Division of Solid Waste Management
Hazardous Waste Program

Annual Report
2016
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</tbody>
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About the Solid Waste Management’s Hazardous Waste Program

The Hazardous Waste Management Program regulates hazardous waste generation, transportation, storage, treatment, and disposal. It has authority over facilities subject to EPA RCRA Subtitle C. Such activities are overseen by EPA Region 4. The Hazardous Waste Management Program operates under the authority of the Hazardous Waste Management Act of 1977 (T.C.A. §68-212-101 et seq.) and various Hazardous Waste Management rules.

Implementation of Tennessee’s hazardous waste program began in October 1980. Regulation of hazardous waste is also a federal responsibility under the Resource Conservation and Recovery Act (RCRA). Tennessee has been authorized by EPA to administer the majority of the federal program and receives a grant in support of this effort. Other funding for this program is obtained through a fee collection system as well as State appropriations.

The coordinated state and federal program regulates activities such as:

- the permitting and inspection of hazardous waste storage, recycling, treatment, and disposal facilities;
- the management of hazardous waste from generators (primarily manufacturing industry) through the required Waste Stream Notifications, Annual Reports, and Waste Reduction Reports;
- the annual registration of hazardous waste transporters and the regulation of used oil.

Hazardous waste management facilities receive hazardous wastes for treatment, storage, or disposal. These facilities are often referred to as treatment, storage, and disposal facilities, or TSDFs.

Treatment facilities use various processes (such as incineration or oxidation) to alter the character or composition of hazardous wastes. Some treatment processes enable waste to be recovered and reused in manufacturing settings, while other treatment processes dramatically reduce the amount of hazardous waste.

Storage facilities temporarily hold hazardous wastes until they are treated or disposed of.

Disposal facilities permanently contain hazardous wastes. The most common type of disposal facility is a landfill, where hazardous wastes are disposed of in carefully constructed units designed to protect groundwater and surface-water resources.

Detailed regulations to ensure that TSDFs operate safely and protect human health and the environment are found in Tennessee Rule 0400-12-01-.06 and .07. Facilities that currently or plan to treat, store, or dispose of hazardous wastes must obtain a RCRA permit. A RCRA permit is a legally binding document that establishes operating requirements and various provisions specific to the needs of the permit applicant depending on the treatment, storage, or disposal activities conducted at the facility. Permits are written to address the specific geography of the facility, the types of hazardous waste management units, and the specific waste streams that will be managed at the facility. The permit also outlines facility design and operation, lays out safety standards, and describes activities that the facility must perform, such as monitoring and reporting. Permits typically require facilities to develop emergency plans, obtain insurance and financial backing, and train employees to handle hazards and can include facility-specific requirements such as groundwater monitoring.
How the data is collected:
Handlers of hazardous waste are required to notify the state of their activity pursuant to the HAZARDOUS WASTE MANAGEMENT REGULATIONS CHAPTER 0400-12-01. Forms are sent to these entities annually requiring each handler to report on their hazardous waste activity. Completed forms are required to be submitted by March 1st of each year detailing their hazardous waste activity for the previous calendar year, frequently referred to as the “Report Year”.

Forms received on March 1st contain information from the previous year. For example, data for calendar year 2016 is received by March 1, 2017 (Fig. 1). Corrections and resubmission may be required by the reporting entity. Reporting of data to EPA is also required. Handler information (site location, name, etc) is entered into EPA’s data system (RCRAInfo) by the Waste Activity Audit staff. Certain waste handling data is extracted from these annual reports and uploaded to EPA as part of the Biennial Reporting System (BRS).

**Figure 1 - REPORT YEAR 2016 (based on calendar year 2015)**

<table>
<thead>
<tr>
<th>START OF DATA PERIOD</th>
<th>END OF DATA PERIOD</th>
<th>MUST BE POSTMARKED BY</th>
<th>AUDIT AND DATA ENTRY</th>
</tr>
</thead>
<tbody>
<tr>
<td>January 1, 2016</td>
<td>December 31, 2016</td>
<td>March 1, 2017</td>
<td>Summer or Fall of 2017</td>
</tr>
</tbody>
</table>

Understanding Reporting Cycles:
Figure 2 indicates the overlapping nature of reporting cycles. Data in this report is based on the “Report Year” scenario outlined in Figure 1.

**Figure 2 - REPORT YEAR 2016 - Overlapping Cycles**

<table>
<thead>
<tr>
<th>CALENDAR CYCLE</th>
<th>TN FISCAL YEAR</th>
<th>FEDERAL FISCAL YEAR</th>
</tr>
</thead>
<tbody>
<tr>
<td>BEGINS</td>
<td>ENDS</td>
<td>BEGINS</td>
</tr>
<tr>
<td></td>
<td></td>
<td>October 1, 2015</td>
</tr>
</tbody>
</table>

BIENNIAL DATA is reported to EPA every two years based on odd-ending years. Data is for one year only and based on the REPORT YEAR. Data for the BIENNIAL report is usually due to EPA in late June or early July following the REPORTING YEAR.

FEDERAL FISCAL YEAR reporting generally involves Compliance Monitoring and Enforcement (CME) data. EPA determines Tennessee’s adherence to the RCRA Program based on how many inspections are conducted and the numbers of enforcement actions in any FEDERAL FISCAL YEAR.

Quantity of Data Managed:
Hazardous waste must be managed from generation to disposal or “cradle-to-grave”. Once a hazardous waste is generated, the generator must be able to identify the points of generation, the amount of time the waste was accumulated and to whom the waste was given to be transported to a treatment or disposal facility. These data are reported annually on forms to the Department. Submitted forms are required to be permanently retained. Figure 3 details this tracking of waste in general terms. Figure 4 identifies required forms to be submitted to the Department and the number of records (potentially) that may be submitted.
**Quantity of Data Managed (continued):**

*Figure 3* - Data Management / Tracking from Generation to Treatment / Disposal

<table>
<thead>
<tr>
<th>Facility</th>
<th>Waste Stream 1</th>
<th>Amt Generated 1</th>
<th>Amt Shipped 1</th>
<th>Amt Treated / Disposed 1</th>
</tr>
</thead>
<tbody>
<tr>
<td>Waste Stream 2</td>
<td>Amt Generated 2</td>
<td>Amt Shipped 2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Waste Stream 3</td>
<td>Amt Generated 3</td>
<td>Amt Shipped 3</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Transporter</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Amt Treated / Disposed 2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Amt Treated / Disposed 3</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Several pages of forms are returned from the regulated sites. *Figure 4* indicates the estimated total of pages returned. Note that in some cases, several records can be placed on one form as in Form TWR(CN-0905). At one point in the past, there were over 32,000 records submitted by Treatment, Storage, Disposal(TSD) sites.

*Figure 4* - Report Year Estimated Number of Forms Returned

<table>
<thead>
<tr>
<th>Information</th>
<th>Pertains To</th>
<th>Form ID</th>
<th>Records per Facility</th>
<th>Estimated Total Sites</th>
<th>Estimated Total Records</th>
</tr>
</thead>
<tbody>
<tr>
<td>Facility Core Data</td>
<td>Location, Contact Persons</td>
<td>Form HN-H</td>
<td>1</td>
<td>3000</td>
<td>3000</td>
</tr>
<tr>
<td>Waste Stream</td>
<td>Description and Amounts</td>
<td>Form WSR</td>
<td>1 to 1,200</td>
<td>3000</td>
<td>10,000 +</td>
</tr>
<tr>
<td>Offsite Shipping</td>
<td>Shipments and Amounts</td>
<td>Form OSR</td>
<td>1 to 50</td>
<td>3000</td>
<td>2500</td>
</tr>
<tr>
<td>Total Waste Received</td>
<td>Shipments and Amounts Rec'd</td>
<td>Form TWR</td>
<td>1 to 30,000</td>
<td>25</td>
<td>30,000 +</td>
</tr>
</tbody>
</table>
REGULATED ENTITIES
The Tennessee Hazardous Waste Management Act of 1977, TCA Section 68-212-101, requires the Division of Solid Waste Management to identify and regulate Hazardous Waste Generators, Hazardous Waste Treatment Storage and Disposal Facilities (TSDF), and Hazardous Waste Transporters. Hazardous Waste Generators are categorized into three groups: Large Quantity Generators (LQG); Small Quantity Generators (SQG); and Conditionally Exempt Small Quantity Generators (CESQG). Conditions for determination of these generator statuses are listed in Figure 7.

**Figure 5 - 2016 Hazardous Waste Handlers, Waste Streams and Tons of Hazardous Waste Generated**

<table>
<thead>
<tr>
<th>Description</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Conditionally Exempt Small Quantity Generators (CESQG)</td>
<td>2159</td>
</tr>
<tr>
<td>Small Quantity Generators (SQG)</td>
<td>774</td>
</tr>
<tr>
<td>Large Quantity Generators (LQG)</td>
<td>626</td>
</tr>
<tr>
<td>TSDF Active Generators</td>
<td>9</td>
</tr>
<tr>
<td>Active TSD Facilities</td>
<td>50</td>
</tr>
<tr>
<td>Hazardous Waste Transporters</td>
<td>281</td>
</tr>
<tr>
<td>Hazardous Waste Transfer Facilities</td>
<td>41</td>
</tr>
<tr>
<td>Used Oil Transporters</td>
<td>74</td>
</tr>
<tr>
<td>Used Oil Transfer Stations</td>
<td>32</td>
</tr>
<tr>
<td>Number of Hazardous Waste Streams</td>
<td>14,164</td>
</tr>
<tr>
<td>Tons of Hazardous Waste Generated</td>
<td>41,705,063</td>
</tr>
</tbody>
</table>

Note: Some data values may change slightly as adjustments and audits are completed. This can occur over a period of years. Every attempt is made to obtain the most current data.

**Figure 6 - Graph of Hazardous Waste Generator Universe by Year**

[State of Tennessee Large and Small Quantity Hazardous Waste Generators 1983 to Present]
**Descriptions of Regulated Entities (continued):**

**Figure 7 - Hazardous Waste Generator Categories - Criteria affecting Generator Status**

<table>
<thead>
<tr>
<th>CATEGORY</th>
<th>LARGE QUANTITY LQG</th>
<th>SMALL QUANTITY SQG</th>
<th>CONDITIONALLY EXEMPT CESQG</th>
</tr>
</thead>
<tbody>
<tr>
<td>MAXIMUM Amount of Hazardous Waste GENERATED in ANY Calendar Month For Reporting Year</td>
<td>1000 KILOGRAMS (2200 POUNDS) OR MORE</td>
<td>MORE THAN 100 KILOGRAMS (220 POUNDS) BUT LESS THAN 1000 KILOGRAMS (2200 POUNDS)</td>
<td>MORE THAN 0.00 BUT LESS THAN OR EQUAL TO 100 KILOGRAMS (220 POUNDS)</td>
</tr>
<tr>
<td>MAXIMUM Amount of ACUTE Hazardous Waste GENERATED in ANY Calendar Month For Reporting Year</td>
<td>1 KILOGRAM (2.2 POUNDS) OR MORE</td>
<td>&lt;1 KILOGRAM</td>
<td>&lt;1 KILOGRAM</td>
</tr>
<tr>
<td>MAXIMUM Amount of ACUTE Hazardous Waste ACCUMULATED at ANY Time For Reporting Year (prior to being shipped off site)</td>
<td>AT LEAST 1 KILOGRAM (2.2 POUNDS)</td>
<td>&lt;1 KILOGRAM</td>
<td>&lt;1 KILOGRAM</td>
</tr>
<tr>
<td>Amount of ACUTE Hazardous Waste spill Cleanup or residue GENERATED in ANY Calendar Month For Reporting Year</td>
<td>AT LEAST 100 KILOGRAMS (220 POUNDS)</td>
<td>&lt;100 KILOGRAMS</td>
<td>&lt;100 KILOGRAMS</td>
</tr>
<tr>
<td>MAXIMUM Amount of ACUTE Hazardous Waste spill Cleanup or residue ACCUMULATED at ANY Time For Reporting Year (prior to being shipped off site)</td>
<td>AT LEAST 100 KILOGRAMS (220 POUNDS)</td>
<td>&lt;100 KILOGRAMS</td>
<td>&lt;100 KILOGRAMS</td>
</tr>
</tbody>
</table>
**Description of Regulated Entities (Continued)**

**Hazardous Waste Transporters**

Transporters of hazardous waste are required to obtain a permit if they drop off or pick up hazardous waste in the State of Tennessee. TDEC permits and tracks both in state and out of state transporters as long as they operate or reside in Tennessee. Note in Figure 8 that one category of transporter resides in Tennessee but operates elsewhere. Other states require an EPA ID for such a transporter (just as Tennessee requires out of state transporters to have an EPA ID from their home state). An effort is made to check transporters against other databases, particularly US DOT web sites.

**Figure 8 - Hazardous Waste Transporter Categories**

<table>
<thead>
<tr>
<th>TRANSPORTER CATEGORY</th>
<th>NEW OR EXISTING</th>
<th>EPA ID REQUIRED</th>
<th>EPA ASSIGNED BY TN</th>
<th>PERMIT REQUIRED</th>
<th>EPA ID FEE</th>
<th>APPLICATION FEE</th>
<th>PERMIT FEE</th>
</tr>
</thead>
<tbody>
<tr>
<td>LOCATED IN TN (OPERATES INSIDE TN)</td>
<td>NEW</td>
<td>YES</td>
<td>YES</td>
<td>YES</td>
<td>YES</td>
<td>YES</td>
<td>YES</td>
</tr>
<tr>
<td>LOCATED IN TN (OPERATES OUTSIDE TN)</td>
<td>NEW</td>
<td>YES</td>
<td>YES</td>
<td>*NO</td>
<td>YES</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td>LOCATED IN TN (OPERATES INSIDE TN)</td>
<td>EXISTING</td>
<td>---- ONLY ANNUAL FEES DUE ----</td>
<td>NO</td>
<td>NO</td>
<td>YES</td>
<td></td>
<td></td>
</tr>
<tr>
<td>LOCATED IN TN (OPERATES OUTSIDE TN)</td>
<td>EXISTING</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>LOCATED OUTSIDE TN (OPERATES INSIDE TN)</td>
<td>NEW</td>
<td>YES</td>
<td>NO</td>
<td>YES</td>
<td>NO</td>
<td>YES</td>
<td>YES</td>
</tr>
<tr>
<td>LOCATED OUTSIDE TN (OPERATES INSIDE TN)</td>
<td>EXISTING</td>
<td>---- ONLY ANNUAL FEES DUE ----</td>
<td>NO</td>
<td>NO</td>
<td>YES</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*THE STATE WHERE THE TRANSPORTER INTENDS TO OPERATE MAY REQUIRE A PERMIT

The universe of hazardous waste transporters has not changed much throughout the years of this program. See Graph - State of Tennessee Hazardous Waste Transporter Permits Issued (Fig 9). A quick check of this graphical representation indicates Tennessee has consistently permitted about 300 hazardous waste transporters each year since 1984.

Transporter permits expire each year on January 31. Permit Renewal Notifications are sent to transporters each year around December 1 with a notice that the applications for renewal are due back to TDEC at the end of December. This allows for a month of overlap in permit re-issuance and permit expiration. This has been an effective process. New transporters are advised that their permits expire at the end of January, regardless of date of issuance. A transporter who applies for a new permit in October will have to re-apply in December when the Permit Renewal Notifications are sent out. Revenue collection for Annual Maintenance (permit) fees and application fees together have ranged from $65,000 to $75,000 annually since the inception of the program.

**Hazardous Waste Transfer Facilities**

A comprehensive fee study was conducted in 2010 which resulted in the creation of new fees for several regulated entities. Hazardous Waste Transfer Facilities are now required to pay an annual fee of $850. This fee is due each year on or before December 31. The total number of registered facilities is about 30.
Figure 9 - Graph of Transporter Permits Issued

State of Tennessee Hazardous Waste Transporter Permits Issued
WASTE GENERATION
Figure 10 - Percent Change in Generation

The Tennessee General Assembly passed the Hazardous Waste Reduction Act in 1990. The Act required large quantity generators to prepare detailed hazardous waste reduction plans for their facilities by January 1, 1992. By March 1, 1993, these generators were to report on their implementation progress in the Report Year 1992 Hazardous Waste Annual Report submission. The Act also required small quantity generators to write similar plans by January 1, 1994, and to report their implementation efforts by March 1, 1995. A voluntary goal of 25% reduction in the generation of hazardous waste was set by the Act.

<table>
<thead>
<tr>
<th>REPORT YEAR</th>
<th>TONS GENERATED</th>
<th>PREVIOUS YR</th>
<th>TONS GENERATED</th>
<th>DIFFERENCE</th>
<th>%CHANGE</th>
</tr>
</thead>
<tbody>
<tr>
<td>2001</td>
<td>45,421,607</td>
<td>2000</td>
<td>47,621,087</td>
<td>-2,199,480</td>
<td>-4.84</td>
</tr>
<tr>
<td>2002</td>
<td>44,583,017</td>
<td>2001</td>
<td>45,421,607</td>
<td>-838,590</td>
<td>-1.88</td>
</tr>
<tr>
<td>2003</td>
<td>45,309,494</td>
<td>2002</td>
<td>44,583,017</td>
<td>+726,477</td>
<td>+1.60</td>
</tr>
<tr>
<td>2004</td>
<td>42,742,883</td>
<td>2003</td>
<td>45,309,494</td>
<td>-2,566,611</td>
<td>-6.00</td>
</tr>
<tr>
<td>2005</td>
<td>43,492,297</td>
<td>2004</td>
<td>42,742,883</td>
<td>+749,414</td>
<td>+1.72</td>
</tr>
<tr>
<td>2006</td>
<td>44,712,601</td>
<td>2005</td>
<td>43,492,297</td>
<td>+1,220,304</td>
<td>+2.73</td>
</tr>
<tr>
<td>2007</td>
<td>45,630,527</td>
<td>2006</td>
<td>44,712,601</td>
<td>+917,926</td>
<td>+2.01</td>
</tr>
<tr>
<td>2008</td>
<td>44,609,720</td>
<td>2007</td>
<td>45,630,527</td>
<td>-1,020,807</td>
<td>-2.29</td>
</tr>
<tr>
<td>2009</td>
<td>40,340,084</td>
<td>2008</td>
<td>44,609,720</td>
<td>-4,269,636</td>
<td>-10.58</td>
</tr>
<tr>
<td>2010</td>
<td>45,276,230</td>
<td>2009</td>
<td>40,340,084</td>
<td>4,936,146</td>
<td>+10.90</td>
</tr>
<tr>
<td>2011</td>
<td>41,892,371</td>
<td>2010</td>
<td>45,276,230</td>
<td>-3,383,859</td>
<td>-8.08</td>
</tr>
<tr>
<td>2012</td>
<td>41,069,092</td>
<td>2011</td>
<td>41,892,371</td>
<td>-823,279</td>
<td>-2.00</td>
</tr>
<tr>
<td>2013</td>
<td>39,217,447</td>
<td>2012</td>
<td>41,069,092</td>
<td>-1,851,645</td>
<td>-4.72</td>
</tr>
<tr>
<td>2016</td>
<td>41,705,063</td>
<td>2015</td>
<td>42,563,923</td>
<td>-858,860</td>
<td>-2.05</td>
</tr>
</tbody>
</table>
Figure 11 - Number of Waste Streams

State of Tennessee Hazardous Waste Stream Count by Report Year

State of Tennessee Waste Generation and Handling by EPA Waste Code
Figure 13 - Graph of Hazardous Waste Generation (Tons)
WASTE REDUCTION
### Waste reduction (efforts) responses are further defined:

<table>
<thead>
<tr>
<th>Effort Code</th>
<th>General Description</th>
<th>Expanded</th>
</tr>
</thead>
<tbody>
<tr>
<td>a</td>
<td>Reformulation/redesign of product</td>
<td>An effort to reduce hazardous waste generation based on changes in design, composition, or specifications of end products that allow fundamental changes in its production.</td>
</tr>
<tr>
<td>b</td>
<td>In-process recycling/process modification</td>
<td>An effort to reduce hazardous waste generation based on the redesign of the procedures of a generation process to reduce, reuse or recycle waste as an integral part of the process.</td>
</tr>
<tr>
<td>c</td>
<td>Equipment/technology modification</td>
<td>An effort to reduce hazardous waste generation based on the redesign, retrofitting or change in equipment or incorporation of a technology to reduce the volume or toxicity of the waste.</td>
</tr>
<tr>
<td>d</td>
<td>Substituting raw materials</td>
<td>An effort to reduce hazardous waste generation based on changes in raw materials to reduce volume and toxicity.</td>
</tr>
<tr>
<td>e</td>
<td>Improved operations</td>
<td>An effort to reduce hazardous waste generation based on improvement in employee training, equipment maintenance, handling of raw materials, detection and control of emissions, etc.</td>
</tr>
<tr>
<td>f</td>
<td>Reduction research/planning</td>
<td>An effort to reduce hazardous waste generation based on research or planning conducted to develop future specific waste reduction efforts.</td>
</tr>
<tr>
<td>g</td>
<td>No effort</td>
<td></td>
</tr>
<tr>
<td>h</td>
<td>Other</td>
<td></td>
</tr>
</tbody>
</table>
Waste reduction (impediments) responses are further defined:

<table>
<thead>
<tr>
<th>Impediment Code</th>
<th>Description</th>
<th>Expanded</th>
</tr>
</thead>
<tbody>
<tr>
<td>a</td>
<td>Training or technical assistance</td>
<td>Reason given by respondents as an impediment to reducing hazardous waste generation based on funding and applicability for training and availability of staff time</td>
</tr>
<tr>
<td>b</td>
<td>Technical feasibility</td>
<td>Reason given by respondents as an impediment to reducing hazardous waste generation based on problems with reformulation or redesign of a product; in-process recycling or equipment modification etc.</td>
</tr>
<tr>
<td>c</td>
<td>Economic practicality</td>
<td>Reason given by respondents as an impediment to reducing hazardous waste generation based on recovery of cost of changing a process or availability of capital versus ability to recover the investment</td>
</tr>
<tr>
<td>d</td>
<td>Measurement/accounting</td>
<td>Reason given by respondents as an impediment to reducing hazardous waste generation based on ability to consistently and accurately measure generation amounts to identify direct and indirect costs</td>
</tr>
<tr>
<td>e</td>
<td>Tennessee hazardous waste regulations</td>
<td>Reason given by respondents as an impediment to reducing hazardous waste generation based on burdens imposed by regulations that impede flexibility to use reduction efforts</td>
</tr>
<tr>
<td>f</td>
<td>Implementation Previous Efforts</td>
<td>Reason given by respondents as an impediment to reducing hazardous waste generation based on feedback from previous reduction efforts</td>
</tr>
<tr>
<td>g</td>
<td>High costs of HW management</td>
<td>Reason given by respondents as an impediment to reducing hazardous waste generation based on the expense of transportation, on site handling as well as cost of insurance</td>
</tr>
<tr>
<td>h</td>
<td>Accidental generation</td>
<td>Reason given by respondents as an impediment to reducing hazardous waste generation due to an unplanned generation event, spill etc.</td>
</tr>
<tr>
<td>i</td>
<td>Other</td>
<td>Some responses given: &quot;Waste Generation Was Based on Sales&quot;; &quot;This is an Insignificant Waste Stream&quot;; &quot;Cannot Control the Product Design of Our Customers&quot;; &quot;One Time Generation Due to Flood&quot;; &quot;Cannot Reduce Waste Generation Any Further&quot;</td>
</tr>
</tbody>
</table>
ENFORCEMENT AND COMPLIANCE
### Figure 16 - Hazardous Waste Compliance Monitoring and Enforcement - Inspections - Report Year 2016

<p>| | |</p>
<table>
<thead>
<tr>
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<tbody>
<tr>
<td>Compliance</td>
<td>Evaluation Inspections</td>
</tr>
<tr>
<td>LQG</td>
<td>131</td>
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<tr>
<td>SQG</td>
<td>110</td>
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<tr>
<td>CESQG</td>
<td>68</td>
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<tr>
<td>NON-NOTIFIERS</td>
<td>87</td>
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</table>

### Figure 17 - Hazardous Waste Compliance Monitoring and Enforcement - Enforcement Actions - Report Year 2016

<p>| | |</p>
<table>
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<tr>
<td>Notices of Violation Issued</td>
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<tr>
<td>Enforcement Action Requests</td>
<td>56</td>
</tr>
<tr>
<td>Show Cause Meetings Held</td>
<td>13</td>
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<td>Warning Letters Issued</td>
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<td>Director’s Orders Issued</td>
<td>26</td>
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<td>Commissioner’s Orders Issued</td>
<td>1</td>
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<tr>
<td>Civil Penalties Collected</td>
<td>$132,764.00</td>
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---

![Graph](image.png)
PERMITTING
**Figure 18 - Hazardous Waste Permitting**

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<th>PERMIT TYPE</th>
<th>AT START OF 2016</th>
<th>RECEIVED IN 2016</th>
<th>ISSUED DURING YEAR</th>
<th>ON HAND END OF 2016</th>
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<td>STORAGE</td>
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<td>2</td>
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<td>STORAGE/TREATMENT</td>
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<td>4</td>
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<td>COMBUSTION (TREATMENT)</td>
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<td>DISPOSAL</td>
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<td>0</td>
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<td>POST-CLOSURE</td>
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<td>1</td>
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<td>CORRECTIVE ACTION ONLY</td>
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<tr>
<td><strong>TOTAL</strong></td>
<td><strong>15</strong></td>
<td><strong>4</strong></td>
<td><strong>4</strong></td>
<td><strong>15</strong></td>
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FEES
### Figure 19 - Summary of Fees Collected

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<th>Fees by Report Year with Percentage by Category</th>
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<tr>
<td>CIVIL PENALTIES AND DAMAGES COLLECTED</td>
<td>$290,603.05 (7.8%)</td>
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<td>GENERATOR FEE</td>
<td>$1,745,406.16 (46.8%)</td>
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<tr>
<td>HW TRANSFER FACILITIES</td>
<td>$32,300.00 (0.9%)</td>
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<tr>
<td>HW TRANSPORTER APP FEE</td>
<td>$6,400.00 (0.2%)</td>
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<tr>
<td>HW TRANSPORTER MAINT FEE</td>
<td>$103,250.00 (2.8%)</td>
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<tr>
<td>INTERNET PROCESSING FEE</td>
<td>$48.00 (0.0%)</td>
</tr>
<tr>
<td>NEW EPA ID</td>
<td>$33,850.00 (0.9%)</td>
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<tr>
<td>NEW EPA ID OWNER CHANGE</td>
<td>$4,800.00 (0.1%)</td>
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<tr>
<td>NEW HAZ WASTE STREAM FEE</td>
<td>$97,205.13 (2.6%)</td>
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<tr>
<td>OFF SITE SHIPMENT</td>
<td>$347,322.54 (9.3%)</td>
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<tr>
<td>OUT OF STATE GEN SHIP FEE</td>
<td>$4,185.58 (0.1%)</td>
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<tr>
<td>OWNER CHANGE FEE</td>
<td>$22,050.00 (0.6%)</td>
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<tr>
<td>PENALTIES ON LATE FEES</td>
<td>$24,054.19 (0.6%)</td>
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<td>SIMPLE INTEREST ON LATE FEES</td>
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<td>TSD ANNUAL FEE</td>
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<td>TSD APP FEE PERMIT MOD</td>
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<td>TSD APP FEE POST CLOS</td>
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<td>TSD CONSTRUCTION INSPECTION FEE</td>
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<td>TSD OFFSITE STORAGE</td>
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<td>UNIVERSAL WASTE DEST FACILITIES</td>
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<td>VARIANCE WAIVER RWV</td>
<td>$3,150.00 (0.1%)</td>
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Report Year 2016 Total $3,726,047.22

*Note: Some data values may change slightly as adjustments and audits are completed. This can occur over a period of years. Every attempt is made to obtain the most current data.*
PROGRAM CONTACTS
Hazardous Waste Management’s Contact Information

Address: Tennessee Department of Environment and Conservation, Division of Solid Waste Management, William R. Snodgrass Tennessee Tower 312 Rosa L. Parks Ave, 14th Floor, Nashville, TN 37243

Phone: 615-532-0780  Fax: 615-532-0938

https://www.tn.gov/environment/program-areas/solid-waste/hazardous-waste-management.html

<table>
<thead>
<tr>
<th>NAME</th>
<th>TITLE</th>
<th>PROGRAM</th>
<th>PHONE</th>
<th>EMAIL</th>
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<tr>
<td>Patrick J. Flood</td>
<td>Director</td>
<td>Division of Solid Waste Management</td>
<td>615-532-0792</td>
<td><a href="mailto:Pat.Flood@tn.gov">Pat.Flood@tn.gov</a></td>
</tr>
<tr>
<td>Lisa Hughey</td>
<td>Deputy Director</td>
<td>Central Office Operations</td>
<td>615-532-0858</td>
<td><a href="mailto:Lisa.Hughey@tn.gov">Lisa.Hughey@tn.gov</a></td>
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<tr>
<td>Ashley Holt</td>
<td>Deputy Director</td>
<td>Field Office Operations</td>
<td>615-532-0853</td>
<td><a href="mailto:Ashley.A.Holt@tn.gov">Ashley.A.Holt@tn.gov</a></td>
</tr>
<tr>
<td>Adrianne White</td>
<td>Manager</td>
<td>Toxic Substances Program</td>
<td>615-532-0885</td>
<td><a href="mailto:Adrianne.White@tn.gov">Adrianne.White@tn.gov</a></td>
</tr>
<tr>
<td>Christopher Lagan</td>
<td>Manager</td>
<td>Compliance and Enforcement Program</td>
<td>615-532-0883</td>
<td><a href="mailto:Christopher.Lagan@tn.gov">Christopher.Lagan@tn.gov</a></td>
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<th>FIELD OFFICE</th>
<th>COUNTRIES SERVED</th>
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<tr>
<td>MEMPHIS</td>
<td>Fayette, Shelby, Tipton</td>
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<td>JACKSON</td>
<td>Benton, Carroll, Decatur, Dyer, Hardin, Haywood, Lake, Lauderdale, Obion, Weakley, Chester, Crockett, Gibson, Hardeman, Henderson, Henry, Madison, McNairy</td>
<td>1625 Hollywood Drive</td>
</tr>
<tr>
<td>NASHVILLE</td>
<td>Cheatham, Davidson, Dickson, Houston, Humphreys, Montgomery, Robertson, Rutherford, Stewart, Sumner, Trousdale, Williamson, Wilson</td>
<td>711 R.S. Gass Blvd</td>
</tr>
<tr>
<td>COLUMBIA</td>
<td>Bedford, Coffee, Franklin, Giles, Hickman, Lawrence, Lewis, Lincoln, Marshall, Maury, Moore, Perry, Wayne</td>
<td>1421 Hampshire Pike</td>
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<tr>
<td>COOKEVILLE</td>
<td>Cannon, Clay, Cumberland, Dekalb, Fentress, Jackson, Macon, Overton, Pickett, Putnam, Smith, Van Buren, Warren, White</td>
<td>1221 South Willow Avenue</td>
</tr>
<tr>
<td>CHATTANOOGA</td>
<td>Bledsoe, Bradley, Grundy, Hamilton, Marion, McMinn, Meigs, Polk, Rhea, Sequatchie</td>
<td>1301 Riverfront Parkway</td>
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<tr>
<td>KNOXVILLE</td>
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<tr>
<td>JOHNSON CITY</td>
<td>Carter, Greene, Hancock, Hawkins, Johnson, Sullivan, Unicoi, Washington</td>
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LIST OF ACTIVE HAZARDOUS WASTE GENERATORS
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<td>ABRA AUTO BODY &amp; GLASS, CHAPMAN</td>
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| ACTIVE GENERATORS                                                                 | DATA DATE: | FORMER SAM SNEAD TIRE | CEG | ELIZABETHTON | FRANKLIN WOODS COMMUNITY HOSPITAL | TNR000030981 | CEG | JOHNSON CITY | FREEMAN TAYLOR & SONS QUIK CLEANERS #2 | TND981469828 | CEG | ELIZABETHTON | GARDNER PAINT SERVICES INC. | TND981857295 | LQG | JOHNSON CITY | GARY'S PAINT & BODY SHOP | TNR000023143 | CEG | GREENEVILLE | GASTROENTEROLOGY ASSOCIATES | TNR000032045 | CEG | KINGSPO | GATEWAY FORD LINCOLN MERCURY | TND034647859 | CEG | GREENEVILLE | GOESSLING USA, INC. | TNR000023879 | CEG | JOHNSON CITY | HACKNEY HOME FURNISHINGS, INC. | TNR0000112599 | SQG | SNEEDVILLE | HANCOCK COUNTY HOSPITAL | TND074915976 | CEG | SNEEDVILLE | HD SUPPLY WATERWORKS LTD. #WW2360 | TNR000022434 | CEG | SNEEDVILLE | HDK INDUSTRIES, INC. | TND147610851 | SQG | ROGERSVILLE | HENARD METAL FABRICATORS INC | TND987779170 | SQG | KINGSPO | HERITAGE GLASS, LLC | TND003374048 | SQG | KINGSPO | HIGHLANDS PATHOLOGY CONSULTANTS, P.C., BLUE R | TNR000007815 | CEG | KINGSPO | HILLS STORES COMPANY | TND987775608 | CEG | BRISTOL | HOLLISTON, LLC | TND00104951 | LQG | CHURCH HILL | HOLSTON ARMY AMMUNITION PLANT | TNS210020421 | LQG | KINGSPO | HUF NORTH AMERICA AUTOMOTIVE PARTS MANUFAC | TNR000037697 | LQG | GREENEVILLE | HUTCHINSON SEALING SYSTEMS | TND982126815 | LQG | CHURCH HILL | I.D. IMAGES | TND987778727 | CEG | GREENEVILLE | IMC PAINTS | TNR000019968 | SQG | KINGSPO | IMF INC | TNR00000372 | CEG | GREENEVILLE | IMPACT PLASTICS INC. | TNR000027573 | CEG | KINGSPO | INDIAN PATH MEDICAL CENTER | TND987770674 | LQG | KINGSPO | INTER-MOUNTAIN PATHOLOGY ASSOC., P.C. | TND030690168 | SQG | BRISTOL | J.B.R. BUICK-GMC TRUCK INC. | TND982101511 | CEG | KINGSPO | JACK MILLER BODY SHOP LLC | TND982101453 | CEG | JOHNSON CITY | JARDEN ZINC PRODUCTS, LLC | TND053983662 | LQG | GREENEVILLE | JD SQUARED INC. | TND071520175 | LQG | JOHNSON CITY | JOHNSON CITY HOUSING AUTHORITY | TND987769148 | CEG | JOHNSON CITY | JOHNSON CITY MEDICAL CENTER HOSPITAL | TND063189989 | LQG | JOHNSON CITY | KATZ AMERICAS | TNR000002568 | CEG | JOHNSON CITY | KENNAMETAL INC | TND004517736 | CEG | JOHNSON CITY | KIEFER MFG. & SALES, LLC | TNR000039040 | SQG | SNEEDVILLE | KING UNIVERSITY | TND074908989 | CEG | BRISTOL | KINGSPO | CABINETRY & FLOORING | TNR000023309 | CEG | KINGSPO | KINGSPO | POWER COMPANY | TND000792812 | SQG | KINGSPO | KINGSPO | RAILCAR SERVICES | TNR000017616 | CEG | KINGSPO | KINKEAD MACHINE CO., INC. | TND003382694 | CEG | BRISTOL | KINTRONICS LABORATORIES INC. | TNR000010413 | SQG | BLUFF CITY | KMART #3022 | TNR000033423 | LQG | BRISTOL | KMART #3147 | TNR000002287 | LQG | KINGSPO | KMART #3773 | TNR000033431 | LQG | GREENEVILLE | KMART #3753 | TNR000002295 | LQG | JOHNSON CITY | KOYO CORPORATION OF USA | TNR000025981 | CEG | TELFORD | KROGER #0261-29 | TNR00004063 | CEG | JOHNSON CITY | KROGER #0328-29 | TNR00004071 | CEG | KINGSPO | KROGER #0367-29 | TNR00004089 | CEG | JOHNSON CITY | LABELTEK | TND025533498 | SQG | SURGOINSVILLE | LAUNDRY SHOP | TND987777927 | CEG | KINGSPO | Tuesday, August 07, 2018 | Page 27 of 77
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### TOTAL FOR JCITY

- CESQG: 161
- SQG: 60
- LQG: 69

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DATA DATE: 4/7/2017

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307 HOEGANAES CORPORATION, GALLATIN PLANT TND95686473 LQG GALLATIN
308 HOGE MOTOR COMPANY TNR000003020 CEG SPRINGFIELD
309 HOLEDRITE TNR000032433 SQG LAVERGNE
310 HOLIDAY CLEANER TND982081408 CEG MURFREESBORO
311 HOLLAND TNR000024026 CEG GOODLETSVILLE
312 HOME DEPOT # 733 TND982163719 SQG HERMITAGE
313 HOME DEPOT 735 TNR000021147 SQG HENDERSONVILLE
314 HOME DEPOT USA HD0776 TNR000024992 SQG SMYRNA
315 HOOD CONTAINER CORPORATION TND050669126 CEG WAVERLY
316 HOLLAND TNR000024026 CEG GOODLETSVILLE
317 HOME DEPOT 735 TNR000021147 SQG HENDERSONVILLE
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319 HOLLAND TNR000024026 CEG GOODLETSVILLE
320 HOME DEPOT USA HD0776 TNR000024992 SQG SMYRNA
321 HADDON'S EQUIPMENT SERVICES INC. TNR000024786 SQG LEBANON
322 HOUR-O-MATIC DRY CLEANERS TND987769858 CEG MURFREESBORO
323 IDEAL CLAMP PRODUCTS, INC. TND981920358 CEG SMYRNA
324 IKG INDUSTRIES TND987770799 CEG NASHVILLE
325 IMAGE CLEANERS INC DBA BELLEVUE CLEANERS TND981024771 SQG NASHVILLE
326 INGLEWOOD DRY CLEANERS TND061284162 CEG NASHVILLE
327 JAMES CORLEW CHEVROLET INC - SERVICE DEPARTMENT TND982096877 CEG CLARKSVILLE
328 JAY CLEANERS TNR000023671 CEG NASHVILLE
329 JBS OF CLARKSVILLE, INC TNR0000054858 CEG CLARKSVILLE
330 JENKINS & WYNNE FORD INC TND98120852 CEG CLARKSVILLE
331 JET PRINTING LLC TNR000036863 SQG DICKSON
332 JIFFY LUBE TNR00000406 SQG MADISON
333 JIM HENRY PAINT & BODY SHOP TND98788971 CEG NASHVILLE
334 JOHN D WALDEN - PROPERTY TNR000017731 SQG SMYRNA
335 JOHN L. ARMITAGE & COMPANY TND95673059 LQG GALLATIN
336 JOHN W MCDougall COMPANY LLC TNR000014472 CEG NASHVILLE
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340 JDC COATINGS, INC TNR00003749 LQG MOUNT JULIET
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343 JIFFY LUBE TNR00000406 CEG MADISON
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345 JOHN D WALDEN - PROPERTY TNR000017731 SQG SMYRNA
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348 JOHN W. MCDougalL COMPANY LLC TNR000014472 CEG NASHVILLE
349 JOHN W. MCDougalL COMPANY LLC TNR000014472 CEG NASHVILLE
350 JONES BROTHERS INC TND982103533 CEG MOUNT JULIET
351 JOSTENS, INC TND982141590 SQG CLARKSVILLE
352 KARMAN properties TNR000042572 SQG GALLATIN
353 KENT SIGN COMPANY, INC TNR000024292 CEG NASHVILLE
354 KEN BINKLEY SIGN COMPANY, INC TND98777802 CEG NASHVILLE
355 KENAN TRANSPORT, LLC TNR00037325 LQG JOELTON

Tuesday, August 07, 2018
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**GRAND TOTAL** 3559

-ENDED OF REPORT-
APPENDIX B

LIST OF ACTIVE HAZARDOUS WASTE TREATMENT, STORAGE, AND DISPOSAL FACILITIES (TSD)
## ACTIVE TREATMENT, STORAGE, AND DISPOSAL FACILITIES

### CHATTANOOGA

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<th>FACILITY NAME</th>
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<td>KORDSA INC.</td>
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<td>5</td>
<td>OLIN CHLOR ALKALI PRODUCTS</td>
<td>TND003337292</td>
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<td>6</td>
<td>SOUTHERN WOOD PIEDMONT COMPANY</td>
<td>TND003327400</td>
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<td>UNIVAR USA INC., CHATTANOOGA</td>
<td>TND000737445</td>
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<td>8</td>
<td>VELSI COL CHEMICAL LLC</td>
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<td>WHELAND FOUNDRY, DIV. OF NORTH AMERICAN ROY</td>
<td>TND987778495</td>
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### COLUMBIA

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<td>YKK SNAP FASTENERS AMERICA INC</td>
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### JACKSON

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### JOHNSON CITY

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<td>BIRCH STREET PROPERTIES, LLC</td>
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<td>EASTMAN CHEMICAL COMPANY, TENNESSEE OPERATIONS</td>
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<td>NUCLEAR FUEL SERVICES, INC. (NFS)</td>
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### KNOXVILLE

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### ACTIVE TREATMENT, STORAGE, AND DISPOSAL FACILITIES

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### ACTIVE TREATMENT, STORAGE, AND DISPOSAL FACILITIES FOR THE KNOXVILLE FIELD OFFICE

**MEMPHIS**

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### ACTIVE TREATMENT, STORAGE, AND DISPOSAL FACILITIES FOR THE MEMPHIS FIELD OFFICE

**NASHVILLE**

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### ACTIVE TREATMENT, STORAGE, AND DISPOSAL FACILITIES FOR THE NASHVILLE FIELD OFFICE
ACTIVE TREATMENT, STORAGE, AND DISPOSAL FACILITIES

STATEWIDE TOTAL OF ACTIVE TREATMENT, STORAGE, AND DISPOSAL FACILITIES

-END OF REPORT-
APPENDIX C

LIST OF ACTIVE HAZARDOUS WASTE TRANSPORTERS
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<td>ADVANCED CHEMICAL TRANSPORT, INC. DBA ACTENVIRO</td>
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<td>M P ENVIRONMENTAL SVCS INC</td>
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