

Storage Tank Enforcement: Tennessee Department of Environment and Conservation Order/Assessment Addressing Alleged Violations



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The Tennessee Department of Environment and Conservation (“TDEC”) issued an April 15th Order and Assessment (“Order”) to Go Gas Quick Stop, Inc. (“Go Gas”) addressing alleged violations of the Tennessee rules related to underground storage tanks (“USTs”). See Case No. UST 21-0010.

The AO provides that Go Gas is the registered owner of three USTs in Jackson, Tennessee.

TDEC Underground Storage Tank Division (“Division”) personnel are stated to have contacted Bassam Saleh on August 6, 2020, to schedule a compliance inspection to be conducted on August 25, 2020. The compliance inspection is stated to have occurred on or about August 25, 2020, and the following violations were allegedly identified:

- Failure to conduct release detection monitoring at least monthly for releases using one of the methods listed in subparagraphs (3) through (f) of this rule in accordance with Rule 0400-18-01-.04(2)(a)
- Failure to install, calibrate, operate, or maintain a release detection method for tank in accordance with manufacturer’s instructions in accordance with Rule 0400-18-01-.04(1)(a)(2)
- Failure to inspect impressed current corrosion protection system every 60 days in accordance with Rule 0400-18-01-.02(4)(c)(4)
- 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)

The results of the inspection are stated to have been sent to Go Gas to which there was no response.

An additional violation is stated to have been identified which included:

- 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)

The Order specifies certain actions that Go Gas needs to undertake to correct the alleged violations and provide the Division with documentation of such corrective action. Further, Go Gas is required to pay a civil penalty of \$16,080.

The Order provides Go Gas certain appeal rights.

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

