AET Compliance Operator A & B Training



Approved by the State of Alabama and the State of Florida

MART

EOOD





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Who or What gives your State Regulatory Agency the Authority to Regulate your Facility?

Your Elected Representatives in the Legislature!



Legislators pass laws giving authority for state agencies to adopt rules

The Energy Act of 2005

- Secondary Containment for new UST Systems
- Delivery Prohibition
- Operator Training
- Increased Inspection
 Frequency

Current EPA Rule-Making Status...

- Currently underway proposed regulations published, comment period ended
- Include changes needed from Energy Act
- Includes deferred provisions from 1988
- Standards for integrity and operability testing
- Improvements to release detection rules
- Monthly visual inspections

Training Requirements

Why do Owner-Operators have to take this training?

The Energy Act of 2005 that was passed by Congress requires owners and operators of facilities with underground storage tanks (USTs) to have training to demonstrate that they have sufficient knowledge of the UST regulations and of facility operations to prevent leaks from **UST systems** and to address spills, and emergencies. **Certification of this training is** required. This law is for people like you who have daily on-site responsibility for addressing emergencies.



Training requirements for Class A Operators



<u>**Class A Operator**</u> means the individual who has primary responsibility to operate and maintain the UST system in accordance with applicable requirements established by the implementing agency. The Class A operator typically manages resources and personnel, such as establishing work assignments, to achieve and maintain compliance with regulatory requirements.

Training requirements for Class A Operators

- Spill and overfill prevention;
- Release detection;
- Corrosion protection;
- Emergency response;
- Product and equipment compatibility;
- Financial responsibility;
- Notification and storage tank registration;
- Temporary and permanent closure;
- Related reporting and recordkeeping;
- Environmental and regulatory consequences of releases; and
- Training requirements for Class B and Class C operators.

Training requirements for Class B Operators



<u>Class B Operator</u> means the individual who has day-to-day responsibility for implementing applicable regulatory requirements established by the implementing agency. The Class B operator typically implements in-field aspects of operation, maintenance, and associated recordkeeping for the UST system.

Training requirements for Class B Operators

- Operation and maintenance;
- Spill and overfill prevention;
- Release detection and related reporting;
- Corrosion protection and related testing; Emergency response;
- Product and equipment compatibility;
- Reporting and recordkeeping;
- Environmental and regulatory consequences of releases; and
- Training requirements for Class C operators

Training requirements for Class C Operators



Class C Operators need to be able to respond to spills, potential leaks, overfills, and emergency situations

<u>Class C Operator</u> means the employee responsible for initially addressing emergencies presented by a spill or release from an UST system. The Class C operator typically controls or monitors the dispensing or sale of regulated substances.

We recommend... NISTM & AET Compliance Online Training for Class C Operator Training







NISTM National Institute for Storage Tank Management

Things to Consider for Companies Needing Operator Training

- Pre-existing training programs by states or companies
- High employee turnover rate
- Frequency of improving petroleum technology
- The nature of the business for which the tank is used
- Different training needs for the three classes of operator
- Documenting who is trained
- Reciprocity from other states
- Assessing competency
- Require refreshers from as-needed to annually

Training Options

Live seminars On-line courses On-line self-help programs On-site training **Certification exams Train the Trainer** In-House Training **Some combination**



Current Status of Operator Training Program Implementation in Missouri

- The Legislature has passed enabling legislation
- The Missouri UST program is in the process of developing regulations to implement the statutes
- EPA has the only authority to enforce the requirements



What are my options?

- Do nothing...
- Wait until inspected by the state or EPA, then get the training
- Get the training ASAP with one of the previously mentioned options





Emergency response – What all Operators Should Know

Emergency response

Response to Potential Environmental Problems Response to Emergencies and Incidents Involving Human Safety



Understanding your responsibilities for:

- Recognizing hazardous situations and incidents
- Responding to fires, explosions, and spills
- Responding to alarms from electronic systems that monitor leaks from underground storage tank systems



What can cause fires and explosions at fueling stations?

- •Smoking
- Static electricity
- Tank overfills

Vehicle overfills
Spills
Vehicle Accidents







Smoking provides an ignition source for petroleum vapors, and is not allowed within 50 feet of dispensers by the State Fire Code Authorities

Smoking



AWARNING STATIC ELECTRICITY SPARK EXPLOSION HAZARD

Before using pump, touch any metal on your car away from your vehicle's fuel filler with bare hand. This will discharge static electricity on your body. Failure to fully discharge may ignite gasoline vapors.

Do not get back in your vehicle while refueling. Sliding across the seat can create a static charge which may ignite vapors.

ELECTRONIC DEVICES HAZARD

Keep cellular phones and other electrical devices turned off and in your vehicle during refueling. They may have an electrical discharge which can ignite vapors.

PORTABLE CONTAINERS

It is unlawful and dangerous to dispense gasoline into unapproved containers as it could cause injury.

Do not fill containers in or on your vehicle. This may lead to a static electrical discharge which may ignite vapors. For your safety, place the container on the ground and keep the nozzle in contact with the container while filling.



Static Electricity

Static electricity is an electric charge caused by an imbalance of electrons on the surface of a material, like walking back and forth on a carpet. At gas stations, it is often created in times of low humidity when people get in and out of their cars. This poses a risk for fires and explosions.

Tank overfills

When a tanker truck driver overfills an underground storage tank, fuel can spill out onto the ground and become a fire hazard and cause groundwater contamination.



Vehicle overfills

Just like with tanker trucks, when the storage tank inside a vehicle is filled beyond its capacity, fuel can spill onto the ground and become a fire hazard and cause groundwater and surface water contamination.



Vehicle Accidents

Vehicles can crash into dispensers, other vehicles, and other structures at your fueling stations. These events can cause spills, explosions, and fires



Spills

People filling their vehicles and filling their portable gasoline containers can spill fuel on the ground. Also, improper filling of portable containers can create static electricity that may cause fires and explosions. Containers should be placed on the ground.

Improper filling

Proper filling



Emergency Shut-off Switches

These switches are required at every facility, and can shutoff the power to all dispensers at the same time. Be sure to know where the switch is at your location!



If the Emergency Shut-off switch is not turned off in an emergency situation, the fuel pumps located within the USTs and piping sumps will continue to operate and pump fuel to the dispensers. This will literally put "more fuel on the fire" and increase the danger.

Response to Incidents Involving Human Safety

This is one of the most important parts of this training, for your life and the safety of others may depend on how quickly you respond to incidents involving fire, explosions, and the events that lead up to them.



<u>Vehicle accidents</u> – Cars and trucks can crash into fuel islands and other vehicles and cause fuel spills



Vehicle accidents can also cause fires and explosions!



<u>Vehicle drive-offs</u> – Drivers can carelessly drive off with nozzle and hose (after it separates at the breakaway connection), and cause spills or fires



<u>Customer spills and vehicle overfills</u> customers that are not mindful of the fueling process can spill fuel and cause environmental problems or fires



<u>UST overfills</u> – This problem was discussed earlier, but it is one of the potential emergencies that you may have to respond to. As with all emergencies, you must follow the procedures listed in the next slide.



How to use a Fire Extinguisher?...PASS



PASS = Pull, Aim at base of fire, Squeeze trigger, Sweep back & forth Things to do in an emergency...

- 1. Immediately turn off the Emergency Shut-off Switch
- 2. Direct any customers or people to get out of the danger area
- 3. Call 911 or the Fire Department
- 4. Make any phone calls from your emergency call list



A quick note about spill response...

<u>Spill kits</u> – Fueling Stations often have spill kits to clean up smaller leaks, particularly from customer overfills. Be sure to have a company spill response plan before trying to clean up a spill.





Emergency Response and Fire Code Personnel

If you have a fire or explosion event at your location, you will see local or state government fire and emergency response personnel arriving onsite to take care of the problem. Follow all of their instructions, and provide them with any information they need about the details of the event. By doing so, you can help your company avoid any problems with get back into operation as soon as possible.



Release Detection Alarms



Class A, B, & C Operators need to know about the type of release detection (leak detection) systems and equipment in use at their facility. They also need to know what to look for, how to respond, and whom to call for alarms, flashing lights or buzzers for the leak detection system.

Visual Observations

Class A, B, & C Operators need an awareness of conditions around the dispensers and man-ways, and during the filling of the USTs.

Visual Observations...Continued:

Class A, B, & C Operators need to be able to recognize vehicle tank overfills, know where the spill kits are on site, how to apply the absorbent materials, and who to call if necessary.



Visual Observations...Continued:

Other fuel spills around the dispenser caused by vehicle driveoffs with the nozzle still in the vehicle gas-tank (the picture below shows where the hose separated at the break-away), or by vehicle collisions with the dispenser. Class A, B, & C Operators need to know how to shut-off the emergency power shut-off switch for the dispensers.



Visual Observations...Things to look for:

<u>UST overfills</u>...If tanker truck drivers are not careful about filling the tank, it can overflow out onto the pavement around the spill bucket. It can also seep into the soils or leak into storm drains and contaminate ground and surfaces waters nearby. You should immediately contact the local fire authorities and shut off power to the pumps.



Visual Observations...Continued:



If Class A, B, & C Operators see a tanker truck driver jamming the gauge stick into the fill pipe of the UST, they need to know to notify your manager immediately because the driver is by-passing the system designed for preventing overfills.



Visual Observations...Things to look for:

<u>Fuel leaking into piping sumps</u> and leaking onto the pavement as the piping sump overflows. This occurs if there is a leak in the piping or from the submersible turbine pump within the sump that leaks more fuel than the capacity of the sump. This is not a common occurrence, but you need to be able to recognize it when you see fuel coming up out of the man-ways. Again, immediately notify the local fire authorities and shut off the emergency power for the dispensers. Dispenser sumps can also overflow...



Visual Observations...Continued:

Fuel leaks into nearby surface waters. Sometimes, the underground storage tank system doesn't appear to be leaking, but fuel still ends up in the environment from a system component that you cannot see. If Class A, B, or C Operators see a petroleum sheen, or floating gasoline or diesel in streams, lakes, rivers, ditches, or any other water body nearby, they should notify a manager or the local fire authorities depending on the volume of fuel they see.



Are there any other government regulators that will inspect your location?

In addition to State UST inspectors, there are a number of different government agencies that may inspect your fueling facility, but the ones you will probably see more frequently are the State Fire Inspectors and the State Weights and Measures Inspectors. It is their job to make sure that your facility is in compliance with fire safety regulations, that the fuel you are selling has good quality, and that the meters in your dispensers are accurate.



Certificate of Completion

For **Class A Operator Training** From



To certify that

NAME of Operator

Has successfully completed

Signature of Trainer

State:

Class A Operator Training Facility

Name of Facility

Date of Completion

State Facility Identification Number:

The End