

**GUIDELINES  
FOR  
TENNESSEE  
HAZARDOUS SUBSTANCE  
UNDERGROUND  
STORAGE TANKS  
October 2018**



**UNITED STATES ENVIRONMENTAL PROTECTION  
AGENCY  
REGION 4  
UNDERGROUND STORAGE TANK PROGRAM  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-3104**

# Tennessee Hazardous Substance UST System Operator Training Requirements

Through an April 24, 2000 Memorandum of Agreement (MOA) with the Tennessee Department of Environmental and Conservations (TDEC), the United States Environmental Protection Agency (EPA) Region 4 is responsible for the verification of operational compliance of regulated hazardous substance underground storage tanks (USTs) in the State of Tennessee. The Energy Policy Act of 2005 (EPAct) has mandated that all regulated USTs storing regulated products be inspected at a minimum of every three years, and with the new federal UST regulations implemented on October 13, 2015, all designated UST operators must be trained and certified by October 13, 2018. For the most part, the regulations for hazardous substance and petroleum USTs are the same; however, there are some differences, particularly in notification requirements in Tennessee.

**Notifications** of installation, change-of-service, closure, and change in ownership should be filed with EPA, Region 4 in Atlanta, GA

EPA, Region 4  
UST Section  
AFC  
61 Forsyth Street  
Atlanta, Georgia 30303-8960

## **UST Closure and change-in-service guidelines**

(Any resulting site remediation will be under the oversight and guidance of the TDEC Division of Solid and Hazardous Waste Management)

**Triennial significant operational compliance inspections** performed by EPA, Region 4 inspectors.

**Operator Training** verified by EPA, Region 4.

Operators of hazardous substance UST systems may use the on-line operator training website for *Tennessee Tank Helper* to satisfy the requirement. The website can be found at: [http://www.tennessee.gov/environment/ust/operator\\_training.shtml](http://www.tennessee.gov/environment/ust/operator_training.shtml)

Once the designated operator(s) has completed the training and received the certificate of completion, a copy of the certificate should be sent to EPA, Region 4 at the following address:

EPA, Region 4  
UST Section  
Operator Training  
AFC  
61 Forsyth Street  
Atlanta, Georgia 30303-8960

The Operator Training certificates for all designated operators within the operator classes at your facility should be kept with the facility's UST notification documentation and made available at the time of inspection by an EPA inspector. If during an inspection, the UST systems are found to be out of compliance, retraining and retesting will be required.

EPA must ensure that operators are trained according to applicable training requirements by October 13, 2018.

After October 13, 2018, operators must be trained as follows:

- Class B operators must be trained within 30 days after assuming operation and maintenance responsibilities at the underground storage tank system.
- Class C operators must be trained before assuming responsibility for responding to emergencies.

### **Class A/B Operator**

Class A or B operators implement applicable underground storage tank regulatory requirements and standards (40 CFR 280) in the field. This individual implements day-to-day aspects of operating, maintaining, and recordkeeping for underground storage tanks at one or more facilities. For example, this individual would typically monitor, maintain, and ensure that:

- Release detection method performance, recordkeeping, and reporting requirements are met.
- Release prevention equipment, recordkeeping, and reporting requirements are met.
- All relevant equipment complies with performance standards.
- Appropriate individuals are trained to properly respond to emergencies caused by releases or spills from underground storage tank systems at the facility.

Training will encompass the following:

- Components of underground storage tank systems.
- Materials of underground storage tank system components.
- Methods of release detection and release prevention applied to underground storage tank components.
- Operation and maintenance requirements of 40 CFR 280 that apply to underground storage tank systems, and include:
  - Spill prevention - triennial testing, if required
  - Overfill prevention – triennial testing
  - Release detection
  - Triennial sump testing, if required
  - Corrosion protection
  - Emergency response
  - Product compatibility
  - Monthly and annual walkthrough inspections
  - Annual release detection equipment testing

- Reporting and recordkeeping requirements.
- Class C operator training requirements.

### **Class C Operator**

A Class C operator is an employee who is generally the first line of response to emergency events or conditions. This individual is responsible for responding to alarms or other indications of emergencies caused by spills or releases from underground storage tank systems. This individual notifies the Class B operator and other appropriate emergency responders when necessary. Not all employees of the facility are necessarily Class C operators. This individual typically:

- Controls or monitors the dispensing or sale of regulated substances, or
- Is responsible for initial response to alarms or releases.

At a minimum, the Class C operator must be trained to:

- 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.

### **Additional Federal Requirements for hazardous substance UST systems (40 C.F.R § 280.42) <http://www.epa.gov/oust/faqs/hazusts.htm>**

Owners and operators of hazardous substance UST systems must provide release detection that meets the following requirements:

- (a) Release detection at existing UST systems must meet the requirements for petroleum UST systems in § 280.41. Since December 22, 1998, all existing hazardous substance UST systems must have met the release detection requirements for new systems in paragraph (b) of this section.
- (b) Release detection at new hazardous substance UST systems must meet the following requirements:
  - (1) Secondary containment systems must be designed, constructed and installed to:
    - (i) Contain regulated substances released from the tank system until they are detected and removed;
    - (ii) Prevent the release of regulated substances to the environment at any time during the operational life of the UST system; and
    - (iii) Be checked for evidence of a release at least every 30 days.**

NOTE.— The provisions of 40 CFR 265.193, Containment and Detection of Releases, may be used to comply with the following requirements.

- (2) Double-walled tanks must be designed, constructed, and installed to:
  - (i) Contain a release from any portion of the inner tank within the outer wall; and
  - (ii) Detect the failure of the inner wall.
  
- (3) External liners (including vaults) must be designed, constructed, and installed to:
  - (i) Contain 100 percent of the capacity of the largest tank within its boundary;
  - (ii) Prevent the interference of precipitation or ground-water intrusion with the ability to contain or detect a release of regulated substances; and
  - (iii) Surround the tank completely (i.e., it is capable of preventing lateral as well as vertical migration of regulated substances).
  
- (4) Underground piping must be equipped with secondary containment that satisfies the requirements of paragraph (b)(1) of this section (e.g., trench liners, jacketing of double-walled pipe). In addition, underground piping that conveys regulated substances under pressure must be equipped with an automatic line leak detector in accordance with § 280.44(a).**
  
- (5) Other methods of release detection may be used if owners and operators:
  - (i) Demonstrate to the implementing agency that an alternate method can detect a release of the stored substance as effectively as any of the methods allowed in §§ 280.43(b) through (h) can detect a release of petroleum;
  - (ii) Provide information to the implementing agency on effective corrective action technologies, health risks, and chemical and physical properties of the stored substance, and the characteristics of the UST site; and,
  - (iii) Obtain approval from the implementing agency to use the alternate release detection method before the installation and operation of the new UST system.

Requests for additional information or guidance documents should be made to:

Bill Truman, Chief  
Underground Storage Tank Section  
EPA, Region 4  
AFC  
61 Forsyth Street  
Atlanta, Georgia 30300  
(404) 562-9457  
Truman.bill@epa.gov