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LETTER REGARDING THE REQUIREMENTS FOR HANDLING WASTES AT NAS HOSPITAL
MILLINGTON SUPPACT TN
3/11/1987
TENNESSEE DEPARTMENT OF HEALTH AND ENVIRONMENT



TENNESSEE DEPARTMENT OF HEALTH AND ENVIRONMENT
Bureau of Environment
Room 1101, State Office Building
170 North Mid America Mall
Memphis, Tennessee 38103

March 11, 1987

J. F. Conroy, CDR, CEC, USN
Public Works Officer
Naval Air Station Memphis
Public Works, S236
Millington, TN 38054

Subject: NAS Hospital Memphis

Dear Commander Conroy:

This letter is written in regard to the requirements for handling wastes generated at NAS Hospital located in Millington, Tennessee. The following definition and Rule defines the Division of Solid Waste Management's position on the issue:

Rule 1200-1-11-.01(2) Definitions

"On-site" means the same or geographically contiguous property which may be divided by public or private right-of-way, provided the entrance and exit between the properties is at a cross-roads intersection, and access is by crossing as opposed to going along, the right-of-way. Non-contiguous properties owned by the same person but connected by a right-of-way which he controls and to which the public does not have access, is also considered on-site property.

Rule 1200-1-11-.03(2)(e)1 states: "Persons who generate hazardous wastes at more than one location in Tennessee shall file notification for each such location.

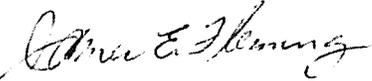
Based on the definition of "on-site" and notification requirements (Rule 1200-1-11-.03(2)(e)1) NAS Memphis has two options regarding the NAS Hospital. The options are as follows:

1. Physically connect NAS Hospital property by a cross-road intersection to NAS Memphis property. The cross-road would allow for the transportation of hazardous waste without having to travel along a public road.
2. Obtain a separate installation identification number (TND Number) for NAS Hospital. NAS Hospital would then be considered a separate facility and would have to comply with all applicable requirements of the Rules Governing Hazardous Waste Management in Tennessee.

J. F. Conroy, CDR, CEC, USN
March 12, 1987
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If you have any questions regarding this letter or if I may be of further assistance, please do not hesitate to contact me at 901/529-6695.

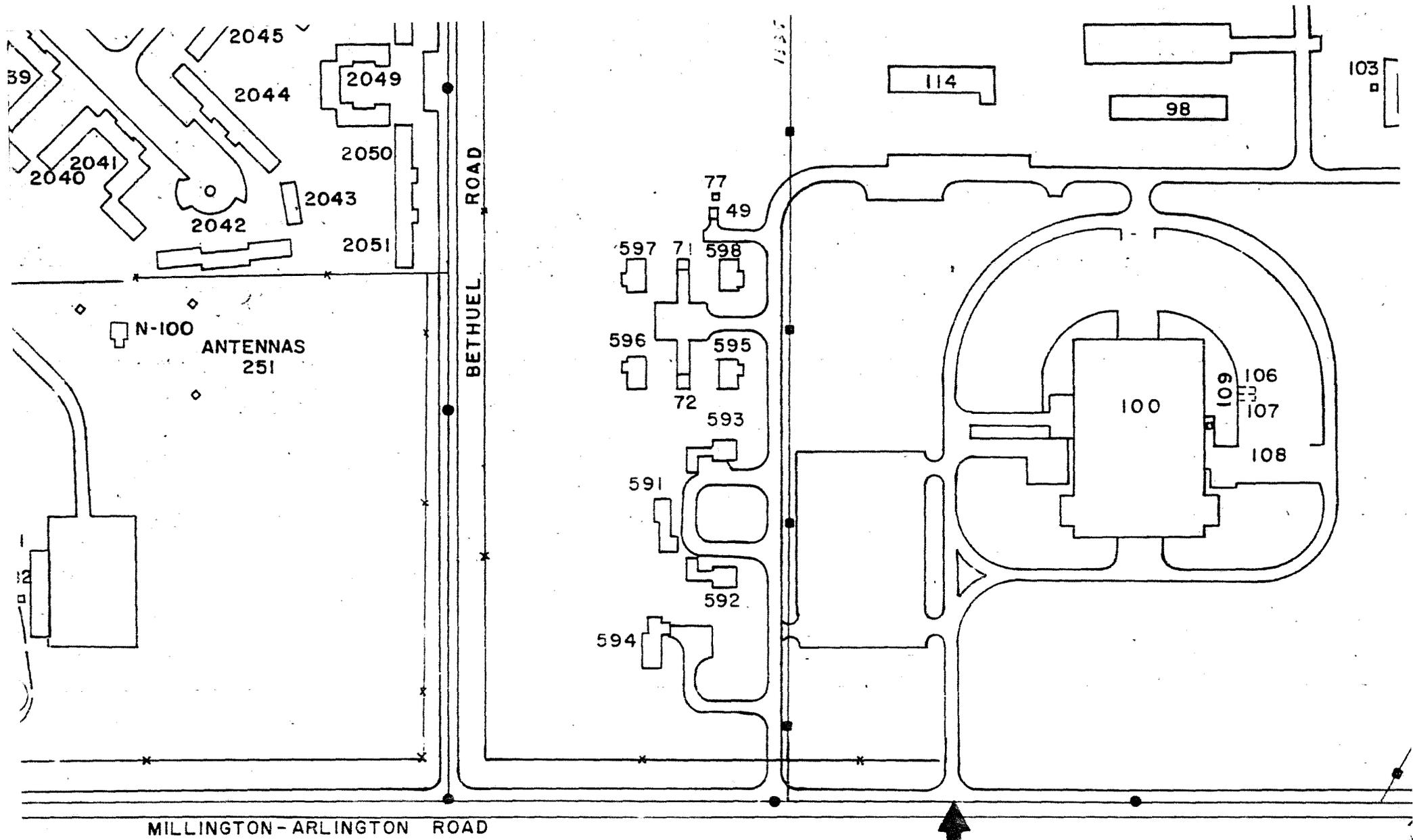
Sincerely,



James E. Fleming
Division of Solid Waste Management

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cc: DSWM Nashville
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