

LDEQ UST Operator Training Program

One of the major milestones for the Energy Policy Act of 2005 was the development of a UST operator training program. In general, LDEQ had to develop an operator training program and all UST operators had to be trained in accordance with this program by August 8, 2012.

On February 20, 2010, the LDEQ UST Operator Training regulations became final. These new UST regulations are located in LAC 33:XI.Chapter 6, and are available for viewing on the LDEQ website at <https://www.deq.louisiana.gov/resources/category/regulations-lac-title-33>.

Below is a summary of the final rule and the operator training program developed by LDEQ.

Classes of UST Operators

UST operators are divided into three classes (A, B and C), and there are specific training requirements for each class.

- Class A UST Operator – The tank owner, or a person designated by the tank owner to represent the owner’s interest, who has the primary responsibility of maintaining compliance with all UST regulations.
- Class B UST Operator – Person(s) designated by the tank owner to implement all applicable requirements of the UST regulations in the field and to implement the day-to-day aspects of the operation and maintenance of a UST system at the facility. Class B UST operators can be the tank owner, employee(s) of the UST owner, or can be a third party operator(s) hired by the UST owner.
- Class A/B UST Operator – After completing the UST operator training seminar in Louisiana, the UST operator will be trained in Class A, B, and C requirements, and will be designated as a Class A/B UST operator.
- Class C UST Operator – Person(s) designated by the tank owner that has the daily, on-site responsibility for addressing emergencies presented by a spill or release from a UST system (e.g., cashiers, fueling attendants, etc.).

UST Operator Designation

UST owners are required to designate, for each UST facility, at least one named individual for each class of UST operator. UST owners can designate a different individual for each class of operator, or one individual for more than one operator class.

During hours of operation, UST facilities must have a least one certified UST operator (either a Class A, B or C) present at the facility, except when the facility is un-manned. A UST facility is considered un-manned when there is no attendant present at the facility who could respond to alarms or emergencies caused by spills or overfills from a UST system.

Beginning February 20, 2010, UST owners must designate their Class A and Class B UST operators and provide these designations to LDEQ inspectors or LDEQ-contract inspectors during LDEQ compliance inspections.

Acceptable Training for Class A and Class B UST Operators

A workgroup that consisted of LDEQ staff and UST industry stakeholders developed a UST operator training program that provides class room training seminars to all Class A and B UST operators free of charge that is held at various locations around the state. A co-operative agreement was entered between LDEQ and Louisiana Compliance Services LLC (LCS), a wholly-owned subsidiary of the Louisiana Oil Marketers and Convenience Store Association (LOMCSA) that allows LCS to administer and conduct the Department-sponsored UST operator training seminars. LDEQ has final approval of the material presented, the training contractors used, and the training locations selected.

Approximately 21 Department-sponsored UST operator training seminars are held at various locations around the state. In addition, several Department-sponsored virtual (Zoom) seminars are conducted per year. The funding source for the training is the Louisiana Motor Fuels UST Trust Fund. All Class A and Class B UST operators are able to attend the seminars at no charge, although there may be a fee for registrants that fail to cancel within 3 days of the seminar date and fail to show up.

All Class A and Class B UST operators are required to attend and complete the Department-sponsored UST operator training seminar. In order to evaluate operator knowledge, there is an exam at the conclusion of each seminar.

UST operators can register for the seminars through the Louisiana Compliance Services website at www.lacomplianceservices.com, or by contacting Louisiana Compliance Services at 225-926-8300.

Requests for Site-Specific Training and Reciprocity with Other States

LDEQ has been approached requesting approval to allow companies to train their own employees with their own site-specific training programs. LDEQ applauds the efforts of companies that are providing site-specific training for their staff, and certainly encourages this activity. However, under the current program and regulations, LDEQ requires all Class A and B UST operators in Louisiana to attend the Department-sponsored UST operator training seminar.

Acceptable Training for Class C UST Operators

Class A or B UST operators must ensure that the UST facility's Class C UST operators complete training in emergency procedures. Class C operator training programs may include in-class, hands-on, on-line, or any other training format deemed acceptable by the facility's Class A or B UST operator. Class C training information is provided to all Class A and B UST operators that attend the Department-sponsored UST operator training seminars.

The Class A or B UST operator must ensure that a list of emergency procedures (which must include site-specific emergency procedures, the location of emergency shut-off devices, and appropriate emergency contact telephone numbers) is posted in a prominent area at the UST facility that is easily visible to the Class C UST operator.

The Class A or B UST operator must submit a list of all Class C UST operators that they have ensured training for to LCS at lomcsa@lomcsa.com in order to obtain a certificate for the Class C UST operators.

UST Operator Training Deadlines

Initial Training Before August 8, 2012:

Class A, B, and C UST Operators

All Class A, B, and C UST operators were required to be trained by the mandatory August 8, 2012 training deadline.

Training After August 8, 2012:

After August 8, 2012, Class A and B UST operators must be trained within 30 days of assuming operation and maintenance responsibility of a UST system. LDEQ allows more time for training if there are no Department-sponsored seminars in the UST owners or operators area within that timeframe and all virtual seminars are full. LDEQ does not expect UST owners or operators to travel farther than the nearest seminar to their logistical area in order to receive training.

After August 8, 2012, Class C UST operators must be trained before assuming unsupervised responsibility for responding to emergencies at a UST system facility.

UST Operator Training Frequency

Class A and Class B UST Operators

Certified Class A and B UST operators must be re-trained every 3 years (re-trained within 3 years of the last training date).

Certified Class A and B UST operators can work at any UST facility within Louisiana without having to be re-trained.

Whenever a UST system is found out of compliance, Class A and/or Class B UST operators, as determined by LDEQ for that facility, may be required to repeat the Department-sponsored UST operator training seminar.

Class C UST Operators

Certified Class C UST operators must be re-trained prior to assuming responsibility at a different facility owned by a different UST owner that did not provide the initial training.

Class C UST operators do not have to be re-trained every 3 years.

Documentation of UST Operator Training

UST owners must keep a training certificate for each person who is currently serving as a Class A, B, or C UST operator for as long as that person serves as a UST operator for that facility.

UST owners may keep the training certificates at either the UST facility or at an alternate location, such as a corporate office, as long as they are made available to LDEQ for review upon request.

Replacement certificates can be obtained by contacting lomcsa@lomcsa.com.

A list of emergency procedures (which must include site-specific emergency procedures, the location of emergency shut-off devices, and appropriate emergency contact telephone numbers) must be posted in a prominent area at the UST facility that is easily visible to the Class C UST operator.

LDEQ Contact

For more information, see the LDEQ UST Division website at www.deq.louisiana.gov/UST or contact Samuel Broussard at 337-262-5744 or samuel.broussard@la.gov.