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/overfill 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
- 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
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
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
1st 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
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, 1900 and were using or were registered as using interstitial monitoring as of January 16, 2018.
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.
Interstitial at UDC for **FLEX**

1 Dispenser - follow rules for FRP

2 or more dispensers - needs sensors at UDC; or provide documented proof of 0.2 gph leak rate compliance
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, unburied 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

- 1st 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