



Louisville, KY
September 12, 2018

Subpart K USTs and Operator Training

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Overview

- Bio
- Challenges
- Solutions
- Closing thoughts

Ben's Bio

- Former inspector 1986-87 (VT), 1989-2002 (AK), UST operator training (nationwide) since 2003.
- Trained first Class A/B operator class in US (OR) 2003.
- Provided training at DoD Facilities.
- Trained first official Subpart K Class A/B Operator Class in 2016 in Guam.

Opening Story

- About to head to a bulk fuel facility, got the call: “these aren’t your regular USTs”.
- Class made it very clear “this isn’t a gas station”.
- Had to stop class, they explained how the system worked, I explained how the UST training rules worked.
- Ended up co-creating the course. Everyone learned something.

Challenges

- Traditional USTs versus Subpart K USTs.
- Different and unique release detection requirements.
- Not many of Subpart K tanks spread out across the US.
- Mostly DoD facilities.
- Inspectors and trainers may not be well versed in Subpart K fuel systems.
- Gas stations really don't need Subpart K training and vice versa.
- Federal Regs are basically requiring it though.
- Subpart K system monthly inspections vs gas station monthly inspections.

Two Schools of Thought:

- 1. All Subpart K tank operators must learn about gas stations, too – and vice versa. (Everything and the Kitchen Sink Model)
- 2. We'll come up with a training that matches your system. (Only on a Need to Know Basis Model)

Solutions

- **Option 1:** Dedicated Subpart K Training
- **Option 2:** Regular Class A/B training
- **Option 3:** Custom Blending Regular and Subpart K Training

Option 1:
Dedicated
Subpart K
Training

- Offer Subpart K training only to Subpart K tank operators.
- Assume they won't be running a gas station UST in the near future.
- Example: Guam EPA contract.
- State approved content required?

Option 2: Regular Class A/B Training

- Have Subpart K operators take generic state-approved Class A/B UST operator training.
- Kind of a forced march.
- Most gas station UST information not really applicable.

Option 3: Blend Regular and Subpart K Training

- Have Subpart K operators take generic state-approved Class A/B UST operator training PLUS Subpart K module.
- Can be customized if live and if the trainer knows the system. And state UST agency approves.

Closing Thoughts

- Federal Rules don't really allow custom solutions.
- State agencies might have more flexibility.
- Might have to be treated separately.