

STATE OF TENNESSEE

DEPARTMENT OF ENVIRONMENT AND CONSERVATION

IN THE MATTER OF:)	DIVISION OF SOLID WASTE
)	MANAGEMENT
TECHNIQUES SURFACES, USA, INC.)	
)	
TNR 00-004-2978)	CASE NO. HWM 23-0012
)	
RESPONDENT)	

DIRECTOR’S ORDER AND ASSESSMENT

NOW COMES Lisa A. Hughey, Director of the Tennessee Division of Solid Waste Management, and states:

PARTIES

I.

David Salyers, P.E., is the duly appointed Commissioner of the Tennessee Department of Environment and Conservation (Department) and is charged with the responsibility for administering and enforcing the Tennessee Hazardous Waste Management Act of 1977, Tennessee Code Annotated sections 68-212-101 through -121, and the Tennessee Used Oil Collection Act of 1993, Tennessee Code Annotated sections 68-211-1001 through -1019 (Acts). Lisa A. Hughey is the duly appointed Director of the Division of Solid Waste Management (Division). She has received written delegation from the Commissioner to administer and enforce the Acts.

II.

Techniques Surfaces, USA, Inc., (TS USA or Respondent) is a foreign limited liability corporation created in the State of Ohio and is authorized to conduct business in the State of Tennessee. Its agent for service of process is Cathy McReynolds, Techniques Surfaces, USA, Inc., 1031 Windtower Drive, Chattanooga, Tennessee 37402-2191.

JURISDICTION

III.

When the Commissioner finds that provisions of the Acts are not being carried out, the Commissioner or his representative (Commissioner) is authorized to issue an order for correction to the responsible party. Tenn. Code Ann. §§ 68-212-111 and 68-211-1012. Further, the Commissioner is authorized to assess damages and civil penalties against any person who violates any provision of the Acts or any rule, regulation, or standard adopted pursuant to the Acts. Tenn. Code Ann. §§ 68-212-114 and 68-211-1012. Rules governing hazardous waste and used oil management have been promulgated. Tenn. Code Ann. § 68-212-107; Tenn. Comp. R. & Regs. 0400-12-01-.01 -.02 (Rules).

IV.

The Respondent is a “person” under the Act. Tenn. Code Ann. § 68-212-104(14).

V.

For the purpose of enforcing the Acts or any rule or regulation authorized by the Act, or enforcing any requirement of an order issued by the Commissioner, the Commissioner is authorized to enter any place where wastes (which the Commissioner has reason to believe may be hazardous) are, may be, or may have been generated, stored, transported, treated, disposed of,

or otherwise handled. Tenn. Code Ann. §§ 68-212-107(b) and 68-211-1012. The Commissioner also has authority to inspect any samples of any waste, samples of any containers or labeling for such wastes, samples of ambient air, surface waters, and ground waters at the facility or site, as well as the authority to inspect and copy any records, reports, test results, or other information relating to the purposes of the Acts.

FACTS

VI.

The Respondent operates a custom nitride treatment process for steel parts at its facility located at 1031 Windtower Drive, Chattanooga, Tennessee 37402 (facility). The facility operates as a large quantity generator of hazardous waste, a used oil generator, and a small quantity handler of universal waste. The facility has an Environmental Protection Agency installation identification number of TNR 00-004-2978 and has notified the Division of the generation of five hazardous waste streams.

VII.

The April 12 and 13, 2023 Compliance Evaluation Inspection

On March 27, 2023, the Division received a complaint alleging that hazardous waste materials were not being properly handled at the facility resulting in those materials being released into a nearby waterway. As a result, On April 12 and 13, 2023, Division personnel conducted a Hazardous Waste Complaint Investigation and Compliance Evaluation Inspection (CEI), consisting of a facility walk-through of areas related to the generation and management of hazardous waste, used oil and universal waste, and a records review.

VIII.

Adjacent to the facility wastewater treatment equipment, the Division inspector observed a pipe carrying hazardous rinse wastewater from the nitriding process rinse tanks to a hazardous wastewater holding tank, which then fed a heated hazardous wastewater evaporator. This pipe had a small leak in it, and hazardous rinse wastewater had spilled onto the floor. Facility personnel repaired the leak and cleaned up the spill during the CEI. The Division inspector additionally observed an overflow of wash rack wastewater on the ground outside of the production area of the building. Facility personnel pumped the overflow wastewater into a tote, and the overflow wastewater was then placed into the hazardous wastewater storage tank.

IX.

In the satellite accumulation area (SAA) of the warehouse area, the Division inspector observed five 15-gallon drums of hazardous wastewater sludge. Two of these drums were not closed, and four were not labeled. These drums were closed and appropriately labeled during the CEI.

X.

During the records review, the Division inspector observed:

- Between April 2020 and April 2023, seven weekly inspections of the central accumulation area (CAA) had been conducted more than seven days from the previous weekly inspection.
- The facility had not developed a Quick Reference Guide for the Contingency Plan.
- The facility Hazardous Waste Reduction Plan had not been signed or dated.

- The facility did not have a Hazardous Waste Treatment Permit for the hazardous wastewater evaporator.

XI.

On May 11, 2023, the Division sent a Notice of Violation (NOV) to the Respondent, documenting the observations made during the April 11 and 12, 2023, CEI. The NOV cited the following Rules violations:

1. Failure to repair a leak of a tank system.
2. Failure to close two of five SAA containers and failure to label four of five SAA containers with the words "Hazardous Waste" and with an indication of the hazards of the contents.
3. Failure to conduct timely weekly inspections of the CAA.
4. Failure to develop a Quick Reference Guide for the Contingency Plan.
5. Failure to sign and date the Hazardous Waste Reduction Plan.
6. Failure to have a Hazardous Waste Treatment Permit for the hazardous wastewater evaporator.

The Respondent was advised to either comply with the requirement of having a Hazardous Waste Treatment Permit for use of the wastewater evaporator or change the process to an operation that does not require a permit, and to submit notification of compliance by June 12, 2023.

XII.

On June 2, 2023, the Division sent a letter to the Respondent offering the opportunity to schedule a Show Cause meeting to discuss the violations noted during the April 11 and 12, 2023 CEI. A Show Cause Meeting was scheduled for June 28, 2023. However, the meeting was not held due facility personnel sickness, and it was not rescheduled.

XIII.

On June 8, 2023, the Respondent sent a letter requesting a 30-day extension to address the outstanding violations cited in the May 11, 2023 NOV. In this letter, the Respondent stated that violations 1 and 2 had been corrected during the CEI, and violations 3 through 5 had been corrected since the CEI. The letter further stated that the required permit application documents were being compiled for submission to the Division. On June 9, 2023, the Division granted this 30-day extension via email.

XIV.

The July 25, 2023 Follow Up Inspection

On July 25, 2023, Division personnel conducted a follow-up inspection. Facility personnel stated that the hazardous rinse wastewater evaporator had been taken out of service on June 26, 2023, due to a malfunction. The Division inspector noted that the hazardous rinse wastewater evaporator was not on site. The hazardous rinse wastewater holding tank had been labeled with an accumulation start date of June 26, 2023, indicating that this tank was now considered to be a hazardous waste storage tank. Additionally, twelve 275-gallon totes containing hazardous rinse wastewater were observed and were all labeled appropriately and had been marked with accumulation start dates. Appropriate emergency preparedness and prevention equipment was in place. In a letter dated July 31, 2023, the Division acknowledged that all outstanding violations had been corrected.

XV.

During the course of the investigation of the Respondent's facility, the Division has incurred damages in the amount of **\$1,725.00**.

VIOLATIONS

XVI.

The Respondent failed to remove from service a leaking component of a tank system, as required by Rule 0400-12-01-.03(1)(h)1.(ii)(I), which references Rule 0400-12-01-.05(10)(g)5.(iv) and is a condition for exemption from the requirement to obtain a permit for the treatment, storage, and disposal of hazardous waste per Rule 0400-12-01-.07(1)(b). These rules state, in pertinent part:

0400-12-01-.07 PERMITTING OF HAZARDOUS WASTE TREATMENT, STORAGE, AND DISPOSAL FACILITIES.

(1) General

(b) Scope/Applicability

2. A permit is required for the treatment, storage, and disposal of any “hazardous waste” as identified or listed in Rule 0400-12-01-.02.

4. The following persons are among those who are not required to obtain a permit under the Act and this rule:
 - (i) Generators who accumulate hazardous waste on-site in compliance with all of the conditions for exemption provided in subparagraphs (1)(e), (f), (g), and (h) of Rule 0400-12-01-.03;

0400-12-01-.03 NOTIFICATION REQUIREMENTS AND STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE

(1) General

(h) Conditions for exemption for a large quantity generator that accumulates hazardous waste.

A large quantity generator may accumulate hazardous waste on site without a permit or interim status, and without complying with the requirements of Rules 0400-12-01-.05 through 0400-12-01-.07, and 0400-12-01-.09, including the

notification requirements, provided that all of the following conditions for exemption are met:

1. Accumulation. A large quantity generator accumulates hazardous waste on site for no more than 90 days, unless in compliance with the accumulation time limit extension or F006 accumulation conditions for exemption in parts 2 through 5 of this subparagraph. The following accumulation conditions also apply:
 - (ii) Accumulation of hazardous waste in tanks.
 - (I) If the waste is placed in tanks, the large quantity generator must comply with the applicable requirements of paragraph (10) of Rule 0400-12-01-.05, except part (10)(h)3 of Rule 0400-12-01-.05 (closure and post-closure care) and subparagraph (10)(k) of Rule 0400-12-01-.05 (waste analysis and trial tests), as well as the applicable requirements of paragraphs (27), (28), and (29) of Rule 0400-12-01-.05

0400-12-01-.05 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF EXISTING HAZARDOUS WASTE TREATMENT, STORAGE, AND DISPOSAL FACILITIES

(10) Tank Systems

- (g) Response to Leaks or Spills and Disposition of Leaking or Unfit-for-Use Tank Systems

A tank system or secondary containment system from which there has been a leak or spill, or which is unfit for use, must be removed from service immediately, and the owner or operator must satisfy the following requirements:

5. Provision of Secondary Containment, Repair, or Closure
 - (iv) If the source of the release was a leak to the environment from a component of a tank system without secondary containment, the owner/operator must provide the component of the system from which the leak occurred with secondary containment that satisfies the requirements of subparagraph (d) of this paragraph before it can be returned to service, unless the source of the leak is an aboveground portion of a tank system. If the source is an aboveground component that can be inspected visually, the component must be repaired and may be returned to service without secondary containment as long as the requirements of part 6 of this

subparagraph are satisfied. If a component is replaced to comply with the requirements of this subparagraph, that component must satisfy the requirements for new tank systems or components in subparagraphs (c) and (d) of this paragraph. Additionally, if a leak has occurred in any portion of a tank system component that is not readily accessible for visual inspection (e.g., the bottom of an inground or onground tank), the entire component must be provided with secondary containment in accordance with subparagraph (d) of this paragraph prior to being returned to use.

XVII.

The Respondent failed to close two containers in the warehouse hazardous waste SAA, as required by Rule 0400-12-01-.03(1)(f)1.(iv)(I), which is a condition for exemption from the requirement to obtain a permit for the treatment, storage, and disposal of hazardous waste per Rule 0400-12-01-.07(1)(b). These rules state in pertinent part:

0400-12-01-.07 PERMITTING OF HAZARDOUS WASTE TREATMENT, STORAGE, AND DISPOSAL FACILITIES.

(1) General

(b) Scope/Applicability

2. A permit is required for the treatment, storage, and disposal of any “hazardous waste” as identified or listed in Rule 0400-12-01-.02:
4. The following persons are among those who are not required to obtain a permit under the Act and this rule:
 - (i) Generators who accumulate hazardous waste on-site in compliance with all of the conditions for exemption provided in subparagraphs (1)(e), (f), (g), and (h) of Rule 0400-12-01-.03;

0400-12-01-.03 NOTIFICATION REQUIREMENTS AND STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE

(1) General

- (f) Satellite accumulation area regulations for small and large quantity generators.
 - 1. A generator may accumulate as much as 55 gallons of non-acute hazardous waste . . . in containers at or near any point of generation where wastes initially accumulate which is under the control of the operator of the process generating the waste, without a permit or interim status and without complying with the requirements of Rules 0400-12-01-.05 through 0400-12-01-.07 and 0400-12-01-.09, provided that all of the conditions for exemption in this subparagraph are met. A generator may comply with the conditions for exemption in this subparagraph instead of complying with the conditions for exemption in part (g)2 or (h)1 of this paragraph, except as required in subparts (vii) and (viii) of this part. The conditions for exemption for satellite accumulation are:
 - (iv) A container holding hazardous waste must be closed at all times during accumulation, except:
 - (I) When adding, removing, or consolidating waste;

XVIII.

The Respondent failed to label four containers in the warehouse hazardous waste SAA, as required by Rule 0400-12-01-.03(1)(f)1.(v)(I) & (II), which is a condition for exemption from the requirement to obtain a permit for the treatment, storage, and disposal of hazardous waste per Rule 0400-12-01-.07(1)(b). These rules state in pertinent part:

0400-12-01-.07 PERMITTING OF HAZARDOUS WASTE TREATMENT, STORAGE, AND DISPOSAL FACILITIES.

- (1) General
 - (b) Scope/Applicability
 - 2. A permit is required for the treatment, storage, and disposal of any “hazardous waste” as identified or listed in Rule 0400-12-01-.02:
 - 4. The following persons are among those who are not required to obtain a permit under the Act and this rule:

- (i) Generators who accumulate hazardous waste on-site in compliance with all of the conditions for exemption provided in subparagraphs (1)(e), (f), (g), and (h) of Rule 0400-12-01-.03;

0400-12-01-.03 NOTIFICATION REQUIREMENTS AND STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE

(1) General

(f) Satellite accumulation area regulations for small and large quantity generators.

- 1. A generator may accumulate as much as 55 gallons of non-acute hazardous waste . . . in containers at or near any point of generation where wastes initially accumulate which is under the control of the operator of the process generating the waste, without a permit or interim status and without complying with the requirements of Rules 0400-12-01-.05 through 0400-12-01-.07 and 0400-12-01-.09, provided that all of the conditions for exemption in this subparagraph are met. A generator may comply with the conditions for exemption in this subparagraph instead of complying with the conditions for exemption in part (g)2 or (h)1 of this paragraph, except as required in subparts (vii) and (viii) of this part. The conditions for exemption for satellite accumulation are:

(v) A generator must mark or label its container with the following:

- (I) The words "Hazardous Waste" and
- (II) An indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

XIX.

The Respondent failed to timely complete weekly inspections of the CAA, as required by Rule 0400-12-01-.03(1)(h)1.(i)(V)I, which is a condition for exemption from the requirement to

obtain a permit for the treatment, storage, and disposal of hazardous waste per Rule 0400-12-01-.07(1)(b). These rules state in pertinent part:

0400-12-01-.07 PERMITTING OF HAZARDOUS WASTE TREATMENT, STORAGE, AND DISPOSAL FACILITIES.

(1) General

(b) Scope/Applicability

2. A permit is required for the treatment, storage, and disposal of any “hazardous waste” as identified or listed in Rule 0400-12-01-.02:
4. The following persons are among those who are not required to obtain a permit under the Act and this rule:
 - (i) Generators who accumulate hazardous waste on-site in compliance with all of the conditions for exemption provided in subparagraphs (1)(e), (f), (g), and (h) of Rule 0400-12-01-.03;

0400-12-01-.03 NOTIFICATION REQUIREMENTS AND STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE

(1) General

(h) Conditions for exemption for a large quantity generator that accumulates hazardous waste.

A large quantity generator may accumulate hazardous waste on site without a permit or interim status, and without complying with the requirements of Rules 0400-12-01-.05 through 0400-12-01-.07, and 0400-12-01-.09, including the notification requirements, provided that all of the following conditions for exemption are met:

1. Accumulation. A large quantity generator accumulates hazardous waste on site for no more than 90 days, unless in compliance with the accumulation time limit extension or F006 accumulation conditions for exemption in parts 2 through 5 of this subparagraph. The following accumulation conditions also apply:
 - (i) Accumulation of hazardous waste in containers. If the hazardous waste is placed in containers, the large quantity generator must comply with the following:

(V) Inspections.

- I. At least weekly, the large quantity generator must inspect central accumulation areas. The large quantity generator must look for leaking containers and for deterioration of containers caused by corrosion or other factors. See item (II) of this subpart for remedial action required if deterioration or leaks are detected.

XX.

The Respondent failed to develop and submit a complete and accurate contingency plan, as required by Rule 0400-12-01-.03(12)(j)2., which states in pertinent part:

0400-12-01-.03 NOTIFICATION REQUIREMENTS AND STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE

(12) Preparedness, Prevention, and Emergency Procedures for Large Quantity Generators

(j) Copies of contingency plan.

A copy of the contingency plan and all revisions to the plan must be maintained at the large quantity generator, and:

2. A large quantity generator that first becomes subject to these provisions after the effective date of these rules, or a large quantity generator that is otherwise amending its contingency plan, must at that time submit a quick reference guide of the contingency plan to the local emergency responders identified in part 1 of this subparagraph or, as appropriate, the Local Emergency Planning Committee. The quick reference guide must include the following elements:
 - (i) The types/names of hazardous wastes in layman's terms and the associated hazard associated with each hazardous waste present at any one time (e.g., toxic paint wastes, spent ignitable solvent, corrosive acid);
 - (ii) The estimated maximum amount of each hazardous waste that may be present at any one time;
 - (iii) The identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff;

- (iv) A map of the facility showing where hazardous wastes are generated, accumulated, and treated, and routes for accessing these wastes;
- (v) A street map of the facility in relation to surrounding businesses, schools, and residential areas to understand how best to get to the facility and also evacuate citizens and workers;
- (vi) The locations of water supply (e.g., fire hydrant and its flow rate);
- (vii) The identification of on-site notification systems (e.g., a fire alarm that rings off site, smoke alarms); and
- (viii) The name of the emergency coordinator(s) and 7/24-hour emergency telephone number(s) or, in the case of a facility where an emergency coordinator is continuously on duty, the emergency telephone number for the emergency coordinator.

XXI.

The Respondent did not have Hazardous Waste Treatment Permit for the operation of the hazardous rinse wastewater evaporator, as required by Rule 0400-12-01-.07(1)(b)2., which states in pertinent part:

0400-12-01-.07 PERMITTING OF HAZARDOUS WASTE TREATMENT, STORAGE, AND DISPOSAL FACILITIES.

(1) General

(b) Scope/Applicability

2. A permit is required for the treatment, storage, and disposal of any “hazardous waste” as identified or listed in Rule 0400-12-01-.02. The terms “treatment”, “storage”, “disposal” and “hazardous waste” are defined in Rule 0400-12-01-.01(2)(a). Owners and operators of hazardous waste management units must have permits during the active life (including the closure period) of the unit. Owners and operators of surface impoundments, landfills, land treatment units, and waste pile units that received wastes after July 26, 1982, or that certified closure (according to Rule 0400-12-01-.05(7)(f)) after January 26, 1983, must have post-closure permits, unless

they demonstrate closure by removal or decontamination as provided under parts 7 and 8 of this subparagraph, or obtain an enforceable document in lieu of a post-closure permit, as provided under part 9 of this subparagraph. If a post-closure permit is required, the permit must address applicable Rule 0400-12-01-.06 Groundwater Monitoring, Unsaturated Zone Monitoring, Corrective Action, and Post-closure Care Requirements. The denial of a permit for the active life of a hazardous waste management facility or unit does not affect the requirement to obtain a post-closure permit under this paragraph.

XXII.

By violating the above rules, the Respondent has violated Tennessee Code Annotated section § 68-212-105(4).

Tenn. Code Ann. § 68-212-105(4) provides:

It is unlawful to:

- (4) Store, containerize, label, transport, treat or dispose of hazardous waste, or fail to provide information in violation of the rules, regulations, or orders of the Commissioner or Board, or in such a manner as to create a public nuisance or a hazard to the public health.

ORDER AND ASSESSMENT

XXIII.

Under the authority vested by sections 68-212-111 and 68-212-114 of the Acts, I, Lisa A. Hughey, issue the following Order and Assessment to the Respondent:

1. The Respondent is assessed DAMAGES in the amount of **\$1,725.00** to be paid to the State on or before the 31st day after receipt of this Order and Assessment.

2. The Respondent is assessed a CIVIL PENALTY in the amount of **\$9,400.00** to be paid to the State on or before the 31st day after receipt of this Order and Assessment.
3. Payment of the DAMAGES AND CIVIL PENALTY totaling **\$11,125.00** should reference Case No. HWM 23-0012, be made payable to “Treasurer, State of Tennessee,” and sent to the Division of Fiscal Services – Consolidated Fee Section, William R. Snodgrass Tennessee Tower, 312 Rosa L. Parks Avenue, 10th Floor, Nashville, Tennessee 37243.

RESERVATION OF RIGHTS

In issuing this Order and Assessment, the Director does not implicitly or expressly waive any provision of the Acts or regulations promulgated thereunder or the authority to assess costs, civil penalties, and damages incurred by the State against the Respondent(s). The Department expressly reserves all rights it has at law and in equity to order further corrective action, assess civil penalties and damages, and to pursue further enforcement action including, but not limited to, monetary and injunctive relief. Compliance with this Order will be considered as a mitigating factor in determining the need for future enforcement action(s).

NOTICE OF RIGHTS

The Respondent may appeal this Order and Assessment. Tenn. Code Ann. §§ 68-212-113 and 114. To do so, a written petition setting forth the reasons for requesting a hearing must be received by the Commissioner within 30 days of the date the Respondent received this Order and Assessment, or this Order and Assessment will become final.

If an appeal is filed, an initial hearing of this matter will be conducted by an Administrative Law Judge (ALJ) as a contested case hearing pursuant to the provisions of Tenn. Code Ann. § 68-212-113; Tenn. Code Ann. § 4-5-301 to -326 (the Uniform Administrative Procedures Act); and

Tenn. Comp. R. & Regs. 1360-04-01 (the Department of State's Uniform Rules of Procedure for Hearing Contested Cases Before State Administrative Agencies). Such hearings are legal proceedings in the nature of a trial. Individual Respondents may represent themselves or be represented by an attorney licensed to practice law in Tennessee. Artificial Respondents (corporations, limited partnerships, limited liability companies, etc.) cannot engage in the practice of law and therefore may only pursue an appeal through an attorney licensed to practice law in Tennessee. Low-income individuals may be eligible for representation at reduced or no cost through a local bar association or legal aid organization.

At the conclusion of any initial hearing, the ALJ has the authority to affirm, modify, or deny the Order and Assessment. Furthermore, the ALJ on behalf of the Board has the authority to assess additional damages incurred by the Department including, but not limited to, all docketing expenses associated with the setting of the matter for a hearing and the hourly fees incurred due to the presence of the ALJ and a court reporter.

Any petition for review must be directed to the Commissioner of the Department of Environment and Conservation, c/o Jenny L. Howard, General Counsel, Department of Environment and Conservation, William R. Snodgrass Tennessee Tower, 312 Rosa L. Parks Avenue, 2nd Floor, Nashville, Tennessee 37243. The petition may be mailed or delivered to this address, or it may be sent to TDEC.Appeals@tn.gov. Payments of the civil penalty and damages shall be made payable to the "Treasurer, State of Tennessee" and sent to the Division of Fiscal Services - Consolidated Fees Section, Tennessee Department of Environment and Conservation, Snodgrass Tennessee Tower, 312 Rosa Parks Avenue, 10th Floor, Nashville, Tennessee 37243. Technical questions and other correspondence involving compliance issues should be sent to Christopher Lagan, State of Tennessee, Division of Solid and Hazardous Waste Management,

William R. Snodgrass Tennessee Tower, 312 Rosa L. Parks Avenue, 14th Floor, Nashville, TN 37243. Attorneys should contact the undersigned counsel of record. **The case number, HWM 23-0012, should be written on all correspondence regarding this matter.**

Issued by the Director of the Division of Solid Waste Management, Tennessee Department of Environment and Conservation, on this _____ day of _____, 2023.



Lisa A. Hughey, CHMM
Director, Division of Solid Waste Management
TN Department of Environment and Conservation

Reviewed by:



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