



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION

Division of Solid Waste Management
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 14th Floor
Nashville, Tennessee 37243

August 20, 2021

Mr. Jeremy Dennison
TWRA Field Coordinator
200 Lowell Thomas Drive
Jackson, TN 38301

CERTIFIED MAIL
7019 1640 0001 2447 0242
RETURN RECEIPT REQUESTED

RE: Final Permit Decision – Proposed New Compost Facility
TWRA Composting Site, Chickasaw – CMP350000012

Dear Mr. Dennison:

The Tennessee Department of Environment and Conservation (TDEC), Division of Solid Waste Management (DSWM), is hereby issuing the enclosed permit to you for construction and operation of the referenced disposal facility. A copy of the final permit decision summary and record of no technical comments received during the public comment period are also enclosed.

I appreciate your interest in complying with State statutes and look forward to working with you again. If you have any questions, please contact Brianna Rives of this office by email at Brianna.Rives@tn.gov or call 615-532-2756.

Sincerely,

A handwritten signature in blue ink, reading "Lisa A. Hughey", is positioned above the printed name and title of the signatory.

Lisa A. Hughey, CHMM
Director

Enclosures – (3)

cc: Clifton Jeter, DSWM, Jackson Environmental Field Office
Rudy Collins, TDEC, Regional Director for External Affairs, Jackson Environmental Field Office
Loretta Buchanan, DSWM, Nashville Central Office
Kayse Smith, DSWM, Nashville Central Office
Jessi Mitchell, DSWM, Central Files, Nashville Central Office

State of Tennessee
Department of Environment and Conservation
Division of Solid Waste Management

Solid Waste Management Program
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 14th Floor
Nashville, Tennessee 37243
615-532-0780

**REGISTRATION AUTHORIZING SOLID WASTE
DISPOSAL ACTIVITIES IN
TENNESSEE**

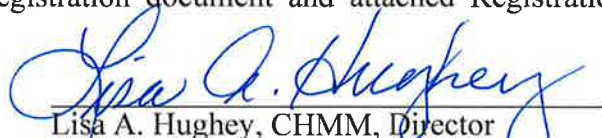
Registration Number: CMP350000012

Date Issued: August 20, 2021

Issued to: The Tennessee Wildlife Resources Agency (TWRA)

Activities Authorized: Construction, operation, and closure of a composting facility located at 3820 Big Springs Road, Medon, Tennessee for the processing into compost material of deer carcass parts resulting from deer processing and TWRA sampling efforts.

By my signature this registration is issued in compliance with the provisions of the Tennessee Solid Waste Disposal Act (Tennessee Code Annotated, Section 68-211-101, et seq.), and applicable regulations developed pursuant to this law and in effect; and in accordance with the conditions and other terms set forth in this registration document and attached Registration Conditions.



Lisa A. Hughey, CHMM, Director
Division of Solid Waste Management

PERMIT TERMS AND CONDITIONS

1. Re-certification by Permittee for Facilities Whose Initial Operation is Delayed - If the facility does not initiate construction and/or operation within one year of the date of this permit, the permittee must re-certify the application in accordance with Rule 0400-11-01-.02(3)(d).
2. Duty to Comply - The permittee must comply with all conditions of this permit, unless otherwise authorized by the Department. Any permit noncompliance, except as otherwise authorized by the Department, constitutes a violation of the Act and is grounds for enforcement action, or for permit termination, revocation and re-issuance, or modification.
3. Need to Halt or Reduce Activity Not a Defense - It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
4. Duty to Mitigate - In the event of noncompliance with the permit, the permittee shall take all reasonable steps to minimize releases to the environment, and shall carry out such measures as are reasonable to prevent adverse impacts on human health or the environment.
5. Proper Operation and Maintenance - The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the permit.
6. Permit Actions - This permit may be modified, revoked and re-issued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and re-issuance, or termination, or a notification of planned changes or anticipated noncompliance, does not stay any existing permit condition.
7. Property Rights - This permit does not convey any property rights of any sort, or any exclusive privilege.
8. Duty to Provide Information - The permittee shall furnish to the Commissioner, within a reasonable time, any relevant information which the Commissioner may request to determine whether cause exists for modifying, revoking and re-issuing, or terminating this permit, or to determine compliance with this permit. The permittee must also furnish to the Commissioner, upon request, copies required to be kept by this permit. All records, including a copy of this permit and the approved Part I and Part II application, must be maintained at the facility or other locations as approved by the Commissioner.

9. Inspection and Entry - The permittee shall allow the Commissioner, or an authorized representative, to:

- (i) Enter at any reasonable time the permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;
- (ii) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (iii) Inspect at any reasonable time any facilities, equipment (including monitoring and control equipment), practices or operations regulated or required under this permit (Note: If requested by the permittee at the time of sampling, the Commissioner shall split with the permittee any samples taken.);
- (iv) Sample or monitor at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the Act any substances or parameters at any location; and
- (v) Make photographs for the purpose of documenting items of compliance or noncompliance at waste management units, or where appropriate to protect legitimate proprietary interests, require the permittee to make such photos for the Commissioner.

10. Monitoring and Records

- (i) Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity.
- (ii) The permittee shall retain records of all required monitoring information.
- (iii) Records of monitoring information shall include:
 - (I) The date, exact place, and time of sampling or measurements;
 - (II) The individual(s) who performed the sampling or measurements;
 - (III) The date(s) analyses were performed;
 - (IV) The individual(s) who performed the analyses;
 - (V) The analytical techniques or methods used (including equipment used); and
 - (VI) The results of such analyses.

11. Reporting Requirements

- (i) The permittee shall give notice to the Commissioner as soon as possible of any planned physical alterations or additions to the permitted facility.
- (ii) Monitoring results shall be reported at the intervals specified elsewhere in this permit.
- (iii) The permittee shall report orally within 24 hours from the time the permittee becomes aware of the circumstances of any release, discharge, fire, or explosion from the permitted solid waste facility which could threaten the environment or human health outside the facility. Such report shall be made to the Tennessee Emergency Management Agency, using the 24-hour toll-free number (800) 262-3300.
- (iv) Where the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Commissioner, it shall promptly submit such facts or information.

12. Duration of Permits - This permit shall be effective for the operating life of the facility.

13. Effect of Permit - The issuance of this permit does not authorize the permittee to injure persons or property or to invade other private rights, or to violate any local law or regulations.

14. Transfer, Modification, Revocation and Re-issuance, and Termination of Permits - This permit may be transferred, modified, revoked or reissued, or terminated as set forth in 0400-11-01-.02(6).

15. Applicable Standards - All applicable facility standards of Rule Chapter 0400-11-01, Solid Waste Processing and Disposal Amendments shall be considered conditions of this registration.

16. Penalties - Any violation of the conditions or other terms of this registration may subject the registrant to the penalties set forth in Tennessee Code Annotated Section 68-211-114 and 68-211-117.

17. Hazardous Waste Restriction - No hazardous waste, as regulated by the Tennessee Hazardous Waste Management Act (TCA Section 68-212-101, et seq.), and the Rules adopted pursuant to that Act, shall be accepted at this facility.

18. Construction and Operation - The permittee shall construct and operate the facility in accordance with the approved engineering plans and operations manual which becomes a condition of this permit as Attachment I.

19. Special Waste - Except as specifically provided for in the Facility-Specific Conditions of this permit, the permittee may not accept for disposal any special waste unless approved to do so in writing by this Department.

VARIANCES AND WAIVERS

The following variances or waivers from standards or requirements in Rule Chapter 0400-11-01, Solid Waste Processing and Disposal Amendments, are hereby granted in accordance with Rule 0400-11-01-.01(5):

1. Rule 0400-11-01-.11(2)(a)2(x) and Rule 0400-11-01-.11(2)(a)1(iii) –The facility will not be required to implement a contact water containment, recycling, and/or treatment plan due to the nature of the materials being composted.
2. Rule 0400-11-01-.11(3) – The resulting compost material will not be used as a product, so samples and measurements will not be taken unless requested by TDEC or the end use of the material changes. The resulting material is to be incinerated in a TWRA owned and permitted incinerator.

Registration Number: CMP350000012
Date Issued: August 20, 2021

FACILITY-SPECIFIC PERMIT CONDITIONS

The following conditions of this permit are established pursuant to Rule 0400-11-01-.02(5)(b):

None.

New TWRA Hardeman County Compost Facility Approved

The Tennessee Department of Environment and Conservation (TDEC), Division of Solid Waste Management (DSWM), has issued a solid waste compost facility permit for a new Tennessee Wildlife Resources Agency (TWRA), Chickasaw Composting Facility. The facility, identified as CMP350000012, is located in Hardeman County at 3820 Big Springs Road, Medon, TN 38356.

This permit authorizes construction, operation, and closure of a new fully-permitted Tier II composting facility, resulting in 0.34 acres to be used for the composting of wastes classified as deer carcass parts resulting from deer processing operations and/or certain wastes having similar characteristics and approved in writing by the Department.

DSWM made the draft of this permit available for review during a 45-day public comment period which ended August 16, 2021. DSWM received no oral or written technical comments during the above-mentioned public comment period.

The final permit is posted online. Visit tn.gov/environment/notices/twrachickasaw to access the facility information in the Dataviewer. Two locations also have paper copies available for review:

Bolivar-Hardeman County Public Library
213 North Washington Street
Bolivar, TN 38008
731-658-3436

TDEC-Jackson
Environmental Field Office
1625 Hollywood Drive
Jackson, TN 38305
731-512-1300

For questions, contact the facility's official responsible for operation or DSWM's Solid Waste Permitting Manager:

Mr. Jeremy Dennison
TWRA Field Coordinator
200 Lowell Thomas Drive
Jackson, TN 38301
731-234-0107

Mr. Nickolaus Lytle
TDEC-DSWM, Tennessee Tower, 14th Floor
312 Rosa L. Parks Avenue
Nashville, TN 37243
615-532-8004
Fax: 615-532-0938
Nickolaus.Lytle@tn.gov

TDEC is an Equal Employment Opportunity/Affirmative Action (EEO/AA) employer. TDEC does not unlawfully discriminate on any basis prohibited by applicable law in any of its programs, services, or activities.

EEO/AA/ADAAA inquiries or complaints may be directed to the ADAAA Coordinator, TDEC HR Division, at 615-532-0200. Hearing-impaired callers may use the Tennessee Relay Service (800-848-0298).

If it is hard for you to read, speak, or understand English, TDEC may be able to provide translation or interpretation services free of charge. Please contact Emily Martin at 615-532-0780 for more information.

If you would like to receive notices like this directly, contact the DSWM's Central Office for a Mailing List Request Form. Email Solid.Waste@tn.gov or call 615-532-0780.



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Nashville, Tennessee 37243

RE: Response to Public Comments
 New TWRA Chickasaw Tier II Compost Facility (CMP350000012)

Rule 0400-11-01-.02(4)(e)2(i) states that public notice of the preparation of a draft permit or a notice of intent to deny an original permit shall allow at least 45 days for public comment.

The 45-day public comment period began on July 1, 2021, and ended on Monday, August 16, 2021. The Tennessee Department of Environment and Conservation (TDEC), Division of Solid Waste Management (DSWM), received no oral or written technical comments during the above-mentioned public comment period.