person's ability to safeguard any county property used by the collection contractor (primarily land and waste containers).

A county representative must also remain on-site during the times the contractor is packaging the materials for shipment in case assistance is needed with the site arrangements, utilities, or other problems. If the representative has to leave during the packaging, he/she should leave a number where he/she can be reached if needed. The county should designate a backup representative who can be available to serve as a substitute or to share the responsibility should the event become lengthy. The site representative will be asked to return to the site, regardless of the hour, to inspect the site clean-up prior to the contractor's departure from the site. The State will only hold the contractor responsible for any damages that are incurred as a result of the collection event operation. The county has the responsibility for documenting any damages to the site. The representative may make suggestions for improving the site security provided by the contractor in cases where the contractor may leave hazardous materials and/or equipment on site overnight.

Procedures for Scheduling a Collection Event

Collection events have historically been held on Saturdays in Tennessee and around the nation. Collection events may possibly be scheduled on another day of the week if necessary arrangements can be made with the collection contractor and the HHW coordinator feels that the collection will be well attended.

Generally, counties may host one collection event per fiscal year (July 1-June 30). Due to financial and other constraints, all requests for service by the contractor may not be accommodated. In order to maximize the use of limited funds, priority will be given to those counties that have demonstrated success with collection events. Counties with historically low participation rate will be encouraged to host collection events in alternating years and to direct their residents to collection events in neighboring counties.

In order to better serve the needs of the county, the contractor, and SWM; the HHW Program has implemented a scheduling procedure. The year is broken into two collection seasons with the spring season running from approximately the second week in March to the weekend prior to Memorial Day and the fall season running from the weekend after Labor Day to early November. A reminder to submit an event request will be sent to the counties the first weekday of November. HHW event requests may be submitted up to a year prior to the requested HHW event date. The deadline for submitting a spring HHW event request is the first weekday in December. All requests will be prioritized and scheduled accordingly. Notifications will then be sent to the counties either confirming the request or suggesting alternative collection options.

To make an official collection request, a letter or email should be sent from the County Mayor to the Household Hazardous Waste Coordinator requesting to be serviced by the HHW contractor. The letter should list the preferred date for the collection and include two alternative dates. If the event is controlled by other constraints such as site availability or running in conjunction with another event such as The

Great American Cleanup that should be stated in the letter. The State will try to accommodate the requested date to the fullest extent possible. Please note that the State does not host HHW events on Easter or Memorial Day weekends.

The State reserves the right to make any and all necessary scheduling changes. The county may wish to contact the HHW Coordinator when selecting possible dates to request. The written request should include the following:

- * A request to be serviced by the State's HHW Contractor.
- * The date when the collection event is desired and at least two alternate dates.
- * A detailed summary of the county's BOPAE collection program specifying how the county meets the minimum requirements for HHW service.
- * The name and email address of the contact person who will serve to coordinate the fulfillment of the county's responsibilities associated with the collection event. (This contact person and the county site representative may be different)
- * The name, business phone, and home phone of the site representative who will be on site the day of the collection event.
- * Any proposed deviations from the minimum site criteria; and
- * The telephone numbers for the local law enforcement, emergency response, and nearest medical facilities and the address of the medical facility.

Minimum Requirements to Receive HHW Collection Service

The following provides an overview of **minimum** requirements to qualify for an HHW Collection event. These requirements are established to eliminate the collection of BOPAE materials at mobile events and provide funding for disposal of the most hazardous materials found in households. A county shall provide regular or year-round services directly or by contract, if adequate sites are not otherwise available in the county for the use of the residents of the county.

Alkaline Batteries: The County may recycle alkaline batteries or educate the public that alkaline batteries no longer contain mercury and therefore may be disposed in their garbage.

Rechargeable Batteries (NiCad, NiMH, LiIon, Zinc, small sealed lead acid): The County shall provide year round collection and recycling of rechargeable batteries. Call2Recycle and others offer collection programs for a fee.

Lead Acid Batteries: Per T.C.A. 68-211-866, "each county shall provide directly, by contract or through a solid waste authority at least one (1) site to receive and store waste tires, used automotive oils and fluids, and lead-acid batteries, if adequate sites are not otherwise available in the county for the use of the residents of the county." Lead acid batteries have value and most counties contract with a local battery recycler.

All other batteries shall be managed by the State HHW Contractor at mobile HHW collections.

Used Automotive Oil: Per T.C.A. 68-211-866, "each county shall provide directly, by contract or through a solid waste authority at least one (1) site to receive and store waste tires, used automotive oils and fluids, and lead-acid batteries, if adequate sites are not otherwise available in the county for the use of the residents of the county." Well managed used oil collection generates revenue from used oil transporters or provides cost avoidance when collected by the county and burned in used oil heaters.

Used Antifreeze: Per T.C.A. 68-211-866, "each county shall provide directly, by contract or through a solid waste authority at least one (1) site to receive and store waste tires, used automotive oils and fluids, and lead-acid batteries, if adequate sites are not otherwise available in the county for the use of the

residents of the county.” Most used oil transporters provide antifreeze collection at no cost in order to get the used oil also. Otherwise, antifreeze collection and recycling averages a cost of \$35-50 per 55-gallon drum.

Paint: The County shall provide for collections of oil-based paint. Oil-based paint shall be collected at a fixed location and disposed by the State HHW contractor in scheduled milk run pick-ups. The county may manage the latex paint by recycling or solidification, as approved by the Department’s Division of Solid Waste Management Environmental Field Office. Refer to the Household Paint Management Guidance and Policy on the HHW Coordinator’s Web page for details.

(https://www.tn.gov/content/dam/tn/environment/solid-waste/documents/hazardous-waste/sw_paintguidance.pdf)

Electronics: The County shall provide scheduled collections of household electronic scrap for recycling. The equipment to be collected shall include central processing units (CPUs), laptops, cathode ray tubes (CRTs), televisions, flat screen monitors, peripherals, printers, scanners/copiers, fax machines, cell phones, and personal digital assistants.

Markets for each of these materials, as noted above, are provided on the HHW Coordinator’s Web Page (<https://www.tn.gov/environment/program-areas/solid-waste/materials-management/hhw-program/hhw-coordinators.html>).

Volunteers

Volunteers are an excellent resource, and the State encourages the county to utilize help from the community to the fullest extent possible. Volunteers are especially helpful in making sure that the event is well publicized and runs smoothly. Volunteers can be utilized in a number of ways to aid in publicizing the event. They can hang banners and signs, pass out flyers and brochures, make presentations to local organizations, etc. They can also post notices at businesses willing to advertise for the county as well as make and post signs that direct participants to the collection site. Additional areas where volunteers are most useful are taking surveys and directing traffic. Other jobs the volunteers can perform to help the event run smoothly are: enforce “entrance/exit only” signs, keeping out curious pedestrians, reminding participants to stay in their vehicles, watching for illegal dumping on the site perimeter, and turning away latecomers. The county may also enlist volunteers to help with cardboard boxes, especially if they are to be processed for recycling.

The County may ask participants at the collection event to complete a short survey form about how far the participants traveled, how they learned about the event, if they have participated before, or any other solid waste issues the county would like to include. Volunteers can be responsible for administering the surveys. They should understand all the questions and know how to ask them in an unambiguous fashion. Additionally, volunteers can distribute educational information provided by the State or local government on solid waste issues. Volunteers and county staff are encouraged to attend the Contractor’s Health and Safety briefing thirty minutes prior to the event start time.

Restrictions

The contractor is allowed to accept only wastes from households and Very Small Quantity Generators (VSQG). REGULATED HAZARDOUS WASTE_FROM SMALL QUANTITY AND LARGE QUANTITY GENERATORS WILL NOT BE ACCEPTED. The VSQG collection will be administered by the Contractor. The generator will be required to submit a pre-inventory waste survey to the Contractor. The Contractor will provide an estimated cost for disposal based on the pre-inventory waste survey, a collection appointment often to immediately follow the HHW collection, transportation guidance for the generator, and a receipt for payment by the generator upon delivery to the collection event.

Examples of VSQGs are schools and institutions, body shops, dry cleaners, print shops, commercial growers, and other small businesses. A list of the most common HHW materials as well as those not accepted in the program is provided at the end of this guide.

Household Paint Collection Program

Counties shall collect paint prior to the County's collection event in order to receive mobile collection service. However, no pre-collected waste other than oil-based paint will be accepted for disposal by the contractor. The paint collection program was established to allow counties to collect paint from citizens throughout the year. Oil-based paint may be brought to the collection site the day of the event to be included with the household hazardous waste collected the day of the event if prior arrangements are made with the contractor. Only household paint is acceptable. Any unacceptable waste is the responsibility of the county.

There are several steps and requirements that must be followed before a county can participate in this program. The Household Paint Collection Policy and Guidance provide greater detail about permit modifications and collection best management practices and should be reviewed in the planning stages. These documents are available on the HHW Coordinator Web site at <https://www.tn.gov/environment/program-areas/solid-waste/materials-management/hhw-program/hhw-coordinators.html>.

In summary, however, the county must notify the Division of Solid Waste Management (DSWM) at the local TDEC Environmental Field Office. Following approval from DSWM, the county should contact the HHW Coordinator to request supplies for the collection of oil-based paint and instructions for requesting future milk run pick up service. Latex paint may be managed by the county by solidification or consolidation and recycling. Before the oil-based paint is accepted by the HHW Contractor either at the collection event or by milk run pick up service. Only counties that have received written approval from SWM and have contacted the HHW Coordinator may receive disposal services for oil-based paint at no cost to the county.

Contacts

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COMMONLY ASKED QUESTIONS

1. What can a county do for households who cannot come on the day of the collection?

The county should encourage people to bring HHW for friends, neighbors, or relatives who are shut-ins, lack transportation, or have a previous obligation on the day of the Collection Event. Anyone who does this should be prepared to answer questions about unlabeled materials or take back any material that is unidentifiable or refused. Because the program is state-funded any Tennessee resident can utilize the program in any county of their choosing. For information on dates, locations, and times, citizens can check the schedule on the web or may call 1-800-287-9013.

2. Will the Collection Event be canceled for inclement weather?

The State will decide by the Thursday morning before the collection event if weather conditions are severe enough to merit cancellation. If it appears likely that the extremely inclement weather will threaten the safety of the staff, the county representative will be consulted and a new date set. Once the collection event begins, sudden electrical storms or high winds may cause the collection to temporarily close or cease; rain will not affect the collection event. The State's contractor provides trained workers dressed in protective clothing to unload HHW from participants' cars, sort the materials under a canopy, and pack them for transportation.

3. Will unknown materials be accepted?

As far as the homeowner is concerned, unknown and unlabeled materials may be brought to the collection event. Homeowners should come prepared to share as much information as possible about unlabeled materials to assist the contractor with proper identification. With such cooperation from citizens, there are few materials the contractor's chemists cannot identify. Any material that cannot be identified in the presence of the participant will be returned to the participant. (The contractor cannot properly transport or dispose of unidentified material.)

4. Will farm pesticides be accepted?

All **households** may participate, including farms. A farm household, like other households, may dispose of consumer-oriented pesticides used on their family's home, lawn, and garden. However, chemicals used in agri-business endeavors on the farm are not qualified for this program. The Department of Agriculture has an Agricultural Pesticide Waste Collection Program to deal with pesticides generated by agri-business. For more information on this free program for agribusinesses, visit the program's website. <https://www.tn.gov/agriculture/businesses/pesticides/ag-businesses-pesticide-collection.html>. You could also contact Jim Endsley at (615) 837-5523 or Jim.Endsley@tn.gov

5. Will the county be responsible for any household hazardous waste?

The contractor is required to properly package and dispose of every HHW item accepted during the collection event. The contractor has the responsibility to reject any waste he is unable to legally dispose of while still in the possession of the owner. The contractor will be expected to accept all materials except those household wastes specifically excluded by contract and non-household generated wastes. The contractor will not be responsible for the removal and disposal of any non-hazardous household waste (ordinary solid waste) or hazardous wastes dumped at the site before or after the advertised hours. **Counties will be responsible for any pre-collected HHW that has not been approved by the HHW Coordinator.** The County should make every effort to direct do-it-yourselfers with motor oil, antifreeze, batteries, propane cylinders, paint, and electronic scrap to the year-round collection sites.

6. What will the contractor do with the collected wastes?

The contractor disposes of the collected HHW at privately-owned facilities that have licenses and permits to dispose of hazardous waste. These facilities may include incinerators, chemical waste landfills, or recycling processors. The contractor will be allowed to choose the facilities he uses as long as it is on the State's approved list. The State will only reimburse the hazardous waste contractor for waste disposed of by licensed and permitted disposal facilities. The contractor will ship the wastes to such facilities, even out of state if necessary, in order to comply with this requirement. There is no obligation on the county's part to provide the collection contractor with a licensed and permitted disposal facility within the county's borders. The contractor is obligated by the terms of the contract to submit to the State certificates of disposal from licensed and permitted disposal facilities in order to receive payment for the services rendered.

7. Will the contractor provide insurance for the collection event?

The contractor is required by the contract with the State to accept all legal responsibility for the safety and well-being of all persons and property on-site during the collection event. The contractor is required to carry certain types and amounts of insurance necessary to cover this liability and has the right to restrict any of the work areas from the general public.

8. How is this collection program funded?

The HHW Mobile Collection Service is funded from the Solid Waste Management Fund. This fund was established by the Solid Waste Management Act of 1991. The fund is financed by the pre-disposal fee collected on the retail sale of new automotive tires in Tennessee and a surcharge per ton on waste disposed in Class I landfills in Tennessee. In addition to the HHW Program, the monies from the Solid Waste Management Fund are used to fund all other programs established by the Solid Waste Management Act of 1991. These programs include recycling market development and grants for recycling equipment, solid waste planning and education, convenience centers, and waste tire collection and clean-ups.

9. How was the contractor selected?

The contractor was selected through a proposal evaluation process established by state law. Each potential contractor was required to submit a proposal on a specified time and date for evaluation purposes. A Request for Proposal (RFP) was mailed to companies in the hazardous waste industry and defined the requirements of the program and specified the information required in the proposal. The potential contractors were required to discuss their experience in HHW collection, their company organization, the technical aspects of their proposed service to Tennessee, and the cost to the State for the service. Each of these proposals was graded by a group of evaluators who are knowledgeable in the hazardous waste field. The scores of each section were summed to a total. The contract was awarded to the proposer receiving the most points from the evaluation.

Common Household Hazardous Wastes

1. Household Cleaners
 - a. Drain openers
 - b. Oven cleaners
 - c. Wood and metal cleaners and polishes
 - d. Toilet bowl, tub, and tile cleaners
 - e. Strong disinfectants
2. Automotive Products
 - a. Fuel and oil additives
 - b. Grease and rust solvents
 - c. Carburetor and fuel injector cleaners
 - d. Air conditioning refrigerants
 - e. Starter fluids
 - f. Body putty
 - g. Antifreeze/coolant
 - h. Grease
 - i. Waste gasoline
 - j. Welding supplies
3. Home Maintenance and Improvement Products
 - a. Wood and concrete sealers
 - b. Paint and varnish thinners, strippers, and removers
 - c. Adhesives
 - d. Roofing tar
4. Lawn and Garden Products
 - a. Herbicides
 - b. Pesticides/ rodenticides
 - c. Fungicides/ wood preservatives
 - d. Fertilizers
5. Miscellaneous
 - a. Button batteries and lithium batteries
 - b. Fingernail Polish Remover
 - c. Pool chemicals
 - d. Photographic processing chemicals
 - e. Prescription medicines/ drugs
 - f. Aerosols/compressed gas
 - g. Elemental mercury / mercury-containing devices e.g. thermometers, thermostats
 - h. Fluorescent bulbs
 - i. Over the counter medicines

Common Household Wastes Not Acceptable at Collection Events

Medical Waste (as defined by Tennessee Rule 1200-1-7-.01(2)) (except needles and sharps in puncture-proof containers)

Explosives or Ordnance (e.g., ammunition, DOT Class A, B, or C explosives)

Radioactive Compounds (e.g., Americium, Barium, Cesium, Uranium)

Friable asbestos (this is demolition waste) – double bag and dispose

Empty commercial farm pesticide containers – triple rinse and dispose

Machine parts/compressors containing oil or freon

Appliances – recycle locally as white goods

Incandescent light bulbs

Auto parts – gas tanks, tires, filters

Cement mix, lime, bone meal, and grout - trash

Empty containers of any kind, including gas cylinders

Electronic scrap

Paint