



Underground Storage Tank Operator Training Requirements in Vermont

Vermont's UST operator training provisions mirror the federal requirements. The requirement for operator training was contained in the federal Energy Act of 2005, and was incorporated into Vermont's UST Rules in 2009. Our most recent revision of the UST Rules, effective October 1 2011, made no changes to the operator training requirements.

The requirement goes into effect on August 1, 2012. By that date, all facilities in Vermont with category one tanks will have to have a designated Class A, B, and C operator. One person can hold all three designations.

When we were developing the operator training requirements for the 2009 UST rules, many people in private industry told us they wanted to train their own people. Vermont therefore structured its rules allowing the private sector to develop a training program, which the UST program then reviews, and if it meets our standards, approves. Since the rules were adopted in 2009, only the International Code Council (ICC) has come forward with an exam tailored to Vermont's UST Rules. We expect other vendors to submit training programs soon. You can sign up for the test at www.iccsafe.org. The only center in Vermont where you can take the ICC exam is in Burlington, but there are other test centers in Springfield, Massachusetts, Albany, New York, and Concord, New Hampshire.

One question we are still working on is how much training tank owners need if they have a simple suction system. The Vermont UST Program is strongly considering developing its own training program and test for tank systems that have simple suction piping. It seems unnecessary for a person who has a suction system to have to learn about double-wall piping, automatic line leak detectors, containment sumps, electronic interstitial probes, etc, in order to pass the ICC exam. The program has not made any definite decisions, but we think this could be an effective way to improve compliance for small facilities such as mom & pop country stores and town garages.

It is allowable for a tank owner to contract with a certified operator. The intent behind the operator training requirement is that owners and operators are supposed to become familiar with their tank systems, and contracting with an outside party may not move us very far toward that goal. Still, for some tank owners, contracting might make sense.

Vermont's UST rules are quite similar to both New Hampshire's and Maine's rules, and we have determined that any operator who is certified by either of those two states will be deemed to be trained for Vermont's purposes as well. This is helpful for companies that operate chains of convenience stores in several New England states, but may not be as useful for small sole proprietorships and municipal garages. Still, if a tank owner is interested, New Hampshire's requirements can be found here:

<http://des.nh.gov/organization/divisions/waste/orcb/ocs/ustp/operator-training/index.htm>

Maine's requirements can be found here: <http://www.maine.gov/dep/rwm/ust/tanksmartonline.service.htm>

The newly-revised 2011 Vermont UST rules are found here:

<http://www.anr.state.vt.us/dec/wastediv/ust/regs/FullUSTRegs.pdf>

The operator training requirements are in sections 8-307 and 8-308, which begin on page 3-11.

The Vermont UST Program web site contains a lot of useful information, and we add to it regularly. Our home page can be found here:

<http://www.anr.state.vt.us/dec/wastediv/ust/home.htm>

