Operator Training Guidelines

for the

Oklahoma Petroleum Storage Tank Division



The Federal Government passed legislation in 2005 titled the Energy Policy Act. This legislation mandates that states require owners and/or operators of underground storage tanks be trained Certified Operators. The goal is for owners and operators to become knowledgeable of all requirements to operate their own underground storage tank (UST) systems and share responsibility in protecting human health, safety, and the environment.

Please visit the PST Portal at https://apps.occ.ok.gov/pstportal to create a new portal account and request access to the Operator Training section of the portal.

Who has to be certified?

EPA developed a tiered classification system for operators. Each UST system at every operating or temporary out of use facility must have a certified Class A, Class B, and Class C Operator designated. An individual can be certified for all three classes as long as they are trained in all three. The Class A or Class B Operator may train a Class C.

What are the different classifications of operators?

The following are definitions of the different operator classifications. Owners must determine who best fits this role at their facilities. The default operator type is Class A/B.

<u>Class A Operators</u> are responsible for the **broader** aspects of compliance and they have the highest level of responsibility. In smaller operations this will likely be the tank Owner or Operator and within a larger company this may be an Environmental Manager. The Class A Operator is responsible for a general knowledge of UST's in order to make decisions regarding compliance. They must ensure appropriate individuals are fulfilling operation, maintenance, and recordkeeping requirements. This knowledge must include the following:

- Spill Prevention
- Overfill Prevention
- Release Detection
- Corrosion Protection
- Emergency Response
- Product Compatibility
- Financial Responsibility and the Indemnity Fund
- Notification Requirements
- Release Reporting
- Temporary and Permanent Closure Requirements
- Operator Training
- Permitting

<u>Class B Operators</u> implement the regulatory requirements on a **daily basis** at one or more facilities. The same Class B Operator cannot be assigned to more than thirty (30) facilities in Oklahoma. Class B Operators must have a more in-depth understanding of operation and maintenance aspects but will have a narrower area of responsibility than a Class A Operator. In a large corporation this could be a District Manager or Site Manager. For a smaller company it may be the Owner or Operator.

The Class B Operator is to understand and ensure compliance with the following:

- Compatibility of equipment with the fuel stored
- Release Detection Requirements
- Spill Prevention
- Overfill Prevention
- Corrosion Protection
- Emergency Response
- Reporting and Recordkeeping Requirements
- Class C Operator Training Requirements

<u>Class C Operators</u> are the first line of response to an <u>emergency event</u>. In most facilities this will be the Clerk or Maintenance Employee. The Class C Operator controls dispensing of fuel and responsible for initial reaction to alarms or releases. This operator will respond to emergency fuel spills and safety threats to the public or the environment. They must be trained to notify emergency responders (i.e. Fire Department) and the Class A or Class B Operator. An Operator with at least a Class C certification must be on site during fueling operations at attended facilities. In most situations it will be necessary to have multiple Class C Operators certified. Class C Operators are trained by the Class A or B Operator. A blank Class C can be found on the PSTD webpage.

By what date does an operator have to be certified?

OCC regulations require that each facility have certified operators by **July 1**, **2011**. Beginning July 1, 2011 a Class A and Class B Operator must be certified within 30 days of assuming responsibility for an underground storage tank system. A Class C Operator must be certified before assuming responsibility for responding to emergencies. Class C Operators are not required to take the online training. They are trained by the Class A or Class B Operator. Class A and B Operators must be recertified every 3 years. Class A/B or B Operators must be recertified within 30 days for any assigned facility that is determined to be out of compliance with the EPA and PSTD requirements for release prevention and/or detection.

How does an Operator become certified?

Class A and B Operators must log on to https://apps.occ.ok.gov/pstportal and complete the PSTD Operator Training Program to become certified. Each user that wants to be certified will need to create their own portal account and request access to the Operator Training section. They will select the operator type (A/B is the default) and enter the facility number for which they will be assigned. Trainees must go through each training section and pass each section with a score of at least 80%. Trainees can log off during the training and the system will save their progress for 15 days. After 15 days all progress will be cleared.

What is required to show proof of training?

All Operators must post "Oklahoma Operator Certificate(s)" along with the OCC Fuel Permit. After the Class A/B Operator completes the PSTD Operator Training Program, the system will prompt the trainee to print a certificate. The certificate must be posted at the facility. A Class C Operator must receive site specific training from a certified Class A or B Operator. The "Certificate of Training for Class C Operators" must list those eligible and it must be posted at the facility. Additional copies of certificates can be printed under the 'My Certificates' section of Operator Training in the portal.

Rules

The following rules were adopted by the Oklahoma Corporation Commission to enforce the Operator Training Requirements.

165:25-1-120. Training requirements

Each underground storage tank system or group of underground storage tank systems at a facility must have a Class A, Class B, and Class C operator designated. Separate individuals may be designated for each class of operator or an individual may be designated to more than one of the operator classes.

165:25-1-122. Operator Class designations

- (a) A Class A operator has primary responsibility to operate and maintain the underground storage tank system in the broader aspects of the statutory and regulatory requirements to achieve and maintain compliance.
- (b) A Class B operator implements applicable requirements and standards for one or more facilities to monitor day-to-day aspects of operation and recordkeeping.
- (c) A Class C operator is an onsite employee responsible for responding to alarms or emergencies caused by spills or release from underground storage tank systems. An operator with at least a Class C Certification must be onsite during fueling operations at attended facilities.

165:25-1-124. Frequency and proof of training

- (a) Each operator class must obtain initial certification from a PSTD-approved training provider no later than July 1, 2011. A Class A or Class B operator may train a Class C operator.
- (b) Class A and Class B operators must be trained within 30 days after assuming operation and maintenance responsibilities for an underground storage tank system. Class C operators must be trained before assuming responsibility for responding to emergencies.
- (c) Class A and Class B operators must be recertified every 3 years.
- (d) Class B operators must be recertified within 30 days in any areas (e.g. spill, overfill, corrosion protection) that are determined to be out of compliance with EPA and PSTD requirements for release prevention and/or release detection.
- (e) Owners or operators must provide PSTD with documentation for all operator classes.

165:25-1-126. Enforcement of operator training requirements

Failure to properly train any operator class or comply with requirements of this Part will result in fines and/or formal enforcement action.