

Division of Underground Storage Tanks





Tennessee Tank Talk

NEW OPERATOR RETRAINING PROCESS

The Division has developed a **<u>NEW</u>** process to satisfy operator retraining requirements for specific violations documented during an operational compliance inspection.

A <u>packet</u> of six Operator Retraining flyers and a back page reference guide will be provided to the tank owner and the Class A and Class B UST operators designated in <u>Tennessee Tank Helper</u> for the facility. The packet includes:

- 1. ATG Automatic Tank Gauging
- 2. **CP** Corrosion Protection
- 3. IM Interstitial Monitoring
- 4. PIPING Pressurized and Suction
- 5. SIR / MTG Statistical Inventory Reconciliation / Manual Tank Gauging
- 6. SPILL AND OVERFILL
- 7. REFERENCE BACK PAGE including suspected release reporting, fund application and notification information

If significant violations are discovered during the inspection, operator retraining is required under Rule 0400-18-01-.16(4). The tank owner is responsible for ensuring they have trained and designated UST Class A/B operators for each facility.

The Division's new streamlined process allows operator retraining requirements to be met:

- 1. At the time of the inspection The inspector will review the retraining flyer <u>packet</u> and flyers that pertain to the violations found with the tank owner and A/B operators onsite.
- After the inspection The inspector will email and/or postal mail (USPS) the retraining flyer <u>packet</u> attached with the 'Results of Inspection - Action Required' correspondence documenting the violations found during the inspection. The retraining flyer <u>packet</u> must be reviewed.

Prior to the inspection, please verify in Tennessee Tank Helper the designated A/B operators are current, and training is

completed.

Please note that these changes to the operator retraining process do not apply to initial operator training requirements under Rules 0400-18-01-.16(1) through (3).

This new streamlined operator retraining process benefits both our regulated community and the Division by significantly reducing operator retraining time/personnel costs, and in most cases, nearly eliminates operator retraining enforcement penalties while continuing to meet Rule requirements. Please be sure to send us feedback and improvement suggestions anytime to <u>Tanks.UST@tn.gov</u>. We look forward to hearing from you.

Operator Training Helpful Resources

Operator Retraining Flyers

Tennessee Tank Helper

Tank Owner Quick Reference Guide

Tank Operator Reference Guide

Annual UST Owners Compliance Toolbox

Report Suspected Releases to: Releases.UST@tn.gov

Additional Resources

Division Updates and Outreach

Current Tennessee UST Rules

2018 Federal Rule Change Quick Reference Guide

Standardized Inspection Manual (SIM)

UST Contact Information

Contact Your Local Field Office

UST Forms and Guidance

EPA - Must For USTs

TDEC Underground Storage Tanks Home Page

EPA- Underground Storage Tanks Home Page

Department of **Environment & Conservation**

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