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Storage Tank Enforcement: Tennessee Department of Environment and Conservation Proposed Order/Assessment Addressing Memphis Medical Center

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The Tennessee Department of Environment and Conservation ("TDEC") issued a July 1st Proposed Order and Assessment ("Order") to Methodist Healthcare Memphis Hospitals ("MH") addressing alleged violations of the Tennessee Underground Storage Tank ("UST") regulations. See Case No. UST26-0057.

The Order addresses MH's LeBonheur Children's Medical Center ("Medical Center").

MH's Medical Center is stated to be the registered owner of one UST in Memphis, Tennessee.

TDEC Division of Underground Storage Tanks ("Division") are stated to have performed a compliance inspection at the Medical Center on December 11, 2025.

The inspection is stated to have identified the following violations:

- Failure to keep spill catchment basins free of water, dirt, debris, etc.
- Failure to perform periodic walkthrough inspections.
- Failure to test electronic and mechanical components of release detection at least annually for proper operation.
- Failure to conduct an annual line tightness test on pressurized underground piping.
- Failure to install ancillary equipment and containment systems in accordance with manufacturer's installation instructions.
- Failure to install line leak detection for pressurized underground piping.

The Division sent a Results of Compliance Inspection - Action Required letter to MH on December 19, 2025. The Division is stated to have sent subsequent letters citing the violations to which there was a failure to return to compliance.

A civil penalty of \$16,560 is assessed. Further, certain remedial actions are required to be undertaken to correct the alleged outstanding violations within a timeframe.

The Order provides certain appeal rights.

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