

# KNIGHT OIL COMPANY

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April 3, 2008

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

FILED

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Terri A. Lorenzon, Director  
Environmental Quality Council



Fuel & Lube Oil  
Distributor

Re: Class B Operator Training

Dear Mr. Lucht,

As a Board of Trustee member of the Wyoming Petroleum Marketers Association (WPMA), I respectfully request your adoption of WPMA's requested amendments to the proposed rule revisions to Chapter 17, Storage Tanks, as presented by Executive Director Mark Larson. In particular, 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. I am aware that several states, including Colorado, are allowing Class B Operators to provide the training and have oversight over almost unlimited facilities. While I understand your desire to assure adequate knowledge of underground storage tank systems, let me assure you that I take this responsibility very seriously as well and will more than exceed the minimums of Class C Operator Training...not only to assure the safety of our employees and clientele but because I understand the seriousness of product releases and the intrinsic dangers they represent.

I know you are aware of the significant issues Wyoming is facing regarding finding, hiring and retaining adequate employees. A recent news article reported that Wyoming's unemployment rate is the lowest since 1976. Accordingly, finding manager's sufficient to meet the very tight proposed requirement of only 2-3 facilities allowed for Class B Operator oversight may mean that companies frequently violate the regulations. I do not believe it was the intent of the EPA to enact such tight requirements. Indeed, Mr. Larson informed a recent WPMA meeting that you have even commented that you feel the EPA did not want this new law. So why is it then that DEQ is seeking to impose such high thresholds of operator training? It is my belief that Wyoming needs to look for workable solutions that get to the intent of the regulations, not promulgate overly stringent and burdensome requirements focused solely on departmental enforcement.

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

Sincerely,

Rick Knight

Cc: Mr. Dennis Boal, Chairman  
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