## What is Operator Training?

The Federal Energy Policy Act enacted by Congress in 2005 mandated training for all UST system operators.

In North Carolina, there are two types of UST operators who must receive training: Primary Operator (Class A/B) and Emergency Response Operator (Class C).

## What is a "Primary Operator"?

Each UST owner must designate at least one (but may designate more than one) Primary Operator for each UST facility. To be designated as a Primary Operator, the individual must meet the following criteria:

1. Responsible for day-to-day aspects of operation, maintenance, and record-keeping for the UST system.
2. General knowledge of UST compliance requirements.
3. **Not** a third party contractor.
4. An employee of the UST owner or the entity operating the facility's USTs.

## What is an "Emergency Response Operator"?

Each UST owner must also designate at least one (but may designate more than one) Emergency Response Operator for each UST facility. The Emergency Response Operator is defined by the following criteria:

1. Controls or monitors fuel sales or dispensing operations.
2. Provides immediate response to alarms and releases.
3. Present at the facility during fuel dispensing operations.

If a facility is unmanned, then a trained Emergency Response Operator must conduct a site visit at least once a day OR an automated notification system must be in place at the facility. In addition, highly-visible placards must be placed in the dispensing area to indicate where the automatic-shutoff is located, as well as to instruct individuals to call 911 in the event of an emergency.

A daily site visit requires a trained Emergency Response Operator to check leak detection consoles for power, alarms, and warnings as well as visually inspect all aboveground equipment for signs of leaks, spills, and/or erratic operation.

An automated notification system must immediately alert an Emergency Response Operator of alarms for tanks, piping, and overfills at any time.

## What topics are included in Operator Training?

The training for the Primary Operator covers the topics of: spill prevention, overfill control, leak detection, corrosion protection, compatibility, financial responsibility, suspected releases, Emergency Response Operator training requirements, UST system components, and UST reporting and recordkeeping requirements. Training for the Emergency Response Operator includes: actions required to respond to emergencies and alarms indicating spills or releases from the UST system(s).

## How will the Primary Operator be trained?

Training the Primary Operator begins at the UST facility. An NCDENR inspector will call the UST owner to schedule a compliance inspection. The owner should ensure that the Primary Operator is present at the facility for that inspection.

The Primary Operator will be trained during the compliance inspection **only if** the facility is in compliance at the time of inspection. To complete on-site training, the Primary Operator is given the Operator Regulatory Knowledge Assessment (ORKA).

If the facility is **not** in compliance at the inspection, then the ORKA will not be given and a Notice of Violation will be sent to the UST owner directing the Primary Operator to attend Tank School or take an online training course.

## What is the ORKA?

The Operator Regulatory Knowledge Assessment, or ORKA, is an assessment, or test, that the Primary Operator must complete during a compliance inspection. If the operator scores a 75% or better on the ORKA, and if the facility is in compliance, then the operator training requirement is satisfied for the facility and the Primary Operator will receive a "Trained Operator Certificate".

If the Primary Operator does not achieve a passing score on the ORKA, then a Notice of Violation will be sent to the UST owner with instructions for the Primary Operator to enroll in Tank School or take one of the

approved online training courses for retraining listed at portal.ncdenr.org/web/wm/ust/registration.

## What is Tank School?

Tank School is a free, day-long class with exam that retrains Primary Operators in accordance with the US EPA requirements for operating and maintaining UST systems. The class is held regularly throughout the state. Registration for the class is competed online at portal.ncdenr.org/web/wm/ust/registration.

If a Primary Operator achieves a score of 75% or better on the assessment given at Tank School, then the operator training requirement is satisfied for the facility and the Primary Operator will receive a "Trained Operator Certificate".

## How will the Emergency Response Operator be trained?

The training of a UST facility's Emergency Response Operator is the responsibility of the Primary Operator. Primary Operators should conduct the training using the Emergency Response Operator training packet available on the UST Section website at portal.ncdenr.org/web/wm/ust/operatortraining. The packet includes instructions and materials, as well as a UST-26 form to document that training was completed. The UST-26 form must be kept at the UST facility.

Primary Operators can also train a store manager as an Emergency Response Operator, who can then conduct Emergency Response Operator training for other employees and sign the UST-26 form under the oversight of the Primary Operator. The Primary Operator should identify the store manager authorized to provide the training in writing and attach it to the UST-26 form.

Additionally, Emergency Response Operator training can be conducted using an online training tool, if the Primary Operator has verified that the online tool includes all the training requirements that the UST Section-issued Emergency Response Operator training packet covers. The UST-26 form, or similar documentation, must be kept at the UST facility to verify that training was completed.

## What are the requirements after Operator Training has been completed?

Once the Primary Operator has been trained and received a "Trained Operator Certificate", no training renewal is required unless:

1. A new Primary Operator is appointed for that facility, or
2. The facility is out of compliance at the next compliance inspection.

In either case above, the Primary Operator is required to register for Tank School or an online training course within 30 days and complete the course within 90 days.

Emergency Response Operators should be trained before assuming responsibility for monitoring or controlling fuel dispensing. Once trained, no training renewals are required.

### Questions?

If you have any questions, please contact the UST Section Central Office at (919) 707-8171 or visit our web site at: http://portal.ncdenr.org/web/wm/ust/ustmain.

# Underground Storage Tank Operator Training Requirements

NCDENR

**N.C. Department of Environment and Natural Resources**

**Division of Waste Management UST Section**

Revised 10/2013