

USING PHOTO DOCUMENTATION TO YOUR ADVANTAGE

Meet container placement requirements & protect your company from liability

BY ERIC H. LESKINEN

You've heard it before: 'If it wasn't documented, it didn't happen.' The good news is that documentation doesn't have to be a daunting task anymore. New advancements in digital forms and online documentation software have become the norm in the propane industry, and photo documentation is a tool that more and more marketers are implementing to reduce risk, increase efficiencies and help maintain container placement code requirements. Photo documentation is particularly useful when it comes to meeting your container placement requirements. The National Fire Protection Association Liquefied Petroleum Gas Code (NFPA 58) has set requirements for Department of Transportation (DOT) cylinder and American Society of Mechanical Engineers (ASME) tank placement. These requirements are critical to maintain the safe use of propane for customers and reduce risk for your company. Not meeting these requirements could put your company and your customers at serious risk. Do you know if all of the containers you service are up to code?

Your Container Placement Checklist

Chapter 6 of NFPA 58 outlines all the major requirements for propane container placement. The following is a shorthand list of the major placement requirements your company needs to stay on top of.

- *Container foundation* — Is the DOT cylinder or ASME tank set on the proper foundation? For example, cylinders must be installed aboveground and set on a firm foundation or otherwise be firmly secured, and aboveground horizontal ASME tanks must be placed on masonry or other noncombustible structural supports.
- *Container location* — Ensure that the container location meets NFPA 58 requirements and state and local codes. Containers — depending on the size and type — must have a minimum separation distance from buildings, building openings, exterior source ignition, etc.
- *Container condition* — All containers must be painted to minimize corrosion. It is also important to keep an eye on overall appearance; poor container appearance can negatively impact the image of your company.

It's critical that your employees are trained to maintain these requirements when installing or servicing container installations. Having written policies and procedures in place certainly helps, because to say it plainly, tracking and auditing every propane container in your company's portfolio is a mountain of work. Using a photo documentation process will make it easier to meet container placement requirements and help your team improve operational efficiencies.

Simplifying Propane Installation Tracking & Audits

Tracking your containers and auditing them for compliance is a best practice recommended by propane safety experts to maintain compliance with NFPA 58 requirements and to ensure that employees in the field are completing their responsibilities appropriately. It's a great tool to not only help management with overall risk reduction, but to also evaluate technician performance and provide any necessary training feedback.

When your delivery drivers are out on their routes and your service technicians are in the field, have them take photos of the container installations at each customer location they visit. You'll have direct visual documentation to include with the customer's account showing that the tank set your company installed and/or serviced is compliant with NFPA 58 container requirements. It is a good idea to take a photo of every container that your company delivers or installs and to update that photo on a regular

basis. When your drivers and service technicians are out in the field, have them take photos of any installations they identify as noncompliant. This will make sure noncompliant containers are recorded, followed up on and corrected to help eliminate issues and risks for your company. Plus, taking a quick photo of a noncompliant container is much easier than filling out a report after the fact.

Always remember, photo documentation is a helpful tool, but your employees should still utilize their training to visually inspect containers for compliance issues.

Lack of Photo Documentation Could Cost You

We've discussed the benefits of implementing a photo documentation process into your company's operations, but what exactly are the risks of skipping it altogether? One of the greatest threats to a propane company is the DIY homeowner. From obstructing containers with objects or renovations to completely

moving the container set, nothing is unheard of in our industry. And any scenario you might think of could result in a safety hazard — and a lawsuit for your company.

In a situation like this, having clear photo documentation that the container in question was compliant with NFPA 58 and other federal, state and local requirements will help protect your company from liability in the event of litigation. And even more likely, a photo documentation process will help avoid unnecessary safety hazards to better protect your customers in the long run. ▀

Eric H. Leskinen, executive vice president of P3 Propane Safety, has more than 30 years of experience with career progression from field operations to corporate direction. He has designed, managed and executed safety training and compliance programs for multistate companies with up to 1,100 employees. Visit p3propane.com.

