



STATE OF IOWA

TERRY E. BRANSTAD, GOVERNOR
KIM REYNOLDS, LT. GOVERNOR

DEPARTMENT OF NATURAL RESOURCES
ROGER L. LANDE, DIRECTOR

To: UST Field Offices and Third-Party Compliance Inspectors
From: Tom Collins/Paul Nelson
Re: UST Class A/B/C Operator Training Enforcement
Date: 4 March 2012

The operator training deadline was December 31, 2011. Every regulated UST facility had to have at least one trained Class A and Class B operator. Unstaffed retail marketing facilities and non-retail UST facilities must have a trained Class A and Class B operator. Staffed retail marketing facilities must also have a trained Class C operator.

The 2012 tank management fee application required the name of the class A and B operators, date of training and name of trainer or vendor. The DNR UST Section is tracking Class A and B operator information. If the information was not provided with payment for the tank tags, we withheld the tags until training was completed. However, since there were several operators who did not have training, we decided to release their tags to get them out and on the tanks. Next week, letters will be sent to owners and operators who have not yet submitted documentation of training. They will be given 10 days to comply. If documentation is not submitted in the time allowed, we will enforce a delivery prohibition.

There will continue to be a need for operator training at UST facilities due to personnel changes and turnover. A list of approved training vendors is provided on the UST Section's website: <http://www.iowadnr.gov/portals/idnr/uploads/ust/opvendors.pdf?amp;tabid=672>.

For immediate training, web-based training is always available. Classroom-based operator training may be available periodically. Check the UST Section website for classroom schedules. UST Section forms have been changed to reflect the training requirement, e.g., proof of training is required before tank tags can be issued (148 or Registration form) or before a new owner can operate (Change of Ownership form).

Operator training certificates for Class A/B/C must be readily available at each facility during the inspection [135.4(11)a, b,c]. Emergency contact information and emergency procedures must also be prominently displayed at the site [135.4(6)f], and readily available to Class C operators, i.e., at the counter where the Class C operator oversees the dispensing of petroleum products. If the facility does not have the DNR's emergency procedures form, they must have something similar. Unstaffed facilities are required by fire code (NFPA 30A) to post emergency instructions and contacts in the dispenser area. The DNR's emergency procedures are in a *3/2010 UST Memo* on our website: <http://www.iowadnr.gov/InsideDNR/RegulatoryLand/UndergroundStorageTanks/USTOwnersOperators/USTTraining.aspx>.

If during your inspection, a facility cannot provide documentation of training, inform the manager or contact person that documentation must be submitted to you within 10 days. If the matter is not resolved in 10 days, notify Paul or me, and we will begin to enforce a delivery prohibition and/or an administrative order. Contact Paul Nelson (Paul.Nelson@dnr.iowa.gov or 515.281.8879) or Tom Collins (Tom.Collins@dnr.iowa.gov or 515.281.8879) to report a failure to comply with operator training requirements.

When Class A/B operator documentation is received, please be sure to send/email a copy to Paul or me so we can enter it on the database.