



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

Hazardous Waste Enforcement: Tennessee Department of Environment and Conservation Proposed Order and Assessment Addressing Sweetwater Utility Vault Manufacturer

05/29/2026

The Tennessee Department of Environment and Conservation (“TDEC”) issued a March 29th Director’s Order and Assessment (“Order”) to Oldcastle Infrastructure, Inc. (“OI”) addressing alleged violations of the Tennessee hazardous waste regulations. See CASE NO. HWM 25-0032.

The Order provides that OI operates a manufacturing facility in Sweetwater, Tennessee.

The facility is stated to engage in the manufacturing of utility vaults and pads for use in communication, power, and water supply industries.

Hazardous waste is stated to be generated from cleanup activities, spent solvent, and aerosol can residue. Further, the facility is characterized as a RCRA Small Quantity Generator of hazardous waste since 2021.

TDEC Division of Solid Waste Management (“Division”) is stated to have conducted a Compliance Evaluation Inspection (“CEI”) at the facility on September 10, 2025. The CEI was conducted after receiving a letter from OI which self-disclosed potential violations of hazardous waste rules associated with Large Quantity Generators.

Alleged violations referenced in the Order include:

- Failure to make a hazardous waste determination.
- Failure to mark an indication of hazardous and an accumulation start date.
- Failure to properly close hazardous waste containers.
- Failure to properly label hazardous waste containers.
- Lack of immediate access to spill control contamination equipment.
- Failure to submit annual reports.
- Failure to conduct routine inspections.
- Failure to provide annual hazardous waste training.
- Failure to document employee names, titles, and job descriptions, as well as the type and amount of introductory and continued training, and failed to maintain documentation that personnel have completed their annual training.

- Failure to prepare a contingency plan and associated quick reference guide for submittal to local emergency agencies.
- Failure to document arrangements with local emergency responders.
- Failure to prepare a hazardous waste reduction plan.

OI submitted a letter to the Division on October 29, 2025, which addressed each of the violations cited in a Notice of Violation. The letter is stated to have detailed the corrective actions for each violation and was accompanied by supporting documentation including a waste determination, training records, annual reports, emergency preparedness documents, a shipping manifest and photographs.

The Division is stated to have conducted a follow-up inspection at the facility and noted correction of certain previously alleged violations.

The Order proposes to assess damages in the amount of \$1,049.30. Further, a civil penalty of \$3,500 is proposed to be assessed.

The Order provides certain appeal rights.

A copy of the Order can be found [here](#).