

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 _____

December 2021

EPA definitions

Delivery Safety



Many GAWDA member companies are servicing extraction facilities and other industries that use significant amounts of hazardous materials. If you have quantities equal to/ greater than the reporting quantity or if you have Extremely Hazardous Substances as listed in the *List of Lists* (see hyperlink) then you will have to comply with one or more of these EPA statutes.

The EPA not only uses acronyms, but they throw in numbers to further confuse us. Below is a chart of the acronyms and *What actions are necessary* for you to be compliant with EPA regulations.



EPA Title #	Requirement	Actions necessary
302	Emergency Planning	Local governments are required to prepare chemical emergency response plans, and to review plans at least annually.
		State governments are required to oversee and coordinate local planning efforts. .
		Facilities that maintain Extremely Hazardous Substances (EHS) on-site in quantities greater than corresponding threshold planning quantities (TPQs) must cooperate in emergency plan preparation
304	Emergency Release	Facilities must immediately report accidental releases of EHSs and “hazardous substances” must be reported to state and local officials. Any releases of these substances in quantities greater than their corresponding Reportable Quantities (RQs) must be reported to state and local officials.
311/312	SDS and Inventory (SARA Tier II)	Facilities handling or storing any hazardous chemicals must submit Safety Data Sheets (Safety Data Sheets, SDSs) to state and local officials and local fire departments.
		Facilities must also submit an inventory form for these chemicals, to state and local officials and local fire departments.
313	Toxic release Inventory	Facilities must complete and submit a toxic chemical release inventory form (Form R) annually. Form R must be submitted for each of the over 600 TRI chemicals that are manufactured or otherwise used above the applicable threshold quantities.
112 (r)	RMP	Certain listed regulated flammable and toxic substances are required to develop a Risk Management Program, which includes a(n):
		Hazard assessment that details the potential effects of an accidental release, an accident history of the last five years, and an evaluation of worst-case and alternative accidental releases scenarios;
		Prevention program that includes safety precautions and maintenance, monitoring, and employee training measures; and
		Emergency response program that spells out emergency health care, employee training measures and procedures for informing the public and response agencies (e.g., the fire department) should an accident occur.
Resource:	List of lists	





Safe Delivery Practices for Liquid Dewars

If you're in the compressed gas business, then liquid dewar deliveries are probably part of your normal delivery routes. Dewars are heavy, cumbersome and, depending on the wheel configuration, unstable.

Delivery of these packages should be addressed prior to signing the account. However, when that does not happen, the driver should have the last call on if the manual delivery route is safe. Some obstacles that could prevent manual delivery include stairs, unsafe ramps and unsafe delivery surfaces (gravel or broken concrete) or elevators. The GAWDA Safety Committee has published two Best Safety Practices* to assist training your employees:

[Sample Cylinder Delivery at Locations with Stairs or Ramps \(2020\)](#)

[Transport of Pressurized Cryogenic Liquid Containers in an Elevator \(2021\)](#)

And the [Delivery Survey](#)



Both of these Safety Practices discuss the steps employees should take to ensure a safe delivery; these include:

#1 Complete a Delivery Survey prior to first delivery!

- Inspect the dewar before transporting
- Verify pressure is 5 psi below PRD rating
- Check to ensure the pressure builder is off
- Special precautions must be made if transporting a dewar on an elevator

**Best Safety Practices may be found on the Member's Only Document page of the GAWDA Website.*

If you have any questions about these topics, or any other DHS, EPA or OSHA topic, please contact:

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