

# Operator Training Class A/B Operators

- ▶ An individual should have been trained and designated by October 13, 2018
- ▶ Responsible for
  - ▶ Registration & Financial Assurance
  - ▶ Understanding the sites equipment including: corrosion protection, release detection monitoring, spill/overflow equipment, maintain records for equipment testing
  - ▶ Trained to respond to emergencies
- ▶ Can be the owner/operator/employee or a hired individual
- ▶ No limit to the number of sites
- ▶ Does not have to be onsite
- ▶ Trains the Class C operator

# How do I become an AB operator?

- ▶ Complete the UST webinar - Rutgers Continuing Education
  - ▶ <http://www.cpe.Rutgers.edu/brochures/intros/ust-AB.html>
- ▶ Pass the ICC test
  
- ▶ Complete a course and pass the exam from one of the states currently on the reciprocity list:
  - Colorado, Connecticut, Kansas, Michigan, New Hampshire, Puerto Rico, and West Virginia

# How do I designate an AB operator?

- ▶ Complete the UST Registration & Billing Questionnaire with AB operator information.
- ▶ Provide a copy of the passing ICC test or the paperwork of completion from the reciprocal state.
- ▶ Include the ENTIRE tank insurance policy
- ▶ Mail to:

Bureau of Case Assignment & Initial Notice  
Site Remediation and Waste Management Program  
NJ Dept. of Environmental Protection  
401-05H  
PO Box 420  
Trenton, NJ 08625-0420

# What happens if I don't have a Class AB operator designated on my registration?

- ▶ The sites UST Registration renewal will not be issued
- ▶ Currently in the renewal period: Burlington and Mercer Counties - expire 3/31/19
  - ▶ Next renewal period: Union County - expire 6/30/19
- ▶ A Notice of Violation will be issued - 30 day grace period
  - ▶ Field Notice of Violation issued during an inspection
  - ▶ Office Notice of Violation mailed to sites Owner & Operator - approx. 2,500 sites
    - ▶ Working backwards from the furthest renewal date (Middlesex, Essex and Morris)
- ▶ Failure to comply with the Notice of Violation within 30 days may result in a delivery ban and/or formal administrative enforcement actions including penalties

# Class C Operator

- ▶ At least 1 Class C must be onsite when the site is operating; unless site is unmanned
- ▶ Trained by the AB operator:
  - ▶ Who to call in the event of an emergency -
    - ▶ Owner/Operator/UST contractor/DEP Hotline
  - ▶ What to do / who to call for monitoring system alarms
    - ▶ Owner/Operator/UST Contractor
  - ▶ How to shut down the system in an emergency
  - ▶ Location of and how to use the emergency spill kit
- ▶ Training is documented by the AB in a logbook kept onsite, training will be evaluated by a DEP inspector during an inspection.
- ▶ Failure to have a Class C will result in a Notice of Violation; 30 day grace period to get someone trained/retrained

# Unmanned Facilities

No Class C required

- ▶ No attendant at location during operational hours:
  - ▶ Emergency generator & heating oil tanks
  - ▶ Public Work Yards
  - ▶ Self-serve company fleets
- ▶ Facilities that receive after hour deliveries
- ▶ Post Emergency Information Sign - visible from fill ports and dispensers

# Unmanned Sign Information

- ▶ Emergency Number for local police and fire departments
- ▶ DEP Hotline (877) WARN-DEP
- ▶ Name and Phone number for person responsible during emergency
  - ▶ Owner/Operator/AB Operator
- ▶ UST Contractor
- ▶ LSRP
  
- ▶ Signs should have been posted by January 2019
- ▶ New tank systems signs posted during installation



**ATTENTION**  
FUEL DELIVERY DRIVERS  
**IF ALARM SOUNDS**  
**STOP FILLING TANKS**  
**IMMEDIATELY!**

**EMERGENCY**  
**PUMP SHUT OFF**  
**LOCATED IN**  
**GARAGE # 7**

TOWNSHIP OF UNION DEPARTMENT OF PUBLIC WORKS

RELEASE RESPONSE PLAN

	PHONE #	CONTACT NAME
NJDEP HOTLINE:	877-927-6337	
FIRE DEPARTMENT:	911	CENTRAL DISPATCH
LOCAL HEALTH DEPARTMENT:	908-851-8507	MARCONI GAPAS
COUNTY HAZMAT:	908-654-9881	CHRIS SEATURO
	AFTER HOURS 908-654-9800	
FACILITY OWNER/OPERATOR:	908-686-1922	MICHAEL ROMANO
CORRECTIVE ACTION CONTRACTOR:	908-964-5360	T. SLACK ENVIRONMENTAL SERVICES
REPAIR CONTRACTOR:	908-964-5360	T. SLACK ENVIRONMENTAL SERVICES
OTHER CONTACTS		
DIRECTOR OF PUBLIC WORKS:	908-851-8500	SERGIO PANUNZIO
ADMINISTRATOR:	908-851-8500	RON MANZELLA
SUB-SURFACE EVALUATOR	908-851-8506	PHILIP HADERER

PROCEDURES:

1. SHUT PUMPS DOWN WITH EMERGENCY SWITCH (LEFT OF PUMPS BY DOOR)
2. DIAL 911 FOR FIRE DEPARTMENT
3. CONTAIN THE SPILL/LEAK WITH CONTAINMENT KIT
4. NOTIFY GENERAL SUPERVISOR OR SUPERVISOR
5. NOTIFY APPROPRIATE AGENCIES TO REMEDIATE INCIDENT
6. NOTIFY APPROPRIATE AGENCY TO REMOVE PRODUCT AND CONTAINMENT MATERIALS



# Retraining

- ▶ At the discretion of the DEP inspector
- ▶ Minor violations - example: water in spill buckets - phone call or onsite training with DEP inspector
- ▶ Major violation - examples: not having operational leak detection or cathodic protection mechanisms, failing to respond to alarms or active discharges - onsite training or may require full retraining of the AB (class and test)
- ▶ Retraining must be completed within 30 days from the date the Department advises the facility of significant or repetitive violations

# 14-day Notice

14dayUSTnotice@dep.nj.gov

- ▶ Responsibility of the Owner/Operator
- ▶ Contractor can send notification on their behalf
- ▶ Notifications are sent at least 14 days prior to the start of work date:
  - ▶ Installation - tanks/lines
  - ▶ Closure - tanks/lines
  - ▶ Any time a sub-modification permit is required
  - ▶ Stage 2 decommissioning
  - ▶ Vapor Recovery Testing
- ▶ 14-days after decommissioning - including PEI checklist & Stage 1 testing
- ▶ Vapor Test FAIL (within 72 hours of a test failure)

## Notification includes:

- ▶ PI number
- ▶ Site name and address
- ▶ Site contact information - name and phone number
- ▶ Contractor - name and phone number
- ▶ Start date of work
- ▶ Type of work to be done

## Emergency Work

- ❖ Notification must be sent within 14 days of work done; include reason for emergency work and work completed to correct the issue.

# New Testing Requirements

1<sup>st</sup> round was due by Oct. 13, 2018

- ▶ Annual Testing:
  - ▶ Monitoring System Certification - including ATG probes, interstitial sensors and high level alarm
  - ▶ Positive shut-down verification, if site is using low-level sump testing
  
- ▶ 3 year testing:
  - ▶ Overfill certification - flapper shut-off valves & ball floats
  - ▶ Spill bucket testing
  - ▶ Containment testing - STPs and UDC where interstitial monitoring is used

## ALARM HISTORY REPORT

----- IN-TANK ALARM -----

F 3:114 PUL

HIGH WATER ALARM  
MAR 14. 2018 10:49 AM  
MAR 16. 2017 8:27 AM

OVERFILL ALARM  
OCT 28. 2018 9:25 AM  
MAR 14. 2018 10:43 AM  
MAR 16. 2017 8:25 AM

SUDDEN LOSS ALARM  
MAR 14. 2018 10:37 AM  
MAR 16. 2017 8:23 AM

HIGH PRODUCT ALARM  
MAR 14. 2018 10:43 AM  
MAR 16. 2017 8:25 AM

INVALID FUEL LEVEL  
MAR 14. 2018 10:37 AM  
MAR 16. 2017 8:24 AM  
MAY 3. 2016 11:22 AM

PROBE OUT  
MAY 3. 2016 11:17 AM

HIGH WATER WARNING  
MAR 14. 2018 10:49 AM  
MAR 16. 2017 8:27 AM

DELIVERY NEEDED  
MAR 14. 2018 10:38 AM  
DEC 23. 2017 6:50 PM  
JUL 7. 2017 5:57 PM

MAX PRODUCT ALARM  
MAR 14. 2018 10:45 AM  
MAR 16. 2017 8:26 AM

\* \* \* \* \* END \* \* \* \* \*

## ALARM HISTORY REPORT

----- SENSOR ALARM -----

L 3:INTER PREMIUM  
ANNULAR SPACE  
HIGH LIQUID ALARM  
MAR 14. 2018 8:20 AM

LOW LIQUID ALARM  
MAR 14. 2018 8:20 AM

HIGH LIQUID ALARM  
MAR 16. 2017 8:13 AM

\* \* \* \* \*

## ALARM HISTORY REPORT

----- SENSOR ALARM -----

L 7:STP PREMIUM  
STP SUMP  
FUEL ALARM  
MAR 14. 2018 8:15 AM

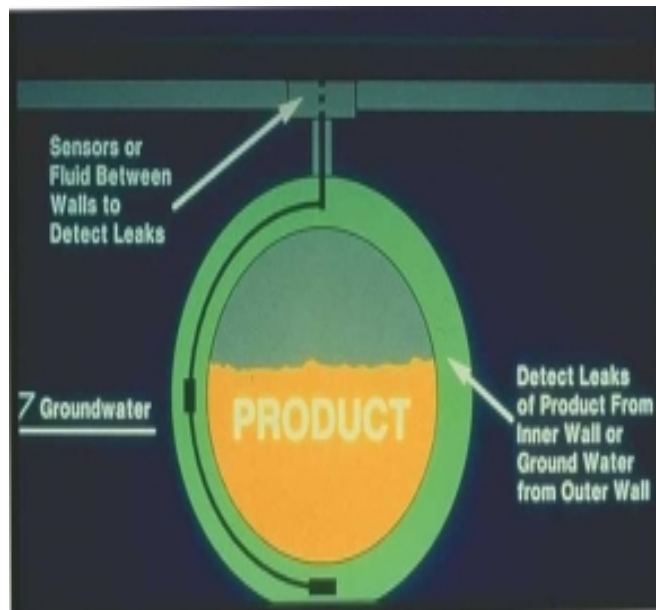
FUEL ALARM  
MAR 16. 2017 8:10 AM

FUEL ALARM  
MAR 16. 2016 8:40 AM

# Interstitial Monitoring - do I have to??

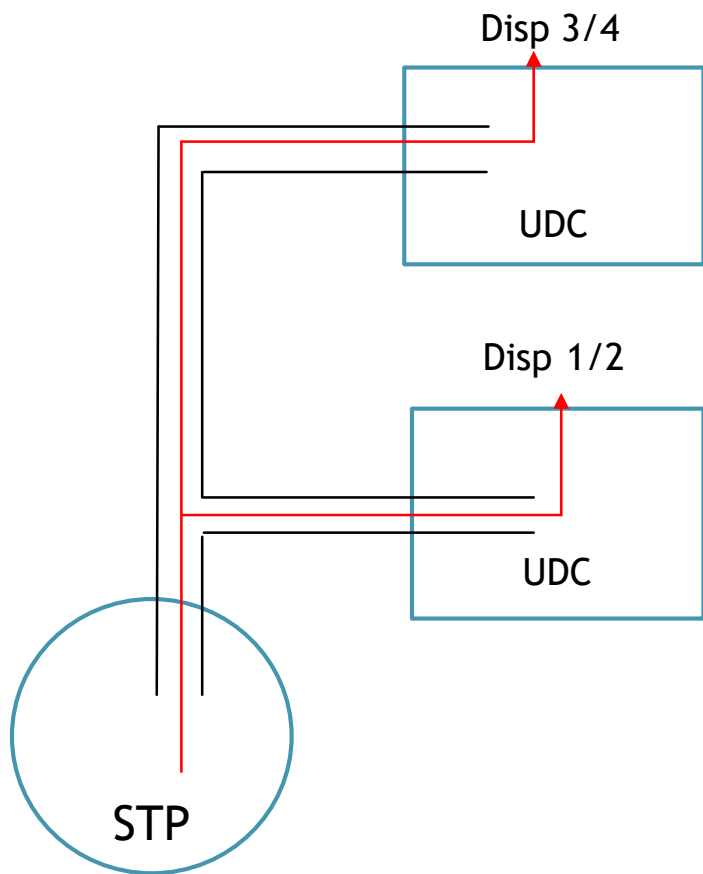
## Yes, you do, if...

- ▶ Tanks OR Lines - installed on or after September 4, 1990
- ▶ Tanks OR Lines - installed before September 4, 1990 and were using or were registered as using interstitial monitoring as of January 16, 2018.



APR 17, 2017 10:39 AM
LIQUID STATUS
-----
APR 17, 2017 10:39 AM
L 1:UNLEADED 87A ANNULAR SENSOR NORMAL
L 2:UNLEADED 87A FILL SENSOR NORMAL
L 3:UNLEADED 87A STP SENSOR NORMAL
L 4:UNLEADED 87B ANNULAR SENSOR NORMAL
L 5:UNLEADED 87B FILL SENSOR NORMAL
L 6:UNLEADED 87B STP SENSOR NORMAL
L 7:PREMIUM ANNULAR SENSOR NORMAL
L 8:PREMIUM FILL SENSOR NORMAL
L 9:PREMIUM STP SENSOR NORMAL
L10:DISPENSER PAN 1-2 SENSOR NORMAL
L11:DISPENSER PAN 3-4 SENSOR NORMAL

# Interstitial at the UDC for *FRP* lines



## Containment Boot is OPEN

Allowing fuel to drain back to STP sump, 30 day UDC inspection and log are required.



## Containment Boot is CLOSED

Site must install and maintain liquid sensor in UDC



# Under Dispenser Containment (UDC)

- ▶ UST system shall be equipped with under-dispenser containment (UDC) for any new dispenser system installed on or after April 11, 2016.



- ▶ A dispenser is considered new both the dispenser and the equipment needed to connect the dispenser to the UST system are installed.
- ▶ Equipment necessary to connect the dispenser to the UST includes check valves, shear valves, unburred risers, flexible connectors or other transitional components that are beneath the dispenser and connect the dispenser to the underground piping.



# Containment Testing

## Piping sumps, STP sumps, UDCs and Spill Buckets

- ▶ All spill buckets no continuously monitored via pressure, vacuum or liquid
- ▶ Required for all sumps & UDCs where interstitial monitoring is required
- ▶ Within 30 days of installation
- ▶ 1<sup>st</sup> round deadline Oct. 13, 2018 for existing systems
  - ▶ DEP allowed for an extension - April 13, 2019
- ▶ 3 years thereafter
- ▶ After April 13, 2019, sites not tested will receive a Notice of Violation and penalty assessments.

# Testing and Failures

- ▶ Testing must be done by a UST contractor certified in tank testing or installation.
- ▶ Containment failure - site must repair/replace/retest within 30 days
  - ▶ Repair/replace deadline can be extended with a signed ACO
- ▶ Spill bucket failure - *immediately take out of service = no deliveries !!*
  - ▶ Slip on spill buckets - for temporary repairs (30 days or longer with ACO)
  - ▶ Environmental investigation is required
  - ▶ \$35,000 penalty if a delivery is taken to a failing spill bucket

# Hydrostatic Testing Options

## Full Test

- ▶ Sump is tested to 4 inches above the highest penetration or seam



## Low-level Test

- ▶ Sump is tested to 4 inches above height where positive shutdown will trigger
- ▶ Positive shutdown must shut off STP, not only a dispenser
- ▶ Positive shutdown must be maintained and certified annually