Operator Training
Presented by the PA DEP
Let’s start with the numbers
Nationwide, how many regulated USTs are out there?

As of September 30, 2011:

- 590,104 active USTs at approximately 212,000 facilities
- 501,723 releases have occurred since 1984
- 87,983 releases remain to be cleaned up
Where’s Pennsylvania stand?

As of September 30, 2011:

- 23,538 active USTs at approximately 8,400 facilities
- 15,283 releases have occurred since 1984
- 2,674 releases remain to be cleaned up
Cleanup Costs...

Nationally, the US EPA estimates that the average remediation costs per site have been about $125,000, but costs often have exceeded $1 million.
Thoughts...

Cleanups are expensive, difficult, and time consuming!

- Why are there so many ongoing cleanups?
- How can new cleanups be reduced or be completely prevented in the first place?
- How can regulators be more proactive and be less reactive?
The Beginning of Operator Training

- On March 5, 2003, the U.S. Government Accountability Office (GAO) released a report to the U.S. Congress giving suggestions on how to improve the Underground Storage Tank Program.

- The GAO report states that, as of May 2001, 89% of the 693,198 federally regulated UST systems had the proper leak detection and prevention equipment installed; however, more than 200,000 of them (roughly 30%) were not being operated and maintained properly.

- From the study and various other studies, it was determined that many of the operational and maintenance problems associated with the UST systems were attributed to poorly trained staff.
Energy Policy Act of 2005

- Passed by US Congress on July 29, 2005 and signed into law by President George W. Bush on August 8, 2005.
- Contains a provision that requires all states and territories to implement an operator training program for all owner/operators of regulated USTs.
- There are no exceptions to the required operator training.
Regulatory Timeline

- Effective as of December 26, 2009 as an amendment to Title 25 PA Code, Chapter 245

- This amendment is found in Section 245.436

- Section 245.436 covers two main items:
  - Emergency Procedures for facilities
  - UST Operator Training
Let’s start with...

Emergency Procedures & Notification Instructions
Emergency Procedures & Notification Instructions

- Must be prepared, readily available at all regulated UST facilities as of **June 28, 2010**

- A copy of the Emergency Procedures & Notification Instructions must be given to all Class C operators as of **August 8, 2012**

- At **manned** facilities, Emergency Procedures & Notification Instructions should be readily available to the Class C Operator on duty.

- At **unmanned** facilities, Emergency Procedures & Notification Instructions should be posted within sight of the facility user (e.g. at the dispenser and/or at the tank fill) -- use good judgment!
Emergency Procedures & Notification Instructions

At a minimum, the Emergency Procedures & Notification Instructions must include:

- Contact phone number that will reach the Class A, B, and C operators. This contact number may be central dispatcher or 24-hour answering service that will directly contact the Class A, B, and C operators.
- Emergency numbers: Police, Fire, Hazardous Materials Response, PA DEP Regional Office, PA DEP 24hr Emergency Response, and 911
- Facility location: Street Address, Municipality, and County
- Procedures for response to a Release Detection Alarm
- Procedures for Response to a Spill
Remember the best plan is usually a simple, easy to follow plan!

Need some quick examples?
GASOLINE SPILL AND LEAK
EMPLOYEE EMERGENCY ACTION PLAN

*YOU NEED TO KNOW WHERE THE EMERGENCY SHUT OFF IS
LOCATED AND HOW TO OPERATE**

IF PERSONAL SAFETY IS IN DANGER,
EVACUATE IMMEDIATELY!

FIRES OR LARGE SURFACE SPILLS (25 GALLONS OR MORE OF GASOLINE)

1) Turn off electricity to pumps (EMERGENCY SHUTOFF BUTTON)
2) Evacuate area if deemed necessary.
3) Contact Fire Department Emergency 911
4) Contact Facilities Maintenance [REDACTED] or by phone [REDACTED] to create a case. Environmental Consultant will respond to the Priority One case.
5) Contact Store Manager and Field Consultant.

SMALL SURFACE SPILLS (LESS THAN 25 GALLONS OF GASOLINE)

1) Isolate or block off the area to prevent employee or customer contact.
2) Cover the area with absorbent material (Oil Dry or Kitty Litter) if at all possible to contain spill.
3) Do not flush area with water or sweep material into grass or sewers.
4) Contact Facilities Maintenance [REDACTED] or by phone [REDACTED] to create a case. Environmental Consultant will respond to the Priority One case.
5) Contact Store Manager and Field Consultant.

STORE ADDRESS:

STORE PHONE NUMBER:

EMERGENCY NUMBER: 911

LOCAL POLICE (Non emergency):

STORE OWNER / NUMBER:

[REDACTED] FIELD CONSULTANT:
PROCEDURES FOR UNMANNED FACILITY

1. CONTACT PHONE NUMBER FOR CLASS C OPERATOR
   DAN
   JIM

2. EMERGENCY PHONE NUMBERS
   POLICE: 911
   FIRE: 911
   HAZARDOUS RESPONSE: 911
   DAN

3. DRIVE
   PO BOX 18512
   DUNMORE BOROUGH
   LACKAWANNA COUNTY

4. PROCEDURES IN RESPONSE TO AN ALARM ASSOCIATED WITH RELEASE DETECTION EQUIPMENT
   A) TURN POWER OFF TO PUMP
   B) INVESTIGATE ALARM LOCATION

C) NOTIFY PROPER AUTHORITY IF ENVIRONMENTAL ISSUE OCCURS

5. PROCEDURE IF A SPILL OCCURS.
   TURN OFF POWER TO PUMP, CONTROL & SECURE THE AREA OF THE SPILL WITH SPILL ABSORBANT MATERIAL AND SPILL PADS.
   NOTIFY THE FOLLOWING IMMEDIATELY:
   A. DEPT. OF ENVIRONMENTAL PROTECTION - 570.826.2511
   B. DAN
   C. JIM
Let’s move on to...

Operator Training and Operator Availability
By August 8, 2012

- Owners must designate three classes* of operators for each UST facility
  - Class A
  - Class B
  - Class C
  
  *One person may be designated for more than one class

- Designated operators must meet training requirements for their class

- Trained operators must meet availability requirements for their class

- Operators must be designated and trained by August 8, 2012 or the facility will not be allowed to continue to operate
Class A Operators

- Persons having primary responsibility for the operation and maintenance of the UST system and facility

- Manage resources and personnel to achieve and maintain regulatory compliance

- Common examples: District Manager, Regional Manager, or UST Owner
Responsibilities of Class A Operators

• Ensures proper installation, modification, and repair of UST system and that proper records are retained and readily available

• Has knowledge of Class B and Class C operator training requirements

• May prepare plans and instructions for B & C

• May train or assist in training Class C operators
Required Training for Class A

- Completion of a PA DEP approved course focused on Federal and State regulations for UST’s relating to technical standards and corrective action requirements

- Completion means:
  - Attendance for the entire course
  - Receipt of a passing grade via test or demonstration
  - Receipt of a training certificate
### Required Training for **Class A**

- **Training should enable the operator to make informed decisions regarding compliance**

- **It shall include requirements for:**

  - Spill and overfill prevention
  - Release detection and reporting
  - Corrosion protection
  - Emergency response
  - Product and equipment compatibility
  - Financial responsibility
  - Notification and UST registration
  - TOS and permanent closure
  - A/B/C training
The PA DEP “may” recognize completed training that is recognized by another state and approved by the EPA – To date, none have been accepted.

Training is only required once per individual, but repeat training may be required if related violations are documented through inspection.

Owner or Operator shall incur costs of training.

After August 8, 2012 - When a Class A operator is replaced, the new operator must be trained within 30 days of assuming duties.
“Wait... I have been operating this gasoline station for 30 years, why do I need this training class???”
Recent Field Observations
Class B Operators

Person who oversees and implements the **day-to-day** aspects of operations, maintenance, and record keeping for the underground storage tanks at one or more facilities.
Responsibilities of **Class B Operators**

- Assists Class A with *day-to-day* operations and maintenance activities including:
  - Checking spill and overfill prevention and CP equipment and ensuring they are tested
  - Performing release detection
  - Collecting records and documentation
  - May train Class C operators

- Common examples: Store Manager, On-site Manager, or UST Owner
Here’s some examples of things that you don’t want to see...
More interesting stuff...
“I could see doing leak detection on my tanks if they were leaking, but my tanks aren’t leaking.” A quote from a township official
Required Training for Class B

- Completion of a PA DEP approved course focused on the Operation and Maintenance requirements of a UST facility

- Completion means:
  - Attendance for the entire course
  - Receipt of a passing grade via test or demonstration
  - Receipt of a training certificate
Required Training for Class B

- Training must provide specific information on UST components, construction materials, and release detection and prevention methods.

- It shall include requirements for:
  - Spill and overfill prevention
  - Release detection and reporting
  - Product and equipment compatibility
  - Corrosion protection and related testing
  - Reporting and record keeping
  - Emergency response
  - Class C training
Additional **Class B Training Notes**

- The PA DEP “may” recognize completed training that is recognized by another state and approved by the EPA – To date, none have been accepted

- Training is only required once per individual, but repeat training may be required if related violations are documented through inspection

- Owner or Operator shall incur costs of training

- After **August 8, 2012** - When a Class B operator is replaced, the new operator must be trained within **30** days of assuming duties
Contracting **Class A and Class B**

- Owner may contract ("written agreement") and designate a PA DEP certified IUM (UST inspector) or UMX (UST installer) to perform Class A and Class B duties for a facility.

- The IUM or UMX assumes partial responsibility for compliance with the requirements in Title 25 PA Code, Chapter 245.

- Additionally, the IUM may not perform a PA DEP Facility Operations Inspection for a facility where the IUM is also the designated operator – “Conflict of Interest” Provision.

- No initial operator training is required for a certified IUM or UMX, but training may be required if related violations are documented through inspection.
Class C Operators

- Persons responsible for responding to alarms or other indications of emergencies caused by spills or releases from UST systems and equipment failures. (…First Line of Defense…) 

- A facility may have more than one Class C operator, but not all employees are necessarily Class C operators 

- Common Examples: Gas Station Attendants, Garage Mechanics, etc.
Responsibilities of Class C Operators

- Responds immediately to emergencies such as:
  - Alarms
  - Spills
  - Releases

- In the event of an emergency:
  - Shuts down operations
  - Notifies emergency responders
  - Notifies Class A or B operators

- May also control or monitor the dispensing or sale of the regulated substance
Required Training for Class C Operators

- Training provided by tank owner and/or Class A or B operator – No operator training course is required or approved by the PA DEP – This is designed to be free, no cost training provided by the tank owner and/or Class A or B operator

- Must enable the Class C operator to take action in response to emergencies

- Class C Operator must be trained on individual, facility specific emergency procedures & notification instructions

- Emergency procedures and notification instructions must be reviewed at least once every 12 months and documented

- Class C Operator must be trained prior to assuming Class C duties
Operator Availability

- Trained Class A, B, and C operators must be readily available to respond to suspected or confirmed releases, equipment failures, and other unusual operating conditions.

- Availability requirements vary by operator class.
Operator Availability

Class A and B

✅ Immediately available for telephone consultation while in operation

✅ Must be able to be onsite within 24 hours
Operator Availability

Class C

- **Retail Motor Fuel** - must be onsite during all times of retail fuel sales. A Class A or B may temporarily substitute.

- **Non-Retail** - manned based on owner and operational needs

- **Unmanned Facilities** - available for immediate telephone consultation and be able to be onsite within 2 hours.
Required Documentation

- Must be kept onsite or readily available for viewing by third-party inspectors, PA DEP, or EPA staff

- Documentation must include: Operator Names, Operator classes (A/B/C), Operator contact information, initial and refresher training dates for emergency procedures and notification instructions, and copies of Class A and Class B training certificates
Copies of the operator training certificates do not need to be submitted with the “Facility Operations Inspection” Report.

The “Storage Tanks Registration / Permitting Application Form” will be modified so that, after August 8, 2012, a tank owner of:

1) a brand new UST; or
2) an existing UST that is “Temporarily Out-of-Use”; or
3) an existing UST that has undergone an ownership change will need to verify that Class A, Class B, and Class C operator training has been successfully completed prior to PA DEP allowing the UST to operate.
Hmm...

Is my company able to conduct operator training?

How do I get my training course approved by the PA DEP?
Operator Training Course Approval

- All Class A and Class B operator training courses must be approved by PA DEP
- Submit completed application to PA DEP including:
  - Course outline
  - Test description
  - Assessment procedure
Operator Training Courses

- Applications for Training Course approval is on the PA DEP Storage Tanks website
  - [www.depweb.state.pa.us](http://www.depweb.state.pa.us) → Keyword: Storage Tanks → Underground Storage Tanks → UST Operators
- Refer to 25 PA Code, Chapter § 245.141 for specific requirements
- Processing time is up to **120 days**
- 3 year certification
Operator Training Courses

- Courses for Class A and Class B may be combined or separate; most are combined.

- IUM, UMX, or certified company may provide training with a PA DEP approved course.
Current PA DEP Approved Operator Training Courses

- Petroleum Testers, LLC
- Keystone Petroleum LTD
- Interstate Compliance Services
- JD2 Environmental Inc
- Synergy Environmental
- Edward Guckin
- Carroll Independent Fuel LLC
- First Energy
- Practical American Safety Solutions, LLC
- Andrew Geist
- Ewing Oil Company
- Professional Petroleum Svc Co
- PA Dept of Corrections
- Hafer Equipment
- Williams & Company Consulting
- Petroleum Retailers and Auto Repair Association, Inc.
- Pennsylvania Petroleum Marketers & Convenience Store Association
- Petroleum Technical Services LLC
- PA Dept of Transportation
- Antea Group / API
- Clayton Services Corporation
- Wawa Inc
- Cogo’s Company
- Datanet Engineering, Inc
- McRO Tank Division, Inc
- Harris Environmental, Inc
- United Refining Company of PA
pennsylvania
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