

**Safety Meetings are important!**

They: get your employees actively involved  
encourage safety awareness  
help identify problems before they become accidents  
motivate employees to follow proper safety procedures

**We are happy to provide you with a monthly topic for your agenda.**

**ROUTE TO:**

- General Manager
- Safety Coordinator
- Supervisor Dept. \_\_\_\_\_
- Other \_\_\_\_\_
- Date of Meeting \_\_\_\_\_

**February 2024****EPA SARA Tier II****CGA Safety Data****GAWDA Sample Safety Practice Downloads****Lessons Learned: Distracted Driving****EPA SARA Tier II****Hazardous Chemical  
Inventory Reporting**

**EPCRA Sections 311-312** requires facilities to report hazardous chemicals that are used or stored.

Since 1986, any facility, public or private, that has hazardous materials present at or above established EPA amounts known as Threshold Planning Quantities (TPQ) may potentially be subject to the Emergency Planning and Community Right-to-Know Act (EPCRA) and must report inventory levels on a SARA Tier II report. Generally the TPQ for the hazardous materials we inventory is **10,000 lbs.**, unless the material is considered an Extremely Hazardous Substance, then the TPQ is significantly lower (see [EPA List of Lists](#)).

The purpose of a SARA Tier II report is to provide State and local officials and the public with specific information on hazardous chemicals present at your facility (quantities, location and storage conditions) during the past year. This information is used by local Fire Departments for personnel training, hazmat pre-planning and local/regional response to spills and releases. Tier II data is also used in mapping hazmat facilities and their distance to sensitive populations, such as schools and nursing homes.



In addition to the products at your facility, you must also notify your customers (by February 15th) of their reporting obligations for any hazardous material stored at their locations above the TPQ, as listed in the EPA List of Lists.

For example:

- Bulk storage tanks/trailers at customer locations and owned by your company that contain hazardous material at or above the TPQ.
- You are NOT obligated to notify the customer if they own the bulk tank...but it is good customer service.
- You are NOT obligated to file IF there is language in the contract that states the customer is responsible to comply with all EPCRA obligations.

NOTE: hospitals are exempt from the reporting and your notification requirement. (EPCRA 311 and 40 CFR 370.2 and 355.2 allow the exclusion of any “hazardous chemical” that is used for research, medical facility or hospital if they have a technically qualified direct supervisor).

Tier II forms, instructions and state reporting requirements can be found at [EPA.gov/epcra](https://www.epa.gov/epcra).

### Dates to note:

**February 15** - written notification due for customers with bulk tanks at/above TPQ

**March 1** - SARA Tier II filing due

## CGA Safety Data

Since you’ve just completed your OSHA 300A report for 2023, take a look at your numbers and plug them into the formulas below to see how your company stands in relation to fellow Independent GAWDA members and fellow Large company GAWDA members. Let me know how you fared.

**Total Recordable Incident Rate (TRIR) =**  
 $(\# \text{ total incidents} / \# \text{ total hours worked}) \times 200,000.$

**Days Away, Restricted or Transferred Rate (DART)=**  
 $(\# \text{ DART incidents} \times 200,000) / \# \text{ total hours worked.}$



There are many factors that affect these numbers and there are two clear observations from the data:

1. Both the companies with >50 employees (or >100,000 total hours worked) and the companies with <50 employees (or <100,000 total hours worked) are trending down in the Total number of recordable incidents.
2. The companies with >50 employees are significantly lower in both the TRIR and the DART rate. With that said, these larger companies have many more employees who are not at high risk of injury (i.e. administrative positions) and the larger companies also have safety programs in place to help mitigate employee injuries. Smaller companies are not likely to hire more administrative employees to help reduce their rates but setting clear standards, goals and training requirements has been proven to decrease injury rates.

Figure 1

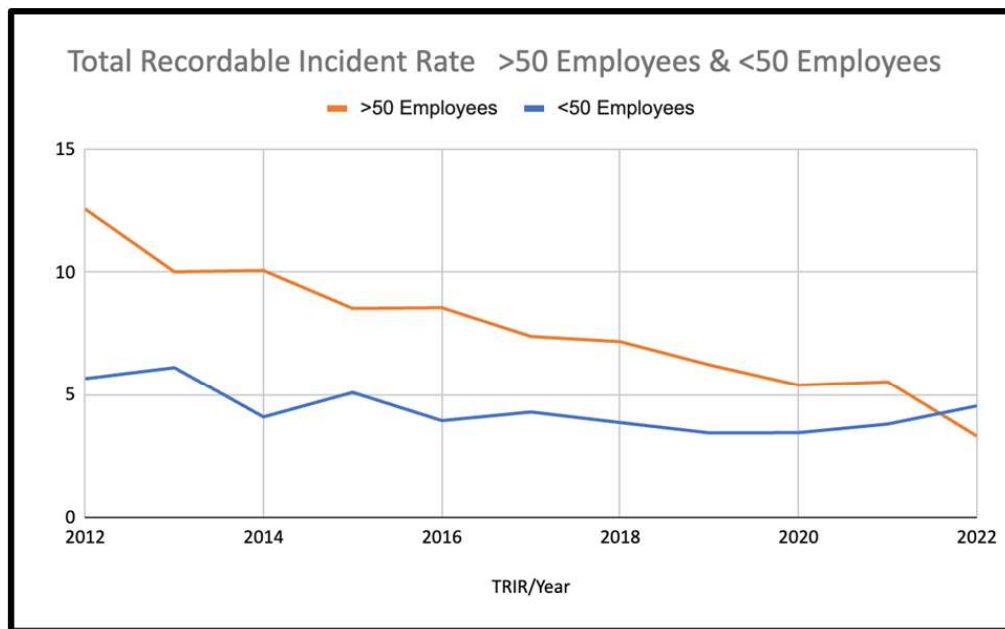
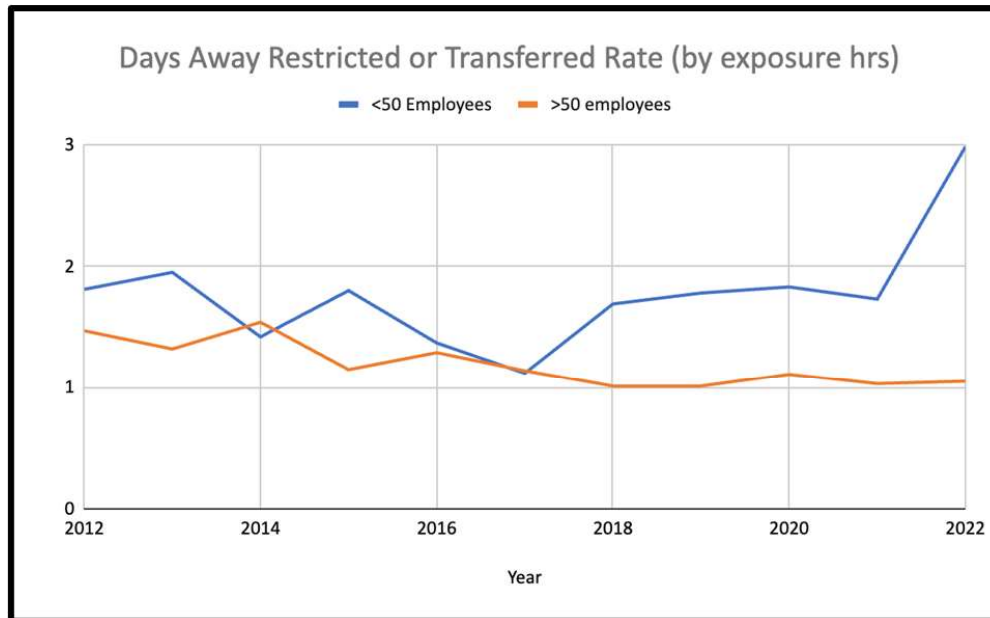



Figure 2



## GAWDA Sample Safety Practice Downloads - Top 5

There were over 700 downloads last year (not including Previews of the Safety Practices). The Safety Committee created these documents and they are GAWDA distributors and suppliers, just like you. These documents contain real, practical information to help run your business more effectively, efficiently and Safely!



**Over 700 Sample Safety Downloads by GAWDA Members in 2023**

Sample Safety Practice	Downloads
Cylinders - Safe Handling of	57
Fill Plant PPE	36
Employee Onboarding Process Guidelines	35
Active Shooter Emergency Preparedness	31
Cylinder Loading Dock Safety	23

For a complete list of Sample Safety Practices log onto the GAWDA website and click on the [Members Only Documents](#).



**Lessons Learned:** *GAWDA members share their experiences in their own words*

### **Distracted Driving Accident – It Can Happen to You!**

A GAWDA member professional CDL driver woke up in the morning and performed his routine morning tasks of eating breakfast with his family and getting ready to go to work. He said goodbye to everyone and said, “see you home tonight”.

Nothing was different from any other workday morning. The driver made it to work at his usual time, clocked in and began to review his route for the day. It appeared to be a typical delivery day. There were no new customers and the route for this day was a common route and road driven many times. The driver performed his normal vehicle inspection on the tractor and cylinder trailer. No deficiencies were identified. The weather forecast called for cooling temperatures and a bit of rain during the day.

It was mid-afternoon, and all deliveries were made successfully.

While driving back to the depot, the temperatures started to drop, and the driver decided to adjust the temperature. While adjusting the heater controls on the dashboard, the driver took his eyes off the road and the vehicle drifted to the right shoulder. The front right drive tire grabbed the road shoulder and suddenly the vehicle got sucked into the steep berm. The next thing the driver felt was the sliding momentum and seeing the ground in front of him. He thought he could stop the momentum if he put his hands on the ground.

When the sliding momentum stopped, the driver figured out that he was on his side trapped in his vehicle. A witness traveling behind the truck called 911 and emergency responders appeared at the scene within minutes. The only thing the driver could do was disengage his seatbelt. Otherwise, he was stuck in the vehicle and couldn't exit the vehicle without assistance. The emergency responders were able to free the driver. The driver was transported to the hospital and evaluated. He was diagnosed with a punctured lung, broken ribs, dislocated shoulder, rotator cuff injury, cuts, and abrasions.

Investigation determined that the vehicle initially rolled 180 degrees and slid for a bit while rolling another 90 degrees and coming to rest. While rolling the 180 degrees the roof of the cab was sheared off.





Pictures below are of the vehicle when it came to rest.



**Lessons Learned:** Distracted driving doesn't only pertain to cell phone use.

Other distractions include taking your hands off the steering wheel or your eyes off the roadway to eat or manipulate other vehicle controls. It is imperative to eliminate all distractions while driving and be attentive to the task at hand. If not, an event like this could happen to you. Just talk to this GAWDA member, a professional driver. He didn't imagine such an event would happen to him, but it did. Just remember it was an ordinary morning and he said "see you home tonight". He didn't make it home that night. In fact, he spent several nights in the hospital, and it took over 7 months to be released to full duty.

If you have any questions about this article, SARA Tier II or other EPA, DHS, OSHA questions, please contact Marilyn Dempsey.

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