

Class A, B, and C Operator

The Minnesota Pollution Control Agency (MPCA) has requirements for operators at underground storage tank facilities. Every facility must designate a Class A, Class B, and Class C operator, with the exception of unattended card-lock facilities, which only need a Class A and Class B operator. Facilities that have tanks used solely for heating purposes are exempt from these requirements.

All designated operators must be either the owner, operator, or an employee of the owner or operator.

Class A operator

This person has general oversight of operations at the facility, and has a broad understanding of the legal requirements related to owning and operating an underground storage tank (UST) system. This person is commonly viewed as the owner of a facility, but does not necessarily have to be the owner. The Class A operator would ensure that the appropriate individuals are assigned and trained to properly operate and maintain the UST system, maintain appropriate records, and properly respond to emergencies such as spills or releases.

The Class A operator will be tested on their general knowledge, so that they can make informed decisions regarding compliance and ensure the operation and maintenance tasks are being properly completed. Test topic areas include; spill prevention, overfill prevention, release detection, corrosion protection, emergency response, secondary containment requirements, equipment compatibility, notification requirements, release and suspected release reporting, environmental and regulatory consequences of releases, temporary and permanent closure requirements, and operator training requirements.

Class B operator

This person oversees the daily operations of the facility and has an in depth understanding of the tank system and how its components are properly operated and maintained. This person is commonly viewed as the manager or maintenance supervisor of a facility, but does not have to be. This individual monitors, maintains, and ensures that all methods and equipment complies with appropriate performance standards and applicable rules. The Class B operator is also responsible for record keeping and reporting requirements. The Class B operator must be present on-site at least once per month. While on-site, the operator must validate that:

- Release detection is being conducted properly on tanks and piping.
- Monthly, annual and three year operation and maintenance inspections/testing is being complete and appropriate measures taken.
- Required reporting and record keeping is being performed.
- Spill, overfill, and corrosion protection systems are in place, tested, and operational.
- Unusual operating conditions or release detection system indications have been reported and investigated.

The Class B operator will only be tested on the tank system components and methods that are in place at the facility. Topic areas include spill prevention, overfill prevention, release detection, corrosion protection, emergency response, testing, inspections, equipment compatibility, reporting and record keeping, and training requirements for Class C operators.

Class C operator

This person controls the dispensing of fuel and is the first line of response in the case of a spill, alarm, or other emergency at the facility. This person would be trained in the proper procedures for responding to spills and alarms at the facility. This person is commonly viewed as an attendant, but does not have to be. Each individual that has control over dispensing activities must be designated and trained as a C operator. The Class C operator would notify

the Class B or A operator and appropriate emergency responders when necessary. At least one Class C operator must be present at all times during the operation of the tank system, with the exception of unattended facilities. The Class C operator is not required to pass an exam; however, he/she must be trained by the Class A or Class B operator in the appropriate emergency response procedures.

Unattended card-lock facility

Unattended card-lock facilities are those where the operation of the tank, including dispensing of fuel, is done without the on-site presence of a Class A, Class B, or Class C operator. Examples include unattended service stations, some fleet fueling facilities, and facilities with tanks that serve emergency generators. Facilities that are manned with a Class A, Class B, or Class C operator for at least 6 hours a day are not considered unattended card-facilities.

A Class A and B operator must be designated for these facilities and the B operator must be on site at least once a week. An emergency contact sign must be posted in a conspicuous location with the facility name, facility address, telephone numbers for the facility and local emergency response.

Designating operators

There are multiple ways to designate Class A and B operators:

- Designate separate people for Class A and Class B operator
- Designate the same person for Class A and Class B operator (also referred to as A/B operator)
- Designate multiple people for each operator class at one or multiple facilities
- Designate one person for multiple facilities

Training requirements

The MPCA highly recommends that the Class A and B operators attend training before taking the exam, however it is not required. Training is required in two circumstances: the operator failed the exam, or the facility is found to be out of compliance. Below are compliance problems that would require training:

- failure to properly operate and maintain cathodic protection systems
- failure to properly install and maintain spill and overfill prevention equipment
- failure to properly conduct release detection
- failure to conduct monthly, annual and three year inspections/testing properly
- failure to properly place tank in temporary closure

The MPCA approves instructors able to offer training courses. The list of approved training providers and courses is available at <https://www.pca.state.mn.us/waste/operator-requirements-and-training>.

Operators exams

Class A and B operators are required to take and pass an exam with a score of 75% or higher. The exam is administered online by the MPCA and can be found at <https://www.pca.state.mn.us/waste/operator-requirements-and-training>

MPCA will accept operator certification from other states. Owners/operators must submit certification and information to demonstrate the other state's examination is equivalent to the MPCA exam.

Need more information

Visit the UST Program at <https://www.pca.state.mn.us/waste/underground-storage-tank-systems>. The site has forms, fact sheets, and other information about USTs and UST requirements.

You can also call the MPCA at 651-296-6300 or 1-800-657-3864.