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**By TDEC-OGC at 10:10 am, Dec 23, 2025**

December 22, 2025

**BY EMAIL**

<p>David Salyers, Commissioner          TENNESSEE DEPARTMENT OF ENVIRONMENT &amp;          CONSERVATION          Davy Crockett Tower          500 James Robertson Parkway          Nashville, TN 37243          (888) 891-TDEC (8332)  <a href="mailto:david.salyers@tn.gov">david.salyers@tn.gov</a></p>	<p>Jenny Howard, Deputy Commissioner and          General Counsel          TENNESSEE DEPARTMENT OF ENVIRONMENT &amp;          CONSERVATION          Davy Crockett Tower          500 James Robertson Parkway          Nashville, TN 37243          (888) 891-TDEC (8332)  <a href="mailto:jenny.howard@tn.gov">jenny.howard@tn.gov</a></p>
<p>Stacey Cothran, Chair          UNDERGROUND STORAGE TANKS AND SOLID          WASTE DISPOSAL CONTROL BOARD          William R. Snodgrass Tennessee Tower          312 Rosa L. Parks Avenue          Nashville TN 37243  <a href="mailto:scothran@wm.com">scothran@wm.com</a></p>	<p>Loretta J. Buchanan, Board Administrator          UNDERGROUND STORAGE TANKS AND SOLID          WASTE DISPOSAL CONTROL BOARD          William R. Snodgrass Tennessee Tower          312 Rosa L. Parks Avenue          Nashville TN 37243  <a href="mailto:Loretta.J.Buchanan@tn.gov">Loretta.J.Buchanan@tn.gov</a></p>

**Re: Petition for Declaratory Order**

Dear Commissioner Salyers, Deputy Commissioner Howard, Chair Cothran, and Administrator Buchanan:

Our firm represents the City of Murfreesboro, Tennessee. On behalf of the City, we hereby file with the Underground Storage Tank and Solid Waste Disposal Control Board—in accordance with Tenn. Code Ann. § 4-5-223 and Tenn. Comp. R. & Regs. 0400-10-01-.01—a petition for declaratory order regarding the applicability and validity of certain provisions of Tenn. Comp. R. & Regs. Rule 0400-11-01-.02, including 0400-11-01-.02(1)(c)1.(iii) and 0400-11-01-.02(6)(b)5.(ii).

I would be most appreciative if one of you could please confirm receipt of this letter and the enclosed petition. We look forward to working with you all and Underground Storage Tanks and Solid Waste Disposal Control Board to resolve this matter.

Petition for Declaratory Order  
December 22, 2025  
Page 2

Please feel free to contact me with any questions.

Sincerely,



Lisa K. Helton

LKH/bap  
encls.

cc: Hunter C. Branstetter ([hbranstetter@srvhlaw.com](mailto:hbranstetter@srvhlaw.com))  
Adam F. Tucker ([atucker@murfreesborotn.gov](mailto:atucker@murfreesborotn.gov))  
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Central Tennessee Regional Solid Waste Planning Board  
c/o John Rodgers ([jroddgers@krbslaw.com](mailto:jroddgers@krbslaw.com))