



ENVIRONMENTAL QUALITY ADVISORY BOARD BOARD MEETING

October 2, 2025 - 6:00 PM

AGENDA

- I. **CALL TO ORDER**
- II. **ROLL CALL**
- III. **APPROVAL OF ORDER OF AGENDA**
- IV. **APPROVAL OF MINUTES**
 - a. Approval of August 7, 2025 Minutes
[EQAB Minutes August 7 2025 - DRAFT \(002\).docx](#)
 - b. Approval of September 4, 2025 Minutes
[Meeting Minutes -9.4.2025 - DRAFT - revised.docx](#)
- V. **OFFICER REPORTS**
 - a. Presentation by Rex Redd, Director of the Oak Ridge Art Center
- VI. **COMMITTEE REPORTS**
 - a. Update on 350 Powerhouse Road Site
[TDEC- ETPP- Oak Ridge Roane County- 9.23.25 \(002\).pdf](#)
[TDEC Inspection Photos 08 27 2025.docx](#)
[TDEC Notice of Violation Letter 7-2025.pdf](#)
 - b. Update on City Recycling
 - c. Update on City Tree Preservation
- VII. **UNFINISHED BUSINESS**
- VIII. **NEW BUSINESS**
- IX. **APPEARANCE OF CITIZENS**

All citizens are given 3 minutes.
- X. **ANNOUNCEMENTS**
- XI. **ADJOURNMENT**



ENVIRONMENTAL QUALITY ADVISORY BOARD
Regular Meeting Notes
Thursday, August 7, 2025
6:00 PM

I. CALL TO ORDER

The regular meeting of the Environmental Quality Advisory Board (EQAB) convened at 6:00 pm on August 7, 2025, with Chair Robin Graham presiding.

II. ROLL CALL

Upon roll call the following members were present: Joel Hewitt, Robin Graham, Kelli Thompson, Anne Marie Mulvihill, Les Hook, Robert Kennedy, David Brady, and Jessica Butler, with Staff representative Beth Hickman.

Absent: Scott Black, Kirk Gaertner

III. APPROVAL OF ORDER OF AGENDA

Agenda was approved with no changes.

IV. APPROVAL OF MINUTES

June 5, 2025 Minutes were approved.

V. SPECIAL REPORTS

Review of Board Members Actions with Regards to Focus Topics:

- a. Promoting Greenways, Trails, and Parks – Les, Scott, Kirk, and David
 - 1. Urban Forest Subcommittee - David, Jessica, and Joel to assist

Objective: protection of Trees in the City of Oak Ridge

End goal: ordinance(s)

Next steps: find examples of successful programs in similar cities e.g. Morrisville, NC | find specifics for Tree Bank implementation, like tree circumference

Kirk to follow developments with Recreation and Parks.

- b. Providing City of Oak Ridge with a report on Carbon Emissions - Robert, with editorial assistance from Anne Marie.

Other projects:

- 1. Precipitation and Weather Events: forecast for next 50 years – Joel to assist
- 2. Heat Emissions: How Roofs and Road Surfaces affect them – already written for Tetra Tech

3. Lawns – a more enlightened approach, to be reflected in City code changes (e.g. no tickets for other options, like natural landscaping) – with assistance from David.

Les suggested referencing the UT Smart Yard program on that website.

- c. Promoting Recycling – Robin

1. Subcommittee will include David, Kelli, and Joel (Scott and Kirk participation TBD)

VI. UNFINISHED BUSINESS

No unfinished business

VII. NEW BUSINESS

EQAB projects could be facilitated by consultation with outside experts.

Use of non-EQAB volunteers would require a change in the bylaws, which must be approved by the City Council via the Consent Agenda. Beth Hickman to send language.

VIII. APPEARANCE OF CITIZENS

City Council member Ellen Smith attended. Private citizen Doug Colclasure also attended.

IX. ANNOUNCEMENTS

Next meeting: September 4, 2025 at 6:00pm

X. ADJOURNMENT

Meeting adjourned by the Chair at 8:00 PM.

Approved on October 2, 2025

Anne Marie Mulvihill, Secretary



ENVIRONMENTAL QUALITY ADVISORY BOARD

Regular Meeting Notes

Thursday, September 4, 2025

6:00 PM

I. CALL TO ORDER

The regular meeting of the Environmental Quality Advisory Board (EQAB) convened at 6:00 pm on September 4, 2025, with Chair Robin Graham presiding.

II. ROLL CALL

Upon roll call the following members were present: Robin Graham, Joel Hewitt, Kelli Thompson, Anne Marie Mulvihill, Les Hook, Robert Kennedy, David Brady, Scott Black, Neely Brown, and Brennan Gleason, with Staff representative Eric Ault.

Absent: Kirk Gaertner, Jessica Butler

III. APPROVAL OF ORDER OF AGENDA

Agenda was approved with no changes.

IV. APPROVAL OF MINUTES

There was no meeting in July due to summer holiday, August and September minutes to be approved at October meeting.

V. OFFICER REPORTS

City Clerk Beth Hickman presented information about the Citizen Academy Project, a six-week program that provides an in-depth look at local government operations. Classes are to run 9/23-11/18. She said that the attendees would have a project which they would present to City Council at the October 21st Work Session. This year's Project is on recycling and she hoped EQAB would be engaged with the attendees on their project.

VI. COMMITTEE REPORTS

Chair Robin Graham distributed a draft memo to inform City Manager of the two main areas for EQAB focus: increasing recycling and protection of mature trees in the Oak Ridge community. Board members will review and submit editorial comments.

- a. Report from Recycling Ad Hoc Working Group (R. Graham, K. Thompson, J. Hewitt) – part of this subcommittee's mission is an ongoing educational campaign to raise citizen awareness about recycling. Waste Connection company can provide template materials; other resources include the State Parks "Go Green" website. Methods of communication with

households and businesses were discussed, with electric bill flyers and copy for the City website suggested as options for consideration. (Kelli Thompson to continue working with the City Communications staff on this project.) Builders, developers, realtors, schools, and public meetings are also target audiences for messaging. Chair Robin Graham is making presentations about recycling to groups by invitation. Potential for glass recycling is being researched, as are methods for evaluation of educational campaign overall effectiveness.

- b. Report on Existing Trees – by Les Hook: this Subcommittee objective is to reduce the loss of mature trees and control invasive species. Maintaining the City's urban forests will include a review of existing ordinances, Tree Plans for similar cities Knoxville and Cooksville, research into implementation of a Tree Bank, and connecting with the Tennessee Environmental Council.
- c. Discussion of Kudzu Mitigation and Controls – Chair Robin Graham was asked by City Manager Randy Herman to have EQAB research options; she will be writing a 2–3-page paper on the subject.

VII. NEW BUSINESS

- a. Citizen's Academy – Kelli Thompson, Joel Hewitt and Robin Graham agreed to help the Oak Ridge Citizens Academy on their recycling projects.

VIII. APPEARANCE OF CITIZENS

No citizens made an appearance.

IX. ANNOUNCEMENTS

Next meeting: October 2, 2025 at 6:00pm

X. ADJOURNMENT

Meeting adjourned by the Chair at 8:00 PM.

Approved on October 2, 2025

Anne Marie Mulvihill, Secretary



September 23, 2025

Tennessee Department of Environment and Conservation
Attn: Commissioner David Salyers
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue
Nashville, TN 37243

RE: Notice of Violation, Carbon Rivers, Inc., ETPP Site, Oak Ridge, Roane County

Dear Commissioner Salyers,

We are writing to express our profound disappointment and frustration regarding the ongoing environmental violations by Carbon Rivers, Inc. at their facility in the East Tennessee Technology Park (ETTP) in Roane County. This issue was brought to our attention via a copy of the TDEC Notice of Violation letter dated July 8, 2025, which was received from a concerned neighbor, not through any official channel.

Historically, Roane County and the City of Oak Ridge have enjoyed a productive and collaborative partnership with TDEC. You and your staff have been vital participants in the recruitment of economic development projects that constitute the nuclear renaissance happening in the Oak Ridge Corridor. TDEC's role on the reservation is critical to provide assurances and pathways for new companies to navigate what can be complex conditions.

However, we are deeply concerned by the lack of effective action to bring Carbon Rivers into compliance with important environmental protections. The company's continued non-compliance creates a threat to our local environment, including the water quality of the nearby Clinch River, and to the well-being of the approximately 3,000 residents living in close proximity to this site.

Our frustration stems from two key points. First, as you know from our meetings with the Governor's Chief Operating Officer, this site is pivotal to the nuclear renaissance occurring in Oak Ridge. TDEC's credibility is on the line with the local public. If TDEC cannot ensure our community's environmental health regarding decaying windmill blades, it severely undermines the trust we must place in your department to handle the far more complex issues involving nuclear materials.

Secondly, it is unacceptable that we learned of these gross violations from a private citizen. The July 8 letter details a situation that is not new; in fact, the spillage of "shredded fibrous material" has been an uncorrected issue since at least October 16, 2024, and has been cited in "numerous previous inspections". The inspection report describes an unmanaged site where uncovered cardboard boxes, weakened by the elements, are spilling fiberglass dust near the Clinch River. TDEC's own report notes a lack of "managerial oversight" and that records provided by the company were "insufficient for compliance and inconsistent with verbal communication". To compound this, Carbon Rivers appears to have ignored your department's directives, as no response plan was provided by the June 13, 2025, deadline you set.

This pattern demonstrates that Carbon Rivers has been either grossly negligent or has intentionally disregarded TDEC's rules and authority. Therefore, we strongly recommend that TDEC hold Carbon

Rivers accountable for their violations and take decisive enforcement action to the fullest extent of your authorized capability, including the assessment of civil penalties as authorized by Tenn. Code Ann. § 68-211-117. The credibility and reputation of TDEC with the residents of Roane County, City of Oak Ridge and the Oak Ridge Corridor depend on it.

Sincerely,

A handwritten signature in blue ink, appearing to read "Wade Creswell".

Wade Creswell
Roane County Executive
Roane County Government

A handwritten signature in blue ink, appearing to read "Randall W. Hemann".

Randall W. Hemann
City Manager
City of Oak Ridge

cc: COO Brandon Gibson
Commissioner Stuart McWhorter

Carbon Rivers Inspection
All photos taken 8/27/2025 at 10:30am



Carbon Rivers Inspection
All photos taken 8/27/2025 at 10:30am



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All photos taken 8/27/2025 at 10:30am



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Carbon Rivers Inspection
All photos taken 8/27/2025 at 10:30am



Carbon Rivers Inspection
All photos taken 8/27/2025 at 10:30am

Inspector: Molly Stanford

Upon entering the facility I drove to the metal building to look for the on site manager. No one was present and no vehicles were in the facility. I drove around the facility, then I got out of my vehicle and walked the area. No processing was being done at the facility and no one present.

There are two different areas outside one to the left of the metal building and one on the right as you approach the front of the metal building. These two areas contain a large amount of large square cardboard boxes which have been weakened by the elements as they are uncovered and sitting out on the open. The boxes are unstable and falling over, leaving fibrous material spilling out. These fibers are scattered all over the area which is in close proximity to the Clinch River. This has been an issue since 10/16/2024 and has remained uncorrected. This area has not been cleaned up despite being cited as non-compliant in previous inspections.

Upon this inspection I immediately noticed instead of removing the fibrous material or cleaning it up the facility has arranged large "fence" of wind mill blades around the boxes and material in what appears to be an effort to hide the material. I walked through the "fence" of wind mill blades to see even more of the fibrous material spilled onto the ground and the boxes continuing to degrade and fall apart.

No gate in place, however the facility is waiting for the city to approve a gate before installation.

This facility has no managerial oversight or managerial control. This was mentioned in the last inspection with no change.

With no personnel present at the time of inspection inbound outbound records were requested 8/29/2025 via email.

The latest response letter dated 7/11/2025 stated "within the next 45 days we are scheduled to remove approximately half of the existing inventory from the site". This has not occurred.



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION

Division of Solid Waste Management
Knoxville Environmental Field Office
3711 Middlebrook Pike, Suite 101
Knoxville, Tennessee 37921

July 8, 2025

Mr. Bowie Benson
Carbon Rivers, Inc.
2409 Sycamore Drive
Knoxville, TN 37921

CERTIFIED MAIL
#9489 0090 0027 6711 0422 67
RETURN RECEIPT REQUESTED

RE: Compliance Evaluation Inspection
Notice of Violation
Carbon Rivers, Inc., ETTP Site
RMF730000015

Dear Mr. Benson:

On May 29, 2025, the Division of Solid Waste Management (DSWM) conducted a Compliance Evaluation Inspection at the above referenced facility. The inspection was conducted to evaluate the facility's compliance with the *Tennessee Solid Waste Disposal Act*, Tennessee Code Annotated § 68-211-101 *et seq.* and with Tennessee's Solid Waste Regulations (Division Rule Chapter 0400-11-01) promulgated pursuant to that Act. During this inspection, Carbon Rivers, LLC was found to be in violation of Rule 0400-11-01-.02(1)(b)3(xxii)(II). The details of these findings can be found in the attached inspection report.

If you have any questions or comments concerning this correspondence, please contact Jeremy Hooper by email Jeremy.Hooper@TN.gov or by phone (615)-686-7847.

Sincerely,

A handwritten signature in blue ink, reading "Molly Stanford", is positioned above the printed name and title.

Molly Stanford (Jul 8, 2025 08:36 EDT)

Molly Stanford
Environmental Scientist

A handwritten signature in blue ink, reading "Revendra Awasthi", is positioned above the printed name and title.

Revendra Awasthi (Jul 8, 2025 08:48 EDT)

Revendra Awasthi, CHMM
Environmental Field Office Manager

cc: Rob Ashe, Deputy Director of Field operations, DSWM, NCO, via email
Chris Lagan, Manager, Enforcement Section, DSWM, NCO, via email
Records.swm@tn.gov

SOLID WASTE INSPECTION REPORT

SITE/PHYSICAL LOCATION

Carbon Rivers, Inc., ETP Site
350 Powerhouse Road
Kingston, TN 37763
Site ID: RMF730000015

PRIMARY CONTACT

Bowie Benson
Chief Executive Officer
Carbon Rivers, LLC
(865)-630-9506
Bowie.benson@carbonrivers.com

DATE/TIME OF INSPECTION

Date: May 29, 2025
Time: 9:00 AM

INSPECTION PARTICIPANTS

Molly Stanford, Division of Solid Waste Management (DSWM)

REPORT PREPARED BY

Molly Stanford
Division of Solid Waste Management
3711 Middlebrook Pike, Suite 101
Knoxville, TN
(865) 304-0603

PURPOSE OF INSPECTION

This inspection was conducted to evaluate the facility's compliance with the applicable requirements of the rules, regulations, permit terms and conditions promulgated pursuant to the *Tennessee Solid Waste Disposal Act*, Tennessee Code Annotated § 68-211-101 *et seq.* and with Tennessee's Solid Waste Regulations (Division Rule Chapter 0400-11-01). The facility is encouraged to advise the DSWM of any information in the report or attached letter that the facility deems to be incorrect.

FACILITY DESCRIPTION:

Carbon Rivers, LLC (RMF730000015) is a Recovered Materials Processing Facility accepting glass fiber composite manufacturing scrap (wind turbine blades and components) for the purpose of recovering the fiber glass material for beneficial reuse.

INSPECTION FINDINGS:

Facility Site Observations:

On May 29, 2025, the Division of Solid Waste Management (DSWM) conducted a Compliance Evaluation Inspection at Carbon Rivers ETP facility. This site is currently registered as a recovered material

processing facility (RMPF) and utilized for the processing and storage of wind turbine components and related materials. A large industrial shredder is located onsite at the ETTP location. There is a large pile of shredded fiberglass material directly next to the fiberglass shredder. As you enter through the facilities main road there is a large pile of cardboard boxes filled with shredded fiberglass material. There is another area beside the metal storage and maintenance building on site with fiberglass material (see attached photos on pages 5-7).

The two areas containing the large square cardboard boxes of a shredded fibrous material, one near the main road and second next to the metal building, are out in the open. These uncovered cardboard boxes have been weakened by the elements rendering them unstable and falling over, leaving fibrous material spilling out. These fibers are scattered all over the area which is in close proximity to the Clinch River. This has been an issue since 10/16/2024 and has remained uncorrected. This area has not been cleaned up despite being cited as non-compliance in numerous previous inspections. No effort to clean this area has been made since 10/16/2024.

At the time of inspection May 29, 2025, the facility manager was not present. The facility was found to have no managerial oversight and no managerial control. This has been mentioned several times in previous inspections.

Post Inspection Report:

In a phone call with Mr. Nick Ciparro on 6/2/2025 the inspector discussed the immediate nature of the DSWM desire to clean up the fibrous shredded material which has consistently been a problem since 10/16/2024.

The DSWM requested Inbound/outbound records (via phone and email) on 5/30/2025, 6/2/2025, and 6/4/2025. An outbound spreadsheet (Attachment I) was received via email on 6/6/2025 however the records provided were lacking pertinent information and deemed insufficient for compliance.

Per a phone conversation on 5/30/2025 between the inspector Mr. Nick Ciparro, the inspector requested the outbound records in which Mr. Ciparro stated 100 tons had left the site. He then later stated in the same conversation that 300 tons had left the site. The records provided in an excel spreadsheet (attachment II) display only 40 tons of material leaving the site.

After establishing that these records were insufficient to Mr. Ciparro, a single picture was sent of multiple outbound records with the top portion containing information cut off and unavailable to view (attachment 2).

The inbound/outbound records are not being managed appropriately and when reviewed are insufficient for compliance and inconsistent with verbal communication.

In an email dated 6/6/2025 the inspector mentioned several non-compliant items which need to be addressed and a deadline for a response plan for how these items will be rectified by 6/13/2025. **No response was provided.**

NON-COMPLIANCE ITEMS:

Carbon Rivers was found to be out of compliance with the following rules and regulations of the Division of Solid Waste Management \ during the May 29, 2025, inspection:

Rule 0400-11-01-.02(1)(b)3(xxii)(V)III

The owner or operator manages the recovered material(s) and/or product(s) produced as a valuable commodity(ies) while it is under the owner or operator's control and minimizes the potential for releases of recovered materials or process residues to the environment except in a manner authorized by state and local air pollution control, water pollution control, and/or waste management agencies.

Rule 0400-11-01-.02(2)(b)3(xxii)(VIII)I

The owner or operator maintains the records necessary to demonstrate compliance with item 6 above (Inbound Material Records)

Rule 0400-11-01-.02(1)(b)3(xxii)(VI)

Upon request of the Commissioner, the owner or operator timely demonstrates, to the satisfaction of the Commissioner, that there is a viable market for the sale of, or a use or reuse of, the recovered material

Not meeting the conditions for recovered material processing facilities means that the facility is subject to the requirement to have a permit, and failure to have a permit is a violation of Rule 0400-11-01-.02(1)(b)I which states:

Permitting of Solid Waste Storage, Processing, and Disposal Facilities.

(1) General

(b) Scope/Applicability

1. The requirements of this rule apply as specified to operators of facilities in Tennessee. Except as otherwise provided in this rule, no facility can lawfully store, process, or dispose of solid waste unless the operator has a permit.

Failure to have a permit for the activities at the site is a violation of Tennessee Code Annotated (Tenn. Code. Ann.) §§ 68-211-104(3) and (4).

Tenn. Code. Ann. §§ 68-211-104(3) and (4) state:

It is unlawful to:

- (3) Construct, alter, or operate a solid waste processing or disposal facility or site in violation of the rules, regulations, or orders of the commissioner or in such a manner as to create a public nuisance.

- (4) Transport, process, or dispose of solid waste in violation of this chapter, the rules and regulations established under the provisions of this chapter or in violation of the orders of the commissioner or board.

To return to compliance with the above Rules, Carbon Rivers, LLC shall **within 30 days** of receipt of this letter:

- 1) Submit updated inbound/outbound records for the current quarter with all relevant information present. This shall include at a minimum, dates, the amount of material received, the amount of material removed, and what the end destination was for that material (i.e., disposal at a landfill, recovered as a reused material, etc.).
- 2) Remove and properly manage all boxes of shredded fibrous material with records and receipts of disposal at a permitted waste facility; or receipts for the material being sold as beneficial reuse material.

As noted above, not meeting the conditions for recovered material processing facilities means that the facility is subject to the requirement to have a permit, and failure to have a permit is a violation of Rule 0400-11-01-.02(1)(b)1. If you fail to meet the conditions, Carbon Rivers will be required to submit an application for a Permit-By-Rule Solid Waste Processing Facility per Rule 0400-11-01-.02(2).

Please be aware that Tenn. Code Ann. §§ 68-211-117 authorizes the Department of Environment and Conservation to take enforcement action, including assessment of a civil penalty of up to FIVE THOUSAND DOLLARS (\$5,000.00) per day, for violation of the Tennessee Solid Waste Disposal Act.

If you have any questions concerning this correspondence, please contact Jeremy Hooper by email at Jeremy.Hooper@TN.gov or by phone (615)-686-7847.



Molly Stanford (Jul 8, 2025 08:36 EDT)

Molly Stanford
Environmental Scientist



Revendra Awasthi (Jul 8, 2025 08:48 EDT)

Revendra Awasthi, CHMM
Environmental Field Office Manager

Enclosures: Attachment I – Excel sheet submitted by Carbon Rivers
Attachment II – Outbound record submitted by Carbon Rivers
May 29, 2025, inspection document from the DSWM

PHOTOS

All photos taken on May 29, 2025





