

# Compliance

## TOP METHODS FOR PREPARING FOR A DOT COMPLIANCE AUDIT

Streamline your propane operation to ace your next safety compliance audit

BY BRENT CAMMETT

### KNOCK KNOCK. WHO'S THERE?

The Department of Transportation (DOT) auditor.

It's a Monday morning at your propane operation. You've done your morning debrief and sit down to start your work week. Then you hear a knock on the door. Someone comes in and asks your front office staff if they can speak with the owners or managers of the operation. When your customer service representative retrieves you, the visitors introduce themselves as DOT auditors and present a laundry list of documentation they plan to review. One of the officials says, "We will be back in 48 hours. Please locate these items so we can review them when we return."

This is a true story from a propane marketer I was able to assist — and it's not an uncommon situation to find yourself in. The DOT conducts spot-check audits of propane operations. Auditors can arrive at any time and

perform a review of your documentation and reporting process.

### WHAT HAPPENS IF DOCUMENTATION IS MISSING OR NONCOMPLIANT?

For good reason, propane regulators are strict about safety practices and compliance requirements. The DOT has been known to place hefty fines or even shut down the operation indefinitely if the paperwork does not meet the minimum requirements. Any delay in the busy season can be a costly one, from the loss of employees and customers to an increased workload to become compliant when already stretched thin. Make sure your company and your team are prepared and know how and where to find these answers, so you can be prepared for a drop-in DOT audit.

### WHAT DOES A DOT COMPLIANCE AUDIT CHECK FOR?

Though this is not an exhaustive list,

you can expect a DOT audit to include questions about DOT regulations and driver certifications, such as:

- Can the company produce 14 months of valid annual inspections for all operating commercial motor vehicle equipment, both tractors and trailers?
- Can the company produce 90 days of valid copies of post-trip inspection reports for each commercial motor vehicle equipment?
- Can the company produce a current DOT security plan?
- Can the company produce complete and accurate driver qualification files?
- Is there a system that will ensure drivers' medical certificates (physicals) are current?
- Can the company produce a current copy of the federal motor carrier safety regulations (FMCSR)?
- Can the company produce a current copy of the hazardous material registration?

- Are all employees that affect the safe transportation of hazardous materials trained within 90 days of employment and every three years after that on hazardous materials with documentation maintained on file?

## HOW TO FOSTER SEAMLESS SAFETY DOCUMENTATION & REPORTING

Many propane marketers want to do the right thing, but they're not sure where to begin. By connecting with a propane safety expert and completing a DOT compliance assessment, you can put together a road map of how to incrementally build a regulatory compliance plan.

This safety checklist will comprise everything needed for your propane company's unique situation, identifying areas where you are noncompliant, so you can begin the processes to get to where you need to be. After all, it's impossible to remedy issues or missing pieces that you aren't aware of.

A good DOT compliance assessment will include:

- Comprehensive review that shows you where to begin
- Actionable suggestions to optimize your compliance
- Identification of shortcomings that could affect your compliance
- Uncovering of common issues your customers are facing
- Changes you should implement to avoid recurring errors
- Initial and timely recurrent follow-up training schedules
- Noncompliant field and office processes
- A road map for you to achieve regulatory compliance

## WILL YOU GET A 10/10 ON YOUR NEXT AUDIT?

If an auditor came knocking, propane company owners and managers who can prove their compliance with federal and local requirements would answer the

door with a smile, shake the hand of the inspector and be prepared to impress them with a seamless documentation, reporting and recollection platform. A manager of a less prepared and organized company might break out into cold sweats and want to call in sick the day the auditors return. Which one are you?

Your next audit could happen tomorrow morning. Be honest with yourself: Is your operation prepared to ace an audit within 48 hours of an inspector showing up at your door? If not, it's high time to find a DOT compliance assessment to develop a road map of where to begin. 📌

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