

**State of Vermont
Department of Environmental Conservation**

**Waste Management Division
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Vermont Underground Storage Tank Operator Training Guidance

What is operator training?

Operator training is a 3-tiered training program for the operation of Underground Storage Tanks (USTs). The training is required by federal law, and is intended to ensure that those who own and operate underground tanks understand how to operate and maintain UST systems properly.

What UST systems do these guidelines apply to?

These guidelines apply to all facilities with Category One USTs, i.e. tanks that are subject to a permit issued by the Vermont Department of Environmental Conservation.

Who must receive operator training?

Anyone who is responsible for operating a category one tank. These people are separated into three classes of operators: Class A, Class B, and Class C. The permittee of each UST facility must designate a Class A, Class B, and Class C operator. One person may be a designated Class A or B operator for more than one facility. For example, a manager or tank system engineer may be the designated Class A or B operator for several facilities located in Vermont for a given chain of stores. Tank owners may also contract with a Class A or B operator. All individuals designated as a Class A, B, or C operator must, at a minimum, demonstrate the level of training described in the UST Rules and this guidance document. Separate individuals may be designated for each class of operator, or an individual may have more than one operator class designation. Class designation may only be given to an individual who has successfully demonstrated the knowledge required for their class designation.

When must operators be trained?

By August 1, 2012, the Class A, B, and C operators for each facility must be identified. By that date, individuals seeking to be designated Class A or B operators must pass an approved test, and the permittee must submit a form to the state (Appendix B) identifying Class A and B operators. The permittee does not have to submit the name(s) of Class C operator(s), but a list of Class C operators must be available at the facility or another location approved by the UST Program.

After August 1, 2012, any new Class A or B operator must successfully complete their exam within 30 days of assuming responsibility for the UST system. An updated Facility Designation Form (Appendix B) must be submitted to the state within 45 days of the new assignment of responsibility. Class C operators must complete their training before assuming their responsibilities as the Class C operator.

Training will be valid for two years. If a facility is found to be out of compliance with the UST Rules, the UST Program may require that the Class A and/or B operator for that facility must retake the exam.

How does someone become a trained operator? What level of knowledge must each class have?

Individuals can be designated Class A or B by successfully completing an exam, approved by the Vermont UST Program, which demonstrates their knowledge in the required areas. Class C designation can be achieved by passing an approved exam, or by receiving training directly from a Class A or B operator.



Completion of a specific training course or program is not required. Many people will need to take one or more courses in order to attain the level of knowledge necessary to pass an approved test, but if someone already possesses the necessary level of knowledge, that individual may take an approved exam without first taking a course.

On a case-by-case basis, the Vermont UST Program may accept an exam approved by another state.

Any operator training program may be decertified if:

- (1) the performance of three or more operators who have passed the test in question indicates a gross failure of understanding of the elements required for their operator classification; or
- (2) there are significant operational compliance issues at three or more facilities with operators who have passed that test.

Class A

A Class A operator has the primary responsibility to operate and maintain the UST system. Their responsibilities may include managing resources and personnel to achieve and maintain compliance with the UST Rules.

In general, a Class A operator must be knowledgeable of the broad aspects of the statutory and regulatory requirements for compliance. The Class A operator **must** pass an exam to demonstrate knowledge in the following areas:

1. A broad knowledge of UST system requirements so he or she can make informed decisions regarding compliance and ensure appropriate individuals are fulfilling operation, maintenance, and recordkeeping requirements defined in the UST Rules. This includes knowledge of:
 - a. Spill prevention
 - b. Overfill prevention
 - c. Release detection
 - d. Corrosion protection
 - e. Emergency response
 - f. Product compatibility
 - g. Recordkeeping and documentation.
2. Financial responsibility
3. Notification requirements
4. Release and suspected release reporting
5. Temporary and permanent UST closure requirements
6. Operator training requirements

Class B

A Class B operator implements the UST Rules “on the ground.” This individual ensures that the necessary equipment is functional, the necessary documentation is maintained, and that appropriate personnel are trained to respond to emergencies. Unlike Class A operators, Class B operators have a more specialized knowledge focused on UST operation and maintenance. The Class B operator **must** pass an exam to demonstrate knowledge in the following areas:

1. Components of UST systems
2. Materials comprising UST components
3. Methods of release detection and release prevention for USTs
4. Reporting and recordkeeping requirements

5. Operation and maintenance requirements in the UST Rules including:
 - Spill prevention
 - Overfill prevention
 - Release detection
 - Corrosion protection
 - Emergency response
 - Product compatibility
 - Component compatibility, e.g. which types of overfill devices are and are not compatible with suction dispensers, one- and two-point vapor recovery systems, etc.
6. Class C operator training requirements

Class C

The Class C operator is trained to be the first to respond to an emergency. This individual may be designated as a Class C operator either by passing an exam that has been approved by the Vermont UST Program, or by receiving training directly from a designated Class A or Class B operator. The Class A or B operator is responsible for ensuring that the Class C operator has sufficient knowledge in the following areas:

1. Actions to take in response to an emergency related to the UST system, e.g. where emergency shut-off switches are located, and how to operate them; appropriate numbers to call to report a spill or other emergency; how to contain spilled petroleum product, etc.
2. Electronic monitoring system alarm conditions, and appropriate responses to those conditions
3. UST facility layout (i.e., location of tanks, containment sumps, dispensers, fill ports, emergency shutoffs, alarms)
4. Appropriate phone numbers to call to report spills, overfills, and other emergencies.

If I have only one facility, and it has one particular type of UST system, do I have to be trained on all different types of UST systems?

It is acceptable for the Class A or B operator to be trained only on the types of equipment found at the facility he or she will be operating. For example, if a country store has fiberglass tanks and suction dispensers with intrinsically safe piping, the Class A or B operator for that facility need not demonstrate knowledge and understanding of cathodic protection systems, or requirements that apply to pressurized piping systems.

Must a trained operator be present at the facility at all times?

Vermont's UST Rules do not require that a designated operator be present at the facility at all times the facility is open. But if a designated trained operator is not present during operating hours, the permittee must ensure that at least one person is present who is knowledgeable of the following:

1. Actions to take in response to an emergency related to the UST system, e.g. where emergency shut-off switches are located, and how to operate them; appropriate numbers to call to report a spill or other emergency; how to contain spilled petroleum product, etc.
2. Electronic monitoring system alarm conditions, and appropriate responses to those conditions
3. UST facility layout (i.e., location of tanks, containment sumps, dispensers, fill ports, emergency shutoffs, alarms)
4. Appropriate phone numbers to call to report spills, overfills, and other emergencies.

In other words, there must be at least one person present whenever the facility is open who has the same level of knowledge as a Class C operator, but that person does not have to be a designated Class C operator. If a store manager is the designated Class C operator, the store manager can train other store employees in the required fields of knowledge. Even though those employees may have the necessary knowledge, they are not considered Class C operators. (Remember, a person can only become a designated Class C operator by passing a test or by being trained by a Class A or B operator. A person cannot become a Class C operator by being trained by another Class C operator.)

Facility inspection requirement

The Class A or B operator, or a person working under the supervision of a Class A or B operator, is required to conduct and document a monthly inspection of the facility. The operator must inspect the facility for any conditions that would require an immediate response, such as any indication of a spill or release or any alarms indicating a possible release. A sample checklist is included in Appendix A. The sample checklist is provided as a convenience to tank owners and operators. You are not required to use that checklist, but at a minimum, you must document the same information the sample checklist covers.

Can an operator’s classification be revoked?

Yes. Any certified operator may be decertified for any of the following:

- (1) the operator’s performance indicates a gross failure of understanding of the elements required for their operator classification;
- (2) there are significant operational compliance issues at one or more facilities for which the operator is responsible; or
- (3) the operator is unable to document that he or she was trained by an appropriate person or passed an approved operator test.

What if I still have questions?

Please visit the Vermont UST Program’s web site:

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

If you don’t find the answers to your questions there, please call the UST Program at 802-241-3888.

Approval

This guidance document is hereby approved and adopted.

George Desch, Director
Waste Management Division

Date

Appendix A- Sample Checklist – Vermont UST Facility Monthly Inspection

Facility ID: _____ Date of Inspection: _____

Inspection completed by: _____ Operator Class: _____

1. Our leak detection is (circle all that apply)

Manual Electronic

2. Our weekly leak detection indicates a release or suspected release from the tank or piping (circle one):

Yes No

3. If Yes, select the indicator (check all that apply):

- Electronic tank interstitial alarm
- Failed in-tank leak test
- Electronic piping interstitial alarm
- Product in tank interstitial
- Water in tank interstitial
- Product in piping sump
- Water in piping sump
- Inventory monitoring
- Manual tank gauging

Did the inspection reveal any indication that a spill or overfill may have occurred? (circle one)

Yes No

5. Did the inspection reveal any unusual operating conditions that indicate a release, suspected release, or faulty equipment (circle one)

Yes No

If Yes, describe the unusual operating conditions: _____

4. Describe the action taken to respond to the release, suspected release, spill, or overfill and the conclusion:

Remember – you must report any conditions that suggest a release may have occurred to the Vermont UST Program: (802) 241-3888, or 800-641-5005 during non-business hours.

Appendix B- UST Facility Trained Operator Designation Form

Facility Name: _____ Facility ID Number: _____

I, _____, the permittee or authorized signatory of the permittee of the above facility, have designated the following individuals as the Class A and B operators for this facility.

NOTE: Certification of an operator is valid for two years.

Please also include a copy of the certificate or other evidence demonstrating that the class A and B operators have passed the training.

Class A Operator

Name: _____

Training Certified by: _____

Date of Training Expiration: _____

Class B Operator

Name: _____

Training Certified by: _____

Date of Training Expiration: _____

Signature of Permittee or Designee

Date