

A/B/C Operators: Responsibilities and Training Requirements

Any storage tank system that is required to have a permit to operate under <u>Wis. Admin.</u> <u>Code § ATCP 93.145</u> must meet the A/B/C Operator training requirements. Below is an overview of the requirements. For a full list of requirements, please see <u>Wis. Admin.</u> <u>Code § ATCP 93.800</u>.

Training Programs

- Operator training is conducted by DATCP approved vendors. The vendor will provide proof of training upon successful completion of the training course. Proof of training must be kept on site and available for inspection.
- A list of approved training programs can be found on our <u>A/B/C Operator</u> <u>webpage</u>.
- A/B Operators must receive training from an authorized training program, but C Operators may be trained by the A/B Operator. A <u>Class C UST Operator</u> <u>Certification form</u> is available on the A/B/C Operator page on our website.
- Operator training does not expire and there is no renewal requirement. Retraining may be required for operators of non-compliant storage tank systems.

Class A Operators

Responsibilities of Class A Operators:

- Compliance with tank system registration and permit to operate requirements
- Manage resources and personnel to achieve and maintain compliance with regulatory requirements.
- Ensure that appropriate individuals do all of the following:
 - Properly operate and maintain the underground storage tank system
 - Receive training to operate and maintain the underground storage tank system and keep records
 - Properly respond to emergencies or alarms relating to spills, leaks or releases from the underground storage tank system
 - o Make financial responsibility documents available as required

Required Training Elements for Class A Operators:

Each Class A Operator must attend DATCP approved training in all of the following:

- Basic underground storage tank system requirements, so that the operator can make informed decisions regarding compliance and ensure appropriate individuals are fulfilling operation, maintenance, and record keeping requirements and standards of this chapter regarding all of the following:
 - Spill prevention
 - Overfill prevention
 - Leak and release detection
 - Corrosion protection
 - Emergency response
- Tank registration and permitting requirements

BUREAU OF WEIGHTS AND MEASURES

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RESOURCES

<u>Wis. Admin. Code ATCP</u> <u>93</u>: http://docs.legis.wisconsin .gov/code/admin_code/at cp/090/93

A/B/C Operator info on our website: https://datcp.wi.gov/Page s/Programs_Services/ABC OperatorInfo.aspx

<u>Class C UST Operator</u> <u>Certification Form</u>: https://datcp.wi.gov/Docu ments/Class%20C%20UST %20Operator%20Certificat ion.pdf Required Training Elements for Class A Operators (cont'd):

- Product compatibility
- Financial responsibility documentation requirements
- Notification Requirements
- Requirements for reporting obvious and suspected releases
- Requirements for permanently closing a tank system and for placing a tank system temporarily out of service
- Operator training requirements

Class B Operators

Responsibilities of Class B Operators:

- Ensure recordkeeping and reporting requirements are met for release detection methods and release prevention equipment.
- Ensure all relevant equipment complies with performance standards.
- Perform or review inspections required by PEI RP 500 and RP 900 per Wis. Admin. Code § ATCP 93.500(8) and ATCP 93.605(1).
- Ensure appropriate individuals are trained to properly respond to emergencies or alarms relating to spills, leaks or releases.
- Ensure all Class C operators are provided with written instructions that include all of the following:
 - Emergency response procedures, including all of the following:
 - Procedures for overfill protection during delivery
 - Operation of emergency shut-off systems
 - Appropriate responses to all alarms
 - Reporting of leaks, spills and releases
 - Any site-specific emergency procedures
 - The name and information needed for contacting appropriate parties if a leak, spill, release or alarm occurs

Training Elements for Class B Operators

Each Class B operator must receive training in either site-specific operator training focused only on regulatory requirements and equipment specific to the operator's underground storage tank facility, or general training that encompasses all regulatory requirements and typical equipment used at UST facilities. At minimum, each Class B operator must attend DATCP approved training in all of the following:

- In-depth understanding of purposes, methods, and function of:
 - Components of underground storage tank systems
 - Materials of underground storage tank system components
 - Methods of leak and release detection, and leak and release prevention applied to underground storage tank system components
 - Operation and maintenance requirements of Wis. Admin. Code ATCP 93 which apply to underground storage tank systems and which address each of the following:
 - Spill and overfill prevention
 - Leak and release detection
 - Corrosion protection
 - Emergency response
 - Product compatibility
 - Reporting and recordkeeping requirements
 - Class C operator training requirements

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Class C Operators

Responsibilities of Class C Operators:

- Initially responding to alarms, spills, leaks or releases
- Notifying the Class B or Class A operator and appropriate emergency responders, including 911 personnel, when necessary
- Controlling or monitoring the dispensing or sale of regulated substances

Training Elements for Class C Operators

Each Class C operator must be trained by a Class A or Class B operator, or complete DATCP approved training in all of the following:

- Emergencies, including situations which pose an immediate danger or threat to the public or to the environment and which require immediate action
- Alarms caused by spills, leaks or releases from an underground storage tank system
- Emergency response procedures, including all of the following:
 - Procedures for overfill protection during delivery of regulated substances
 - o Operation of emergency shut-off systems
 - o Appropriate responses to all alarms
 - Reporting of leaks, spills and releases
 - Any site-specific emergency procedures
 - The name and other information needed for contacting appropriate parties if a leak, spill, release, or alarm occurs

Documentation Deadlines

All Class A, Class B, and Class C operators must obtain the training and certification required before assuming their responsibilities except that existing, compliant facilities that experience a personnel change have 30 days to have a new class A or B operator trained. Facilities must notify DATCP of A or B operator changes within 15 days of the new operator completing the training program.

Recordkeeping

The owner or operator must maintain operator documentation at the underground storage tank system site and have it immediately available for inspection by an authorized agent or the department. Records must identify all Class A, Class B, and Class C operators currently designated for the facility. This includes the names, class of operator trained, date of assumed duties, date of each completed initial training, and any retraining. Certificates verifying completion of training or retraining must be maintained in paper or electronic form by the owner or operator. Fueling facilities that are not attended as specified in section ATCP 93.605 (5) (a). At facilities that typically are unmanned, such as emergency generators, the owner or operator must maintain the documentation at a readily available site and provide it for inspection upon request.

Retraining

If the authorized agent or the department determines an underground storage tank system is not in compliance with release prevention and detection requirements or exhibits a continued pattern of non-compliance, retraining of the A, B, and/or C operator(s) may be ordered to be completed within 30 days.

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