



Date: January 2, 2025

To: Facility Mailing List for Shelby County

From: Tradebe Treatment and Recycling of Tennessee, LLC

Subject: Notification of Class 2 Modification  
Hazardous Waste Management Permit TNHW-188

Tradebe Treatment and Recycling of Tennessee at 5485 Victory Lane, Millington, Tennessee 38053, submitted a Class 2 modification to the Division of Solid Waste Management, Hazardous Waste Management Program, Hazardous Waste Permitting Section located at the Davy Crockett Tower, 7th Floor, 500 James Robertson Parkway, Nashville, TN 37243 on December 13, 2023. In accordance with Tennessee Hazardous Waste Rule 0400-12-01-.07(9)(c)(5)(ii), the Class 2 modification specifies changes being made to the permit and requirements of submission. The modifications to Hazardous Waste Management Permit TNHW-188 for Tradebe Treatment and Recycling of Tennessee, LLC, located at 5485 Victory Lane, Millington, Tennessee 38053 in Shelby County, were approved by the Division of Solid Waste Management on November 25, 2024. The modification updates the following information:

- Increased facility's overall hazardous waste storage capacity to 889,012 gallons.
- In Section III: Specific Conditions for Storage in Containers, Unit 209 Sub Areas 1, 2, 3, 4, 5, and 6 were added with a maximum storage capacity for each Sub-Area.
- In Section V: Specific Conditions for Physical and Chemical Treatment in Containers, updated Table 1 to include Unit 209 and updated Table 2 to include the maximum throughput of treatment in Unit 209 as 120,000 gallons per day.
- In Attachment 2: Waste Analysis Plan, Unit 209 Sub Areas and Mix Tanks' Plans were added. Appendix 2-F Waste Codes by Unit was added to the end of the Waste Analysis Plan.
- In Attachment 3: Security Preparedness and Prevention, updated to include Unit 209 Sub-Areas and Mix Tanks.
- In Attachment 4 Facility Inspection Program, the inspection logs were updated to include all inspection activities related to Unit 209 Sub-Areas 1, 2, 3, 4, 5, and 6 and Unit 209 Mix Tanks.
- Updated Attachment 6: Contingency Plan section Waste Quantities and Potential Hazards Within Each Unit to Unit 209's Sub-Areas 1, 2, 3, 4, 5, and 6 as well as Unit 209 Mix Tanks.
- In Attachment 7: Closure Plan was updated to include the closure of Unit 209 as well as an updated cost estimate for closure.
- In Attachment 8: Storage and Treatment in Containers, added Unit 209 Sub-Areas 1, 2, 3, 4, 5, and 6.
- In Attachment 9: Storage and Treatment in Tanks, added Unit 209 Mix Tank 1 and 2

Further information on this matter may be obtained by contacting Ms. Tita Lagrimas at (800) 388-7242 or [Tita.Lagrimas@tradebe.com](mailto:Tita.Lagrimas@tradebe.com).

Copies of the modification requests and supporting documents may be reviewed at the TDEC, Memphis Environmental Field Office, located at 8383 Wolf Lake Drive, Bartlett, TN 38133-4119, Phone (901) 371-3000. The permittees' compliance history during the life of the permit being modified is available from Brett Harris, Hazardous Waste Permitting/Corrective Action Section Manager in DSWM's Central Office at the Davy Crockett Tower, 500 James Robertson Parkway, 7th Floor, Nashville, Tennessee 37243, by phone at (615) 393-9221, email at Brett.Harris@tn.gov or fax 615-532-0938.

**Notice Issued: January 2, 2025**