

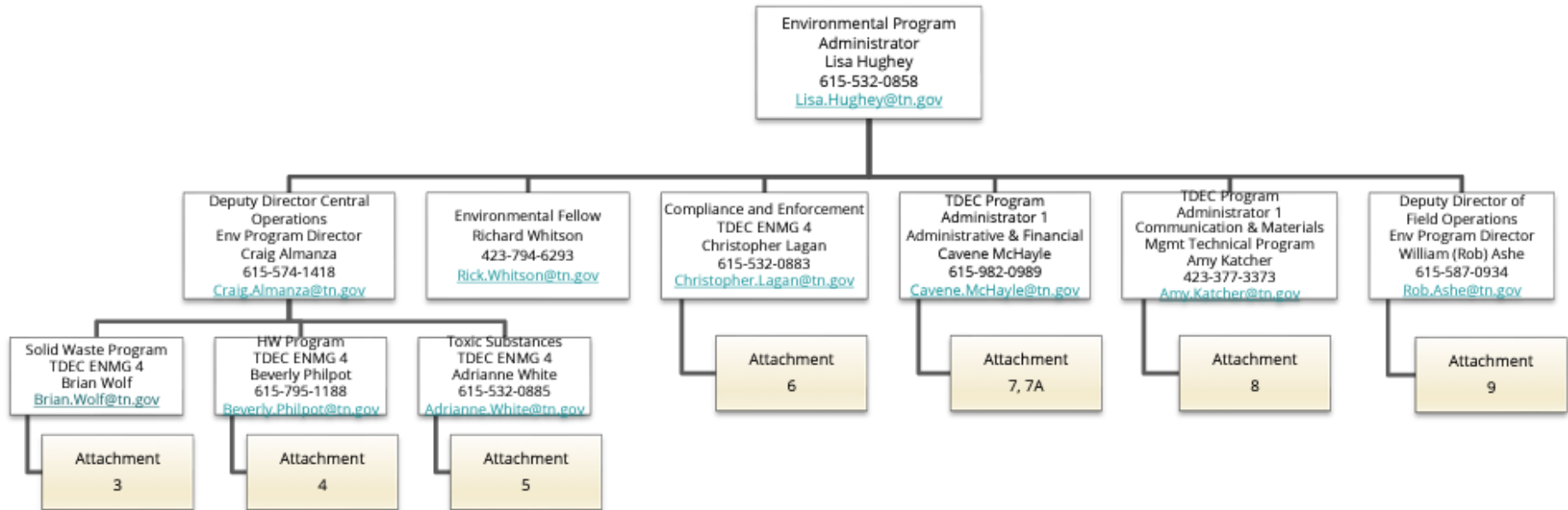


Department of  
**Environment &  
Conservation**

## **TDEC- Division of Solid Waste Management 2023 Division Update**

A&WMA 2023 Southern Section Conference

# Division Organizational Chart



# Central Office Staffing Changes

- Haz Waste Program
  - Al Frakes retired at the end of March. Brett Harris is the Permitting Manager
  - Jennifer McClellan moved into the Combustion Permitting position vacated by Jackie Okoreeh-Baah when she retired
  - Lucas McKinney joined the Corrective Action staff as a geologist in May.
- Solid Waste program
  - Brian Wolf is SW Program Manager
  - Jeremy Hooper was promoted to an EC3 in the SW program
  - Jerry Branham retired and Bart Marston is the new SUIT program manager.
- Materials Management Program
  - Ginna McWhirter hired as new Used Oil Coordinator in February
    - responsible for:
      - Used Oil program, batteries, oil, paint, antifreeze, and electronics recycling education and outreach
  - Lost Bob Fletcher on May 31<sup>st</sup>, 2023

# Field Offices

Have a question about Tennessee's Environment?  
Call 1-888-891-TDEC (8332)  
[ask.tdec@tn.gov](mailto:ask.tdec@tn.gov)

## Nashville

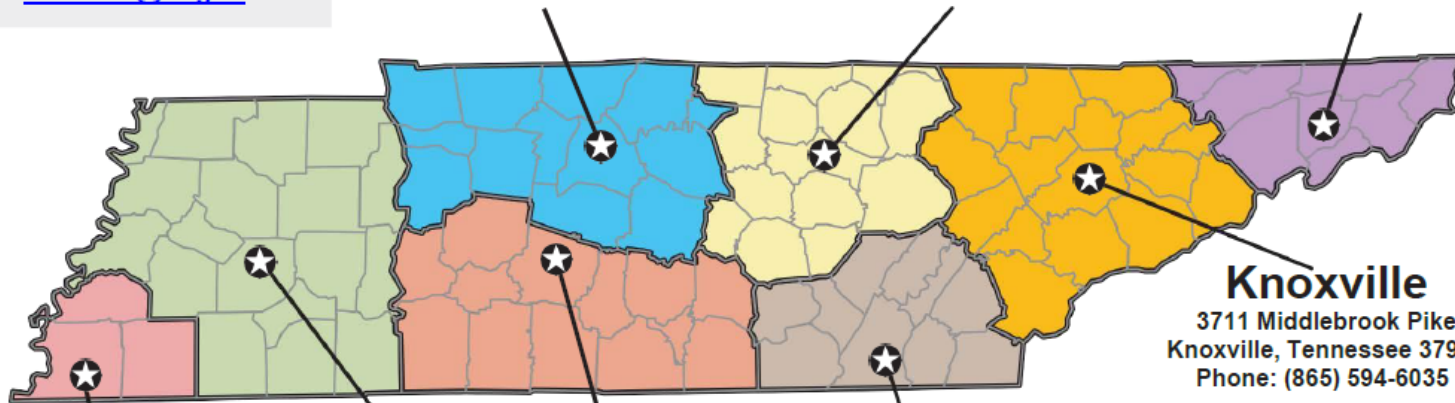
711 R.S. Gass Boulevard  
Nashville, Tennessee 37243  
Phone: (615) 687-7000

## Cookeville

1221 South Willow Avenue  
Cookeville, Tennessee 38506  
Phone: (931)520-6688

## Johnson City

2305 Silverdale Road  
Johnson City, Tennessee 37601  
Phone: (423)854-5400



## Jackson

1625 Hollywood Drive  
Jackson, Tennessee 38305  
Phone: (731) 512-1300

## Chattanooga

1301 Riverfront Parkway, Suite #206  
Chattanooga, Tennessee 37402  
Phone: (423) 634-5745

## Knoxville

3711 Middlebrook Pike  
Knoxville, Tennessee 37921  
Phone: (865) 594-6035

## Memphis

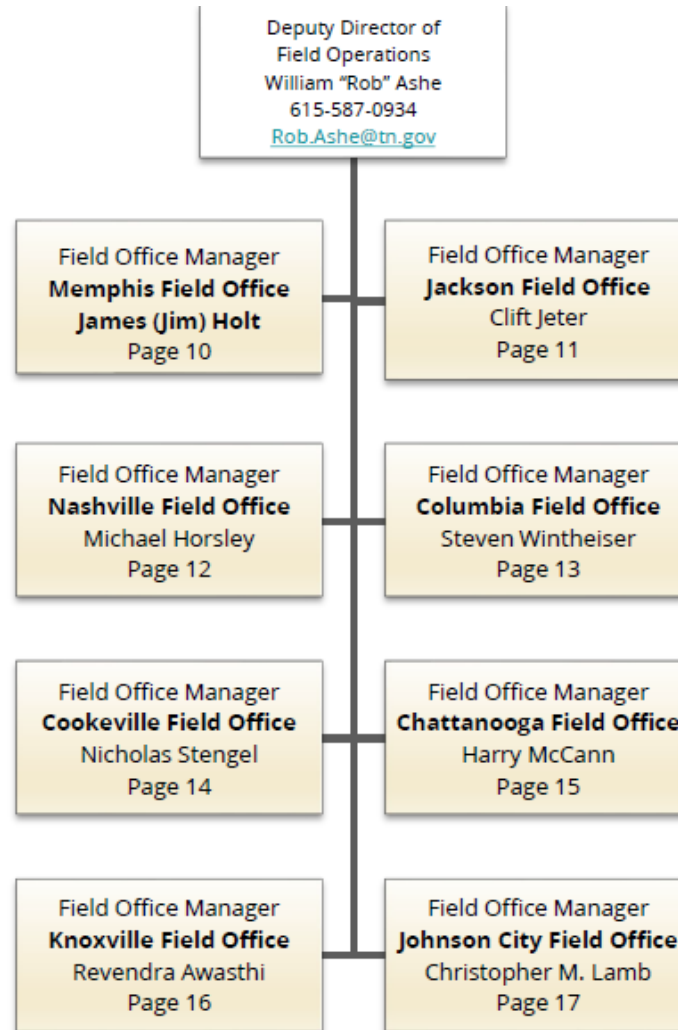
8383 Wolf Lake Drive  
Bartlett, Tennessee 38133  
Phone: (901) 371-3000

## Columbia

1421 Hampshire Pike  
Columbia, Tennessee 38401  
Phone: (931) 380-3371



# Field Office Managers



# Field Office Vacancies

- Statewide – Senior Geologist
- Columbia – Engineer

# Tennessee at a Glance

## TENNESSEE AT A GLANCE

Calendar Year January 1, 2019 through December 31, 2019

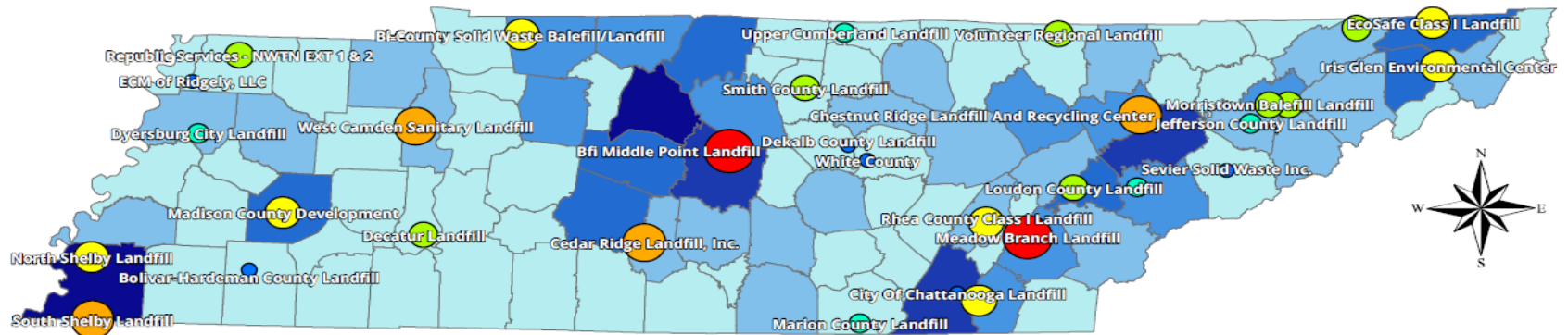
Disposal and Generation	
Class I Landfill Municipal Solid Waste Disposal	7,710,071.23 tons
Class III/IV Landfill Construction and Demolition Diversion *	1,811,078.00 tons
Total Generation Including Class I Disposal, Class III/IV and other Diversion, and Recycling both Public and Private (as reported)	19,336,424.00 tons

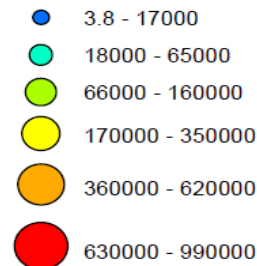
Total Post-Consumer Recycling by Public Programs Totals Exclude All Private Commercial and Industrial Recycling	
Plastic	7,350.80 tons
Paper	116,219.50 tons
Metal	57,052.60 tons
Glass	12,504.90 tons

# Class I Disposal (Private and Public)

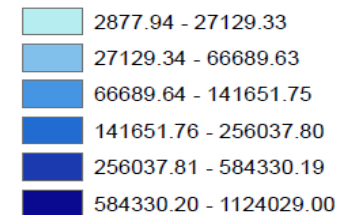
## 2019 Active Class I Landfill and County Tonnages in Tennessee



### 2019 Landfilled Tonnages



### MSW Generated by County





# Policy and Guidance

## Guidance and Policy effective from December 2022 through August 18, 2023:

### Guidance

1. Updated Special Waste Guidance - 12/12/2022.
2. New Guidance for Clarification of the Definition of Recovered Materials -7/31/2023.
3. Updated Disposal of Petroleum Contaminated Soil and Debris in Class I Landfills - 8/14/23

### Policies

1. New Standard Operating Procedure (SOP) – Processing Closure Certifications/Documents Policy - 12/9/2022
2. New Standard Operating Procedure (SOP) – Processing Post-closure Certifications- 4/14/2023.
3. Updated - Standard Operating Procedure (SOP) –Inspection Frequency of Solid Waste Facilities - 7/1/2023.
4. New Standard Operating Procedure (SOP) for Special Waste Evaluations – 8/8/2023.

## Policy issues at the federal level most impacting TDEC's regulatory programs?

- PFAS and PFOA
- OB/OD Guidance from EPA (open burning & open detonation)
- Environmental Justice

# Policy and Guidance

All draft and finalized TDEC Policies and Guidance since August 8, 2017, may be found at:

<https://www.tn.gov/environment/about-tdec/policy-and-guidance-documents0.html>

All finalized Solid Waste Policies and Guidance may be found at:

[Solid Waste Management Program Policy & Guidance Manual \(tn.gov\)](#)

All finalized Hazardous Waste Policies and Guidance may be found at:

[Hazardous Waste Policies and Guidance \(tn.gov\)](#)

# Hot Topics

## PFAS:

- Per- and polyfluoroalkyl (PFAS) substances are a large and diverse family of over 5,000 manmade chemicals used in a wide variety of manufactured goods
- Increasing attention has been focused on PFAS.
- They don't break down in the environment and that is how they find their way to landfills and WWTPs

# Hot Topics

EPA announced steps to better align the agency's work with the latest available science on PFOA and PFOS contamination to groundwater, rescinding its 2019 memorandum *"Interim Recommendations to Address Groundwater Contaminated with Perfluorooctanoic Acid and Perfluorooctanesulfonate."* The science on PFOA and PFOS is rapidly changing.

EPA determined the interim recommendations no longer reflect the best available science and rescinding the memo will lead to stronger public health protections. More contaminated groundwater will now be investigated and potentially cleaned up and site managers will resume using well-established processes for making site-specific clean up decisions. This is because site managers should now investigate groundwater contaminated with PFOA and PFOS at levels below the interim recommendations and use preliminary cleanup goals that incorporate the latest science.

# Hot Topics

In recognition of this and the increasing attention to PFAS at the federal level (EPA 2021), the Tennessee Department of Environment and Conservation (TDEC) initiated a Landfill/WWTP PFAS Work Group to bring public and private stakeholders together to discuss PFAS in landfills and WWTPs.

- The Working Group's membership includes:
  - Wastewater consultants
  - Managers from private waste management companies
  - Municipal solid waste managers
  - Municipal water resource managers
  - Division of Water Resources
  - Division of Solid Waste Management
  - Office of Policy and Sustainable Practices
  - Office of General Counsel
  - Office of the Commissioner

# Hot Topics

- The Working Group began their efforts in December 2020
  - Based on the working group's discussions and literature reviews, and that EPA acknowledged the need for additional studies and data on the relationship between PFAS, landfills, and WWTPs
  - TDEC has determined that the appropriate path forward for Tennessee is to collect additional data and evaluate future EPA announcements and scientific studies

This approach will better inform TDEC on what, if any, actions are needed to address PFAS in relation to landfills and WWTPs in Tennessee

# Hot Topics

## Financial Assurance

- Continuing to review Financial Assurance for all Class 1 landfills and we are hiring a dedicated person to oversee SW/HW FA.
  - The Division held informal stakeholder sessions last fall and the current package is in the governor’s office for review
  - After approval, formal stakeholder sessions will be conducted
  - It’s anticipated that will occur by the end of October of this year
  - Items in the current package include:
    - 1) clarifying major vs. minor modifications
    - 2) roofs on transfer stations
    - 3) clarifying requirements of Annual and Triennial Engineering Reports (e.g., removing notarization requirements)
    - 4) Clarification of “appurtenance” definition, due process for minor mods, and fee schedule
    - 5) Secondary Containment requirements for leachate storage.

# Hot Topics

## Rule Making

- The Hazardous Waste Rules up to date with the federal rules on September 6<sup>th</sup> when the housekeeping changes and the Import/Export rule became effective
  - The authorization request to EPA for these last updates will be submitted by the end of September
- Federal Hazardous Waste rulemaking
  - Technical Corrections are being made to the Generator Improvements Rule, Pharmaceuticals Rule, and the Definition of Solid Waste Rule and will be effective on December 7, 2023
    - unless EPA receives adverse comments by October 10, 2023
  - Examples of the types of corrections being made are, correcting typos, correcting incorrect or outdated citations, making minor clarifications, and updating addresses.
- Federal Advance notice of Proposed Rulemaking
  - Used Drum Management and Reconditioning
  - EPA is soliciting information and requesting comments to assist in the potential development of non-regulatory and regulatory options that would ensure the proper management of used industrial containers that held hazardous chemicals or hazardous waste, up to and including the drum reconditioning process.
- Contaminants of Emerging Concern – 29 PFAS constituents, lithium, metallic dust. Growing concerns over lithium fires. Destruction and disposal of PFAS being reviewed – Incineration could be impacted.



# Hot Topics

## Rule Making

- E-manifest final rule expected in FY24 from EPA.
- Permitting Updates rule expected from EPA in 2024 or later
  - This action would consider making regulatory amendments, updates and clarifications to codify established policies, reflect current information, make technical corrections and address inadvertent errors, update current MCLs for groundwater protection standards, possible changes to the organic air emissions standards for AA, BB, and CC, and financial assurance.
- Environmental Justice and EJ Screen tool
  - State working with EPA to provide feedback on the EJ Screen tool and the designations for permitted facilities and large quantity generators
  - The two designations are being combined in some of the reports without distinctions being made to the different type of facility which gives a false impression on the number of permitted facilities within a certain radius
  - As a result of the concerns about EJ Screen's TSDf data displaying large quantity generators, EPA will be updating the online documentation to clarify that the TSDf layer in EJScreen includes LQGs, as this information is relevant for many users.

# Hot Topics

## Material Management Grants

- We had a Second Round of Used Oil and Convenience Center Grants
  - \$600,000 total for Used Oil
  - \$600,000 total for Convenience Center Grants
  - All applicants received at least partial funding.
    - Six (6) Used Oil grants, and
    - Fifteen (15) Convenience Center grants awarded to counties, municipalities or non-profits who applied.
- Special Project Technical Assistance Grants Contracts signed on July 1:
- \$250,000 Waste Characterization Study grants to Interlocal Solid Waste Authority and Shelby County
- \$25,000 Solid Waste Master Planning grants to Crockett County, Dyer County, Gibson County and the Greater Nashville Regional Council.
  - Second Round of Recycling Equipment/Recycling Rebate and HHW grant applications open now
  - \$150,000 for HHW
  - \$500,000 for RE/RR

# Hot Topics

## Household Hazardous Waste

- The Materials Management Program team wrapped up the spring 2023 HHW mobile event season in late May by completing 27 events across the state.
  - Served 2,279 households across the state.
  - They collected:
    - 13,198 pounds of flammable liquids
    - 15,187 pounds of non-flammable liquids
    - 23,318 pounds of poisons
    - 5,134 pounds of aerosols
    - 1,673 pounds of fluorescent lamps
    - 6,058 pounds of corrosive materials
    - 670 pounds of oxidizers
    - 53 pounds of mercury
    - 492 pounds of sharps

total weight of 70,213 pounds that was kept out of our rivers, streams and reservoirs.

# Hot Topics

## Household Hazardous Waste

The fall HHW season kicked off August 26, 2023 in Henry County.

— Future events:

- Maury and Sullivan on Saturday September 30.
- Anderson, Cheatham, Wilson on Saturday October 7.
- Cumberland and Jefferson Saturday October 14.
- Carter and Sumner on Saturday October 21.
- Madison County on Saturday October 28.
- And the fall season wraps up in Rutherford County on Saturday November 4.

For the exact locations and times (they are all somewhere between 8 a.m. and 2 p.m.) please visit [tn.gov/environment](https://tn.gov/environment). Click the program areas, go to solid waste, click on Materials Management, then Household Hazardous Waste, then click on the hyperlink that says, “collection schedule” under the HHW Collection Events header about 1/3 of the way down the page.

**The End!**

**Thank You!**

**Rob Ashe**

**615-587-0934**

**Rob.ashe@tn.gov**