

STATE OF TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION

Division of Underground Storage Tanks William R. Snodgrass Tennessee Tower 312 Rosa L. Parks Avenue, 12th Floor Nashville, Tennessee 37243

November 3, 2021

5984 Stage, LLC c/o Michael B. Chance, Registered Agent 6060 Poplar Avenue, Suite 440 Memphis, Tennessee 38119-0910

Re: Kangaroo Express #102

5984 Stage Road

Bartlett, Tennessee 38134 Facility ID # 9-792028 Case # UST21-0089

Dear Mr. Chance:

Enclosed is an Order and Assessment issued by the Tennessee Department of Environment and Conservation, Division of Underground Storage Tanks. The Order cites operational violations discovered at the facility during an inspection conducted on February 4, 2021. The Order requires you to take corrective action to bring the facility into operational compliance. The following actions must be taken to bring the facility into compliance:

- 1. The Respondent shall submit documentation of Interstitial Monitoring records for all tank systems for the 12 months prior to the February 4, 2021 compliance inspection or submit documentation that includes the Monthly Electronic Interstitial Monitoring Report, monthly Liquid Sensor Status report, and Alarm History for all tank systems for October 2021 to return to compliance.
- 2. The Respondent shall submit documentation of Interstitial Monitoring records for all piping systems for the 12 months prior to the February 4, 2021 compliance inspection or submit documentation that includes the Monthly Electronic Interstitial Monitoring Report, monthly Liquid Sensor Status report, and Alarm History for all piping systems for October 2021 to return to compliance.
- 3. The Respondent shall complete and return the Request to Attend Underground Storage Tank Training form to schedule attendance.

Because there is outstanding noncompliance, if this Order becomes final, then the facility will be placed on the petroleum **Delivery Prohibition List**. Red Tags will be installed at the fill ports and dispensers at the facility. Upon completion of the necessary corrective action, documentation establishing the return to compliance shall be submitted to the Division.

Submit the required compliance documentation to tonya.spence.casson@tn.gov or to:

Served via Private Process Server

Tonya Spence Casson Division of Underground Storage Tanks Chattanooga Environmental Field Office 1301 Riverfront Parkway Chattanooga, Tennessee 37402

A civil penalty of \$33,120.00 has been assessed against you based on the violations. The civil penalty is calculated as follows:

Violation #1: Failure to maintain a log of monthly inspections of spill catchment basins for 12 months

in accordance with Rule 0400-18-01-.02(3)(b)4.

Individual Civil Penalty Amount for Violation Multiplication Factor\$100.00

36

\$3,600.00

Violation #2: Failure to maintain a log of the last 12 months of visual inspections for seeps and drips

after removing the dispenser cover in accordance with Rule 0400-18-01-.04(1)(e).

<u>Individual Civil Penalty Amount for Violation</u> <u>Multiplication Factor</u> <u>Total Penalty Civil Penalty</u>

\$100.00 24 \$2,400.00

Violation #3: Failure to perform annual test of line leak detectors in accordance with Rule 0400-18-01-

.04(4)(a).

<u>Individual Civil Penalty Amount for Violation</u> <u>Multiplication Factor</u> <u>Total Penalty Civil Penalty</u>

\$2,000.00 3 \$6,000.00

Violation #4: Failure to monitor tanks at least monthly in accordance with Rule 0400-18-01-.04(2)(a).

<u>Individual Civil Penalty Amount for Violation</u> <u>Multiplication Factor</u> <u>Total Penalty Civil Penalty</u>

\$3,200.00 3 \$9,600.00

Violation #6: Failure to conduct annual line tightness test or do monthly monitoring on pressurized

underground piping in accordance with Rule 0400-18-01-.04(2)(b)1(ii).

<u>Individual Civil Penalty Amount for Violation</u> <u>Multiplication Factor</u> <u>Total Penalty Civil Penalty</u>

\$2,000.00 3 \$6,000.00

Violation #7: 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).

<u>Individual Civil Penalty Amount for Violation</u> <u>Multiplication Factor</u> <u>Total Penalty Civil Penalty</u>

\$5,520.00 1 \$5,520.00

Total Amount of your Civil Penalty: \$33,120.00

Payment of the civil penalty shall be submitted to the following address:

Department of Environment & Conservation Division of Fiscal Services – Fee Section William R. Snodgrass Tennessee Tower 312 Rosa L. Parks Avenue, 10th Floor Nashville, Tennessee 37243

Payment shall be made payable to the "Treasurer, State of Tennessee". The case number shown on the first page of the enclosed Order should be written on said payment(s).

The appeal period is limited. **Carefully read the Notice of Rights contained in the Order.** An appeal must be in writing and received within 30 days after you receive this Order. If you do not submit a timely appeal, then the entire civil penalty amount of \$33,120.00 will become final, due to be paid, and subject to collection.

If you have any questions about this matter, please contact Tonya Spence Casson at (423) 637-5432 or tonya.spence.casson@tn.gov.

Sincerely,

Stanley R. Boyd Director

cc: Enforcement File

Stanley & Boyd

Memphis Environmental Field Office

STATE OF TENNESSEE

DEPARTMENT OF ENVIRONMENT AND CONSERVATION

IN THE MATTER OF:)	DIVISION OF UNDERGROUND
)	STORAGE TANKS
5984 STAGE, LLC)	
)	CASE NO. UST21-0089
RESPONDENT)	FACILITY: KANGAROO EXPRESS #102

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 among other duties and responsibilities, he is charged with the responsibility for administering and enforcing the Tennessee Petroleum Underground Storage Tank Act ("Act"), Tenn. Code Ann. sections 68-215-101 to -129. Stanley R. Boyd is the duly appointed Director ("Director") of the Underground Storage Tank Division ("Division"). He has received written delegation from the Commissioner to administer and enforce aspects of the Act.

II.

5984 Stage, LLC ("Respondent") is a limited liability company created in the State of Tennessee and is properly registered to conduct business in Tennessee. The Respondent is the registered owner of three underground storage tank ("UST") systems located at 5984 Stage Road, Bartlett, Tennessee, 38134. Service of process may be made on the Respondent's Registered Agent, Michael B. Chance, at 6060 Poplar Avenue, Suite 440, Memphis, Tennessee, 38119-0910.

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 red tag 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. section 68-215-103(11) and has violated the Act as hereinafter stated.

FACTS

٧.

On or about October 23, 2017, the Division received a Notification for Underground Storage Tanks form, signed by Hunter Smith, listing the Respondent as the owner of the three UST systems located at 5984 Stage Road, Bartlett, Tennessee, 38134. The facility ID number is 9-792028.

VI.

On or about December 21, 2020, Division personnel contacted the Respondent's contractor Tim Wilson with Compliance Associates, LLC by email and scheduled a compliance inspection to be conducted on January 6, 2021. On or about December 22, 2020, Division personnel also sent a letter confirming the inspection date.

VII.

On or about January 26, 2021, Division personnel performed a compliance inspection at the subject facility with a Follow-up Inspection performed on February 4, 2021. The inspector discovered the following violations:

- Violation #1: Failure to maintain a log of monthly inspections of spill catchment basins for 12 months in accordance with Rule 0400-18-01-.02(3)(b)4. Specifically, at the time of inspection, the Monthly Spill Bucket Inspection Log was not provided for Division review.
- Violation #2: Failure to maintain a log of the last 12 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 inspection, the Quarterly Dispenser Inspection Log was not provided for Division review.
- Violation #3: Failure to test line leak detectors annually in accordance with Rule 0400-18-01-.04(4)(a). Specifically, at the time of the inspection, current annual line leak detector test results were not provided for Division review.
- Violation #4: Failure to monitor tanks at least monthly in accordance with Rule 0400-18-01-.04(2)(a).

 Specifically, at the time of inspection, Interstitial Monitoring (IM) monthly records for all tank systems for the 12 months prior to the inspection were not provided for Division review.
- Violation #5: Failure to provide a release detection method that meets the performance requirements for tanks in accordance with Rule 0400-18-01-.04(1)(a)3(ii). Specifically, at the time of the inspection, the annual functionality test for all sensors was not provided for Division review.

VIII.

On or about February 9, 2021, Division personnel sent a Results of Compliance Inspection – Action Required letter to the Respondent. The letter cited the violations discovered during the inspection and required the Respondent to submit documentation to the Division by March 9, 2021, to document correction of the violations.

IX.

On or about March 12, 2021, Division personnel sent a Results of Compliance Inspection – No Response Received letter to the Respondent. The letter cited the violations discovered during the inspection, the lack of response to the violations, and required the Respondent to submit documentation to the Division by April 12, 2021, to document correction of the violations.

On or about April 16, 2021, 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.

XI.

On or about April 19, 2021, Division personnel received documentation to address some of the violations. The Division received:

- Annual Electronic Interstitial Monitoring Test Report conducted February 24, 2021. This addressed Violation #5.
- Precision Line Tightness and Leak Detector Test Report conducted February 24, 2021. This addressed Violation #3.

XII.

During the enforcement review, the following violation was added:

Violation #6: Failure to conduct 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 inspection, Interstitial Monitoring (IM) monthly records for the piping associated with all tank systems for the 12 months prior to the inspection were not provided for Division review.

XIII.

On or about May 21, 2021, Division personnel sent a Notice of Violation letter to the Respondent. The letter cited the violations discovered during the inspection and required the Respondent to submit documentation to the Division by June 24, 2021, to document correction of the remaining violations.

XIV.

The following violation was added after the compliance due date of June 24, 2021 passed without a response:

Violation #7: 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).

On or about August 8, 2021, Division personnel received documentation to address some of the violations. The Division received:

- Monthly Spill Bucket Inspection Log for September 2020 through August 2021. This addressed
 Violation #1.
- Quarterly Dispenser Inspection Log dated September 14, 2020 and March 10, 2021. This addressed Violation #2.

The Division also received Monthly Electronic Interstitial Monitoring Alarm Reports for September 2020 through August 2021. These did not include the required Liquid Status Report (except September and October 2020) or Alarm History Report attachments. A System Status Report dated November 9, 2020 indicated a Fuel Alarm from the sensor in the Premium Submersible Turbine Pump ("STP") sump. No investigation and/or repair records were submitted to address the Fuel Alarm. Violation #4 and Violation #6 have not been addressed.

VIOLATIONS

XVI.

By failing to operate a petroleum underground storage tank system in compliance with the Act, the Respondent has 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;

XVII.

By failing to maintain a log of monthly inspections of spill catchment basins for 12 months, the Respondent has violated Rule 0400-18-01-.02(3)(b)4, which states:

0400-18-01-.02 UST SYSTEMS: INSTALLATION AND OPERATION.

- (3) Spill and overfill prevention.
 - (b) Operating requirements.
 - 4. Spill catchment basins shall be visually inspected by the owner and/or operator at least once per month to assure the integrity of the storage space provided for spill containment. A log of these inspections showing at a minimum the last 12 months shall be maintained by the owner and/or operator. Unless directed or allowed to do otherwise by the division the log

shall be maintained in a format established by the division and in accordance with guidance provided by the division.

XVIII.

By failing to maintain a log of the last 12 months of visual inspections for seeps and drips after removing the dispenser cover, the Respondent has 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.

XIX.

By failing to perform annual line leak detector tests, the Respondent has 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

XX.

By failing to monitor tanks at least monthly, the Respondent has 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 that 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).

XXI.

By failing to conduct annual line tightness test or do monthly monitoring on pressurized underground piping, the Respondent has 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.

XXII.

By failing to cooperate with the Division by failing to provide documents, testing, or monitoring records to the Division, the Respondent has 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. §§ 68-215-101 et seq.

ORDER AND ASSESSMENT

XXIII.

Pursuant to the authority vested by Tenn. Code Ann. sections 68-215-107, -114, and -121,

- I, Stanley R. Boyd, acting as the authorized representative of the Commissioner, hereby issue the following Order and Assessment to the Respondent:
 - 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 submit documentation of Interstitial Monitoring records for all tank systems for the 12 months prior to the February 4, 2021 compliance inspection or submit documentation that includes the Monthly Electronic Interstitial Monitoring Report, monthly Liquid Sensor Status report, and Alarm History for all tank systems for October 2021 to return to compliance.
 - ii. On or before the thirty-first day after receipt of this Order, the Respondent shall submit documentation of Interstitial Monitoring records for all piping systems for the 12 months prior to the February 4, 2021 compliance inspection or submit documentation that includes the Monthly Electronic Interstitial Monitoring Report, monthly Liquid Sensor Status report, and Alarm History for all piping systems for October 2021 to return to compliance.
 - 3. On or before the thirty-first day after receiving this Order, the Respondent shall return a signed Request to Attend Underground Storage Tank Training form to the address that appears on the request form, which is enclosed. The Respondent must attend Underground Storage Tank Training within **six months** after receiving this Order.

- 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 \$33,120.00. This amount consists of the following:
 - i. Thirty-six violations assessed at \$100.00 per missing log entry per spill bucket for a total of \$3,600.00 for failing to keep the monthly spill bucket inspection log.
 - ii. Twenty-four violations assessed at \$100.00 per missing log entry per dispenser for a total of \$2,400.00 for failing to keep the quarterly dispenser inspection log.
 - iii. Three violations assessed at \$2,000.00 per missing line leak detector test for a total of \$6,000 for failing to perform annual line leak detector tests.
 - iv. Three violations assessed at \$3,200.00 per tank system for a total of \$9,600.00 for failing to monitor tanks at least monthly.
 - v. Three violations assessed at \$2,000.00 per piping system for a total of \$6,000.00 for failing to monitor piping monthly.
 - vi. One violation assessed at 20% of the civil penalty for all outstanding violations for a total of \$5,520.00 for failing to provide documents, testing, or monitoring records to the Division.
- 5. The Respondent is advised that the foregoing Order is not in any way to be construed as a waiver, express or implied, of any provision of the law or regulations, including but not limited to, future enforcement for violations of the Act and Regulations which are not charged as violations in this Order. However, compliance with the Order will be one factor considered in any decision whether to take enforcement action against the Respondent in the future.
- 6. 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.
- 7. For good cause shown by the Respondent, the Director may extend the compliance dates contained within this Order for a fixed time period. 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. § 69-215-119; 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 Tonya Spence Casson, Division of Underground Storage Tanks, Chattanooga Environmental Field Office, 1301 Riverfront Parkway, Chattanooga, Tennessee 37402 or to tonya.spence.casson@tn.gov. Attorneys should contact the undersigned counsel of record. **The case number, UST21-0089, 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 ______ day of ______ day of ______ , 2021.

Stanley R. Boyd, Director

Stanley & Boyd

Division of Underground Storage Tanks

TN Department of Environment and Conservation

Reviewed by:

Ashley Ball (Nov 3, 2021 14:59 CDT)

Ashley J. Ball BPR# 025250

Senior Associate Counsel

Department of Environment & Conservation 312 Rosa L. Parks Avenue, 2d Floor

Nashville, Tennessee 37243 615-532-0142

Ashley.Ball@tn.gov



STATE OF TENNESSEE

DEPARTMENT OF ENVIRONMENT AND CONSERVATION Division of Underground Storage Tanks William R. Snodgrass Tennessee Tower 312 Rosa L. Parks Avenue, 12th Floor Nashville, Tennessee 37243

REQUEST TO ATTEND UNDERGROUND STORAGE TANK TRAINING ONLINE

Please complete this form to attend training on the proper operation of underground storage tanks in accordance with rules established by the State of Tennessee. This form serves as a reservation to attend UST systems and maintenance training online with the Division of Underground Storage Tanks.

provide information about th	ne class and the online Tank Scho	npleting this form as it will be the primary way the web link to attend. Please carefully read the bol. If any of these requirements cannot be met whis box:	requirements
pm Central time / 9:30 am to	5:00 pm Eastern	ates throughout the year. All classes are from 8 nations time. The Division usually schedules 3 tank schedules After receipt of this completed form, the	ool classes per
I,proper operation of undergro		·	training on the
Name:		Date:	
My contact information is:	Email: Telephone: Address:		

Mail or Email this Request to:

Tonya Spence Casson Chattanooga Environmental Field Office 1301 Riverfront Parkway Chattanooga, Tennessee 37402 Tonya.Spence.Casson@tn.gov

REQUIREMENTS TO ATTEND ONLINE TANK SCHOOL

- ✓ Access to a computer and reliable/good internet connection [1.0 Mbps (Receive) and 1.5 Mbps (Send) is recommended].
- ✓ Access to reliable (charged/wired) audio source (i.e., cell phone, computer speakers, headset, etc.)
- √ Valid email address
- ✓ Ability to complete an online pre-test prior to class and an online post-test after the class presentation.
- ✓ Ability to participate and attend entire online class (approximately 6 hours).