



Alabama Department of Environmental Management
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September 3, 2010

MEMORANDUM

To: UST Owners

From: Lee Davis, Chief
ADEM UST Compliance Unit

A handwritten signature in black ink, appearing to be "Lee Davis", written over a horizontal line.

Re: UST Operator Training
Effective November 24, 2009

ADEM's underground storage tank (UST) regulations were revised November 24, 2009 to accommodate the EPA requirements of the 2005 Energy Act for UST Operator Training. In short, UST owners are required to designate three classes of operator for each UST facility (Class A Operator, Class B Operator, and Class C Operator). Class A, Class B, and Class C operators are defined in rule 335-6-15-.02(pp) through (rr) (Attached). The complete operator training regulations are provided in rule 335-6-15-.46.

There may be more than one Class C Operator at each UST facility. And one person may be designated to more than one operator class. Persons designated to more than one operator class must be trained in each classification for which they are designated. **All operators must be trained by August 8, 2012.**

Class A operator training must provide a general knowledge of underground storage tank system requirements so the operator can make informed decisions regarding compliance and ensure responsible persons are fulfilling operation, maintenance, and recordkeeping requirements and standards for underground storage tanks. The training must provide information on spill prevention, overfill prevention, release detection, corrosion protection, emergency response, product compatibility, documentation of financial responsibility, notification and registration, release and suspected release reporting, temporary and permanent closure, and operator training.

Class B operator training must provide a more in-depth understanding of operation and maintenance aspects than Class A training, but may cover a more narrow breadth of regulatory requirements. Class B operators may obtain either site-specific operator training, which is focused only on equipment used at the underground storage tank facility, or training in broader regulatory requirements. At a minimum, Class B operator training must encompass components of underground storage tank systems, materials of underground storage tank system components, methods of release detection and release prevention applied to underground storage tank components, and underground storage tank operation and maintenance requirements including: spill prevention, overfill prevention, release detection, corrosion protection, emergency response, product compatibility, reporting and recordkeeping, and Class C operator training.



Class C operator training must provide, at a minimum, instruction on: immediate actions required to be taken in response to emergencies, such as situations posing an immediate danger or threat to the public or to the environment, and actions required to be taken in response to alarms caused by spills or releases from an underground storage tank system.

Class A, B, and C operator training requirements may be satisfied by any one or combination of the following:

1. An operator training program that has received prior Department approval. The program may include in-class, on-line, or hands-on training, and must include an evaluation of operator knowledge. Examples of evaluation include testing, practical demonstration, or other tools acceptable to the Department. The Department will provide a list of approved training providers on the ADEM website.
2. An examination designed to measure operator knowledge and administered by the Department or a third party acceptable to the Department. The examination must reasonably determine that the person tested has the necessary knowledge and skills to be considered competent to operate underground storage tanks.
3. For Class C operators, training conducted by a trained Class A or Class B operator.
4. Operator training received outside the State of Alabama that is verified by and acceptable to the Department.

Class A and Class B operator training records must be maintained either at the underground storage tank facility or at an alternative site, and documentation of training must be provided to the Department upon request. Class C operator training records must be maintained at the underground storage tank facility so that they are immediately available upon inspection by the Department.

All persons designated as Class A, Class B, or Class C operators must be trained no later than August 8, 2012. After August 8, 2012, Class A and Class B operators must be trained within 30 days after assuming operation and maintenance responsibilities for an underground storage tank system, and Class C operators must be trained before assuming responsibility for responding to emergencies.

After August 8, 2012, if the Department determines that a significant violation of the underground storage tank regulations exists the responsible operator(s) must be retrained. The retraining must occur within a reasonable time established by the Department. At a minimum, retraining shall include training in the area(s) determined to be in violation.

(pp) "Operator, Class A" means any person who is, or is employed by, the tank owner, underground storage tank facility owner, or lessee, who has primary responsibility to operate and maintain underground storage tank systems. The Class A operator's responsibilities include managing resources and personnel, such as establishing work assignments to achieve and maintain compliance with Department underground storage tank regulatory requirements. In general, this person focuses on the broader aspects of the regulations and standards necessary to operate and maintain underground storage tank systems in accordance with this chapter. For example, this person typically ensures that responsible person(s):

1. Are trained to operate and maintain underground storage tank systems and keep records in accordance with the requirements in this chapter;
2. Operate and maintain underground storage tank systems in accordance with the requirements in this chapter;
3. Maintain records in accordance with the requirements of this chapter;
4. Respond to emergencies caused by releases or spills from underground storage tank systems in accordance with the requirements of this chapter; and
5. Make financial responsibility documents available to the Department as required by rules 335-6-15-.13 and 335-6-15-.43.

(qq) "Operator, Class B" means any person who is, or is employed by, the tank owner, underground storage tank facility owner, or lessee, who implements underground storage tank regulatory requirements and standards in the field in accordance with this chapter. This person implements day-to-day aspects of operating, maintaining, and recordkeeping for underground storage tank systems at one or more facilities. For example, this person typically monitors, maintains, and ensures:

1. Compliance with release detection, recordkeeping, and reporting requirements;
2. Compliance with release prevention, recordkeeping, and reporting requirements;
3. Compliance with performance standards for all relevant equipment; and
4. Training of responsible persons to respond to emergencies caused by releases or spills in accordance with the requirements of this chapter.

(rr) "Operator, Class C" means any person who is, or is employed by, the tank owner, underground storage tank facility owner, or lessee, who is generally the first line of response to events indicating emergency conditions. This person is responsible for responding to alarms or other indications of emergencies caused by spills or releases from underground storage tank systems, and for notifying the Class B or Class A operator and appropriate emergency responders when necessary. Not all employees of the facility are necessarily Class C operators. This person typically:

1. Controls or monitors the dispensing or sale of regulated substances; or
2. Is responsible for initial response to alarms or releases.