



**"Serving Agriculture and Industry"**

Douglas, Wyoming 82633

P.O. Box 86

Telephone: 358-2383

**FILED**

APR 02 2008

Terri A. Lorenzon, Director  
Environmental Quality Council

April 1, 2008

Mr. Bob Lucht  
Wyoming DEQ – Storage Tank Program  
Herschler Building, 4W / 122 West 25<sup>th</sup> Street  
Cheyenne, WY 82002

Re: Class B Operator Training

Dear Mr. Lucht,

As a Board of Trustee member of the Wyoming Petroleum Marketers Association, I would like to request your consideration and adoption of WPMA's requested amendments to the proposed rule revisions to Chapter 17, Storage Tanks, as presented by our Executive Director Mark Larson. Specifically, I would like to assure that the Class B Operator training be allowed to provide Class C Operator training and skills demonstration for no less than six or more facilities.

As Mr. Larson stated in his letter to you dated March 27, 2008, the EPA specifically allows for more than one facility to have oversight by a Class B Operator. Mr. Larson also indicates that several states, including Colorado, are allowing Class B Operators to provide the training and have oversight over almost unlimited facilities. While I understand the departments desire to assure adequate knowledge of UST systems, I can assure you that our company takes this responsibility very seriously as well and will more than exceed the minimums of Class C Operator Training.

While our company will oversee only two sites, others have many more. Those with more, as well as our company, continue to struggle with employee recruitment and more importantly, employee retention. With the very tight proposed requirement of only 2-3 facilities allowed for Class B Operator oversight, it will be incredibly difficult to maintain required compliance of the regulations. I do not believe that it was the intent of the EPA to enact such tight requirements. Even you, as informed by Mr. Larson at a recent WPMA meeting indicated, felt that EPA did not want this new law. So why is it so incredibly important that DEQ seek to impose such high standards of operator training? Wyoming needs to look for workable solutions that meet the intent of the regulations rather than initiate overly burdensome requirements focused solely on departmental enforcement.

I am respectfully requesting that the Wyoming DEQ NOT limit Class B Operator training and oversight to any less than six facilities. The intent of the EPA regulations can certainly be met without putting such a demanding burden on the petroleum marketers of Wyoming.

Sincerely,

Todd S. Van Rensselaer  
President  
Link Oil Company, Inc.

cc: Mr. Dennis Boal, Chairman  
Environmental Quality Council  
122 W. 25<sup>th</sup> St. / Room 1714  
Cheyenne, WY 82002