

FAQs FOR OPERATOR TRAINING

Question: What is Operator Training?

Answer: Operator Training is a federally mandated requirement contained in the Energy Policy Act of 2005 [Public Law 109-58]. The Act requires that all regulated underground storage tank (UST) facilities have three classes of individuals trained in proper operation and maintenance of regulated UST systems. Operator Training refers to the process by which these individuals achieve certification to fill these roles.

Question: What are the three classes of Operators defined in the Energy Policy Act of 2005?

Answer: Class A Operators have primary responsibility over operations and maintenance at a UST facility. The role of Class A Operators is more administrative, often including managing resources and personnel, to achieve and maintain compliance with regulatory requirements. Class A Operators are also primarily responsible for making sure that any suspected releases or reportable spills are reported in a timely manner to IEMA (and 911 where required) and that financial responsibility requirements are met for the facility.

Class B Operators have more of an operational management role. They implement applicable UST regulatory requirements and standards in the field, including the day-to-day aspects of UST operation, maintenance and recordkeeping at one or more UST facilities.

Class C Operators are often cashiers and attendants at retail fuel dispensing facilities. They are responsible for initial response to alarms or other indications of emergencies caused by spills or releases from USTs. Not all employees of a UST facility are necessarily required to be Class C Operators.

Note: In Illinois, as in many other states, Class A and Class B Operator certifications are combined into the Class A/B Operator certification. The approved trainers in Illinois reflect this by offering Class A/B Operator courses that cover the range of responsibilities for both Class A and Class B certification as described in the Energy Policy Act of 2005.

Question: Do I have to have someone designated in each class at my facility?

Answer: Yes. Facilities will be required to have at least one person designated in each class. One person can be designated as the Class A/B and Class C Operator, or separate individuals can be designated for each class. A Class A/B Operator can be designated for more than one facility. Onsite records must include the name and phone number of the assigned A/B Operator.

Note: Class A/B Operator certification obtained from an Illinois OSFM approved training vendor covers all the requirements for Class C certification. Thus at certain facilities, all three levels, A, B and C, may be covered in one individual.

Question: Do I have to have all three classes of individuals on site at all times?

Answer: No. For an attended or manned facility, you must have at least one class of Operator on site at all times that the facility is open and dispensing fuel. For an unattended or unmanned facility, you must conspicuously post emergency contact information for the Class A/B Operator(s), including names and telephone numbers, unless a toll-free number for 24 hour dispatch to the facility has been prominently displayed. The A/B Operator(s) need not be present at all hours of operation. After August 8, 2012, at no time may a facility operate without validly trained Class A/B and C Operators.

Question: How is a manned facility different from an unmanned facility?

Answer: A manned facility means a UST facility that has a responsible attendant present during all hours of operation. A manned facility is the same as an attended facility. An unmanned facility means a UST facility that is not required to have a responsible attendant present during all hours of operation. Most unmanned facilities are unattended fuel dispensing facilities. However, some unmanned facilities are not unattended, the difference being that they are not fuel dispensing facilities. USTs storing fuel supplying backup generators and boilers are examples of facilities that are considered unmanned, but are not

unattended fuel dispensing facilities.

Note: If a normally attended fuel dispensing facility is operated as an unattended fuel dispensing facility for any portion of the day, week or month, it must meet all requirements for an unattended fuel dispensing facility.

Question: What is the deadline date by which facilities will be required to have their individuals trained?

Answer: The deadline date was August 8, 2012. All requirements are now in effect.

Question: Can we get an extension to this date?

Answer: No. This date was mandated by the Energy Policy Act of 2005.

Question: Does Illinois allow reciprocity with other states?

Answer: No. Each individual will be required to have training and pass an exam from an Illinois approved training vendor.

Question: What is the minimum passing score?

Answer: The minimum required passing score shall be at least 75%.

Question: How often does our class of Operators have to take the training and exam?

Answer: Class A/B Operators are required to recertify every 2 years, or after their facility receives a NOV for UST violations or training deficiencies, whichever comes first. Class C Operators are required to recertify every 2 years. All recertifications must be obtained from Illinois OSFM approved training vendors.

Question: How soon do new employees have to take the training?

Answer: Class A/B Operators must be trained within 30 days of assuming operation and maintenance responsibilities for a UST. Class C Operators must be trained before assuming responsibility involving emergency response. A new non-certified Class C employee may work at a facility as long as there is someone certified as either a Class A/B or Class C Operator present with them at the facility. The new employee may not work alone at an attended facility before passing an Illinois OSFM approved Operator course.

Question: Can my Class A/B Operators train our Class C Operators?

Answer: Only if they have submitted the "Underground Storage Tank Training Course Approval Application" and the submitted class has received written approval from the Office of the State Fire Marshal (OSFM). The application for course approval can be found at: [Trainer Application \[PDF, 1MB\]](#).

Question: Is there a fee involved with the training and exam?

Answer: Yes. The training is provided by third party training vendors who offer Illinois OSFM approved training programs. The UST facility owner or operator shall pay the approved provider a reasonable fee.

Question: Where can I find an approved list of providers for Illinois?

Answer: A list of approved providers is at: [Operator Training Provider List as of 11-29-12 \[PDF, 260Kb\]](#).

There are currently 17 providers listed offering both Class A/B and Class C Operator training, many available as online classes. While several are closed corporate classes for in house training, more than half are available to the general public.

Question: What types of records do I have to maintain at the facility?

Answer: At a manned facility,

- a list of the designated Class A/B and Class C Operators for the UST facility (identified by facility number and address);
- completion certificate issued by the approved provider;
- a copy of the current Class C Operator instructions or procedures;
- a copy of the written UST facility operation and maintenance plan; and
- all quarterly inspection checklists for the past two years.

The UST owner shall provide all Class C Operators with written instructions that include:

- emergency response procedures;
- procedures for overfill protection;
- operation of emergency shut-off systems;
- appropriate responses to all alarms;
- reporting of leaks, spill and releases;
- site specific emergency procedures, and
- the names and other information needed for contacting appropriate parties if a leak, spill, release or alarm occurs.

At an unmanned UST facility, the same records as above shall be maintained at the facility or be made available to the OSFM inspector within 30 minutes of a request or before OSFM completes its inspection, whichever is later.

Any time the Class A/B Operator(s) is not permanently onsite, or if he is assigned to more than one facility, the onsite records must include the name and phone number of the Class A/B Operator(s).

Question: What is a written “Facility Operations and Maintenance Plan”?

Answer: UST facility owners and operators in conjunction with their designated Class A/B Operator(s) must adopt and implement a written Operations and Maintenance Plan signed by both the owner and the designated Class A/B Operator for the UST facility. The plan shall be kept at the facility for the life of the UST and shall be updated to reflect changes as they occur.

At a minimum the plan shall include:

- a detailed plan showing what inspections, operations, testing, maintenance and recordkeeping shall be done on a daily, monthly, quarterly and annual basis;
- a description of the manner in which UST facility owners and operators properly dispose of regulated substances spilled at the facility, and
- emergency procedures and instructions.

The certified operators shall ensure that all inspections and testing, as outlined in the facility Operations and Maintenance Plan, are properly performed. They shall also ensure that the work is performed by an OSFM licensed contractor. The Class A/B Operator shall provide the UST facility owner with a copy of each inspection checklist and alert the owner to any conditions that require follow-up actions.

Question: Who can perform the quarterly inspections?

Answer: The Class A/B Operator assigned to the facility is required to perform the Quarterly Equipment Inspection and complete/sign the Quarterly Equipment Inspection Checklist.

Question: Where can I find the quarterly checklist?

Answer: The OSFM Quarterly Equipment Inspection Checklist can be found at:

[Quarterly Equipment Inspection Checklist/Operation & Maintenance Guidelines Form Updated 12-28-12 \[PDF, 299Kb\]](#).

Question: If the OSFM performs an inspection of my facility and finds deficiencies and writes a Notice of Violation (NOV), will I be required to have my Class A/B Operator retrained?

Answer: Yes, if certain violations are noted. Retraining (including both training and testing) is required for the facility's Class A/B Operator(s) if OSFM determines that any aspect of the facility is out of compliance with release detection, corrosion protection, spill and overfill protection, or financial responsibility, or if the facility fails to designate its Class A/B and Class C Operators and have those Operators complete the training required under the Operator Training rules. The OSFM will issue a NOV and the retraining must be completed within 60 days of the issuance of the NOV. If a NOV triggers retraining, that NOV cannot be considered to be complied with until the Class A/B Operator(s) has completed his training.

Question: Can my UST systems be red tagged if I don't have my Class A/B Operator(s) retrained within 60 days?

Answer: Yes.

Question: Who can I contact if I have additional questions pertaining to the Operator Training Program?

Answer: You can find the answer to many of your questions in the Operator Training rules (available at <http://www.sfm.illinois.gov/commercial/ust/operatortraining.aspx>), or you may contact the Petroleum and Chemical Safety Division of the OSFM at (217)785-1020 or www.SFM.DPCS@illinois.gov.