



**John Horner**  
P3 Propane Safety

# The Top Way to Enhance Regulatory Compliance

In today's propane landscape, maintaining compliance is more than just checking the boxes to meet requirements set by various regulatory bodies. It's also about setting the processes in place to protect your customers, employees and company should any unexpected situations arise.

With more than 400 line items to keep track of when it comes to comprehensive regulatory requirements in the U.S., many retailers find great value in bringing in a third-party safety consultant to perform a compliance assessment to figure out where they stand.

The safety consultant is trained to check systems, processes and training to ensure that requirements are being met or exceeded and help the marketer identify any areas that may need additional attention. A

third-party provider can offer an unbiased assessment to uncover blind spots, strengthen safety programs and prioritize where the marketer should focus first.

## DOT Checks

One of the first categories I inspect when a retailer calls me to its location for an assessment is Dept. of Transportation (DOT) requirements. Some of the things every compliant propane marketer will be able to retrieve and show include:

- All required paperwork for each truck that is part of its operation
- Written hiring policies for new employees and rehires
- A truck accident register A system to ensure commercial driver licenses (CDLs) and hazardous material (HAZMAT) handling licenses stay current
- A procedure for drug and alcohol testing that is enforced and documented



## Training Records

Proper initial and recurring propane safety training is both a regulatory requirement and a cornerstone of safe operations. Since consultants work with a wide range of clients, they bring proven best practices for managing and documenting training cycles efficiently. This external insight often streamlines recordkeeping and ensures every employee meets standards confidently.

Third-party reviewers can verify, among other things:

- Whether Certified Employee Training Program (CETP) [now known as the Propane Education & Research Council's (PERC) Education Program (PEP)] training records are current

## *Many [management and leadership practices] can frequently be overlooked and their absence may not be noticed until a regulatory compliance auditor knocks on your door or an incident occurs...*

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- That initial and refresher HAZMAT training is on schedule
- If employees who perform cylinder requalification are being trained as required

### **Management & Leadership Practices**

Safety culture starts at the top and has a trickle-down effect on employees. Third-party safety consultants can assess whether managers and employees consistently follow policies, including but not limited to:

- Personal protective equipment (PPE), such as liquid-proof gloves and face shields
- U.S. Occupational Safety & Health Administration (OSHA) 300 logs are documented and available for everyone to see
- Forklift operators have completed their annual reassessment

Many of these can frequently be overlooked and their absence may not be noticed until a regulatory compliance auditor knocks on your door or an incident occurs. An external perspective ensures accountability and reinforces a company-wide commitment to safety excellence.

### **Main Bulk Plant Operations**

In the bulk propane storage and bobtail filling areas, safety consultants evaluate critical systems that must be present and functional to prevent or stop emergencies in their tracks. They will check for things such as:

- Does the main entrance of the plant have the correct safety signage and a 24/7 contact number?
- Are emergency shut-off valves accessible, working properly and within proper distancing guidelines?
- Are vehicle crash barriers present everywhere traffic is expected?

### **Cylinder Requalification & Filling**

I have seen far too many employees trained on cylinders once, with refresher training never applied. Some other related policies and procedures to check for include:

- All cylinders for transportation in commerce are filled by weight
- The cylinder filling area is properly ventilated according to the National Fire Protection Association's NFPA 58 Liquefied Petroleum Gas Code guidelines
- The Requalifier Identification Number (RIN) number is current, and there are no discrepancies in the office address and manager information

Each of these is vital for safety, confidence, compliance and assurance.

### **Bobtail Operations**

When driver and tech ride-along inspections are added to the assessment, the list of what is checked gets even longer. Even during an on-site inspection, safety consultants should check for bobtail qualifications such as:

- That drivers can demonstrate monthly meter creep tests and discharge system inspections
- Placards that should be clean and installed in appropriate locations
- That drivers should be able to perform the five primary mandated brake tests

Through a driver ride-along, consultants observe real-world performance. This hands-on approach often reveals practical training needs that may not surface in paperwork alone. This can be easily added to the schedule if a safety consultant comes to inspect your facility.

### **The Bottom Line**

By bringing in an outside expert to review these categories, you can turn compliance into a manageable, ongoing process prioritized in bite-sized pieces based on what is most important. A safety consultant can help managers see where to focus first, allowing them to close safety gaps before they become liabilities and foster a safer, more reliable operation. **ICM**

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