

Tennessee Hazardous Substance UST System Operator Training Requirements

Through an April 24, 2000 Memorandum of Agreement (MOA), 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 designated UST operators be trained and certified by **August 8, 2012**.

The way you can meet this requirement is by clicking on the link that says go to *Tennessee Tank Helper* Website. Sign up as an Operator, go through each training module and take the test for B and C modules.

For the most part, the regulations for hazardous substance and petroleum USTs are the same, however there are some differences that you will see in the modules, 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

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

Operator Training is verified by EPA, Region 4.

EPA must ensure that all operators are trained according to applicable training requirements by August 8, 2012.

After August 8, 2012, 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.

Once the designated operator(s) have completed the training and printed the certificate of completion, a copy of the certificate should be sent to EPA, Region4 at the following address:

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

There should be two certificates: one for the B modules (do not print until all of the B modules have been completed) and one for the C module.

The Operator Training certificates for all designated operators within the operator classes should be kept at your facility 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.

Additional Federal Requirements for hazardous substance UST systems (40 C.F.R § 280.42)

What Are The Requirements For Hazardous Substance USTs?

Underground storage tank (UST) systems that store substances identified as being hazardous under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) are subject to the same requirements as petroleum UST systems except that hazardous substance tanks must have secondary containment. Hazardous *wastes* are already regulated under Subtitle C of the Resource Conservation and Recovery Act (RCRA) and therefore are not covered by the UST regulations.

Currently about 1,200 substances (excluding radionuclides) are identified as hazardous under CERCLA [EXIT Disclaimer](#) [see 40 CFR 302](#), section 302.4).

What Requirements Apply To Hazardous Substance USTs?

Hazardous substance USTs have to meet the same [requirements for petroleum USTs](#) concerning correct installation, spill, overfill and corrosion protection, corrective action, and closure.

In addition, hazardous substance USTs must have secondary containment and interstitial monitoring for leak detection, as described below.

What Is Secondary Containment?

All hazardous substance USTs must have "secondary containment." A single-walled tank is the first or "primary" containment. Using only primary containment, a leak can escape into the environment. But by enclosing an UST within a second wall, leaks can be contained and detected quickly before harming the environment.

There are several ways to construct secondary containment:

- Placing one tank inside another tank or one pipe inside another pipe (making them double-walled systems).
- Lining the excavation zone around the UST system with a liner that cannot be penetrated by the hazardous substance.

What Is Interstitial Monitoring?

The hazardous substance UST must have a leak detection system that can indicate the presence of a leak in the confined space between the first and the second wall. Several devices are available to monitor this confined "interstitial" space. ("Interstitial" simply means "between the walls.") The UST regulations describe these various methods and the requirements for their proper use.

You can apply for an exception, called a variance, from the requirement for secondary containment and interstitial monitoring. To obtain a variance you must demonstrate to the regulatory authority that your alternative leak detection method will work effectively by providing detailed studies of your site, proposed leak detection method, and available methods for corrective action.

What About Leak Detection?

All UST systems are required to have leak detection, and the method must be properly operated and maintained.

What About Spill, Overfill, and Corrosion Protection?

All UST systems are required to have spill, overfill, and corrosion protection.

What If You Have A Hazardous Substance Release?

Whether you have a confirmed release, or even if you suspect that you might have a release, you must follow the basic actions described below:

- You must take necessary and appropriate steps to stop further release and contain what has been released to ensure that there are no immediate threats to the safety and health of those nearby.
- You must immediately report hazardous substance spills or overfills that meet or exceed their "reportable quantities" to the **National Response Center at 800 424-8802 or 202 267-2675**.
- You must also report hazardous substance spills or overfills that meet or exceed their "reportable quantities" to the regulatory authority within 24 hours. However, if these spills or overfills are smaller than their "reportable quantities" and are immediately contained and cleaned up, they do not need to be reported.
- Based on the information you have provided, the regulatory authority will decide if you must take further action at your site. You may need to develop and submit a Corrective Action Plan that shows how you will meet requirements established for your site by the regulatory authority. Make sure you implement the corrective action steps approved by the regulatory authority for your site.