

## **A/B/C Operator Training Frequently Asked Questions**

- Q: In Wisconsin, can the same person be the Class A and Class B operator for a site? If so, are they required to take two separate tests? (Some states are allowing one person to be both and only take one test (Colorado and Wyoming for instance)).**
- A:** Yes, the same person can be the Class A and Class B operator for a site. State approved vendors are offering classes and tests for Class A only, Class B only and combination Class A/B levels. A test only option is available through the International Code Council®. We recognize those that successfully complete the Wisconsin version of the International Code Council® test as qualified to be both Class A and B operators.
- Q.: Will the State of Wisconsin be providing state-sponsored training courses to prepare for the Class A and Class B examinations?**
- A:** Not directly. Approved third-party vendors provide training and testing via classroom, webinar and self-directed online courses.
- Q: I do not see a reference to any required monthly or annual inspections being associated with Class B responsibilities. I'm in no way asking for this, but other states have been requiring this. I just want to make sure I'm not missing anything.**
- A:** Please see chapter ATCP 93 of the Wisconsin Administrative Code, subchapter V General UST Storage and Underground Piping, section ATCP 93.500 (8) INSPECTION AND MAINTENANCE OF SYSTEMS. "Operators of new and existing UST systems shall conduct routine and periodic inspection and maintenance in accordance with the applicable sections of PEI RP900." In addition, refer to section ATCP 93.605 (1) (a), General fuel dispensing requirements. STANDARDS AND INSPECTIONS. "Periodic and annual inspections and maintenance shall be conducted in accordance with PEI RP500 and RP900."
- Q: Obviously some common sense practices are necessary, but are there any state mandated limits to the number of sites for which one A or B can be assigned to cover?**
- A:** No maximum at this point in time. The operators must be able to fulfill the requirements of each class at any of the sites where they are listed as operators. If we find that requirements are not being met, we could revisit the no-limit stance.
- Q: Does the A or B have to be based within the Wisconsin? For instance, can a Class B live in Dubuque, Iowa and cover a facility in Platteville, Wisconsin?**
- A:** We will accept other states' training and operator certificates provided we have approved their curriculum and testing.
- Q: Does the training provided by a Class B for a Class C have to be certified by the Department or will an in-house program suffice?**
- A:** Certification of in-house training curriculum is not required. The requirements for the content of the training for Class C operators are in chapter ATCP 93, subchapter VIII.

**Q: I have trained the employees at my gas station to be Class C operators. What kind of certification will the inspector accept for proof?**

**A:** You may create your own certificate; both you and the employee must sign the certificate to acknowledge the training has occurred. You may also fill out the Class C Underground Storage Tank Operator form available on our website.

**Q: I don't have time to train my employees to perform the duties of Class C operators. Can I send them to a class or direct them to an online site?**

**A:** Yes. In-person classes and online training approved by the Department are acceptable means of complying with the requirement; you still must instruct your employees concerning notification and procedures specific to your site.

**Q: Will the training and testing certificate expire?**

**A:** No, however there is a requirement that the underground storage tank system stay in compliance with the code. If evidence of repeated non-compliance exists, the Class B and in some cases the Class A individual may be required by the Department to re-take the original course or complete a refresher training and testing on the subject(s) pertaining to the non-compliance issue.

**Q: What happens if I don't complete the training and testing as required?**

**A:** Your tank system will be subject to shut down by the Department via the use of the red tag procedure as provided in chapter ATCP 93 if you do not designate Class A and B operators by the deadline. You will not be able to use your system until the requirement is met, including the sale of product if you are a retail station.

**Q: What is the deadline for operators to become certified?**

**A:** No later than January 1, 2012, each new or existing underground storage tank system or group of underground storage tank systems at a facility must have a Class A operator, a Class B operator and a Class C operator, as designated by the owner or operator, as accredited according to the Department. For an entity that meets the definition of a small business in s.227.114 (1) of the Wisconsin Statutes, the date is August 8, 2012.

**Q: Our company operates a chemical underground storage tank that is typically unmanned except for receiving product. We have designated Class A and B operators who are present during the receipt of product. Is it necessary to have Class C operators certified as well?**

**A:** All facilities must still have Class A, B and C operators, however a Class C operator need not be on duty at all times or in some cases not-at-all at facilities that are typically unmanned. The facility must post a sign in a conspicuous place stating the emergency shut-off procedures, the contact information of the Class B operator, along with the name and telephone number of the local emergency responders, including 9-1-1 personnel. (This exemption applies to facilities like emergency generators at telecommunication site, card control fuel dispensing and back-up tanks for heating or generators). See answer #13 for additional information.

**Q: I have been trained as a Class A/B Operator, can I also serve as a Class C operator.**

**A:** Yes, since a Class A or B operator is qualified to teach Class C operators it is implied that a Class A or B operator can also act as Class C operator. A Class C operator must be able to respond and take appropriate actions during emergencies and alarms caused by fire, leaks, spills or releases from an underground storage tank system; these subjects are also presented during the Class A/B training.

**Q: If I own the property and the UST; but, lease the property to a trucking business does the trucking company have to have the trained operator?**

**A:** The owner of the tank can provide all three classes of operators, or the owner of the tank should provide the Class A, the lessee (trucking company) provide the Class B and C.

**Q: As the owner, I currently have the tank registered Temporarily Out-of-service (TOS). Do you need a trained operator for a TOS tank or only when it starts operating again?**

**A:** Yes, operators of TOS tanks must designate both Class A and B operators, since technically you are still operating the tank, albeit, in "Temporary out of Service" status.

**Q: How do I let the State know I have completed the training?**

**A:** There are three ways to designate operators. 1) Complete the designation form that was provided by your training company. 2) Complete the operator designation form available on our website. 3) List the operators on your permit to operate renewal application.