

December 14, 2010

## **Georgia Oilmen's Association Announces Underground Storage Tank Class A And B Operator Training And Testing At No Cost To You**

The Georgia Oilmen's Association (GOA) has received many inquiries concerning training and testing for underground storage tank (UST) operators in the state of Georgia. After researching the numerous training options, we have identified an efficient and economical avenue for you to meet the UST operator training requirements **before the August 8, 2012 deadline**. Prior to outlining this GOA recommended avenue for operator training and testing, the next few paragraphs will explain the background on what the operator training and testing is and why it is required.

The US Energy Policy Act (Energy Act) signed by President George W. Bush on August 8, 2005 requires all States that receive federal grant money for their UST programs to ensure that all operators of underground storage tank (UST) systems demonstrate competency on how to comply with UST compliance rules so that environmental releases can be prevented. The Georgia Department of Natural Resources Environmental Protection Division (EPD) has approved a new environmental rule that went into effect September 25, 2009. This new requirement will affect every GOA member and the thousands of operators of UST systems in Georgia.

The new rule splits UST operators into three categories depending upon their job responsibilities -- Class A, B and C. **Only the Class A and Class B operators will require formalized testing.** The categories and job responsibilities are outlined as follows:

- **Class A Operator** - Persons having primary responsibility for on-site operation and maintenance of UST systems (UST Owners, Operations Managers, etc.).
- **Class B Operator** - Persons having daily on-site responsibility for the operation and maintenance of UST systems (Regional Managers, General Managers, Store Managers, etc.).
- **Class C Operator** - Daily, on-site employees having primary responsibility for addressing emergencies presented by a spill or release from an UST system (Fueling attendants, store clerks).

The new regulation stipulates that that each regulated UST facility must employ Class A, Class B and Class C operators who can properly operate and maintain the UST system and respond to events including emergency conditions and alarms caused by spills or releases from the UST system. Class A and B operators who have passed an examination will be required to provide training to the Class C operators under their supervision. The responsibilities of a Class A and Class B operator can be satisfied by a single person for multiple sites. An UST owner may be certified as a Class A operator and choose to use a subcontractor to act as their Class B operator who would then provide the Class C operators with the appropriate training. As required under current training

rules, Class C operators must be trained before dispensing a regulated substance or assuming responsibility for responding to emergencies. Only a Class C operator is required to actually be on site at all times during operation of the fueling system.

New and previously trained operators can be designated as one, two or all three classes of operators. Training for all three classes of operators will be verified at the time of EPD inspection; therefore, written verification of training completion for Class A, B and C operators must be maintained at the facility or be readily available upon request. The Class C operator training written verifications require the UST operator's name, the date training was completed, and the name, site address and facility identification number for the UST facility that the UST operator serves.

The Georgia EPD Underground Storage Tank Management Program (USTMP) has developed a Georgia UST Operator Test. A free web-based study guide is available to help UST operators prepare for the test. However, the study guide is more than 400 pages long and is difficult to read. The USTMP has also approved a number of companies to provide training. However, there is typically a fee required to take the training course. The USTMP has selected the International Code Council (ICC) as the sole third party independent test administrator. There are several testing centers located throughout Georgia. There is also a fee required to take the test.

In short, you must pay to take a training course, possibly commute to an off-site location at a specified time for training, then pay to take the test, and commute to an off-site location to take the test. If you fail the test, then you are obligated to take an approved training course, prior to retesting.

Due to the difficulties posed by the above-mentioned scenario, the GOA has identified an on-line program, **at no cost**, through which you can receive Class A and B operator training and testing in Tennessee. As this program is on-line, it can be completed on your own schedule. The state of Tennessee developed this program and it is concise and easy to understand. Once the test(s) are taken and passed, the Georgia USTMP has agreed to offer reciprocal approval as a Georgia Certified Class A and/or B Operator.

The first step is to log onto the following web site: [://www.tennesseeanytime.org/ustop/](http://www.tennesseeanytime.org/ustop/) On the right side of the web page are three choices: "Facility Owners", "Class A or B Operators that are not also owners" and "C Operators". The "Facility Owners" section is only for owners of facilities in Tennessee. The "C Operators" section is irrelevant, as the A or B operators in Georgia are to train the C operators for the specific facilities where they work. We recommend using "Class A or B Operators that are not also owners" for all individuals who need class A or B operator training, whether they are facility owners or not. The next step is to sign up, creating a username and password. After successfully creating your account, select "Return to USTOP Home". Then log in and select "Begin Training".

Class A operator training has one tutorial module and test. Class B operator training has four tutorials and tests. These are: 1) General Training; 2) Spill and Overfill Prevention; 3) Tank and Piping Release Detection; and 4) Corrosion and Cathodic Protection. For Class B operator training, you must take and pass all four tests. You must read the tutorial prior to taking the test for each section. **We strongly recommend printing off each page of the tutorial as you go, for reference.** Once you have taken and passed the test(s) for the Class A and/or Class B operator training, print your certificate. Again, please remember that for Class B operator, your certificate must show that you have passed all four tests.

The Georgia USTMP has issued to the GOA a letter stating that it is granting reciprocity for individuals who have taken and passed the Class A and/or B operator training test(s) from Tennessee. To receive your acceptance letter from the Georgia USTMP indicating that your Tennessee certification is valid for Georgia, submit a copy of your Tennessee certificate showing passing results for Class A and/or Class B testing, along with a letter of transmittal to:

Richard Strickfaden  
Environmental Protection Division  
Underground Storage Tank Management Program  
4244 International Pkwy, Suite 104  
Atlanta, Georgia 30354

The USTMP will subsequently issue a letter indicating that you are a Georgia Certified Class A and/or B operator. Mr. Strickfaden has also indicated that you may submit your information via electronic mail to: [richard\\_strickfaden@dnr.state.ga.us](mailto:richard_strickfaden@dnr.state.ga.us)

The GOA has surveyed the market place and can assure you that this is the easiest and best way to receive the necessary Class A and Class B operator training and certification; and best of all, it is free. **Please remember that all Class A, B, and C operators must be certified by August 8, 2012.** Should you have any questions, please call Kurt Hausner of Georgia Oilmen's Services, Inc., at (678) 225-4558.