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## Hazardous Waste Enforcement: Tennessee Department of Environment and Conservation Proposed Order/Assessment Related to University of Tennessee at Chattanooga

09/24/2020

The Tennessee Department of Environment and Conservation ("TDEC") Division of Solid Waste Management issued a proposed Director's Order and Assessment ("Order") to the University of Tennessee at Chattanooga ("UTC") addressing alleged violations of the Tennessee rules related to hazardous waste management. See Case No. HWM 20-0006.

The Order states that UTC generates hazardous waste in four separate buildings on the campus which include:

- Administrative Services Building
- Holt Hall
- Grote Hall
- Bretske Hall (collectively, "Facility")

The UTC Facility is stated to be a small quantity generator of hazardous waste and hold a United States Environmental Protection Agency installation identification number. The Facility is stated to have reported the generation of 10 hazardous waste streams for the 2018 reporting year. Such waste streams are stated to originate primarily from academic laboratory operations.

TDEC Division of Solid Waste Management personnel are stated to have conducted a January 30th Compliance Evaluation Inspection ("CEI") of the Facility.

The CEI allegedly identified the following violations:

1. Failure to label hazardous waste containers in the 180-day area of Grote Hall with the words "Hazardous Waste".
2. Failure to mark hazardous waste containers in the 180-day area of Grote Hall with accumulation start dates.
3. Failure to provide spill kits in Room 108 of Holt Hall.

4. Failure to post emergency contact information by the telephone in Room 108 of Holt Hall and failure to post emergency equipment information in the 180-day area of the Administrative Services Building.
5. Failure to maintain copies of hazardous waste manifests.
6. Failure to conduct weekly inspections of the 180-day hazardous waste storage areas.
7. Failure to maintain complete weekly inspection records.
8. Failure to update the facility's hazardous waste reduction plan.

UTC is stated to have communicated with TDEC submitting documentation of the correction of all violations except 6 and 7. Those violations are alleged to be uncorrectable.

The Order assesses damages in the amount of \$3,843.75. A civil penalty of \$10,470 is assessed.

The Order provides TDEC certain appeal rights.

A copy of the Order can be downloaded [here](#).