

# Storage Tank Enforcement: Tennessee Department of Environment and Conservation Order and Assessment Addressing Jackson, Tennessee Facility



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The Tennessee Department of Environment and Conservation (“TDEC”) issued an April 8 Order and Assessment (“Order”) to Sunrise Oil, LLC, (“Sunrise”) for alleged violations of certain underground storage tank regulations. See Case No. UST 19-0022.

Sunrise is stated to be the registered owner of five underground storage tank (“UST”) systems located in Jackson, Tennessee.

Personnel from the TDEC Underground Storage Tank Division (“Division”) are stated to have performed a compliance inspection at the Sunrise facility on July 23, 2018. The inspection allegedly identified the following violations:

- Failure to provide release detection method capable of detecting a release from tank that routinely contains product in accordance with Rule 0400-18-01-.04(1)(a)1. Specifically, at the time of the inspection, two (2) inches of liquid was found in Tank 5 (2,000 gallon kerosene).
- Failure to ensure that cathodic protection system is tested every three (3) years in accordance with Rule 0400-18-01-.02(4)(c)1(i). Specifically, at the time of the inspection, corrosion protection test results were unavailable for review.
- Failure of facility tank owner to have one or more persons designated as Class A and Class B operators in accordance with Rule 0400-18-01-.16(1)(a). Specifically, at the time of the inspection, Class A, B, and C operators had not been properly trained and designated.

The Order states that Division personnel provided a document referencing the violations discovered and asked Sunrise to submit documentation by February 11, to document correction of the violations.

Requirements of the Order include performance of actions necessary to correct the alleged outstanding violations. Documentation of such corrective actions are required to be provided to the Division.

A civil penalty of \$15,600 is assessed.

Certain appeal rights are provided to Sunrise in the Order.

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