



UNDERGROUND STORAGE TANK OPERATOR TRAINING

DESIGNATION OF CLASS A, B, AND C OPERATORS FACT SHEET

(See DEQ website: www.deq.virginia.gov & State UST Regulation <http://lis.virginia.gov/cgi-bin/legp604.exe?000+reg+9VAC25-580>)

Virginia Regulation 9VAC25-580-125 requires UST owners and operators to complete an approved or approvable UST Operator Training program by **August 8, 2012** and to prepare and maintain a list of designated Class A, Class B, and Class C Operators. Since each class of operator requires different levels of training and responsibility, it is necessary for each owner/operator to designate persons responsible for Class A, B, and C duties. Designated operators should be individuals. The UST owner must determine who best fits each role for their UST facilities.



Generally, tank owners/operators should:

1. Designate Class A, Class B, and Class C Operators for each facility,
2. Obtain UST Operator training for all classes of operators by **August 8, 2012**, and
3. Keep on file the designation and Certificates of Training for each trained operator for DEQ staff review upon inspection.

DESIGNATING UST OPERATORS

The “Underground Storage Tank (UST) Operator Class Designation Form – Single Facilities” may be used to document Class A, Class B, and Class C Operators. Any person designated for more than one class of operator must complete the required training for each operator class for which he/she is designated. Many training programs have combined Class A and Class B UST Operator Training into one program because Class A and Class B Operators will commonly be the same individual. Class C Operators generally will be trained by certified Class A and Class B Operators.

THERE ARE MULTIPLE WAYS TO DESIGNATE CLASS A, CLASS B, AND CLASS C OPERATORS

- Designate separate people as Class A, Class B, and/or Class C Operators.
- Designate the same person as Class A, Class B, and/or Class C. One person may be designated as the Class A, Class B, and Class C for many mom/pop type gas stations and/or facilities.
- Designate multiple people for each operator class at one or more facilities.
- Designate one person for multiple facilities.

WHEN DESIGNATING UST OPERATORS YOU SHOULD CONSIDER THE FOLLOWING

- When a facility is found to be non-compliant with certain portions of the UST regulations as a result of an inspection, all designated Class A and Class B Operators assigned to that facility may be required to repeat an approved UST Operator Training course no later than **90 days** from the date they are notified of a retraining requirement by DEQ.
- A new Class A and/or Class B Operator must be trained within **60 days** of assuming the duties for that class of operator.
- Class C Operators must be trained **before** assuming duties.
- A Class A or Class B Operator must be readily available and be able to be onsite at the facility within a reasonable time.
- A Class C Operator must be present when the facility is **manned**. Because of this requirement, tank owners should consider designating and training multiple Class C Operators for each facility.
- Class C Operators must be briefed on facility emergency response instructions every 12 months.
- The UST owner or operator shall incur the costs of training for designated operators.

CLASS A OPERATORS

§9VAC-25-580-125.A.1 of Virginia’s UST Technical Regulation defines a Class A Operator:

...“Class A operator” means an operator who has primary responsibility to operate and maintain the underground storage tank system and facility. The Class A operator’s responsibilities include managing resources and personnel, such as establishing work assignments, to achieve and maintain compliance with regulatory requirements. In general, Class A operators focus on the broader aspects of the underground storage tank statutory and regulatory requirements and standards necessary to properly operate and maintain the underground storage tank system and facility.

- Class A Operators are usually, but not always, tank owners or environmental managers and usually function at the highest level of regulatory compliance responsibility.
- The Class A Operator typically ensures that the appropriate individuals are designated as Class A, Class B, and Class C Operators and that those designated individuals are trained to properly operate and maintain the UST system(s), maintain appropriate records, and properly respond to emergencies such as spills or releases.
- A third party contractor may be designated as a Class A Operator.

CLASS B OPERATORS

§9VAC-25-580-125.A.2 of Virginia’s UST Technical Regulation defines a Class B Operator:

...“Class B operator” means an operator who implements applicable underground storage tank regulatory requirements and standards in the field or at the underground storage tank facility. A Class B operator oversees and implements the day-to-day aspects of operations, maintenance, and recordkeeping for the underground storage tanks at one or more facilities.

- Class B Operators are usually, but not always, UST managers, environmental managers, facility managers, facility superintendents, lessees, or operations managers.
- A Class B Operator is responsible for the day to day operation of the USTs and maintaining the facility compliance records.
- A third party contractor may be designated as a Class B Operator.

CLASS C OPERATORS

§9VAC-25-580-125.A.3 of Virginia’s UST Technical Regulation defines a Class C Operator:

...“Class C operator” means the person responsible for responding to alarms or other indications of emergencies caused by spills or releases from underground storage tank systems and equipment failures. A Class C operator generally is the first line of response to events indicating emergency conditions.

- Class C Operators are generally clerks or employees that control the dispensing or sale of the fuel.
- A certified and trained Class C Operator must be present when the facility is manned and available within a reasonable amount of time when the facility is unmanned.
- In most situations, it will be necessary to have multiple Class C Operators designated and trained.

IF YOU HAVE ADDITIONAL QUESTIONS, DEQ PHONE NUMBERS ARE LISTED BELOW

Alicia Meadows
UST Compliance Coordinator (540) 562-6729

Regional Offices:

Tidewater Region (Virginia Beach)	(757)518-2000
Northern Region (Woodbridge)	(703)583-3800
Piedmont Region (Richmond)	(804)527-5020
Valley Region (Harrisonburg)	(540)574-7800
Blue Ridge Region (Salem)	(540)562-6700
Southwest Region (Abingdon)	(276)676-4800