

## **Are You Meeting Your Class C Operator Requirements?** **By Brian Pottebaum, Loss Control Inspector Supervisor, PMMIC**

Underground storage tank (UST) operator training should not be a new concept to you anymore. There has been a lot of attention to Class A and Class B operator certification. We have successfully trained over 1,400 Class A/B operators in Iowa so far, but have you satisfied your Class C operator training requirements yet?

The EPA defines a Class C operator as an employee that is generally the first line of response to events indicating emergency conditions. This individual is responsible for responding to alarms or other indications of emergencies caused by spills or releases from underground storage tank systems. This individual notifies the Class B or Class A operator and appropriate emergency responders when necessary.

They further define this individual as the one that typically controls the dispensing of regulated substances (i.e. petroleum) and is responsible for initial response to alarms or releases. In most cases, this is going to be the clerk or cashier that is authorizing fuel sales at the dispensing island.

Training the Class C operator must be specific to the location, and at a minimum, they must be trained to take action in response to emergencies (such as, situations posing an immediate danger or threat to the public or to the environment and that require immediate action) or alarms caused by spills or releases from an underground storage tank system.

This individual must know where to locate emergency equipment (i.e. fire extinguisher, spill kit, alarm/monitor, and emergency stop buttons). They must also know how to use this equipment safely and appropriately.

The Iowa Administrative rules clearly indicate that Class C operators can be trained by Iowa certified Class A or Class B operators. The manner in which you train them must be done using an approved training course. There are a variety of courses available both online and in written format. You can obtain a list of approved training courses at <http://www.iowadnr.gov/InsideDNR/RegulatoryLand/UndergroundStorageTanks/USTOperators/USTTraining.aspx>.

The deadline to have all three classes of operators (Class A, B, and C) trained and designated is **December 31, 2011**. If you fail to achieve this requirement, you are subject to regulatory action which may include fuel prohibition or taking your tanks out of operation until you are compliant. After the deadline, you are required to have all new Class C operators trained prior to assuming duties in this role. Annual “refresher” training is recommended but not required at this time.

**IMPORTANT:** The other operator deadline in the State of Iowa that seems to have been widely overlooked was **April 14, 2010**. This deadline requirement is also explained in the DNR Memo “Class C Written Basic Operating Instructions” which can be reviewed at the same DNR training web site as listed above.

By that date, written emergency response procedures were to be posted in a clearly visible location. Procedures were to include but are not limited to:

- The phone number(s) to reach the fire and police departments,
- The names and phone numbers of company personnel (Class A and B Operators) who should be notified in an emergency,
- The phone number of the DNR Emergency Response,
- The location and proper use of spill cleanup equipment,
- Any site specific emergency procedures,
- Location of Class A/B fire extinguishers,
- How to respond to a small spill of petroleum,
- Spill kit items and instructions in how to use them,
- Procedures for **overfill prevention** during the delivery of regulated substances,
- Type of overfill prevention equipment,
- How to respond to an overfill, and
- ATG alarms: what they mean and how to respond.

As part of the Iowa DNR compliance inspection process, you will be required to provide documentation that all of your facilities have the appropriately trained personnel and that you have written emergency response procedure in place.

Obviously, it is in your best interest to have properly trained individuals operating your facilities. And even though it is impossible to prevent all accidents, it is possible to minimize the damage caused by accidents. Having quick and precise reaction to these incidents can make the difference between small cleanup costs and major cleanup costs. Get your employees trained today!