

UST Operator Training Deadline Reminder (12/31/2011) **By Brian Pottebaum, Director of Training Services, PMMIC**

The deadline to meet EPA/State mandated underground storage tank (UST) operator training is fast approaching. Hopefully you were able to attend one of our training sessions last fall or earlier this year. If not, we will be conducting several more sessions around the state throughout the year. **Don't miss this opportunity!**

In summary, the EPA operator training guideline outlines three classes of UST operators:

- **Class A operator** has primary responsibility to operate and maintain the underground storage tank system (i.e. owner/supervisor),
- **Class B operator** implements applicable UST regulatory requirements and standards in the field (i.e. manager), and
- **Class C operator** is an employee and is, generally, the first line of response to events indicating emergency conditions (i.e. clerk).

Each regulated facility must designate a person for each class, and in some cases that may be the same person for 2 or all 3 classes. It might even be the same person at more than one facility. The operator must be appropriately trained for each class they are designated. For example, if you are the facility owner designated as the Class A and B operator, you must receive training for both Class A and B operators. However, the DNR has chosen to allow training that encompasses more than one class, so a Class B training course will count towards the Class A operator training certification, and vice versa. PMMIC Operator training is already approved by DNR as Class A and Class B operator training in one 4-hour session.

All facilities must have trained operators readily available to respond to suspected or confirmed releases, equipment shut-offs or failures, and other unusual operating conditions. Class A or Class B operators should be immediately available for telephone consultation with the Class C operator when a facility is in operation. Class A or Class B operators must have the ability to be on site at the UST facility within four hours. This may require multiple people being certified as Class A/B and Class C operators to cover all situations, such as vacation, travel, sickness, etc.

- **Staffed facilities** must have a Class C operator on site whenever the UST facility is in operation.
- **Unstaffed facilities**, including evening pay-at-pump facilities, must have a Class B operator available to be on site at the UST facility within two hours of being contacted by the public, the owner or operator of the facility, or the regulatory agency. Emergency contact information and emergency procedures must be prominently displayed at the site. In addition, an emergency shutoff device must be readily available to anyone pumping fuel.

Class C operators must know how to respond to petroleum spills, overfills, alarms, and other emergency situations when they occur. Written basic operating instructions, emergency contact names and telephone numbers, and basic procedures specific to the facility should have been provided to all future Class C operators and readily available on

site by **April 14, 2010**. This will be a part of your UST Compliance Inspection conducted this year. If you have not yet complied with this rule the DNR has a blank form and instructions available at <http://www.iowadnr.gov/land/ust/ustprof/doc/memo030310.pdf>.

The EPA deadline for all states to have existing Class A, B, and C operators trained according to state-specific requirements is August 8, 2012, however DNR has set the deadline for Iowa to be **December 31, 2011**. After this date, Class A, B, and C operators must be trained before assuming responsibilities at a facility. Be aware that facilities will not be allowed to operate/open without appropriately trained operators after this date.

All operators must maintain records (i.e. certificates) documenting that they received the appropriate training. That also means that these records must be readily available for review if requested by the regulatory agency, similar to the leak detection, cathodic protection, and financial responsibility records you are currently maintaining.

Class A and Class B operators can lateral transfer between facilities within the state of Iowa with appropriate notification to the DNR. Transferring between state lines requires approval from the state in which you will be the new operator. Because Class C training is mostly “site specific” (Where is the shutoff switch? Who do I call? Where is the spill kit? Etc), retraining is essential any time the operator is relocated.

Retraining required? Yes, if your facility is determined by the state to be out of compliance with regulatory requirements, the Class A and/or Class B operators will be required to be retrained within 60 days from departmental notice and within 15 days for Class C operators. It is currently encouraged by the DNR that all classes of operators are routinely retrained or attend refresher courses.

PMMIC has been training owners and operators and providing training and continuing education courses for installers and inspectors for several years. This operator training is structured around the new regulatory course requirements, and covers everything in UST operations, but it is the 10 plus years of UST underwriting/claims experience and over 15,000 facility inspections that add the extra value to our course. Also, PMMIC has teamed with PMCI to make this premier course readily available to all their members and operators in the state of Iowa.

How do you get this training? We will be providing certified training for Class A and B operators. This training will also include specific training instructions for Class C operators, as they can be trained by an approved Class A or B operator (most likely during employee orientation). Our classroom training will be very thorough, yet very understandable. This complete training package will include presentation, comprehensive review, examination, and certification!

Premium credit still available? Yes, to be considered for a PMMIC policy premium credit in 2011, you must attend a PMMIC approved Operator Training course prior to your 2011 UST insurance renewal. These courses are the only PMMIC approved Operator Training courses currently offered.

Another added benefit. If you attend the PMMIC approved course, we will automatically track the designated A and B operators by site in our underwriting database. If you attend or have attended a training course provided by another vendor, you will need to provide that certificate information to PMMIC so it can be tracked as part of the underwriting criteria; however this course will not make you eligible for a premium credit.

Registration and more course information will be available soon on our website at <http://www.pmmicinsurance.com>. Please contact our office immediately with any questions.