

TDEC

Division of Underground Storage Tanks

Complaint Response Policy

February 22, 2022

DISCLAIMER: This document is policy only and does not create legal rights or obligations. It is intended to provide division staff guidance on how to apply decisions, procedures and practices pertaining to the internal operation or actions of the division. Decisions affecting the public, including the regulated community, in any particular case will be made applying applicable laws and regulations to the specific facts. Mention of trade names or commercial products does not constitute an endorsement or recommendation for use.

SIGNATURE & REVISION HISTORY TABLE PAGE

Stanley A. Boyd

2/22/2022

Division Director

Date

A. Mark Braswell

2/22/2022

Drafter / Preparer

Date

Melinda J. Wein

2/22/2022

Reviewer

Date

Revision Number	Date	Brief Summary of Change
0	2/22/2022	Final Original Draft Policy

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1. Purpose

a. Authority to Investigate

The Tennessee Petroleum Underground Storage Tank Act (UST Act) provides authority to the Commissioner in § 68-215-107(a) through (e) to investigate complaints and the enforce rules of the Underground Storage Tanks and Solid Waste Disposal Control Board adopted pursuant to § 68-215-107(f)(1) through (11) in Chapter 0400-18-01. This document establishes a policy for receiving and responding to complaints, responding to complainants, tracking results, and periodically analyzing the data collected by the Division of Underground Storage Tanks (UST Division).

b. Definition of Complaint for this Policy

Since the UST Act or rules do not contain a definition for the term complaint, for the purposes of this Policy, valid complaints for the UST Division only include petroleum USTs regulated by the UST Act and rules adopted by the Board.

c. Clarification that Complaints may be Anonymous

There is no requirement in the UST Act for complainants to identify themselves or to submit a complaint in writing. Consequently, UST Division staff will accept complaints in any format, written or unwritten, and there is no requirement for a complainant to identify themselves or to provide a mailing or email address or telephone number unless they chose to for post complaint follow-up by the staff member.

2. Definitions

A petroleum underground storage tank or petroleum UST is defined in § 68-215-103(14).

"Petroleum underground storage tank" means any one (1) or combination of tanks (including the underground lines connected thereto) which are used or have been used to contain an accumulation of petroleum substances, and the volume of which (including the volume of the underground pipes connected thereto) is ten percent (10%) or more beneath the surface of the ground. "Petroleum underground storage tank" does not include any tank exempted from this chapter pursuant to § 68-215-124;"

Exempted tanks under § 68-215-124 are:

- “(1) Septic tanks;
- (2) Farm or residential tanks of one thousand one hundred gallons (1,100 gal.) or less used for storing motor fuel for noncommercial purposes;
- (3) Tanks used for storing heating oil for consumption on the premises where stored;
- (4) Pipeline facilities (including gathering lines) regulated under:
 - (A) The Natural Gas Pipeline Safety Act of 1968, compiled in 49 U.S.C. Appx. § 60101 et seq.;
 - (B) The Hazardous Liquid Pipeline Safety Act of 1979, compiled in 49 U.S.C. Appx. § 60101 et seq.;
 or
 - (C) State laws comparable to the law referred to in subdivision (4)(A) or (4)(B), if it is an intrastate pipeline;
- (5) Surface impoundments, pits, ponds, or lagoons;
- (6) Storm water or waste water collection systems;
- (7) Flow-through process tanks;
- (8) Liquid traps or associated gathering lines directly related to oil or gas production and gathering operations;
- (9) Petroleum storage tanks situated in an underground area (such as a basement, cellar, mine working, drift, shaft, or tunnel) if the storage tank is situated upon or above the surface of the floor; and
- (10) Pipes or connections connected to exempted tanks.”

3. Common Complaints Received

The UST Division only has oversight of petroleum USTs, associated piping and ancillary equipment regulated by the UST Act and rules adopted by the Board. The situations listed below are the most commonly received complaints¹.

Unregistered Tanks

UST Act	Unlawful Actions	§ 68-215-104(2)
UST Act	Notification as to tanks in use and tanks taken out of operation	§ 68-215-106(a)(1) and (a)(4)
UST Act	Notification as to tanks in use and tanks taken out of operation	§ 68-215-106(f)(9)
UST rules	Notification, Reporting, and Record Keeping	0400-18-01-.03(1)(a)1 and 2

Release Prevention

UST Act	Unlawful Actions	§ 68-215-104(2) and (6)
UST Act	Supervision, inspection, and enforcement responsibilities	§ 68-215-107(f)(6) and (7)
UST rules	Spill and overfill prevention	0400-18-01-.02(3)(a) through (d)

Corrosion Protection

¹ The list of commonly received complaints is not an exhaustive list of all violations that could occur under the UST Act and rules adopted by the Board.

UST Act	Unlawful Actions	§ 68-215-104(2) and (6)
UST Act	Supervision, inspection, and enforcement responsibilities	§ 68-215-107(f)(6) and (7)
UST rules	Corrosion protection	0400-18-01-.02(4)(a) through (c)6.ii.IV)

Release Detection

UST Act	Unlawful Actions	§ 68-215-104(2) and (6)
UST Act	Supervision, inspection, and enforcement responsibilities	§ 68-215-107(f)(1)
UST rules	Release detection	0400-18-01-.04(1)(a) through (5)(c)

Released petroleum discovered at the petroleum site or in the surrounding area by persons other than the responsible party or their service companies and corrective action contractors

UST Act	Unlawful Actions	§ 68-215-104(1)
UST Act	Supervision, inspection, and enforcement responsibilities	§ 68-215-107(f)(3) and (4)
UST rules	Release reporting, investigation and confirmation	0400-18-01-.05(1) through (4)(b)
UST rules	Petroleum release response, remediation, and risk management - General requirements	0400-18-01-.06(1)(a)
UST rules	Petroleum release response, remediation, and risk management - Initial Response	0400-18-01-.06(3)(a)

Illegal Tank Closures

UST Act	Unlawful Actions	§ 68-215-104(2)
UST Act	Supervision, inspection, and enforcement responsibilities	§ 68-215-107(f)(5)
UST rules	Release detection	0400-18-01-.07

Deliveries to unregistered or red tagged tanks

UST Act	Unlawful Actions	§ 68-215-104(2) and (3)
UST Act	Unlawful use of tanks identified or not identified by notice or tag	§ 68-215-106(c) through (f)
UST rules	Petroleum product delivery	0400-18-01-.15

Tampering with release detection or release prevention equipment

UST Act	Unlawful Actions	§ 68-215-104(2) and (6)
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UST Act	Unlawful use of tanks identified or not identified by notice or tag	§ 68-215-106(c) through (f)
UST rules	Petroleum product delivery	0400-18-01-.15

4. Invalid Complaints

The definition of valid complaint for this Policy does not include:

- a. Reporting of a suspected or confirmed release by a regulated party or their representative;
- b. Inquiries for copies of public records from inspections and cleanup projects;
- c. Requests for technical assistance with day-to-day compliance from the public, potential purchasers, real estate agents, tank owners, tank operators, service providers and corrective action contractors on topics like;
 - i Release detection release prevention questions;
 - ii Release response and corrective action questions;
 - iii Fund eligibility and coverage questions;
 - iv Construction or permitting questions;
 - v Notification and fees questions; and
 - vi Liability questions.
- d. Types of tanks that must be referred to another entity:
 - i Exempt tanks listed in 68-215-124(1) through (10);
 - ii Hazardous substance tanks regulated by the Environmental Protection Agency; and
 - iii All other tanks not defined as a petroleum underground storage tank in 68-215-103(14).

5. Database Tracking – *GasLog*²

Tracking of all valid and invalid complaints will be performed in the GasLog database where the start date for the complaint will be the date the UST Division is contacted by:

- a. The public through an in person conversation, telephone call, email, letter, news report or by any other means; or
- b. A referral by other TDEC Division, state or local agency, EPA or legislative contact.

² See Appendix F: Database Tracking and Entry – GasLog Complaint Tracking Module

6. Initial Complaint Response

The complaint response begins when the complaint is received by the UST Division.

- a. Employees will follow the work outcomes and action steps in their assigned Individual Performance Plan statements³, established UST Guidance⁴, and use established checklists⁵ for the site conditions, and arrive with the specified equipment⁶. See Appendices A, B and C.
- b. A trip report will be written and included in GasLog unless already determined to be non-jurisdictional
- c. Follow-up correspondence⁷ will be sent to or a conversation held with the complainant whenever possible unless already determined to be non-jurisdictional
 - i Letter – use appropriate Division form letter
 - ii Email – use appropriate email content copied from the Division’s form letter
 - iii Always provide results in a trip report showing findings
 - iv Telephone – place telephone conversation report in GasLog

7. Complaint Response Complete

The complaint response is complete and will be closed when the UST Division determines that the complaint:

- a. Is valid for regulation under UST Act and enters process for compliance inspections or the process for suspected and confirmed releases of petroleum;
- b. Is not valid for regulation under the UST Act and is referred to other TDEC entity, state or local agency, or EPA; or
- c. No regulated tank or other environmental condition is found after a trip to the site.

8. Tracking and Data Analysis

- a. Tracking will be performed in the GasLog database and periodic analysis of complaints will be performed by the Field Office Deputy Director to correspond with the mid-year (October 1 through March 31) and end-of-year (April 1 through September 30) Semiannual Reports of UST Performance Measures issued by the Environmental Protection Agency showing at a minimum:
 - i The number and percentage of:

³ See Appendix A – IPP work outcomes and action steps

⁴ See Appendix B - Technical Guidance Documents 19 and 20

⁵ See Appendix C - Drinking Water Complaints, Surface Water Complaints, Vapor Complaints

⁶ See Appendix D - Field Equipment Checklist

⁷ See Appendix E – Complaint follow-up correspondence

- A. Valid versus invalid complaints; and
 - B. The number and percentage of anonymous versus known complainants.
- ii Valid for all regulated USTs under the UST Act § 68-215-101 et seq.
- A. Valid no violations found
 - B. Valid violations found and type of violations
 - I. Release detection
 - II. Release prevention
 - III. Suspected release
 - IV. Confirmed release
 - V. Unregistered petroleum UST
- iii Invalid for all other tanks and structures not regulated under the UST Act § 68-215-101 et seq.
- A. Referred yes or no
 - B. Referred where and date
 - C. Complaint types
 - I. Types of invalid complaints for the UST Act
 - II. Age limited pre-1974 and pre-1988 – § 68-215-106(a)(2)
 - (i) All USTs out of service on or before January 1, 1974; and
 - (ii) All USTs out of service after January 1, 1974 and removed from the ground before July 1, 1988
- “For each petroleum underground storage tank taken out of operation after January 1, 1974, the owner of such tank shall within one (1) year after July 1, 1988, notify the commissioner of the existence of such tanks, unless the owner knows such tanks were removed from the ground. The owner of petroleum underground storage tanks taken out of operation on or before January 1, 1974, shall not be required to notify the commissioner. The commissioner shall accept as formal notification the EPA underground storage tank notification form filed with the department by the owner of the petroleum underground storage tank before July 1, 1988.”
- III. Exempt tanks under § 68-215-124 and other tanks

- IV. Hazardous substance tanks will be referred to the Region IV office of the Environmental Protection Agency in Atlanta, Georgia.
- V. Complaints about the following tanks will be referred to the Division of Solid Waste or Division of Remediation
 - (i) Petroleum ASTs;
 - (ii) Farm and residential tanks of $\leq 1,000$ gallons that are exempt by § 68-215-124(2);
 - (iii) Tanks used for storing heating oil for consumption on the premises where stored that are exempt by § 68-215-124(3);
 - (iv) Flow-through process tanks that are exempt by § 68-215-124(7);
 - (v) Petroleum storage tanks situated in an underground area (such as a basement, cellar, mine working, drift, shaft, or tunnel) if the storage tank is situated upon or above the surface of the floor that are exempt by § 68-215-124(9); and
 - (vi) Pipes or connections connected to exempted tanks that are exempt by § 68-215-124(10).
- VI. Complaints about the following tanks and structures will be referred to the Division of Water Resources
 - (i) Septic tanks that are exempt by § 68-215-124(1);
 - (ii) Surface impoundment and lagoons that are exempt by § 68-215-124(5);
 - (iii) Storm water and waste water collection systems that are exempt by § 68-215-124(6); and
 - (iv) Pipes or connections connected to exempted tanks that are exempt by § 68-215-124(10).
- VII. Complaints about the following tanks and structures exempted by § 68-215-124(9) and (10) will be referred to the Tennessee Public Utility Commission, Gas Pipeline Safety Division
 - (i) Pipeline facilities (including gathering lines) regulated under:
 - (1) The Natural Gas Pipeline Safety Act of 1968, compiled in 49 U.S.C. Appx. § 60101 et seq.;
 - (2) The Hazardous Liquid Pipeline Safety Act of 1979, compiled in 49 U.S.C. Appx. § 60101 et seq.; or
 - (3) State laws comparable to the law referred to in subdivision (4)(A) or (4)(B), if it is an intrastate pipeline; and

- (ii) Liquid traps or associated gathering lines directly related to oil or gas production and gathering operations.

9. Continuous Improvement and Quality Assurance

Training

- i) Division staff will be trained during refreshers at annual staff meetings, compliance inspector training, case manager's training or periodically as needed.
- ii) Report data will be reviewed with individual staff where training opportunities present.
- iii) Updates to the complaint policy will be provided to staff after updates occur.

Complaint Tracking System

- i) The system will be updated as needed per staff and leadership input.
- ii) Updates will be reviewed with Division IT personnel and implemented during the following semi-annual reporting period.

Program Adaptation

- i) The Division will consider changes to rules, regulations or policies should data analysis of environmental complaints show such changes are needed.
- ii) The Division will follow all applicable procedures in pursuing any such future changes.

Appendix A: IPP work Outcome and Action Steps for

UST Division Staff with Complaint Response Responsibilities

Work Outcome Statement: Promptly and effectively respond to all assigned UST environmental response situations and complaints in the Environmental Field Office in State fiscal year. For environmental impact issues, respond within 24 hours of notification/knowledge and within 10 days for other complaints.

Action Steps:

1. Notifies and consults appropriate personnel (i.e., supervisor, RP, CAC, state contractor through Central Office, other department program staff, PIO, local emergency response management) to insure the appropriate response is implemented and information is conveyed, tracked in UST databases, and filed.
2. Insures UST related complaints are entered, within 10 days, into Gaslog and hard file. Any complaint or request that is not under the normal day to day operations of the program is tracked in the Department's CST, if applicable.

Supports Goal: Strategic Goal 3-Positive Environmental Outcomes

B. Complaints are tracked in GasLog

Event Code 35a is used for emergency response, Event Code 02 any other complaints, and these codes will be queried for the annual work report and interim and annual reviews.

SOPs are provided to staff to use with specific inspection forms that are tracked in GasLog under Event Code 14f

Appendix B: Technical Guidance Documents 19 and

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Use the following web links to obtain the most recent guidance/forms for the reference documents.

TGD 019 [Impacted Drinking Water Management](#)

TGD 020 [Petroleum Vapor Management](#)

Appendix C: Drinking Water Complaints, Surface Water Complaints, Vapor Complaints

Examples from reporting period 7/1/2019 to 2/20/21:

Drinking Water:

Complaint No.	UST Fac. ID	Facility Name	EFO	County	Staff Initials
82074	9790157	Charlie's Friendly Service	Memphis	Shelby	KH
82074	Site ID: 89577			Created by:	Updated by:
Plus ID: 783				BG41077	BG41121

Details: The complainant called on February 10, 2020 and said that the facility in question had leaking tanks in the ground and that fuel was leaking into the surface. David Groce and I (Karim Bouzeid) have visited this site in the past for this same complaint. The facility in question has had all tanks removed and appropriate soil sample taken. All documentation shows no tanks and <RBCL contamination results. I told the complainant that we have a closure letter for the tanks and a passing test results for the soil sampling. He said that he was angry that the owner of the facility was, "doing some shady business without a permit". I suggested to them that they may want to check with the city code enforcement or another local government organization as the facility has met all of TDEC-UST standards for their tank closures.

Surface Water:

Complaint No.	UST Fac. ID	Facility Name	EFO	County	Staff Initials
90307		Jack Johnson's Wrecker Service	Chattanooga	Hamilton	DRB
90307	Site ID:			Created by:	Updated by:
Plus ID: 1164				BG41007	

Details: Initial complaint was sent to DRB via email by John Doe (Attorney) for Mr. Smith. Mr. Doe's phone # 423-555-1212 ext. 999, john@ispmadeup.com
Mr. Smith indicated old USTs were still in ground at 888 Easy Walk Lane and last used around 1981. No registered USTs discovered. Surface soil samples taken within 6" in depth did not indicate any BTEX. Hit on PAHs however could be from surface runoff. Referred to SWM

Vapor Complaints:

Complaint No.	UST Fac. ID	Facility Name	EFO	County	Staff Initials
86792	2470913	AR Market 1 LLC	Knoxville	Knox	RAH
86792	Site ID: 78932			Created by:	Updated by:
Plus ID: 964				BG41144	BG41144

Details: Petroleum odors identified in onsite and nearby storm drains. Confirmed during a site visit. Systems test and Site check Required.
Managed as a release case

Appendix D: Field Equipment Checklist for Complaints

STOCKED COOLER

2 – 4 Soil jars
2 – 4 sets VOA vials
1 – 2 sets PAHs bottles
Twine
Scissors/knife
Sample scoop/trowel
Alconox
DI water
Brush
Plastic sheeting
Trash bags
Nitrile gloves (in Ziploc bag)
Leather gloves
Ziploc bags for samples
4 – 6 Laboratory Chain of Custody forms
6 – 10 Sample tags
Indelible ink pen
Orange safety vest
Ear plugs
Safety glasses
Intrinsically safe flashlight
Measuring tape
Screwdriver
Emergency contact numbers

OTHER ITEMS TO TAKE TO THE FIELD

Sample cooler
Business cards
Field/site map
Camera
Inspection forms/tablet
Bailers
Safety cones
Sample coolers (1 stocked and 1 for samples)
Steel toe boots
Rubber boots
Hard

EQUIPMENT

PID
CGI
Water level indicator
Shovel
Hand auger
Measuring wheel
Crowbar
GPS
GPR (when needed)

Buckets
PCA/CAP/Latest monitoring report
Waders

hat

Appendix E: Complaint Follow-up Correspondence

Correspondence content and requirements may vary depending upon many factors. The following is an example of an *Unapproved Underground Storage Tank Closure* referenced on page 3 above.

(*1 Date)

#

(*2 Name)
(Company)
(Address)

Re: Enforcement Action Notice-Unapproved Underground Storage Tank Closure
(*3 Facility Name)
(*4 Facility Address)
Facility ID # (*5), (*6) County

Dear (*7):

The Division of Underground Storage Tanks has discovered that petroleum (*8 tanks, lines, compartments or system) at the above referenced facility have been closed without our approval. This is a violation of Rule 0400-18-01-.07(4)(a) which states, in part:

“(a) At least thirty (30) days before beginning either permanent closure of any portion of an underground storage tank system or a change-in-service under subparagraphs (b) and (c) of this paragraph, owners, operators and/or other responsible parties shall apply for permanent closure, unless such action is in response to corrective action. Application for permanent closure or change in service shall meet the following requirements:

1. An Application for Permanent Closure of Underground Storage Tank Systems shall be submitted in a format established by the division. The application shall be completed according to the instructions provided by the division.
2. The tank owner, operator and/or other responsible party shall obtain division approval of the Application for Permanent Closure prior to permanently closing the UST system or any portion thereof or effecting a change in service of the UST system, unless tank compartment closure is conducted in accordance with paragraphs (3) and (5) of this rule.
3. The application shall constitute a plan for closure or change in service of the UST system, or any portion thereof.”

This file is being referred to the enforcement section of the Division for review and may result in assessment of civil penalties. Once the file is received in our central office, a case manager will be assigned to evaluate the case, and this person will work with you throughout the enforcement process.

Although the Division does have to make you aware of this violation and inform you about the referral, we are committed to working with you to reach our common goal of safely storing petroleum in the State of Tennessee.

Please submit a properly completed Application for Permanent Closure of Underground Storage Tank Systems (PCA) to this field office by (*9 date 30 days). We ask for your help to protect our natural resources because leaking tanks can contaminate Tennessee's drinking water or cause significant safety hazards and the cost to clean-up even small leaks can be very high.

All forms and guidance, including the PCA, are available at <http://www.tn.gov/environment/section/ust-underground-storage-tanks>

If you have any questions about this letter, please do not hesitate to call me at (phone *#).

Sincerely,

(name)

(Title optional)

Division of Underground Storage Tanks

c: -----FO Closure File # (*5)

FO-029EAN 03092016 FINAL

Appendix F: Database Tracking and Entry – GasLog Complaint Tracking Module

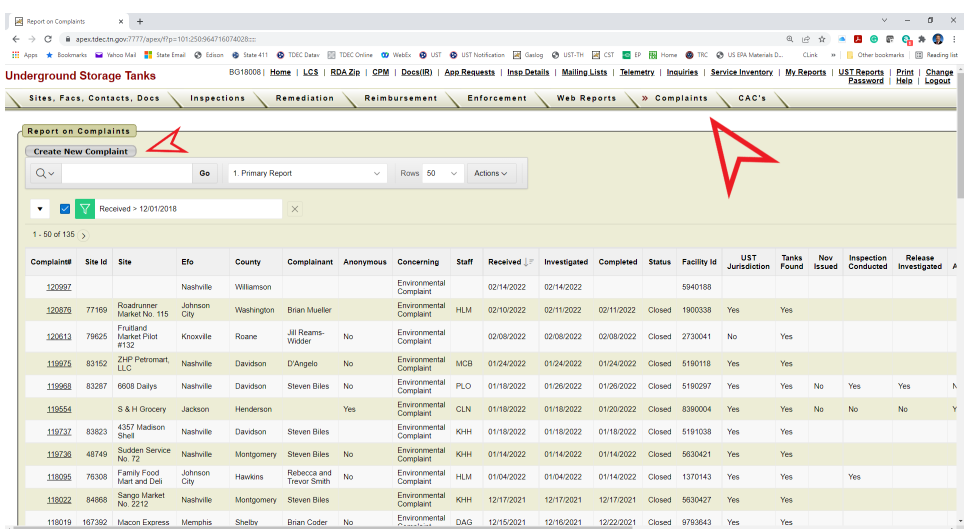
This complaint policy process is paraphrased below for staff convenience and use while using the Division's Complaint Tracking Module. Staff responding to complaints must:

- 1) Thoroughly collect and document complainant allegations and contact information (if not anonymous),
- 2) For environmental impacts, investigate and respond within **2** calendar days and for all others within **10** calendar days of complaint intake,
- 3) Determine if the allegations made can be independently confirmed which will predominantly involve on-site observations, photographic documentation, etc.
- 4) Determine if the allegation falls under the Division of Underground Storage Tanks' jurisdiction (UST Act and subsequent adopted Rules),
- 5) If not the Division of Underground Storage Tanks' jurisdiction, make proper referrals to other TDEC regulatory Divisions, external agencies, and/or local government, if applicable,
- 6) Communicate results of the complaint investigation to complainant upon request,
- 7) Enter complaint investigation and upload documentation into the Division's *GasLog* Complaint Tracking Module completing information in each region of the module in its entirety,
- 8) Complete the above steps and close the complaint within **one business week** of completing the initial complaint response, and
- 9) For continuing UST jurisdictional requirements, track subsequent actions in other *GasLog* modules (compliance, remediation, etc.) per standard protocols.

The following shows each module of the *GasLog* Complaints Tracking Module and brief notes where needed. Selecting the "Apply Changes" button at any point saves the data entered. Selecting the "Cancel" button refreshes the record to the last saved version and does not save any updates currently entered. A printed version of the complaint data can be generated by selecting the "Printed Version" and following the printer dialogue prompts thereafter.

Appendix F (cont'd)

GasLog Complaint Tracking Module



To access GasLog, login to the secured state network application using active directory user id and password.

To start a complaint module database entry, select the complaint module tab on the upper screen right (large red arrow) and then select the "Create New Complaint" gray button on the upper screen left (small red arrow).

Appendix F (cont'd)

Note: The regions' screen is intended to be completed from left to right top to bottom.

Complaint Region					
Sites, Facts, Contacts, Docs		Inspections		Remediation	
Parent Site Name	Site Location	County	EFO	Latitude	Longitude
Macon Express	3388 Macon Rd.	Shelby	Memphis	35.162929	-89.947518

COMPLAINT

Concerning Environmental Complaint

Complaint Number **118019**

Division **UST**

Date Received

Received by RMF . . Roshanda Forsythe . (901) 232-5968

How Received

Assigned By RMF . . Roshanda Forsythe . (901) 232-5968

Assigned Date

Assigned To DAG . . David Groce . (901) 275-4203

UST Facility ID

TDEC Site ID

Concerning

Complainant Allegation	Staff Verified					
Drinking Water	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	
Stream/Surface Water	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	
Vapors in Building	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	
Vapors in Sewer System	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	
Vapors other	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	
Petroleum discovered on-site	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	
Petroleum discovered off-site	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	
Tank floating from tank pit	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	
Storm Drain	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	
Stained Soil	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	
Stressed Vegetation	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	
Building Evacuated	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	
Fire and/or Explosion	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	
Surface Spill	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	
Overfill	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	
Water in Auto Fuel Tank	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	
Water in UST	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	
Unregulated/Orphan Tank	<input checked="" type="checkbox"/> Yes	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A	

Concerning (Other)

Enter or select items beginning with "Date Received" and continue entering/selecting items down the page completing the entire region.

The complaint can be assigned/delegated to other staff members for response and follow-through or by the original staff recipient as needed.

All registered UST facility ID's can be selected.

Important note: A TDEC Site ID must be selected for the Documents with this Complaint and location based on SITE_ID regions to display. Documents, photos, etc. cannot be uploaded without a TDEC Site ID selected. The source of TDEC Site IDs incorporate sites from all TDEC (water, air, solid waste, etc.) so most of the time a TDEC site ID exists. If a TDEC site ID cannot be matched, please contact [Jo McCrary](#) or [David Brewer](#) for assistance.

Check box(es) "Yes" for allegations made by the complainant.

Check box(es), "Yes", "No, or "N/A" for staff verified. Staff verified means that staff themselves directly confirmed the allegation. Any "N/A" box checked should be further detailed in the "Concerning Other" memo box at the bottom of this region.

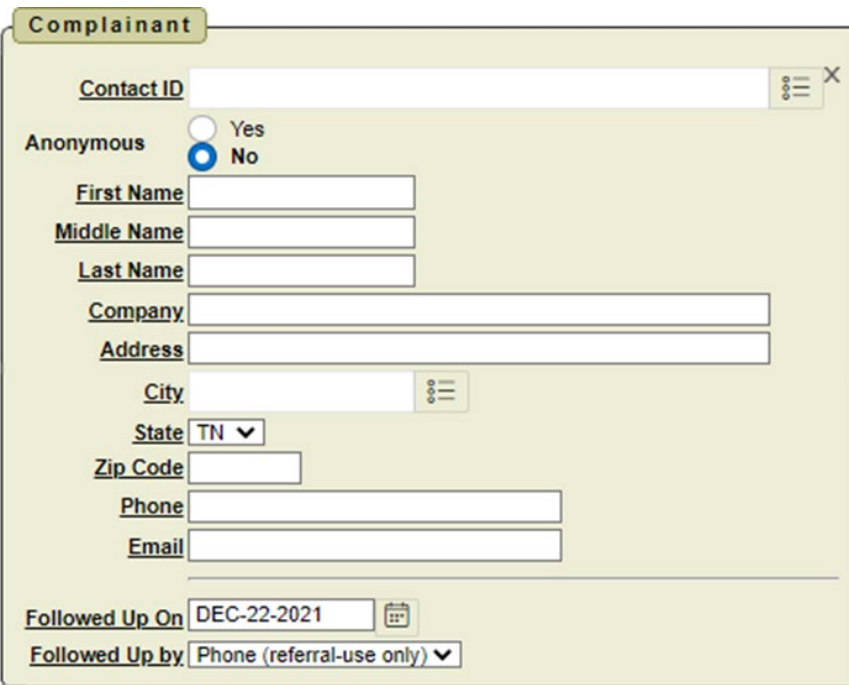
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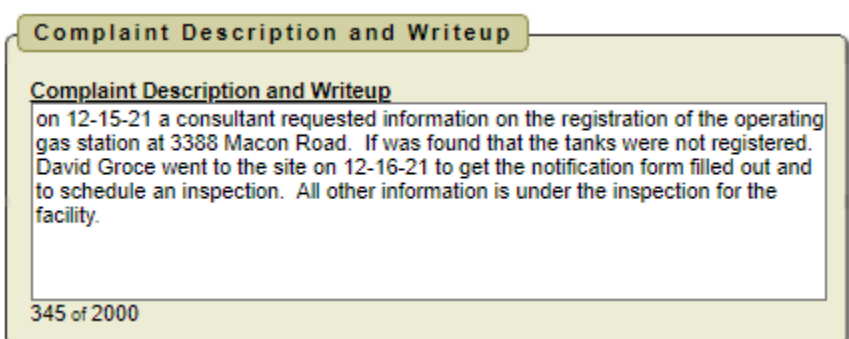
Appendix F (cont'd)

Audit History for Complaints Region																																										
<div style="border: 1px solid black; padding: 5px;"> <p>Audit History For Complaints ▢</p> <table border="1"> <thead> <tr> <th>Complaint ID ↑</th> <th>Col Name</th> <th>Rcd ID</th> <th>Old Value</th> <th>New Value</th> <th>Change Date</th> <th>Change By</th> </tr> </thead> <tbody> <tr> <td>118019</td> <td>SITE_ID</td> <td>118019</td> <td>-</td> <td>167392</td> <td>24-JAN-2022 08:20:41</td> <td>BG41154</td> </tr> <tr> <td>118019</td> <td>ASSIGNED_TO</td> <td>118019</td> <td>-</td> <td>DAG</td> <td>24-JAN-2022 08:22:37</td> <td>BG41154</td> </tr> <tr> <td>118019</td> <td>ASSIGNED_BY</td> <td>118019</td> <td>-</td> <td>RMF</td> <td>24-JAN-2022 08:22:37</td> <td>BG41154</td> </tr> <tr> <td>118019</td> <td>ASSIGNED_DATE</td> <td>118019</td> <td>-</td> <td>DEC-16-2021</td> <td>24-JAN-2022 08:22:37</td> <td>BG41154</td> </tr> </tbody> </table> <p style="text-align: right;">1 - 4</p> </div>							Complaint ID ↑	Col Name	Rcd ID	Old Value	New Value	Change Date	Change By	118019	SITE_ID	118019	-	167392	24-JAN-2022 08:20:41	BG41154	118019	ASSIGNED_TO	118019	-	DAG	24-JAN-2022 08:22:37	BG41154	118019	ASSIGNED_BY	118019	-	RMF	24-JAN-2022 08:22:37	BG41154	118019	ASSIGNED_DATE	118019	-	DEC-16-2021	24-JAN-2022 08:22:37	BG41154	<p>By default, this region is not expanded. Select the arrow right and adjacent to the title "Audit History for Complaints" to expand.</p> <p>This displays the audit trail (staff and when database entries were made) to this record of the complaints module.</p>
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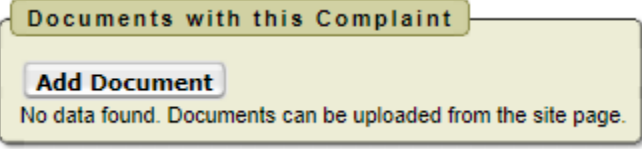
Location based on SITE_ID Region																		
<div style="border: 1px solid black; padding: 5px;"> <p>Location based on SITE_ID</p> <table border="1"> <tbody> <tr> <td>Site ID</td> <td><u>167392</u></td> </tr> <tr> <td>Site</td> <td>Macon Express</td> </tr> <tr> <td>Location</td> <td>3388 Macon Rd.</td> </tr> <tr> <td>City</td> <td>Memphis, TN</td> </tr> <tr> <td>Description</td> <td>-</td> </tr> <tr> <td>County</td> <td>Shelby</td> </tr> <tr> <td>EFO Name</td> <td>Memphis</td> </tr> <tr> <td>Site Owner</td> <td>-</td> </tr> </tbody> </table> </div>		Site ID	<u>167392</u>	Site	Macon Express	Location	3388 Macon Rd.	City	Memphis, TN	Description	-	County	Shelby	EFO Name	Memphis	Site Owner	-	<p>This region displays when a TDEC SITE_ID is selected from the Complaint Region.</p>
Site ID	<u>167392</u>																	
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Location	3388 Macon Rd.																	
City	Memphis, TN																	
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Appendix F (cont'd)

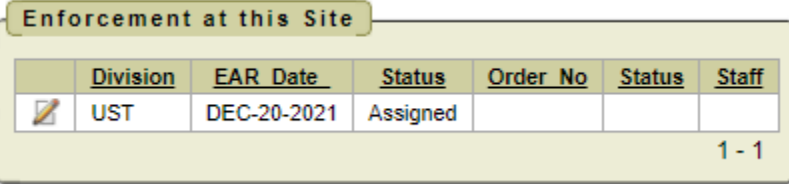
Complainant Region	
	<p>Enter complainant contact information in this region.</p> <p>If the anonymous “yes” radio button is selected, all complainant information fields (first name, middle name, last name, etc.) are greyed out and data entry is not permitted.</p> <p>All care should be taken to protect an anonymous complainant’s privacy. Should an anonymous complainant request an investigation update, simply provided the staff’s phone number so that the complainant can call back in the future to receive an update.</p>

Complaint Description and Writeup Region	
	<p>Describe the complaint allegations and factual details.</p> <p>Be sure to select other complaint module regions’ checkbox(es) and not simply describe in this narrative.</p> <p>The checkboxes are used to mine complaint tracking data and generate statewide reports every 6 months.</p>

Appendix F (cont'd)

Documents with this Complaint Region	
	<p>Select "Add Document" to upload trip report, photos, sampling results, etc.</p> <p>Remember, this region will not display unless a TDEC SITE_ID is selected in the Complaint Region of this module.</p>

Check all that apply Region	
	<p>This region is designed to capture the information sources involved in investigating the complaint.</p> <p>Enter notes to further describe related details of the information source(s).</p>

Enforcement at the Site Region	
	<p>GasLog Enforcement related to this site is displayed for this UST Facility ID.</p> <p>Note this may or may not be associated with this complaint.</p>

Appendix F (cont'd)

Inspections on this Facility Region																						
<div style="border: 1px solid black; padding: 5px;"> <p>Inspections on this Facility</p> <p>1 - 2</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Row Id</th> <th>Case #</th> <th>Site name</th> <th>Inspection Date ↓</th> <th>Purpose Of Visit</th> <th>Currentstatus</th> <th>Violations Found</th> </tr> </thead> <tbody> <tr> <td></td> <td>2</td> <td>Macon Express</td> <td>DEC-22-2021</td> <td>Red Tag</td> <td>Closed</td> <td>-</td> </tr> <tr> <td></td> <td>1</td> <td>Macon Express</td> <td>DEC-20-2021</td> <td>Operational</td> <td>Action Required</td> <td>51</td> </tr> </tbody> </table> <p>1 - 2</p> </div>	Row Id	Case #	Site name	Inspection Date ↓	Purpose Of Visit	Currentstatus	Violations Found		2	Macon Express	DEC-22-2021	Red Tag	Closed	-		1	Macon Express	DEC-20-2021	Operational	Action Required	51	<p>GasLog Operational Compliance Inspections related to this site is displayed for this UST Facility ID.</p> <p>Note this may or may not be associated with this complaint.</p>
Row Id	Case #	Site name	Inspection Date ↓	Purpose Of Visit	Currentstatus	Violations Found																
	2	Macon Express	DEC-22-2021	Red Tag	Closed	-																
	1	Macon Express	DEC-20-2021	Operational	Action Required	51																

Investigation Region	
<div style="border: 1px solid black; padding: 5px;"> <p>Investigation</p> <p><u>Date Investigated</u> <input type="text" value="DEC-16-2021"/> </p> <p>Were tanks found? <input checked="" type="radio"/> Yes <input type="radio"/> No</p> <p>Is this UST Jurisdiction? <input checked="" type="radio"/> Yes <input type="radio"/> No</p> <p><u>Status Detail</u> <div style="border: 1px solid gray; padding: 2px; font-size: small;"> Site has been correctly registered an inspection has been performed and currently working on a results of compliance letter. The tanks were Red Tagged on 12/22/2021. The fire marshal also issued a summons for the owner to appear in court for failure to install LLD and shut down the gas pumps. </div> 297 of 800</p> <p><u>Responsible Party</u> <input type="text"/></p> <p><u>Resp Party Phone</u> <input type="text"/></p> <hr/> <p><u>Date Completed</u> <input type="text" value="DEC-22-2021"/> </p> <p><u>Status</u> <input type="radio"/> Open <input checked="" type="radio"/> Closed</p> <p><u>Referred To</u></p> <ul style="list-style-type: none"> <input type="checkbox"/> TDEC - APC <input type="checkbox"/> TDEC - REM <input type="checkbox"/> TDEC - SWM <input type="checkbox"/> TDEC - WRs <input type="checkbox"/> TDEC - Other <input type="checkbox"/> Other Agency - Local Municipality <input type="checkbox"/> Other Agency - State <input type="checkbox"/> Other Agency - Federal <p><u>Date Referred</u> <input type="text"/> </p> <p><u>Photos</u> <input type="checkbox"/> Yes</p> <hr/> <p>Created by BG41154 (Roshanda.Forsythe@tn.gov) Last updated JAN-24-2022 . by . BG41154 (Roshanda.Forsythe@tn.gov)</p> <p style="text-align: right;">Apply Changes</p> </div>	<p>The results of the complaint investigation are entered here from top to bottom of the region.</p> <p>Enter or select ALL information that applies.</p> <p>The responsible party is the owner/operator shown in notification records at the time of the investigation and/or petroleum release.</p> <p>The date completed should be no later than one business week after the complaint was investigated.</p> <p>If referred to another TDEC Division, external agency, or local government, check all that apply.</p> <p>Complete the date referred, photos checkbox if applicable, and select "Apply Changes" button.</p>

Appendix F (cont'd)

UST Action Pathway Region	
<div style="border: 1px solid black; padding: 5px; background-color: #f0f0f0;"> <p>UST Action PathWay --> Select those that Apply</p> <p><u>NOV Issued</u> <input type="radio"/> Yes <input type="radio"/> No</p> <p><u>Inspection Conducted</u> <input type="radio"/> Yes <input type="radio"/> No</p> <p><u>Release Investigated</u> <input type="radio"/> Yes <input type="radio"/> No</p> <p><u>Notification Application Required</u> <input type="radio"/> Yes <input type="radio"/> No</p> <p><u>No Further Action Required</u> <input type="radio"/> Yes <input type="radio"/> No</p> </div>	<p>For complaints under UST jurisdiction, check either "Yes" or "No" for each item.</p>