

The trifecta that keeps propane marketers compliant

Most propane marketers genuinely want to do the right thing.

They want their drivers safe, their customers protected and their operations dialed in across every regulation. The challenge isn't intent; it's the daily reality that "staying compliant" while running a fuel business can feel like a moving target.

The good news is that there are three interconnected pieces that form the foundation of any solid propane safety program. Each one supports the others, and together, they put a propane operation on a real path to operational safety and regulatory readiness. Let's take a closer look at what comprises each pillar of safety.

1. Start with a compliance assessment – You can't fix what you don't know is broken. That's why a thorough compliance assessment is the logical starting point. Think of it as a baseline physical for your operation. A good assessment takes an honest look at where the company stands with respect to federal, state and local requirements, from NFPA 58 and Department of Transportation (DOT) hazmat rules to state-specific reporting and recordkeeping mandates.

Though essential, code compliance is only half of the picture. The assessment should also test how your multi-role workflows actually function day to day. The deliverable will provide a prioritized roadmap that flags where liability exposure is greatest, identifies what to tackle first and lays out a phased plan the team can execute, rather than scrambling to overhaul everything at once.

2. Standardize with written policies and procedures – Written policies and proce-

dures are what transform individual knowledge into company-wide practice, and they're what protect the business when something goes wrong. A solid policies and procedures manual addresses who is responsible for each operational task, what steps are required, when the work needs to happen and how it gets documented.

Without written guidance covering every role, liability exposure grows. Written procedures eliminate confusion about who owns each step and give every employee a clear reference point.

One important note: These guidelines are living documents. Plan to review your policies and procedures manual annually, along with other important documents such as your DOT security plan, customer agreements, operations and maintenance manuals, and fire safety analysis.

3. Build a regular safety meeting cadence – Policies and procedures are only as strong as your team's grasp of them, especially as regulations change. That's where regular safety meetings come in.

Monthly safety meetings are ideal. A focused 30-minute meeting about a single topic, with a handout and a short quiz to document understanding, helps your team retain information about one or several specific requirements.

A few tips to ensure your safety meetings are consistent and effective include:

- Combine safety meetings with your monthly plant and truck inspections.
- Choose your monthly safety topics in advance.
- Collect training guides and materials ahead of each meeting.
- Track attendance in a system that can produce reports to prove your training

schedule and keep up with any state-specific continuing education unit credits.

- Refresh your safety topics calendar annually by covering nine to 10 new topics each year, with a few recurring items.

► BE PREPARED FOR DOT AUDITS

DOT audits don't come with a warning, and the DOT can issue substantial fines or even halt operations indefinitely when paperwork doesn't meet minimum requirements. Any delay during the busy season can result in lost customers, stretched employees and more.

This is exactly where the safety trifecta outlined above proves its value. A current compliance assessment means you already know where you stand and have addressed the gaps. A written policies and procedures manual gives auditors clear evidence that operational tasks are standardized and documented. A documented safety meeting program produces the training records and attendance logs that auditors specifically look for.

► GET COMPLIANT WITHOUT HIRING A FULL-TIME SAFETY DIRECTOR

For many propane marketers, especially small to mid-sized ones, the cost of bringing on a full-time safety professional simply isn't realistic. The good news is that it isn't necessary. Partnering with a trusted third-party propane safety expert is often a more affordable and efficient way to build a program and keep it current as codes and regulations evolve. **LPG**



Brent Cammett is the director of safety and compliance at P3 Propane Safety. You can reach Cammett at brent_cammett@bostonenv.com or at p3propane.com.