



Department of
**Environment &
Conservation**

Division of Solid Waste Management Program Updates Special Waste Workshop

Tennessee Chamber of Commerce and Industry
36th Annual Environment & Energy Conference

What is Going On at the Division of Solid Waste Management ?

That's of Interest to the TN Chamber

- **Division Initiatives**
 - Policy / Guidance Update (TDEC-wide and Division)
 - Paper Initiative
 - Paper Elimination
 - Inspections using Tablets
- **Rule Making Efforts**
 - Hazardous Waste
 - Solid Waste
 - CCR
- **Focus on Up-Front Compliance**
 - Metrics
 - Training to Improve Metrics



TDEC Policy / Guidance Initiative

- Initiated at the Request of TCCI
- Formed Working Group to Address
- Summary
 - Policy – Applies to TDEC (Internal Focus)
 - Guidance – Assistance To Regulated Community (External Focus)
 - Running All Proposed Guidance Documents Past Board
- Status
 - Final Bureau of Environment Policies at www.tn.gov/environment/article/boe-final-policy-documents (or search TDEC website for “policy documents”)
 - Also Have Draft Policies and Guidance



Division Initiatives - eTDEC

Paperless Initiative

- **Completed Digitizing Paper in Central Office, Working on Paper in Field Offices**
 - Expect to Take Another Year to Complete Effort
- **File Review Process**
 - Most File Reviews Use TN Cloud (or email if small enough)
 - No More Paper Reviews Possible
 - Only Paper Left in CO are D and E Sized Drawings
- **Performing Inspections with Tablets, Uploaded to Database**
 - Started with Solid Waste Program
 - Using Tablets, Phasing Out Paper Forms (Current Problem – Battery Life)
- **Now Both Solid and Hazardous Waste Using Tablets**

Hazardous Waste Rule Package

- The Hazardous Waste Rule Package Contains the Following Revisions:

- **Federal**

1. Imports and Exports of Hazardous Waste (Published on Register on 11/28/16)
2. Hazardous Waste Generator Improvement Rule (Published on Federal Register on 11/28/16); Status – Working Group with TCCI
3. Confidentiality Determinations for Hazardous Waste Export and Import Documents (Published on Federal Register on 12/26/17); Status – Haven't Started, Limited Applicability
4. Hazardous Waste Electronic Manifest System User Fee (Published on Federal Register on 1/3/18); Status – Managed at Federal Level, but Some Clean up Needed of State Rules.



- **State Initiated**

1. Revising the Requirements for Financial Assurance – In The Office of General Counsel for Initial Review
2. Corrections
3. Revising the Language for Trivalent Chromium – Addresses Concerns Specific to Language in One Permit

Solid Waste Rule Package

Status of Regulations or Rules in the Following Areas Include:

- **Significant Rule Package Approved By Board on February 7, 2018**
 - 14 Items: Corrects Typos, Eliminates Unused or Invalidated Rules, Improves Clarity, Addresses Long-Standing Issues, and Addresses Permit by Rule Issues etc.
 - Being Reviewed by OGC Prior to Being Sent to The Attorney General's Office
- **Lead Based Paint Certification Rules – Going to Three-Year Cycle (in OGC for Review)**
- **Asbestos Certification Rule – In OGC for Review**
- **Coal Combustion Residuals Rules (Would be Solid Waste)**
 - Federal Rules Final
 - Federal WIIN Act Encourages State Permit Program
 - TDEC Evaluating Pros/Cons of Developing Rules
 - EPA has Draft Guidance for State Performance Program



Division Initiatives

Division Engaged in a Number of Training Initiatives

- **Solid Waste – Statewide Uniform Inspector Training (SUIT)**
 - Led by Jerry Branham in Nashville
 - Standardizing Inspection Process Across State
 - Includes Classroom Training and Field Co-Inspections
 - Have Developed Training for Stakeholders, too!
- **Hazardous Waste – Program Developed and Being Deployed**
 - Led by Janet Dutto in Chattanooga
 - Held Internal Training over Last Year
 - First External Training Session Last Month
- **Media Sampling Training**
 - Led By Pat Mulligan in Knoxville
 - Focus on Ground Water, Surface Water, and Soil
- **COA Training later This Year**

Division Initiatives

- **Workshops**
 - **Special Waste Applications**
 - Late November in Columbia
 - “Save The Date” Coming Out Later This Week
 - Leader Not yet Determined (Rick Whitson? Janet Dutto?)
 - Will Need Tentative Headcount to Verify Venue Size
- **Working Groups**
 - **Generator Improvement Rule**
 - First Meeting on November 7th at TN Tower
 - Headed by Lisa Hughey
 - Please see Charles if You Wish to Participate
 - **Urban Soil**
 - Looking to Have First Meeting in November
 - Leader Not Yet Determined (me? Rick Whitson? Evan Spann?)
 - Please see Charles if You Wish to Participate (Have a List of Folks)

Division Update

Questions and Discussion Items

Contact Information:

Patrick J. Flood, P.E.

Director, Division of Solid Waste Management

William R. Snodgrass TN Tower

312 Rosa L. Parks Avenue, 14th Floor

Nashville, TN 37243

(615) 532-0792

pat.flood@tn.gov

