Hazardous Waste Enforcement: Tennessee Division of Solid Waste Management Proposed Order and Assessment Addressing Ripley Electroplated Plastic/Metal Parts Manufacturer



Walter Wright, Jr.
wwright@mwlaw.com
(501) 688.8839

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The Tennessee Division of Solid Waste Management ("TDSWM") issued a February 7th Proposed Director's Order and Assessment ("Order") to SRG Global Coatings, LLC ("SRG"). See Case No. HWM 24-0024.

The Order provides that SRG manufactures electroplated plastic and metal parts for automobiles and appliances at a facility in Ripley, Tennessee.

The facility was stated to have not been in operation and in the process of being decommissioned at the time of the TDSWM inspection.

The facility is stated to have operated as a very small quantity generator of hazardous waste in 2024, but was formerly a large quantity generator in 2021, 2022, and 2023. Further, the facility is stated to have been a small quantity handler of universal waste and generator of used oil in 2024.

TDSWM personnel are stated to have conducted a Hazardous Waste Compliance Evaluation Inspection on June 27, 2023.

TDSWM sent a Notice of Violation on August 9, 2024, documenting observations made during the CEI. The Notice of Violation cited the following violations:

- Failure to label or mark clearly containers of used oil with the words "Used Oil."
- Failure to label or clearly mark universal waste batteries with appropriate wording.
- Failure to provide weekly inspection records from time as a LQG in 2021, 2022, and 2023.
- Failure to provide documentation of annual review of hazardous waste training of facility personnel from time as a LQG in 2022 and 2023.
- Failure to provide job titles and descriptions of hazardous waste management employees.
- Failure to notify within 30 days of new hazardous waste streams generated during decommissioning of the facility in 2023.
- Failure to submit complete and accurate information in the 2023 Annual Hazardous Waste Report submitted on March 1, 2024.

The Order proposes to assess damages and a civil penalty totaling $10,050.00. Further, SRG is required to return the outstanding resolvable violation to compliance on or before the 31st day after the receipt of the Order.

The Order provides certain appeal rights.

A copy of the Order can be downloaded here.