



# **South Dakota's Operator Training Plan**

(Groundwater Quality Program, Storage Tank Section)

**1- PURPOSE:** The South Dakota Department of Environment and Natural Resources (DENR) has developed this plan to describe the approach it will be adopting to satisfy the requirements for the underground storage tank (UST) system operator training in South Dakota as described in the Administrative Rules of South Dakota (ARSD) Chapter **74:56:01:38.01** as well as the EPA guidelines dated August 2007. This plan outlines the minimum curriculum objectives and outcome requirements for an acceptable operator training program and also describes options for obtaining the operator training.

**2- SCOPE:** The operator training is required for operators of UST systems that meet the definition of "UST System" in the ARSD Chapter **74:56:01:03**. Three categories of operators must be trained:

- A- Class A Operator - Persons having primary responsibility for on-site operation and maintenance of UST systems.
- B- Class B Operator – Persons having daily on-site responsibility for the operation and maintenance of UST systems.
- C- Class C Operator- Person who take action in response to emergencies (such as, situations posing an immediate danger or threat to the public or to the environment and that require immediate action) or alarms caused by spills or releases from an underground storage tank system.

DENR will not differentiate in the training requirements and curriculum for Class A and Class B operators in the operator training plan.

DENR realizes that unmanned facilities, such as cardtrol facilities and emergency generators at the telecommunication towers may not have an "on-site" presence. However, the UST system owner must designate a person to perform the duties of operator classes A, B, and C for those facilities.

**3- REQUIREMENT:** All regulated UST system operators in South Dakota must be trained by August 8, 2012. After the deadline of August 8, 2012, all new Class A/B operators shall be trained within 30- days after assuming operation and maintenance responsibilities at the UST facility.

Each regulated UST facility in South Dakota will need at least one person trained to perform the duties in each operator class (A, B, and C). In some cases one person may handle all three duties. Class C operators must be trained to address emergencies presented by a spill or release from an underground storage tank system prior to taking daily responsibility. The tank owner shall designate in writing the Class C operator for the facility and keep copies of all designations on file at the facility.

DENR will verify the document during the facility inspections. It will be the responsibility of the tank owners to provide training for Class C operators.

**4- TRAINING OPTIONS:** DENR will accept the following Class A/B training program:

- A- DENR's operator training workshop;
- B- Operator training courses conducted by other states if they meet DENR's curriculum standards and objectives;
- C- Operator training courses conducted by a third party provider if they meet DENR's curriculum standards and objectives;
- D- A national testing agency that certifies an operator has successfully completed UST perator exam.

**5- CURRICULUM OBJECTIVES:** The main objective of the operator training is to provide knowledge necessary for UST system operators to operate UST systems in a manner that prevents releases to the environment and minimize the size of accidental releases through early detection and also mitigates damage from the release with proper emergency response.

The following guidelines describe the minimum requirements a training program must have in the training curriculum in order to comply with the state's requirements for Operator Class A/B training.

**A. South Dakota's UST Program:** A brief discussion of the South Dakota UST program which includes the following,

1. A brief history of the South Dakota's underground storage tank program
2. South Dakota's Administrative Rules (ARSD) related to tank systems
3. Requirements for UST systems (a discussion of different equipment)
4. Plans & Specifications / Notifications requirements (Facility/Change of Ownership)
5. Facility Inspections (a discussion of state's periodic inspections of UST systems)
6. Release Reporting
7. Emergency Response (emergencies presented by a spill or release)
8. Temporary Closure requirements
9. Permanent Closure requirements

**B. Class 'C' Operator Training Responsibility:** The tank owner shall designate in writing the Class C operators for the facility and keep copies of all designations on file at the facility. Class C operators will be trained to address emergencies presented by a spill or release from an underground storage tank system.

1. It is owner/operator's responsibility to train Class C individuals

- C. Financial Responsibility:** A program was developed by the South Dakota Legislature to provide financial support to address petroleum releases at regulated systems. The program is administered by the Petroleum Release Compensation Fund (PRCF).
1. Petroleum Release Compensation Fund
  2. Other financial documentations
- D. Release Prevention Requirements:** Class A/B operators will be able to determine the facility has release prevention equipment and methods that meet the regulatory requirements in place and they are operational.
1. Spill and Overfill Prevention (different types of equipments available and also explain it is owner/operator's responsibility to prevent releases from spills and overfills)
  2. Corrosion Protection (a discussion of materials, sacrificial anode and impressed current system)
  3. Dispenser/Tank Sump (a discussion of different sumps including transition sump)
  4. Double wall tanks/piping (a discussion of Secondary containment requirements)
- E. Release Detection Requirements:** Class A/B operators will be able to determine release detection methods and equipment in place at the facility meet the regulatory requirements and verify they are operational.
1. Tank release detection equipments
    - a. equipment/method performance criteria
    - b. monitoring periods
  2. Tank release detection methods
    - a. interstitial monitoring
    - b. statistical inventory reconciliation
    - c. automatic tank gauging
    - d. manual tank gauging
    - e. inventory control
    - f. groundwater/vapor monitoring wells
  3. Piping release detection equipment/method
    - a. equipment/method performance criteria
    - b. monitoring periods
    - c. pressurized piping
      - i) automatic line leak detectors
        - a) mechanical
        - b) electronic
      - ii) interstitial monitoring
      - iii) monthly monitoring
      - iv) annual precision test
      - v) statistical inventory reconciliation
    - d. Suction piping
      - i) safe suction
      - ii) non-safe suction

**6- OBJECTIVES OUTCOME:** The following describe the minimum outcome of the class A/B training program.

**A. SD UST Program/Financial Responsibility:** Class A/B operators must be able to identify when a notification of installation, replacement, or change in status must be submitted to DENR. They will also be able to identify the necessary criteria to properly place a tank system in temporary closure and the requirements for permanent closure.

Class A/B operators will be able to determine that the facility is in compliance with the requirement for financial responsibility.

**B. Release Prevention/Detection Requirements:**

**1-** Class A/B operators will be able to determine required equipment testing and system testing have been accomplished. Class A/B operators will be able to document product compatibility for product storage and handling equipment. Class A/B operators will also be able to determine the following;

- a- spill/overflow prevention equipments in use at the facility
- b- critical elements of an active corrosion protection system
- c- the function of secondary containment (including sumps)
- d- the tank release detection methods in use at the facility
- e- the elements of the piping release detection equipment/method at the facility
- f- testing requirements for tank, line, and cathodic protection systems
- g- review test reports for tank, line, and cathodic protection tests
- h- record keeping requirements for equipment
  - i - manufacturer records and compatibility statements
  - ii - performance certification
  - iii - testing/calibration records

**2-** Class A/B operators will be able to determine unusual operating conditions or release detection equipment indications have been investigated and reported as appropriate. Class A/B operators will also be able to determine the following;

- a- Identifying a suspected release
  - i - how to investigate
  - ii - what needs to be reported
- b- Identifying a release
  - i - what to report
  - ii - release response actions
  - iii - how to abate/stop release based on the origin
  - iv - how to get system back online