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## Hazardous Waste Enforcement: Tennessee Department of Environment and Conservation Proposed Order/Assessment

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The Tennessee Department of Environment and Conservation ("TDEC") issued a May 19th Director's Order and Assessment ("Order") to Dry Clean Super Center ("DCSC") addressing alleged violations of the Tennessee Hazardous Waste Regulations. See Case No. HWM22-0026.

DCSC is stated to operate a commercial dry cleaning and laundry operation in Memphis, Tennessee.

The facility is stated to have been described to the TDEC Division of Solid Waste Management ("Division") Inspector as the following:

- Small Quantity Generator of hazardous waste.
- Small Quantity Handler of universal waste.

Further, it is stated to generate two hazardous waste streams from the dry cleaning operations:

- Spent perchloroethylene and filters.
- Distillation bottoms.

The facility is stated to have an Environmental Protection Agency installation identification number.

The Division is stated to have conducted an inspection on July 28, 2022. The owner is stated to have informed the inspector that the facility had changed ownership in January 2022.

The Inspector is stated to have observed two containers of hazardous waste still bottoms that were not labeled with the words "Hazardous Waste" and were not marked with an indication of the hazard of the contents. The posted emergency contact numbers listed contacts that were no longer employees at the facility. In addition, the facility is stated to have not notified the Division of the recent change in ownership or the current point of contact.

The Division issued a Notice of Violation on August 26, 2022, citing the following alleged violations:

- Failure to label or clearly mark each container with the words "Hazardous Waste".
- Failure to mark or label a container with an indication of the hazard.
- Failure to maintain current information on emergency contacts posted as information.
- Failure to notify the Division of a change in ownership of the facility.

The Order assesses damages in the amount of \$3,750.00. Further, a civil penalty of \$2,600.00 is assessed.

The Order provides certain appeal rights.

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