

STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION

IN THE MATTER OF:)	DIVISION OF UNDERGROUND
)	STORAGE TANKS
AVION PROPERTIES LLC)	
)	CASE NO. UST22-0128
RESPONDENT)	FACILITY: AVION FOOD AND FUEL
)	NO 106

ORDER AND ASSESSMENT

NOW COMES David W. Salyers, P.E., Commissioner of the Tennessee Department of Environment and Conservation ("Commissioner"), and states:

PARTIES

I.

David W. Salyers, P.E., is the duly appointed Commissioner of the Tennessee Department of Environment and Conservation ("Department") and is charged with administering and enforcing the Tennessee Petroleum Underground Storage Tank Act ("Act"), Tenn. Code Ann. §§ 68-215-101 to -129. Stanley R. Boyd is the duly appointed Director ("Director") of the Division of Underground Storage Tanks ("Division") and has received written delegation from the Commissioner to administer and enforce the Act.

II.

Avion Properties LLC ("Respondent") is a Wyoming limited liability company and is properly registered to conduct business in Tennessee. The Respondent is the registered owner of three underground storage tank ("UST") systems located at 2130 Amnicola Highway, Chattanooga, Hamilton County, Tennessee 37406. Service of process may be made on the Respondent's Registered Agent, Cogency Global Inc., 992 Davidson Drive, Suite B, Nashville, Tennessee 37205-1051.

JURISDICTION

III.

When the Commissioner finds upon investigation that any provision of the Act is not being carried out, and that effective measures are not being taken to comply with the provisions of the Act, the Commissioner may issue an Order for correction to the responsible party, and this Order shall be complied

with within the time limit specified in the Order. Tenn. Code Ann. § 68-215-114. If this Order becomes final, the Commissioner may affix a notice of petroleum delivery prohibition (“red tag”) to the facility fill ports and/or dispensers and give notice on the Department’s website of petroleum delivery prohibition. Tenn. Code Ann. § 68-215-106(c). Further, the Commissioner is authorized to assess civil penalties against any person who violates or fails to comply with the Act. Tenn. Code Ann. § 68-215-121. Rules governing USTs have been promulgated pursuant to Tenn. Code Ann. § 68-215-107(f) and are effective as Tenn. Comp. R. & Regs. 0400-18-01-.01 to -.17 (“Rules”).

IV.

The Respondent is a “person” as defined at Tenn. Code Ann. § 68-215-103(11) and has violated the Act as hereinafter stated.

FACTS

V.

On March 7, 2022, Division personnel contacted Randall Masters, the representative for the former UST owner, by phone and scheduled a compliance inspection to be conducted at the subject facility on April 19, 2022. On or about March 11, 2022, Division personnel also sent a letter confirming the inspection date. The facility ID number is 3-330415.

VI.

On or about April 19, 2022, Division personnel arrived at the facility, and found it was not in operation and that the ownership had changed. Using the contact information listed on a posting in the store window, Division personnel contacted the maintenance person, Bill Breneman. Mr. Breneman provided the contact information for the new owner. On or about April 20, 2022, Division personnel sent a Results of Inspection - Incomplete letter to Mr. Breneman. The letter stated that a new compliance inspection was scheduled to be conducted on April 21, 2022.

VII.

On April 21, 2022, Division personnel performed a compliance inspection at the subject facility. The inspector discovered the following violations

Violation #1: Failure of a facility having one or more petroleum UST systems to have one or more persons designated as Class A, Class B, and Class C Operators, in accordance with Rule 0400-18-01-.16(1)(a). Specifically, at the time of the inspection, Division personnel learned that the

ownership of the facility had changed, but the A and B operators designated in the Division database were still associated with the previous owner.

- Violation #2: Failure to perform annual and periodic walkthrough inspections, in accordance with Rule 0400-18-01-.02(8)(a)1. Specifically, at the time of the inspection, the periodic and annual walkthrough forms and the monthly spill bucket log were not provided.
- Violation #3: Failure to report a change of status for a UST system within thirty days, in accordance with Rule 0400-18-01-.03(1)(g). Specifically, at the time of the inspection, it was discovered that the tank ownership had changed.
- Violation #4: Failure to test electronic and mechanical components at least annually for proper operation, in accordance with Rule 0400-18-01-.04(1)(a)3. Specifically, at the time of the inspection, the ATG console operability test was not provided, and the console was in the "alarm" state.
- Violation #5: Failure to monitor spill prevention equipment for UST systems no less frequently than walkthrough inspections are conducted, or to test spill prevention equipment at least once every three years, in accordance with Rule 0400-18-01-.02(3)(c)1. Specifically, at the time of the inspection, the spill bucket integrity test was not provided for any spill bucket onsite.
- Violation #6: Failure to maintain a log of at least the last twelve months of visual inspections for seeps and drips after removing the dispenser cover, in accordance with Rule 0400-18-01-.04(1)(e). Specifically, at the time of the inspection, the visual inspection log forms were not provided for any dispenser for any month.
- Violation #7: Failure to inspect overfill prevention equipment at least once every three years to ensure that overfill prevention equipment is set to activate at the correct level and will activate when petroleum reaches that level, as in accordance with Rule 0400-18-01-.02(3)(c)2. Specifically, at the time of the inspection, the overfill prevention equipment inspection was not provided for any tank onsite.
- Violation #8: Failure to conduct an annual line tightness test or do monthly monitoring on pressurized underground piping, in accordance with Rule 0400-18-01-.04(2)(b)1.(ii). Specifically, at the time of the inspection, the line tightness test was not provided for any piping system onsite.
- Violation #9: Failure to test line leak detectors annually in accordance with guidance provided by the Division and manufacturer's instruction, in accordance with Rule 0400-18-01-.04(4)(a). Specifically, at the time of the inspection, the line leak detector test was not provided for any piping system onsite.
- Violation #10: Failure to ensure that a cathodic protection system is tested every three years, in accordance with Rule 0400-18-01-.02(4)(c)2.(i). Specifically, at the time of the inspection, the cathodic

protection test was not provided and the STP vaults were inaccessible. Thus, it could not be verified whether flex connectors were present and protected from soil and water.

Violation #11: Failure to conduct release detection monitoring at least monthly for releases, in accordance with Rule 0400-18-01-.04(2)(a). Specifically, at the time of the inspection the ATG continuous statistical leak detection (CSLD) release detection records were not provided for any tank for any month.

VIII.

On April 21, 2022, Division personnel sent a Results of Compliance Inspection – Action Required letter to the Respondent at the address provided by Mr. Breneman. The letter cited the violations discovered during the inspection and required the Respondent to submit documentation detailing corrections of the violations to the Division by May 23, 2022.

IX.

On May 6, 2022, Division personnel received an extension request from Nicholas Tovar, the environmental specialist for Southern Environmental Technologies. In the written request, Mr. Tovar stated that the Respondent had retained Southern Environmental Technologies to perform the required corrective actions. Later the same day, Division personnel sent an Extension request – Approved letter to the Respondent at the address provided by Mr. Breneman. The letter established a new deadline of June 23, 2022, to submit documentation of violation corrections to the Division.

X.

On June 22, 2022, the Division received an email from Maureen Handler, the Senior Environmental Specialist for Southern Environmental Technologies. The email contained the following documentation:

- A copy of the periodic and annual walkthrough forms conducted in June 2022. Included in the walkthrough form was:
 - The monthly spill bucket logs.
 - The quarterly dispenser logs.

The documentation provided confirmed that violations #2 and #6 discovered during the inspection had been addressed.

XI.

On June 23, 2022, Division personnel received an extension request from Mr. Tovar to address the remaining violations. Later the same day, Division personnel sent an Extension request – Approved letter to the Respondent at the address provided by Mr. Breneman. The letter established a new deadline to submit documentation to the Division of July 25, 2022, to document correction of the remaining violations.

XII.

On July 21, 2022, the Division received an email from Mr. Tovar. The email contained the following documentation:

- A Class A and Class B operator training completion certificate for the Georgia Tank & Equipment Contractors Association. Since it was not a certificate from the State of Tennessee, it did not address the violation.
- An amended notification form and a Buyer's notification form changing the ownership of the tanks and listing the Respondent as the owner of the three UST system located at 2130 Amnicola Highway, Chattanooga Tennessee 37406. The form indicated that the Respondent had bought the tanks on March 15, 2022.
- A passing spill prevention device hydrostatic test report conducted on January 17, 2022, by Johnny Manteris with Spatco Energy Solutions.
- A passing overfill prevention operability test conducted on January 17, 2022, by Mr. Manteris.
- A passing corrosion protection test conducted on May 1, 2019, by Kevin Gregory with Tanknology Inc.

The documentation provided confirmed that violations #3, #5, #7 and #10 discovered during the inspection had been addressed.

XIII.

On July 21, 2022, the Division received an email from Mr. Tovar. The email contained copies of the Tennessee Tank Helper completion certificates of the Class A and Class B operator training. However, the operator had not been designated as the Class A and Class B operator by the Respondent.

XIV.

On August 5, 2022, Division personnel sent a Follow-up Letter and Enforcement Action Notice letter to the Respondent. The letter cited the violations discovered during the inspection and the Respondent's failure to return to compliance.

XV.

On August 24, 2022, Division personnel sent certified Notice of Violation letters to the Respondent and to the Respondent's manager Mehul Patel. The letters cited the violations discovered during the inspection and required the Respondent to submit documentation to the Division by September 23, 2022, to document correction of the violations. U.S. Postal Service tracking records delivery to the Respondent on August 27, 2022. The letter sent to Mr. Patel was returned listed as undeliverable on September 7, 2022.

XVI.

To date, adequate documentation has not been received regarding violations #1, #4, #8, #9 and #11. The Respondent has therefore committed the following additional violation:

Violation 12: Failure to cooperate with the Division by failing to provide documents, testing or monitoring records to the Division in accordance with Rule 0400-18-01-.03(2).

VIOLATIONS

XVII.

By failing to operate a petroleum underground storage tank system in compliance with the Act, the Respondent violated Tenn. Code Ann. section 68-215-104(2), which states:

It is unlawful to: Construct, alter or operate a petroleum underground storage tank in violation of this chapter or the rules or regulations established pursuant thereto[.]

XIII.

By failing to have one or more persons designated as Class A, Class B, and Class C Operators, the Respondent violated Rule 0400-18-01-.16(1)(a), which states:

0400-18-01-.16 Certified Operator Program.

- (1) Operator Designation Requirements
 - (a) Effective August 8, 2012, every facility having one or more petroleum UST systems subject to the requirements of Chapter 0400-18-01 must have one or more persons who have been designated by the tank owner as Class A, Class B, and Class C Operator(s).

XIX.

By failing to perform periodic walkthrough inspections, the Respondent violated Rule 0400-18-01-.02(8)(a)1., which states:

0400-18-01.02 UST Systems: Installation and Operation.

- (8) Periodic operation and maintenance walkthrough inspections.
 - (a) To properly operate and maintain UST systems, no later than three years after the effective date of this rule, owners and/or operators must meet one of the following:
 - 1. Conduct a walkthrough inspection that, at a minimum, checks the following equipment as specified below: [...]

XX.

By failing to report a change of status for a UST system within thirty days, the Respondent violated Rule 0400-18-01-.03(1)(g), which states:

0400-18-01-.03 Notification, Reporting and Record Keeping.

- (1) Notification requirements.
 - (g) Any change in the status of the tanks at a petroleum UST facility shall be reported within thirty (30) days of said change. This includes but is not limited to changes of ownership, upgrading or replacement of tanks, changes in mailing address, permanent closure of a tank compartment, and changes in service. Such reports shall be made using an amended notification form. In the case of a sale of tanks, the seller shall submit the notification form designated by the Division, completed in accordance with instructions provided by the Division, and shall also inform the buyer of the notification requirement.

XXI.

By failing to ensure that electronic and mechanical components are tested annually for proper operation, the Respondent violated Rule 0400-18-01-.04(1)(a)3., which states:

0400-18-01-.04 Release Detection.

- (1) General requirements for release detection.
 - (a) Owners and/or operators of UST systems shall provide a method, or combination of methods, of release detection that:
 - 3. Ensures that electronic and mechanical components are tested for proper operation in accordance with subparts 2.(i) through (iii) of this subparagraph. The test must be performed at least annually, and at a minimum, as applicable to the facility, cover the following components and criteria: [...]

XXII.

By failing to test spill prevention equipment at least once every three years to ensure the equipment is liquid tight by using vacuum, pressure or liquid, the Respondent violated Rule 0400-18-01-.02(3)(c)1.(ii), which states:

0400-18-01-.02 UST Systems: Installation and Operation.

- (3) Spill and overflow prevention.
 - (c) Periodic testing of spill prevention equipment and periodic inspection of overflow prevention equipment.
 - 1. Monitoring. Spill prevention equipment (such as a catchment basin, spill bucket, or other spill containment device) must prevent releases to the environment by meeting one of the following:
 - (ii) The spill prevention equipment is tested at least once every three years to ensure the equipment is liquid tight by using vacuum, pressure, or liquid testing in accordance with one of the following criteria: [...]

XXIII.

By failing to maintain a log of at least the last twelve months of visual inspections for seeps and drips after removing the dispenser cover, the Respondent violated Rule 0400-18-01-.04(1)(e), which states:

0400-18-01-.04 Release Detection.

- (1) General requirements for release detection.
 - (e) The dispenser cover shall be opened and a visual inspection for petroleum releases, including seeps and drips, shall be performed at least quarterly, that is, at least once every three months. A log of these inspections showing at a minimum the last 12 months shall be maintained by the owner and/or operator.

XXIV.

By failing to inspect overflow prevention equipment at least once every three (3) years, the Respondent violated Rule 0400-18-01-.02(3)(c)2., which states:

0400-18-01-.02 UST Systems: Installation and Operation.

- (3) Spill and overflow prevention.
 - (c) Periodic testing of spill prevention equipment and periodic inspection of overflow prevention equipment.

2. Inspections. Overfill prevention equipment must be inspected at least once every three years. At a minimum, the inspection must ensure that overfill prevention equipment is set to activate at the correct level specified in subpart (a)1.(ii) of this paragraph and will activate when petroleum reaches that level. Inspections must be conducted in accordance with one of the criteria in items 1.(II)(I) through (IV) of this subparagraph.

XXV.

By failing to conduct an annual line tightness test or do monthly monitoring on pressurized underground piping, the Respondent violated Rule 0400-18-01-.04(2)(b)1.(ii), which states:

0400-18-01-.04 Release Detection.

- (2) Requirements for petroleum UST systems.

Owners and/or operators of petroleum UST systems shall provide release detection for tanks and piping as follows:

- (b) Piping.

Underground piping that routinely contains petroleum shall be monitored for releases in a manner that meets one of the following requirements:

1. Pressurized piping.

Underground piping that conveys petroleum under pressure shall:

- (ii) Have an annual line tightness test conducted in accordance with subparagraph (4)(b) of this rule or have monthly monitoring conducted in accordance with subparagraph (4)(c) of this rule.

XXVI.

By failing to test line leak detectors annually, the Respondent violated Rule 0400-18-01-.04(4)(a), which states:

0400-18-01-.04 Release Detection.

- (4) Methods of release detection for piping.

Each method of release detection for piping used to meet the requirements of paragraph (2) of this rule shall be conducted in accordance with the following:

- (a) Automatic line leak detectors.

Methods which alert the operator to the presence of a leak by restricting or shutting off the flow of petroleum through piping or triggering an audible or visual alarm may be used only if they detect leaks of three gallons per hour at ten pounds per square

inch line pressure within one hour. An annual test of the operation of the leak detector shall be conducted in accordance with guidance provided by the Division.

XXVII.

By failing to ensure that cathodic protection system is tested within six (6) months of installation and every three (3) years thereafter, the Respondent violated Rule 0400-18-01-.02(4)(c)2.(i), which states:

0400-18-01-.02 UST Systems: Installation and Operation.

(4) Corrosion protection.

(c) Operation and maintenance of corrosion protection.

All owners and/or operators of metal UST systems with corrosion protection shall comply with the following requirements to ensure that releases due to corrosion are prevented until the UST system is permanently closed or undergoes a change-in-service in accordance with paragraph (4) of Rule 0400-18-01-.07:

2. All UST systems equipped with cathodic protection systems shall be inspected for proper operation by a qualified cathodic protection tester in accordance with the following requirements:

(i) All cathodic protection systems shall be tested within six months of installation and at least every three years thereafter[.]

XXVIII.

By failing to conduct release detection monitoring at least monthly for releases, the Respondent violated Rule 0400-18-01-.04(2)(a), which states:

0400-18-01-.04 Release Detection.

(2) Requirements for petroleum UST systems.

Owners and/or operators of petroleum UST systems shall provide release detection for tanks and piping as follows:

(a) Tanks.

Tanks shall be monitored at least monthly for releases using one of the methods listed in subparagraphs (3)(c) through (f) of this rule, except those tanks which meet the volume, diameter, and test duration requirements as set forth in subpart (3)(a)1.(i) of this rule may use manual tank gauging (conducted in accordance with subparagraph (3)(a) of this rule).

XXIX.

By failing to cooperate with the Division by failing to provide documents, testing or monitoring records to the Division, the Respondent violated Rule 0400-18-01-.03(2), which states:
0400-18-01-.03 Notification, Reporting and Record Keeping.

(2) Reporting and record keeping.

Owners, operators, and/or other responsible parties of UST systems shall cooperate fully with inspections, monitoring and testing conducted by the Division, as well as requests for document submission, testing, and monitoring by the owner, operator, and/or other responsible parties in accordance with the Tennessee Petroleum Underground Storage Tank Act Tenn. Code Ann. T.C.A. §§ 68-215-101 et seq.

ORDER AND ASSESSMENT

XXX.

Pursuant to the authority vested by Tenn. Code Ann. §§ 68-215-107, -114, and -121 of the Act, the Respondent is issued the following Order:

1. If the Respondent fails to comply with this order and/or file an appeal within the timeframes stated below, **the above-referenced facility will be placed on the Delivery Prohibition List and the fill ports and dispensers will be red tagged until compliance is achieved.** Tenn. Code Ann. § 68-215-106(c).
2. The Respondent shall perform all actions necessary to correct the outstanding violations and to bring the facility into full compliance with regulatory requirements. The Respondent shall provide the Division with documentation of the corrective action performed; the documentation shall be sufficient to establish a return to full compliance.
 - i. On or before the thirty-first day after receipt of this Order, the Respondent shall visit the following link and register to attend Underground Storage Tank Operator Training:
<https://www.tn.gov/content/tn/environment/program-areas/ust-underground-storage-tanks/operator-training/tank-school.html>
 - ii. On or before the thirty-first day after receipt of this Order, the Respondent shall designate the trained Class A and Class B operators for the facility with the Division's Tank Helper database and provide documentation to the Division.

- iii. On or before the thirty-first day after receipt of this Order, the Respondent shall submit documentation of a proper electrical release detection equipment setup to the Division.
 - iv. On or before the thirty-first day after receipt of this Order, the Respondent shall conduct an annual line tightness test and submit documentation to the Division.
 - v. On or before the thirty-first day after receipt of this Order, the Respondent shall conduct an annual line leak detector test and submit documentation to the Division.
 - vi. On or before the thirty-first day after receipt of this Order, the Respondent shall submit documentation of the next month's passing automatic tank gauge leak test reports for all tanks to the Division.
3. On or before **three months** after receiving this Order, the Respondent shall successfully attend Underground Storage Tank Training.
4. On or before the thirty-first day after receipt of this Order, the Respondent shall pay a total civil penalty in the amount of \$69,120.00. This amount consists of the following:
 - i. One violation assessed at \$3,800.00 per facility for failing to have a Class A and B operator trained and designated at the facility.
 - ii. Three violations assessed at \$3,200.00 per UST system for a total of \$9,600.00 for failing to perform annual and periodic walkthrough inspections.
 - iii. Three violations assessed at \$600.00 per UST system for a total of \$1,800.00 for failing to report a change of status for a UST system within 30 days.
 - iv. Three violations assessed at \$2,000.00 per piping system for a total of \$6,000.00 for failing to test electronic and mechanical components at least annually for proper operation.
 - v. Three violations assessed at \$2,000.00 per tank compartment for a total of \$6,000.00 for failing to monitor spill prevention equipment for UST systems no less frequently than walkthrough inspections are conducted, or to test spill prevention equipment at least once every three years.
 - vi. Sixteen violations assessed at \$100.00 per inspection and system (dispenser) for a total of \$1,600.00 for failing to maintain a log of at least the last twelve (12) months of visual inspections for seeps and drips after removing the dispenser cover.
 - vii. Three violations assessed at \$2,000.00 per tank compartment for a total of \$6,000.00 for failing to test the overfill devices.

- viii. Three violations assessed at \$2,000.00 per piping system for a total of \$6,000.00 for failing to conduct annual line tightness test or do monthly monitoring on pressurized underground piping.
 - ix. Three violations assessed at \$2,000.00 per piping system for a total of \$6,000.00 for failing to test line leak detectors annually.
 - x. One violation assessed at \$1,200.00 per cathodic protection system test for a total of \$1,200 for failing to ensure that a cathodic protection system is tested every 3 years.
 - xi. Three violations assessed at \$3,200.00 per tank compartment for a total of \$9,600.00 for failing to conduct release detection monitoring at least monthly.
 - xii. One violation assessed at 20% of the civil penalty for all outstanding violations for a total of \$11,520.00 for failing to provide documents, testing, or monitoring records to the Division.
5. Failure to comply with any of the requirements of this Order could lead to further enforcement actions which may include additional civil penalties, assessment of damages and/or recovery of costs.
6. With the exception of the deadline for filing the appeal of this Order, the Director may extend the compliance dates contained within this Order for a fixed time period for good cause shown by the Respondent. To be eligible for this time extension, the Respondent shall submit a written request to be received in advance of the compliance date. The written request must include sufficient detail to justify such an extension and include at a minimum the anticipated length of the delay. The Director will reply to the Respondent's request in writing, establishing a new deadline for compliance with this Order. Should the Respondent fail to meet the requirements of this Order by the new deadline, then any associated civil penalty shall be due within 30 days after that deadline. The request for an extension of time does not change the deadline to submit an appeal. See Notice of Rights.

RESERVATION OF RIGHTS

In issuing this Order and Assessment, the Department does not implicitly or expressly waive any provision of the Act or the regulations promulgated thereunder or the authority to assess costs, civil penalties, and/or damages incurred by the State against the Respondent. The Department expressly reserves all rights it has at law and in equity to order further corrective action, assess civil penalties and/or damages, and to pursue further enforcement action including, but not limited to, monetary and injunctive relief. Compliance with this order will be considered as a mitigating factor in determining the need for future enforcement action(s).

NOTICE OF RIGHTS

The Respondent may appeal this Order and Assessment. Tenn. Code Ann. § 68-215-119. To do so, a written petition setting forth the reasons for requesting a hearing must be received by the Commissioner within 30 days of the date the Respondent received this Order and Assessment or this Order and Assessment will become final.

If an appeal is filed, an initial hearing of this matter will be conducted by an Administrative Law Judge (ALJ) as a contested case hearing. Tenn. Code Ann. § 68-215-119; Tenn. Code Ann. §§ 4-5-301 to -325 (the Uniform Administrative Procedures Act); Tenn. Comp. R. & Regs. 1360-04-01 (the Department of State's Uniform Rules of Procedure for Hearing Contested Cases Before State Administrative Agencies). Such hearings are legal proceedings in the nature of a trial. Individual Respondents may represent themselves or be represented by an attorney licensed to practice law in Tennessee. Artificial Respondents (corporations, limited partnerships, limited liability companies, etc.) cannot engage in the practice of law and therefore may only pursue an appeal through an attorney licensed to practice law in Tennessee. Low-income individuals may be eligible for representation at reduced or no cost through a local bar association or legal aid organization.

At the conclusion of any initial hearing, the ALJ has the authority to affirm, modify, or deny the Order and Assessment. Furthermore, the ALJ on behalf of the Board has the authority to assess additional damages incurred by the Department including, but not limited to, all docketing expenses associated with the setting of the matter for a hearing and the hourly fees incurred due to the presence of the ALJ and a court reporter.

Any petition for review (appeal) must be directed to the Commissioner of the Tennessee Department of Environment and Conservation, c/o Jenny L. Howard, General Counsel, Department of Environment and Conservation, William R. Snodgrass Tennessee Tower, 312 Rosa L. Parks Avenue, 2nd Floor, Nashville, Tennessee 37243-1548. The petition may be mailed or delivered to this address, or it may be sent to TDEC.Appeals@tn.gov. Payments of the civil penalty and/or damages shall be made payable to the "Treasurer, State of Tennessee" and sent to the Division of Fiscal Services – Consolidated Fees Section,

Department of Environment and Conservation, William R. Snodgrass Tennessee Tower, 312 Rosa L. Parks Avenue, 10th Floor, Nashville, Tennessee 37243. Technical questions and other correspondence involving compliance issues should be sent to Mark Brinton, Nashville Environmental Field Office, 711 R. S. Gass Boulevard, Nashville, Tennessee 37216. Attorneys should contact the undersigned counsel of record. **The case number, UST22-0128, should be written on all correspondence regarding this matter.**

Issued by the Director of the Division of Underground Storage Tanks, Tennessee Department of Environment and Conservation, on this 13th day of December, 2022.



Stanley R. Boyd, Director
Division of Underground Storage Tanks
TN Department of Environment and Conservation

Reviewed by:

Samantha Buller-Young
Samantha Buller-Young (Dec 14, 2022 09:19 EST)

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