

# Why Policies & Procedures Really Matter

BY ERIC LESKINEN



When it comes to staying compliant in the propane industry, all roads lead back to Policies & Procedures. Regulatory codes? Policies & Procedures identify how your company can meet them. Training? Policies & Procedures lead how your company trains new hires and re-trains existing employees. Best practices for liability reduction and safety? Policies & Procedures are recommended and referred to by regulatory agencies, industry associations, and insurance providers.

The propane industry is guided by codes and regulations that can be federal, state, or local. Several key industry stakeholders reference and recommend Policies & Procedures to help propane marketers maintain compliance with these codes and regulations:

## 1. Propane Education & Research Council (PERC)

PERC creates training materials used by propane marketers across the country. PERC's CETP program provides training that frequently points trainees back to their companies' specific Policies & Procedures.

*For example, CETP 1.0 states in Module 2: "Know your company Policies & Procedures for documenting safety-related contacts with the customer. Be sure to document the question or concern that has been raised along with your response."*

## 2. Code of Federal Regulations

Policies & Procedures help companies maintain compliance with CFR roles and requirements.

## 3. Insurance Providers

EMC Insurance references on their website that propane marketers should have a Policies & Procedures Manual in place for many tasks, including performing lockout/tag out scenarios successfully.

## POLICIES & PROCEDURES MUST BE INTEGRATED INTO YOUR BUSINESS

It's critical that your Policies & Procedures Manual is a living document and that it is updated as your company and code requirements change, and should be reviewed on an annual basis to include these changes. This will allow your team to discover and remediate shortcomings. If you have Policies & Procedures, when was the last time you reviewed them? Do you provide training to all employees regularly and to new employees as a part of the onboarding process? If you already have Policies & Procedures, or once you complete

your first manual, it is important to recognize that this isn't a "one and done" deal.

For example, recent changes to the OSHA Crane Rule have deeply impacted the way many propane marketers conduct business. Your Policies & Procedures should reflect this new rule and employees should be trained according to your Policies & Procedures so that they are aware of the new crane rule and how it applies to their tasks.

## BE PROACTIVE WITH POLICIES & PROCEDURES

If your company does not yet have a Policies & Procedures Manual, you should have one. Plain and simple. It is crucial in order to uphold a successful safety program, meet regulatory codes and requirements, and avoid dangerous scenarios or expensive fines. And if you already have Policies & Procedures in place, make sure you review your manual at least once a year and make updates as code requirements change. Working with a safety professional can make reviewing and updating your Policies & Procedures Manual simpler and more convenient, and will ensure that your manual is up to date with industry code changes.

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