

# UST OPERATOR TRAINING GUIDANCE

AUGUST 2013

Hawaii Department of Health

Who needs to be trained?

What type of training do I need?

How do I get the training I need?

When is the deadline to be in compliance?

## REGULATORY BACKGROUND

The Federal Energy Policy Act of 2005 requires each state receiving RCRA Subtitle I funding to develop state-specific operator training requirements. All UST owners/operators must designate at least one trained and certified Class A, B and C Operator for each UST facility within 120 days of the promulgation of Hawaii Administrative Rules 11-281 (**December 9, 2013 deadline**).

All class operators must be trained and certified through an approved

training program. Class A and B Operators designations will be submitted to the department. A designation form is available online at <http://health.hawaii.gov/shwb/>. Class A, B and C Operator certification will remain with onsite records and will be reviewed during inspections or upon request.

The Class A Operator is the person with primary responsibility for the operation, maintenance and compliance of the UST system.

The Class B Operator is

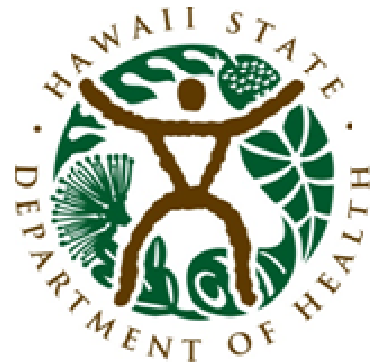
responsible for implementing the day-to-day operation, maintenance and compliance requirements for the UST system.

The Class C Operator is the first line of response to events indicating emergency conditions. This individual is responsible for responding to alarms or other indications of emergencies caused by spills or releases from UST systems. Not all employees of the facility necessarily need to be trained as Class C Operators.

## RETRAINING REQUIREMENT

Class A and B Operators must be retrained and recertified every five (5) years. Class C Operators are retrained and recertified on an annual basis.

If a UST system does not meet significant operational compliance requirements, the Class A and the Class B Operators both must be retrained and recertified within 90 days.



### Contents:

Class A Operator Requirements	2
Class B Operator Requirements	2
Class C Operator Requirements	2
Procedures for training & designations	3
In Summary	3
Contact Us	4

## UST OPERATOR

### CLASS A OPERATORS — MINIMUM REQUIREMENTS

*Class A Operators are usually but not always, tank owners or environmental managers and usually function at the highest level of regulatory compliance responsibility.\**

Class A Operators must have:

1. A general knowledge of applicable federal and state UST requirements for operation, maintenance, and recordkeeping including, but not limited to—
  - A. Release prevention
  - B. Release detection
  - C. Emergency response
  - D. Product compatibility
2. Financial responsibility requirements
3. Notification requirements
4. Release and suspected release reporting requirements
5. Temporary and permanent closure requirements
6. Operator training requirements for Class A, B and C Operators.
7. Permitting



### CLASS B OPERATOR — MINIMUM REQUIREMENTS

*Class B Operators are usually, but not always, UST, facility or operations managers. They oversee and implement the day-to-day aspects of operations, maintenance, and recordkeeping for USTs at one or more facilities..\**



Class B Operators must have:

An in-depth knowledge of UST system requirements for day-to-day operation, maintenance, and recordkeeping including but not limited to:

1. Release prevention
2. Release detection
3. Release & Suspected Release Reporting & Response
4. Product compatibility
5. Components of UST systems
6. Materials of UST system components
7. Reporting and recordkeeping requirements
8. Class C operator training requirements

### CLASS C OPERATOR — MINIMUM REQUIREMENTS

*Class C Operators are generally clerks or employees that control the dispensing or sale of fuel and are tasked with responding appropriately to emergencies.\**



A Class C Operator typically:

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

Class C Operators must be trained to:

1. Take action in response to emergency situations posing an immediate danger to the public or to the environment (e.g. spills or releases from a UST system)
2. Take action in response to alarms caused by spill or releases from a UST system

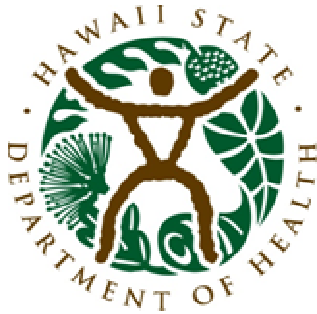
*\* These descriptions are only a general guide to help you decide which person/persons you may choose to be designated. They may not necessarily be the person(s) in these particular positions presently.*

## PROCEDURE TO GET TRAINED AND CERTIFIED

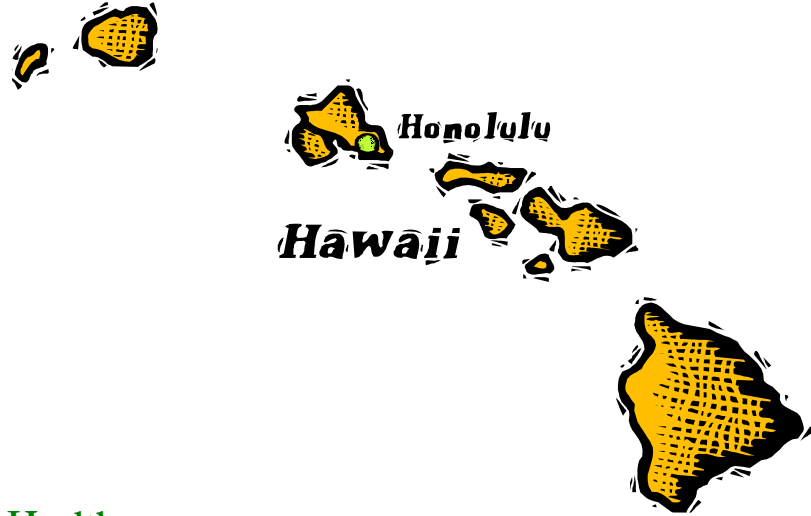
1. Visit <http://health.hawaii.gov/shwb/underground-storage-tanks/> for the list of approved vendors.
2. Decide which person(s) will be most appropriate to be designated Class A, B and C operators for your company.
3. Complete training and get certification by **MONDAY, DECEMBER 9, 2013**.
4. Visit <http://health.hawaii.gov/shwb/underground-storage-tanks/> for a sample designation form that you can use for both submitting to the department and to keep onsite.
5. Keep track of when retraining is required for your operators and submit updated operator designations when appropriate.

## IN SUMMARY

1. Class A and Class B Operator designations will be submitted to the department. Class A, B, and C designations AND certifications will remain onsite at the facility to be reviewed during inspection or upon request.
2. When a different or new operator is designated for A and/or B, the operator designation record must be amended and submitted to the department no later than 30 days.
3. The list of approved operator training programs meet or exceed EPA guidelines for Operator Training and the cost is variable. The list is not intended to be exhaustive. The Department does not endorse these training programs and expects the A/B Operator to determine what program best meets the federal and state requirements and the needs of the facility. Third-Party Operator Training programs recognized by other state programs are also acceptable with approval.
4. **Multiple Designations**  
An individual, where appropriate and with the required training, may fulfill the role of multiple levels of operator. One person may be designated for multiple facilities. The designated person(s) does not necessarily have to be an employee of the facility and there is no requirement for designated operators to be present onsite at particular times, or to perform specific duties.
5. **Reciprocity**  
Hawaii has a reciprocity clause that allows it to accept training and certifications completed in other states. However, you will need to submit your certification and information about the training program for approval before reciprocity is granted.



Hawaii Department of Health



## CONTACT US

### **Solid & Hazardous Waste Branch Underground Storage Tank Program**

919 Ala Moana Boulevard, Suite 212  
Honolulu, HI 96814  
TEL: (808) 586-4226  
FAX: (808) 586-7509

<http://health.hawaii.gov/shwb/underground-storage-tanks/>

- A) Approved list of vendors
- B) Sample designation form
- C) Final rules

For additional questions or to submit your Operator Training Program for approval, please contact Thu Perry, Public Participation Coordinator at 808.586.4226 or email [thu.perry@doh.hawaii.gov](mailto:thu.perry@doh.hawaii.gov).

Thu Perry  
c/o DOH/SHWB  
919 Ala Moana Blvd, Ste. 212  
Honolulu, HI 96814