



July 13, 2020

County Commission,
Dickson County, Tennessee

City Council,
City of Dickson, Tennessee

Re: Proposed Titan Partners Bulk Fuel Depot (the “Facility”),
Burns, Tennessee

Gentlepersons:

We write to express our concern regarding the lack of information on environmental impacts from the proposed Titan Partners Bulk Fuel Depot (the “Facility”) to be located in Burns, TN. We would urge both Dickson County and the City of Dickson, Tennessee to postpone any decisions on the Facility until such time as all such information is available.

Harpeth Conservancy & the Harpeth River

Founded in 1999, the Harpeth Conservancy, formerly known as the Harpeth River Watershed Association (HRWA), is a science-based conservation organization dedicated to clean water and healthy ecosystems for rivers in Tennessee. We employ scientific expertise and collaborative relationships to develop, promote and support broad community stewardship and action. For more than 20 years, the Harpeth Conservancy has worked to monitor, restore and protect the State Scenic Harpeth River and its tributaries. Supported by a broad network of volunteers, donors, and professional staff, Harpeth Conservancy has expertise in a range of disciplines including water quality science, environmental and conservation law and policy, sustainable land use planning, agricultural best management practices, volunteer and community engagement, and others. We have, for many years, worked with organizations up and down the Harpeth, including in Dickson County.

The Facility

The Facility is proposed to be a significant operation, with a capacity of approximately five million gallons. If the Facility were to encounter process upsets, for example, significant environmental impacts on the area’s watercourses could occur. These watercourses are tributaries of the Harpeth River.

Yet, sufficient information regarding the Facility’s operations and impacts, including that contained in its many permit applications, has not yet been made public. Without this information, it is very difficult to understand how the public or its representatives

SCIENCE-BASED CONSERVATION FOR THE RIVERS OF TENNESSEE

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All donations are tax deductible to the full extent allowed by law.

215 Jamestown Park Ste. 101, Brentwood, Tennessee 37027 | Phone: 615-790-9767 | www.harpethconservancy.org

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can make informed decisions on land use, permitting, and other decisions regarding the Facility.

Harpeth Conservancy has made this same point to the Tennessee Department of Environment and Conservation (“TDEC”) in its letter dated July 9, 2020, a copy of which is attached. In that letter we emphasized that TDEC has an obligation to understand the all of the environmental impacts of the Facility before making any decisions on any permits for the Facility. To date, we are unaware that such environmental information has been provided to TDEC. We understand that neither the County nor the City of Dickson have been provided such information either.

We understand, for example, that no detailed information or plans regarding the Facility, including about its containment and safety plans, have yet been shared with the Water Authority of Dickson County (“WADC”). (We have worked with the WADC for a number of years.) We understand that WADC has not yet even received a schedule of permit applications and plans, and instead will be provided these materials only as those are provided to TDEC. Further, no information has been provided about how the Facility can withstand flood, windstorm, underground pipe bursts, ice-loads, snow-loads, and other perils.

WADC and Dickson County and the City of Dickson should receive from the Facility owners not just information about plans for containing spills but also about the Facility’s plans for pipeline integrity testing and monitoring, firefighting chemical compounds and containment that the Facility proposes to use, containment of potential vehicle overturns and any other containment and potential contaminant that could impact the Nails Creek/Turnbull Watershed, and ultimately the Harpeth River.

As you know, WADC operates a water treatment plant on Turnbull Creek, not far downstream of the proposed Facility. Significant pollution events could have a devastating impact on Turnbull Creek, and into the Harpeth River.

Summary

In short, we do not believe that any governmental authority can make an informed decision without complete information regarding all of the cumulative environmental impacts of the Facility. We would urge both Dickson County and the City of Dickson to postpone any decision to allow the Facility to locate in their respective jurisdictions until the kinds of information outlined in this letter are supplied.

Sincerely yours,
Harpeth Conservancy



James M. Redwine, Esq.,
Vice President & COO