

NOTICE OF INTENT TO REISSUE HAZARDOUS WASTE MANAGEMENT PERMIT FOR TRADEBE TREATMENT AND RECYCLING OF TENNESSEE, LLC

The Tennessee Department of Environment and Conservation (TDEC) Division of Solid Waste Management (DSWM) has tentatively decided to reissue a hazardous waste storage and treatment permit for Tradebe Treatment and Recycling of Tennessee, LLC (Tradebe). Tradebe (EPA ID No. TND000772186) is located in Shelby County at 5485 Victory Lane, Millington, TN 38053. TDEC invites the public to submit comments on this proposal during a 45-day comment period ending on **Wednesday, September 21, 2022**.

Tradebe's current permit, TNHW-103, was issued on October 16, 2000, and was effective for ten years. On April 1, 2009, DSWM provided a Part B Call Letter requesting the facility to provide a permit renewal application by April 20, 2010, six months prior to the expiration of the current permit. On April 6, 2010, the facility submitted an extension request for the submittal of the renewal application. DSWM approved the request on April 23, 2010, with a new due date of August 20, 2010. On August 6, 2010, the facility requested another extension on the submittal of the renewal application. DSWM approved the extension on August 13, 2010, setting the new submittal date as September 30, 2010. The facility submitted a permit renewal application to DSWM on October 1, 2010. A public notice announcing receipt of the application was published in a local newspaper on November 10, 2010. As part of the pre-application process, the facility conducted a pre-application public meeting on September 14, 2010, as announced in a public notice published on August 18, 2010.

If the renewal application is approved, the permit will allow a maximum storage quantity of 788,322 gallons of hazardous waste at the facility at any one time. This allows for the maximum storage of 703,772 gallons of hazardous waste in containers in ten storage areas (Units 202, 203, 204, 205, 207, 207C, 207D, 208A, 212, and 217) and 84,550 gallons in four above-ground tanks (T-003, T-004, T-005, and T-006) and one in-ground tank (Mix Tank). The permit will allow the facility to treat a maximum quantity of 937,536 gallons per day. This allows for the maximum treatment capacity of 735,000 gallons per day in containers and 202,536 gallons per day in tanks. Hazardous waste treatment at the facility includes lab pack processing; volume reduction through shredding and compaction; bulking and repackaging of waste; decanting; fuels blending and mixing; treatment of debris; filtration/phase and component separation; stabilization; solidification; consolidation; and chemical treatment prior to off-site disposal.

Corrective action conditions for the Solid Waste Management Units (SWMUs) and Areas of Concern (AOC) are included as part of the permit. The conditions of the permit require that any future and existing SWMUs or AOCs be evaluated for potential releases and remediation, as necessary. The conditions require notification of imminent hazards and, when applicable, compliance with the requirements developed under land disposal restrictions and organic emission standards.

Based on the review of the application and as authorized pursuant to Tennessee Rule 0400-12-01-07(7), DSWM has determined the application to be complete and has drafted a permit. DSWM proposes to issue the permit 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), this notice requires a 45-day comment period, beginning on the date of this publication. A fact sheet has been prepared that provides additional information about the site and the proposed permit. Pending consideration of any contrary information received, it is the present intent of DSWM to issue this permit. If issued, the permit would be effective for ten years.

A public hearing will be held on September 8, 2022, at the Millington Public Library, 4858 Navy Rd, Millington, TN, as well as via video teleconference. Information on how to join online is provided

below. From 5:30 p.m. to 6:00 p.m. CDT, an informational session will be held. The public may inspect and discuss the permit application, draft permit, fact sheet, plans, and other materials with the DSWM and with representatives of the applicant. There will also be an opportunity for comments to be recorded or written and submitted during this time. The formal hearing will begin at 6:00 p.m. First, DSWM will explain its tentative decision to issue the permit. Then the applicant's representative will describe the proposed facility operation. DSWM will then receive oral comments on the draft permit from the public.

Those who wish to join the public hearing virtually can do so by using the following link [tn.gov/environment/notices/hearing-tradebe](https://www.tn.gov/environment/notices/hearing-tradebe). Information regarding how to join by computer will be posted to this website at least 3 days prior to the public hearing. Online participants will be able to view maps, pictures, and other content that will be shared.

Electronic copies of the draft permit, including the fact sheet, are available online at [tn.gov/environment/notices/tradebe](https://www.tn.gov/environment/notices/tradebe) and at the DSWM Central Office, 312 Rosa L Parks Ave, 14th Floor, Nashville TN 37243 (615-532-0780). Paper copies are available for review at the Millington Public Library, 4858 Navy Rd, Millington, TN 38053 (901-872-1585). These materials are also available at the TDEC Memphis Environmental Field Office, 8383 Wolf Lake Drive, Memphis, TN 38133 (901-371-3000).

To comment on the proposed treatment and storage permit renewal, contact Ms. Beverly Philpot, Hazardous Waste Program Manager located at DSWM's Central Office at the TN Tower, 312 Rosa L. Parks Avenue, 14th Floor, Nashville, TN 37243 (615-795-1188), email Beverly.Philpot@tn.gov or fax 615-532-0938. **Comments must be received by 4:30 p.m. CDT, Wednesday, September 21, 2022, to assure consideration.**

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

TDEC is an Equal Employment Opportunity/Affirmative Action (EEO/AA) employer. TDEC does not unlawfully discriminate on any basis prohibited by applicable law in any of its programs, services, or activities.

EEO/AA/ADAAA inquiries or complaints may be directed to the ADAAA Coordinator, TDEC HR Division, at 615-532-0200. Hearing impaired callers may use the Tennessee Relay Service (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 Janelle Starke at 615-906-2950 for more information.

If you would like to receive notices like this directly, contact the DSWM's Central Office for a Mailing List Request Form. Email Solid.Waste@tn.gov or call 615-532-0780.

NOTICE ISSUED: August 7, 2022



Tradebe Treatment and Recycling of Tennessee, LLC
TND000772186
5485 Victory Lane
Millington, TN 385053

5485 Victory Ln

Charles W Baker Airport

Armstrong Field Rd

Fite Rd

Fite Rd