

What Operator Training Do You Need?

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Operators of underground storage tanks (USTs) are going to get the opportunity to add more credentials to their resume. A new law going into effect soon will require UST operators to be trained according to their level of responsibility at the facility.

President Bush signed the Underground Storage Tank Compliance Act as part of the Energy Act of 2005. This act required the EPA to develop basic operator training guidelines that each state (ex. Iowa DNR) must further develop and implement by August 8, 2009. These guidelines were published by the EPA in August 2007 and you can view the entire document at http://www.epa.gov/swerust1/fedlaws/final_ot.htm. The DNR is currently working on developing the state-specific operating training provision.

The operator training guideline outlines three classes of operators:

- **Class A Operator** is any person having primary responsibility for on-site operation and maintenance of UST systems (ex. owner/supervisor),
- **Class B Operator** is any person having daily on-site responsibility for on-site operation and maintenance of UST systems (ex. manager), and
- **Class C Operator** is any person having daily responsibility for responding to alarms or other indications of emergencies caused by spills or releases from the UST system (ex. clerk).

Each facility must designate a person for each class, and in some cases that may be the same person for 2 or all 3 classes. The operator must be 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 may choose to design training that encompasses more than one class, so Class B and C training may count towards the Class A operator training, and so on.

The deadline for all states to have existing Class A, B and C operators trained according to state-specific requirements is **August 8, 2012**. After that date, all new Class A and B operators must be trained within 30 days of assuming that position and Class C operators must be trained before assuming that position.

Class A and B operators must receive training from the DNR or an approved third party. The training program may include in-class, on-line and hands-on experience. The training may also include written and practical examinations. However, an experienced operator may have the choice to forgo the training program and take an approved exam. The DNR has the option to allow Class C operators to be trained by approved Class A or B operators.

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 a time-frame to be determined by the DNR. It is also

possible that all operators will need to receive continuing education units (CEUs), but that criteria has yet to be determined.

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 at the time of a compliance inspection, similar to the leak detection, cathodic protection and financial responsibility records you are currently maintaining. In addition, all certified Class A, B and C operators must be reported to the DNR.

So how can PMMIC help you with this? PMMIC has been training owners and operators and providing training and continuing education courses for installers and inspectors for several years. PMMIC is currently working with DNR and PMCI to get an approved UST operator training program developed and implemented. Although the state-specific guidelines have not yet been finalized by DNR, PMMIC will be providing a training workshop to operators at the Iowa Marketers’ Expo in Des Moines on February 4-6, 2008. Don’t miss this opportunity.

As more information about operator training becomes available, PMMIC will be posting it on their website at <http://www.pmmicinsurance.com>.