



Underground Storage Tank Enforcement Update

Underground Storage Tanks and
Solid Waste Disposal Control Board
May 7, 2025

Rhonda Key, Environmental Manager

ENFORCEMENT OVERVIEW

The Division issued 47 orders
between January 1, 2025
and March 31, 2025.

17 were Fund Orders. Of the 27 remaining
compliance orders, 3 were Appealed, 2 were
Non-Suited, 5 are in Final status, 7 are in Signed
status and, 10 are in Signed-Pending SOP
status.

Enforcement Overview (cont'd)

From January 1, 2025, to March 31, 2025:

The Division assessed \$688,616 in civil penalties.

Final Orders

Final Order

Summary of CRF24-0001

Fac. ID No. 4-250051/ Midway Quick Stop, Cookeville, Fentress County

- Cost Recovery Order signed January 8, 2025.
- Violations on Order:
 - Failure to provide release detection records for UST systems
 - Failure to report a suspected release within 72 hours.
- Penalty:
 - Total fees and penalties: \$34, 335.64.
- An Agreed Order was entered on January 13, 2025. The Respondent is to pay an upfront penalty of \$34,335.64. Failure to comply could result in further enforcement actions.

Final Order

Summary of FDA25-0005

Fac. ID No. 1-300057/ Pilot Travel Center No. 501, Johnson City, Greene County

- Fund Deductible Amount Order signed January 9, 2025.
- Violations on Order:
 - Failure to report a suspected release within 72 hours.
 - Failure to install, calibrate, operate, or maintain release detection method for tank in accordance with manufacturer's instructions.
- The Application for Fund Eligibility is approved with a deductible of \$30,000.
- The order became final February 16, 2025, and is currently in OGC.

Final Order

Summary of FDA25-0009

Fac. ID No. 5-190863/ Mapco Express No. 3065, Nashville, Davidson County

- Fund Deductible Amount Order signed January 22, 2025.
- Violations on Order:
 - Failure to inspect overfill prevention equipment at least once every three years.
 - Failure to operate and maintain corrosion protection system in accordance with a corrosion expert's design to provide continuous protection.
 - Failure to install, calibrate, operate, or maintain release detection method for tank in accordance with manufacturer's instructions.
- The Application for Fund Eligibility is approved with a deductible of \$20,000.
- Penalty:
 - Total fees and penalties: \$4,400.00.
- The order became final February 24, 2025, and is currently in OGC.

Final Order

Summary of FDA25-0010

Fac. ID No. 2-470895/ Flying J. Travel Plaza No. 722, Knoxville, Knox County

- Fund Deductible Amount Order signed January 2, 2025.
- Violations on Order:
 - Failure to report a suspected release to the Division within seventy-two (72) hours after discovery of released petroleum.
 - Failure to conduct annual line tightness test or do monthly monitoring on pressurized underground piping.
 - Failure to install or provide adequate overfill prevention system.
- The Application for Fund Eligibility is approved with a deductible of \$10,000.
- The order became final February 12, 2025, and is currently in OGC.

Final Order

Summary of FDA25-0018

Fac. ID No. 2-070274/ Pilot 1577, Knoxville, Campbell County

- Fund Deductible Amount Order signed January 23, 2025.
- Violations on Order:
 - Failure to report a suspected release to the Division within seventy-two (72) hours after discovery of released petroleum, the occurrence of unusual operating conditions or occurrence of monitoring results that indicate a release may have occurred.
 - Failure to conduct annual line tightness test or do monthly monitoring on pressurized underground piping.
- The Application for Fund Eligibility is approved with a deductible of \$30,000.
- Penalty:
 - Total fees and penalties: \$13,600.00.
- The order became final February 28, 2025, and is currently in OGC.

Final Order

Summary of FED25-0001

Fac. ID No. 3-330758/ Town of Lookout Mountain, Chattanooga, Hamilton County

- Fund Eligibility Denial Order signed January 23, 2025.
- Violations on Order:
 - Failure to test line leak detectors annually.
 - Failure to report a suspected release to the Division within seventy-two (72) hours after discovery of released petroleum.
 - Failure to submit the application for fund eligibility within ninety (90) days of the suspected release.
- The Application for Fund Eligibility is denied.
- The order became final March 30, 2025, and is currently in OGC.

Final Order

Summary of UST24-0215

Fac. ID No. 3-580042/ Sam's Travel Center, Chattanooga, Marion County

- Director's Order signed January 3, 2025.
- Violations on Order:
 - Failure of facility having one or more petroleum UST system to have one or more persons designated as Class A and Class B Operators.
- Penalty:
 - Total fees and penalties: \$4,560.00.
- The order became final February 15, 2025, and is currently in OGC.

Final Order

Summary of UST24-0224

Fac. ID No. 4-890067/ Morrison Market, Cookeville, Warren County

- Director's Order signed February 20, 2025.
- Violations on Order:
 - Failure to report a suspected release to the division within seventy-two (72) hours.
 - Failure to monitor tanks at least monthly.
 - Failure to inspect overfill prevention equipment at least once every three years.
 - Failure to conduct monthly monitoring on pressurized underground piping.
 - Failure to cooperate with the Division.
- Penalty:
 - Total fees and penalties: \$12,960.00.
- The Order became final April 4, 2025, and is currently in OGC.

Final Order

Summary of UST24-0239

Fac. ID No. 9-791359/ Winchester BP, Memphis, Shelby County

- Director's Order signed February 11, 2025.
- Violations on Order:
 - Failure to conduct a site check properly when there is environmental contamination present.
 - Failing to cooperate with the Division.
- Penalty:
 - Total fees and penalties: \$3,840.00.
- The Order became final April 3, 2025, and is currently in OGC.

Final Order

Summary of UST24-0240

Fac. ID No. 3-540125/ Etowah Shell, Chattanooga, McMinn County

- Director's Order signed February 24, 2025.
- Violations on Order:
 - Failure to test line leak detectors annually in accordance with guidance provided by the Division and manufacturer's instructions.
 - Failure to test electronic and mechanical components at least annually for proper operation.
 - Failure to inspect overfill prevention equipment at least once every three years .
 - Failure to test spill prevention equipment at least once every three years.
 - Failure to keep spill catchment basins free of water, dirt, debris, etc.
 - Failing to cooperate with the Division.
- Penalty:
 - Total fees and penalties: \$47,040.00.
- The Order became final April 4, 2025, and is currently in OGC.

Final Order

Summary of UST24-0247

Fac. ID No. 5-830294/ Petro Plus, Nashville, Sumner County

- Director's Order signed January 28, 2025.
- Violations on Order:
 - Failure to inspect overfill prevention equipment at least once every three years.
 - Failing to cooperate with the Division.
- Penalty:
 - Total fees and penalties: \$12,000.00.
- The Order became final March 10, 2025, and is currently in OGC.

Final Order

Summary of UST24-0260

Fac. ID No. 6-500151/ South End BP, Columbia, Lawrence County

- Director's Order signed January 16, 2025.
- Violations on Order:
 - Failure to operate and maintain corrosion protection system in accordance with a corrosion expert's design to provide continuous protection.
 - Failing to cooperate with the Division.
- Penalty:
 - Total fees and penalties: \$2,400.00.
- The Order became final February 22, 2025, and is currently in OGC.

Final Order

Summary of UST24-0265

Fac. ID No. 3-331252/ Kanku's No. 11, Chattanooga, Hamilton County

- Director's Order signed January 16, 2025.
- Violations on Order:
 - Failure to repair, replace or close a UST system and begin corrective action if test results indicate that a release exist.
 - Failure to conduct a site check properly when there is environmental contamination present.
 - Failing to cooperate with the Division.
- Penalty:
 - Total fees and penalties: \$7,680.00.
- The Order became final February 24, 2025, and is currently in OGC.

Final-Probation Orders

Final – Probation Order

Summary of FDA25-0007

Fac. ID No. 5-191335/ Porter Road Citgo, Nashville, Davidson County

- Fund Deductible Amount Order signed February 4, 2025.
- Violations on Order:
 - Failure to have spill prevention equipment that will prevent release of petroleum to the environment when the transfer hose is detached from the fill pipe.
 - Failure to perform periodic walkthrough inspections.
 - Failure to provide release detection method capable of detecting a release from tank that routinely contains product.
 - Failure to conduct annual line tightness test or do monthly monitoring on pressurized underground piping.
 - Failure to test line leak detectors annually.
 - Failure to maintain results of annual testing of electronic and mechanical components for three years.
 - Failure to cooperate with the Division.

Final – Probation Order-Continued

Summary of FDA25-0007

Fac. ID No. 5-191335/ Porter Road Citgo, Nashville, Davidson County

- Fund Deductible Amount Order signed February 4, 2025.
- Violations on Order:
 - Failure to repair, replace or close the UST system and begin corrective action if test results indicate that a release exists.
 - Failure to successfully complete retraining.
- The Fund Eligibility application is approved with a deductible of \$20,000.
- Penalty:
 - Total fees and penalties: \$3,200.00.
- An Agreed Order was entered on March 31, 2025. The Respondent is to pay an upfront penalty of \$1,760.00 and have no probation violations for one year. A contingent penalty will be due if there is a violation during the year probation time.

Final Probation Order

Summary of UST24-0200

Fac. ID No. 8-550038/ Michie Quick Stop, Jackson, McNairy County

- Director's Order signed January 23, 2025.
- Violations on Order:
 - Failure to monitor tanks at least monthly.
 - 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.
 - Failure to operate and maintain corrosion protection system.
 - Failure to conduct monthly monitoring on pressurized underground piping.
 - Failure to perform periodic walkthrough inspections.

Final Probation Order-Continued

Summary of UST24-0200

Fac. ID No. 8-550038/ Michie Quick Stop, Jackson, McNairy County

- Director's Order signed January 23, 2025.
- Penalty:
 - Total fees and penalties: \$21,120.00.
- An Agreed Order was entered on March 20, 2025. The Respondent is to pay an upfront penalty of \$3,580.00 and have no probation violations for one year. A contingent penalty will be due if there is a violation during the year probation time.

Final Remediation Orders

Final Remediation Order

Summary of FDA25-0013

Fac. ID No. 5-190741/ Circle K No. 4703926, Nashville, Davidson County

- Fund Deductible Amount Order signed February 5, 2025.
- Violations on Order:
 - Failure to operate and maintain corrosion protection system in accordance with a corrosion expert's design to provide continuous protection.
 - Failure to keep spill catchment basins free of water, dirt, debris, etc.
 - Failure to have at least one trained Class C Operator on site whenever the facility is operating.
 - Failure to report a suspected release to the Division within seventy-two (72) hours after discovery of released petroleum, the occurrence of unusual operating conditions or the occurrence of monitoring results that indicate a release may have occurred.

Final Remediation Order-Continued

Summary of FDA25-0013

Fac. ID No. 5-190741/ Circle K No. 4703926, Nashville, Davidson County

- Fund Deductible Amount Order signed February 5, 2025.
- The Fund Eligibility application is approved with a deductible of \$30,000.
- Penalty:
 - Total fees and penalties: \$15,100.00.
- The facility has returned to compliance and the civil penalty was paid in full. Remediation has an open case on the facility.

Non-Suit Orders

Non-Suit Order

Summary of UST24-0265

Fac. ID No. 9-792570/ Quick Mart, Memphis, Shelby County

- Director's Order signed January 3, 2025.
 - Violations on Order:
 - Failure of facility having one or more petroleum UST systems to have one or more persons designated as Class A, Class B and Class C Operators.
 - Failing to cooperate with the Division.
- Penalty:
 - Total fees and penalties: \$4,560.00.
- The facility successfully designated the Operators. There was an issue with an incorrect address for the Respondent. The Order was non-suited on February 7, 2025.

Non-Suit Order

Summary of UST24-0242

Fac. ID No. 3-060058/ Collins Oil Co. Inc., Chattanooga, Bradley County

- Director's Order signed March 11, 2025.
 - Violations on Order:
 - Failure to provide release detection method capable of detecting a release from tank that routinely contains product.
 - Failing to cooperate with the Division.
- Penalty:
 - Total fees and penalties: \$15,360.00.
- The Respondent proved compliance the same day the order was sent for service. So, the order was non-suited.

Appealed Orders

Appealed Order

Summary of FDA24-0048

Fac. ID No. 5-750260/ Pilot Travel Center No. 52, Nashville, Rutherford County

- Fund Deductible Amount Order signed January 15, 2025.
 - Violations on Order:
 - Failure to report a suspected release to the Division within seventy-two (72) hours.
 - Failure to keep spill catchment basins free of water, dirt, debris, etc.
 - Failure to comply with requirements concerning design, construction, utilization, and or upgrade of corrosion protection for piping.
- The Application for Fund Eligibility is approved with a deductible of \$30,000.00.
- Penalty:
 - Total fees and penalties: \$2,200.00.
- The order was appealed on February 21, 2025, and is currently in OGC.

Appealed Order

Summary of FDA25-0012

Fac. ID No. 8-390152/ 101 Travel Center, Jackson, Henderson County

- Fund Deductible Amount Order signed January 21, 2025.
 - Violations on Order:
 - Failure to maintain results of annual testing of electronic and mechanical components for three years.
 - Failure to conduct a system test when there is a suspected release to determine whether a leak exists in the tank or delivery piping or a breach exists in either wall or secondary containment.
- The Application for Fund Eligibility is approved with a deductible of \$20,000.00.
- Penalty:
 - Total fees and penalties: \$12,000.00.
- The order was appealed on February 26, 2025, and is currently in OGC.

Appealed Order

Summary of FDA25-0014

Fac. ID No. 9-790821/ The Market No. 135, Memphis, Shelby County

- Fund Deductible Amount Order signed January 9, 2025.
 - Violations on Order:
 - Failure to maintain results of annual testing of electronic and mechanical components for three years.
- The Application for Fund Eligibility is approved with a deductible of \$20,000.00.
- Penalty:
 - Total fees and penalties: \$12,000.00.
- The order was appealed on March 7, 2025, and is currently in OGC.

Appealed Order

Summary of UST24-0176

Fac. ID No. 4180173/ Ian's Market, Cookeville, Cumberland County

- Director's Order signed January 13, 2025.
- Violations on Order:
 - Failure to have a designated A and B Operator.
 - Failure to properly anchor shear valves under dispenser 7/8
 - Failure to test pressurized piping annually
 - Failure to cooperate with the Division.
- Penalty:
 - Total fees and penalties: \$67,680.00.
- The Order was appealed on November 18, 2024 and is currently in OGC.

Appealed Order

Summary of UST24-0235

Fac. ID No. 5-940254/ New Highway 96 Market, Nashville, Williamson County

- Director's Order signed February 11, 2025.
- Violations on Order:
 - Failure to continue operation and maintenance of release detection in a temporarily closed tank system that contains greater than 1 inch of liquid and/or residue.
 - Failure to ensure that the cathodic protection system is tested every 3 years.
 - Failure to inspect the impressed current cathodic protection system every sixty (60) days.
 - Failure to cooperate with the Division.
- Penalty:
 - Total fees and penalties: \$14,400.00.
- The Order was appealed on February 23, 2025, and is currently in OGC.

Appealed Order

Summary of UST24-0263

Fac. ID No. 6-600342/ Sara's Cooking Shack, Columbia, Maury County

- Director's Order signed February 14, 2025.
- Violations on Order:
 - Failure to monitor tanks at least monthly.
 - Failure to cooperate with the Division.
- Penalty:
 - Total fees and penalties: \$3,840.00.
- The Order was appealed on March 12, 2025, and is currently in OGC.

Appealed Order

Summary of UST25-0009

Fac. ID No. 7-270042/ Tony Montana Mini Mart, Jackson, Gibson County

- Director's Order signed March 6, 2025.
- Violations on Order:
 - Failure to have spill prevention equipment that will prevent release of petroleum to the environment when the transfer hose is detached from the fill pipe.
 - Failure to have overfill prevention equipment that will automatically shut off the flow into the tank when the tank is no more than ninety-five (95%) full.
 - Failure to install, calibrate, operate, or maintain release detection method for tank in accordance with manufacturer's instructions.
 - Failure to operate and maintain corrosion protection system in accordance with a corrosion expert's design to provide continuous protection.
 - Failure to cooperate with the Division.
- Penalty:
 - Total fees and penalties: \$29,760.00.
- The Order was appealed on April 3, 2025, and is currently in OGC.

Orders Final or Appealed from Previous Quarter

Final Order

Summary of UST24-0203

Fac. ID No. 9-791900/ PRP Properties, Memphis, Shelby County

- Director's Order signed October 29, 2024.
- Violations on Order:
 - 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.
 - Failure of facility having one or more petroleum UST systems to have one or more persons designated as Class A, Class B, and Class C Operators.
 - Failure to cooperate with the Division.
- Penalty:
 - Total fees and penalties: \$11,760.00.
- The Order became final December 2, 2024, and is currently in OGC. Settlement reached. Respondent paid \$8,349.60 in upfront civil penalties and \$60.00 for service of process. \$3,350.40 remains contingent based on 1 year of probation.

Appealed Order

Summary of UST24-0065

Fac. ID No. 9-792626/Shelby Food Center, Memphis, Shelby County

- Director's Order signed October 18, 2024.
- Violations on Order:
 - 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.
 - Failure to inspect overfill prevention equipment at least once every three years.
 - Failure to perform periodic walkthrough inspections.
 - Failure to conduct annual line tightness test on pressurized underground piping
 - Failure to test line leak detectors annually.
 - Failure to test electronic and mechanical components at least annually for proper operation.

Appealed Order-Continued

Summary of UST24-0065

Fac. ID No. 9-792626/Shelby Food Center, Memphis, Shelby County

- Director's Order signed October 18, 2024.
- Violations on Order:
 - Failure to successfully complete retraining to the appropriate level of operator Class within a timeframe determined by the division when a significant operational compliance violation is discovered.
 - Failure to cooperate with the Division.
- Penalty:
 - Total fees and penalties: \$40.560.00
- The Order was appealed on November 29, 2024, and is currently in OGC. Settlement reached. Respondent will pay \$60.00 for Service of Process and \$3,980.00 in upfront civil penalties in twelve installments. The first installment included the Service of Process and has been paid. \$3,980.00 remains contingent on one year of probation.

Appealed Order

Summary of UST24-0182

Fac. ID No. 2-010088/ Casey's No. 4228, Knoxville, Anderson County

- Director's Order signed October 11, 2024.
- Violations on Order:
 - Failure to report a suspected release to the Division within seventy-two (72) hours.
 - Failure to conduct an annual line tightness test or do monthly monitoring on pressurized underground piping.
 - Failure to monitor tanks at least monthly.
 - Failure to install, calibrate, operate, or maintain a release detection method for tanks in accordance with manufacturer's instructions.
 - Failure of an unmanned facility to meet Class C Operator requirements by posting appropriate signage conspicuously.
 - Failure to cooperate with the Division.
- Penalty:
 - Total fees and penalties: \$67,680.00.
- The Order was appealed on November 18, 2024, and is currently in OGC. Settlement was reached and the Respondent paid \$160.00 for service of process and \$47,376.00 in upfront civil penalties. \$20,304 will remain contingent based on one year of probation.

Appealed Order

Summary of UST24-0229

Fac. ID No. 2-130103/ Ian's Market No. 37, Knoxville, Claiborne County

- Director's Order signed October 22, 2024.
- Violations on Order:
 - Failure to conduct annual line tightness test on pressurized underground piping.
 - Failure to test line leak detectors annually in accordance with guidance provided by the Division and manufacturer's instructions.
Failure of facility having one or more petroleum UST systems to have one or more persons designated as Class A, Class B, and Class C Operators.
 - Failure to report a change of status for a UST system within thirty (30) days.
 - Failure to cooperate with the Division.
- Penalty:
 - Total fees and penalties: \$19,680.00.
- The Order was appealed on November 26, 2024, and is currently in OGC. Settlement has been reached, and the Respondent will pay \$130.00 for service of process and the full \$19,680.00 in six monthly payments of \$3,410.00.