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Brunel Energy, Inc.

Flammable Combustible Gas Liquids

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1. Purpose

- 1.1. Brunel Energy, Inc., hereinafter referred to as, the “Company,” has established a Flammable and Combustible Liquids handling practices policy that provides a basic understanding of the fundamentals and potential hazards associated with flammable and combustible liquids.

2. Applicability

- 2.1. This policy applies to employees, subcontractors and/or visitor(s) of the Company. For the purposes of this policy, an employee shall be considered on the job whenever he/she is:
 - 2.1.1. On or in, any Company or client property, including parking areas; or
 - 2.1.2. On Company time even if off Company premises (including paid lunch, rest periods and periods of being on call).
- 2.2. As a condition of employment, Company employees are required to abide by additional governmental or customer policies and requirements that may be imposed at a worksite in addition to the requirements of these policies and procedures. Nothing set forth in this policy constitutes, construes, or interprets in any way as a contract of employment.

3. Definitions

- 3.1. **Boiling point** is the temperature at which the vapor pressure of a liquid equals the surrounding atmospheric pressure. Atmospheric pressure is 101.4kPa (14.7psi)². As the operating temperature approaches the boiling point of a liquid, the transition from liquid to gas is faster and the vapor concentration can be very high. In the case of a flammable liquid, this would create a highly flammable environment.
- 3.2. **Flash point** is the minimum temperature of a liquid at which enough vapor is given off to form an ignitable mixture with the air near the surface of the liquid or within the vessel used. This is a critical property for evaluating the hazard of a flammable or combustible liquid.
- 3.3. **Lower explosive limit (LEL)** is the minimum concentration of a flammable vapor in the air below which ignition will not occur. An increase in temperature, pressure, and/or oxidant concentration will result in a lower LEL.
- 3.4. **Upper explosive limit (UEL)** is the maximum concentration of a flammable vapor in the air above which ignition cannot occur. An increase in temperature, pressure, and/or oxidant concentration will result in a higher UEL.

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4. Responsibilities

4.1. Manager(s):

- 4.1.1. Shall communicate and implement this policy.
- 4.1.2. Allocate and make available the necessary financial and human resources that are required to functionally implement this policy.
- 4.1.3. Ensure all workers are aware of their roles and responsibilities outlined in this policy.
- 4.1.4. Ensure all workers are trained, knowledgeable, experienced, and competent on this subject.
- 4.1.5. Coach and provide feedback to employees who do not understand or comply with the requirements of the policy.

4.2. Supervisor(s)

- 4.2.1. Shall assist management in implementing and enforcing this policy.
- 4.2.2. Provide worksite assessments and observations on a regular basis to verify compliance with the expectation of this policy.

4.3. Employee(s):

- 4.3.1. Shall follow this policy to ensure work safety and complete all safety training.

4.4. Subcontractor(s):

- 4.4.1. Shall follow this policy to ensure work safety and complete all safety training.

5. Requirements

5.1. Liquid Classification

5.1.1. The following classifications are used:

- 5.1.1.1. Flammable liquids have a flash point below 37.8°C or 100.04°F.
- 5.1.1.2. Combustible liquids have a flash point at or above 37.8°C or 100.04°F. Combustible liquids that are heated above their flash point must also be treated as flammable liquids.

- 5.1.2. The table below highlights the key properties with regard to fire safety, for some of the common liquids encountered in the Company's operations. Class in the table references NFPA 30 criteria for flammable or combustible liquids

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Table 1: Key Properties of Common Liquids

Fluid	Physical State	Specific Gravity	Boiling Point	Flash Point	LEL	UEL	Class	Flammable or Combustible
Methanol	Clear liquid	0.80	64°C	11°C	6.0%	36%	I	Flammable
Gasoline	Light yellow liquid	0.70 – 0.78	39 – 200°C	-43°C	1.4%	7.6%	I	Flammable
Diesel	Straw-yellow liquid	0.83 – 0.876	160 – 366°C	>52°C	0.6%	7.5%	II & III	Combustible
Heavy Crude & Diluent Mixture	Dark brown liquid	0.91 – 0.94	35 – 180°C	<-35°C	0.8%	8%	I	Flammable
Light Crude Oil	Dark brown liquid	0.70 – 0.80	-40 – 530°C	<-35°C	0.8%	8%	I	Flammable

5.2. Petroleum Products Clarification

- 5.2.1. Refined petroleum products are lubricants and fuels, defined as flammable or combustible liquids.
- 5.2.2. Non-refined petroleum products are crude oil and heavy oil.

5.3. Potential Hazards

- 5.3.1. Typical hazards associated with the improper handling of flammable or combustible liquids include:
 - 5.3.1.1. Release of flammable vapors or the uncontrolled venting of potentially flammable mixtures of hydrocarbons to the atmosphere.
 - 5.3.1.2. Creation of an ignitable mixture of air and flammable vapor, which could result in a fire or an explosion.
 - 5.3.1.3. An increased risk of fire and/or explosion when handling flammable liquids in pressurized or contained environments.
 - 5.3.1.4. Build-up of static electricity and ignition of flammable vapors during transfer operations, or storage.
 - 5.3.1.5. The loss of tank containment or another type of incident, resulting in a spill or leak of flammable liquids creating a flammable environment.
 - 5.3.1.6. The creation of an ignition source in a flammable environment.

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- 5.3.1.7. Mishandling of combustible liquids that are heated above their flash point, which is the point they become flammable liquids.
- 5.3.1.8. Systems at high temperatures, pressures and/or in the presence of oxidants resulting in an increased risk because of the flammability of the environment.
- 5.3.1.9. Toxic properties of some flammable or combustible liquids, which can result in the exposure of employees or bystanders.

5.4. Potential Sources of Ignition

- 5.4.1. Any source of ignition is prohibited in areas where flammable and combustible sources are stored. This includes cigarette smoking, sparks from welding or grinding, open flames, etc.
- 5.4.2. When handling flammable or combustible liquids, and when simply in the presence of these liquids, it is important to visually inspect the area for potential sources of ignition. Potential sources of ignition include but are not limited to:
 - 5.4.2.1. Open Flames
 - 5.4.2.2. Lightning
 - 5.4.2.3. Hot Surfaces
 - 5.4.2.4. Radiant heat
 - 5.4.2.5. Smoking
 - 5.4.2.6. Cutting and welding
 - 5.4.2.7. Spontaneous ignition
 - 5.4.2.8. Frictional heat or sparks
 - 5.4.2.9. Static electricity
 - 5.4.2.10. Electrical sparks
 - 5.4.2.11. Spray currents
 - 5.4.2.12. Direct or indirect fired equipment (e.g. boilers, glycol heaters ovens, furnaces, and heating equipment)

6. Procedure

6.1. General Rules

- 6.1.1. The following are rules that shall be followed when handling flammable or combustible liquids, as per company practices:
 - 6.1.1.1. An open flame is not permitted within any potential source of ignitable vapor including without a hot work permit.
 - 6.1.1.2. Smoking is permitted in designated smoking areas only.

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- 6.1.1.3. A hot work permit must be issued before any spark-producing operation (e.g. welding, cutting) can take place in an area containing flammable liquids.
- 6.1.1.4. A Class B (or ABC) fire extinguisher must be readily available when working with or near flammable and combustible liquids.
- 6.1.2. The following ventilation requirements must be met when handling flammable or combustible liquids to ensure the resulting vapors do not create a flammable or toxic environment. Vapors emitted by flammable and combustible liquids are heavier than air and as a result, they will accumulate in low-lying areas:
 - 6.1.2.1. Continuous mechanical ventilation in any area where flammable liquids are being handled in a way that vapors are released.
 - 6.1.2.2. Either natural or continuous mechanical ventilation in any area where flammable liquids are being handled in a way that vapors are released.
- 6.1.3. Absorbent materials must be used to promptly clean small spills and leaks. The following conditions apply when handling flammable or combustible liquids:
 - 6.1.3.1. Absorbent materials shall be available in areas where flammable and combustible liquids are being handled.
 - 6.1.3.2. Contaminated waste materials shall be disposed of in closed receptacles.
 - 6.1.3.3. Waste contaminated solvent, oil, grease, paint, or other flammable substances shall be placed in covered metal containers (with proper lids) before disposal and shall not be stored in work areas.
 - 6.1.3.4. Used rags and similar material contaminated with flammable liquids or combustible liquids are a fire hazard and must be stored in designated oily rag receptacles.
- 6.1.4. Flammable and combustible liquids that are not in use must be properly stored. This is not referencing flammable or combustible liquids in process. This is intended for miscellaneous storage of small quantities of flammable or combustible liquids:
 - 6.1.4.1. Flammable and combustible substances are stored separately from substances they might react with., such as an oxygen tank.
 - 6.1.4.2. Containers with flammable or combustible liquids must be kept closed and must be stored in either a flammable liquid cabinet, a flammable liquid storage room or a designated outdoor storage area.
 - 6.1.4.3. Flammable or combustible liquids are not to be stored in or adjacent to exits, elevators or principal routes that provide access to exits.
 - 6.1.4.4. Containers and materials stored in flammable materials storage rooms must be arranged in a way that allows for aisles of at least 1 m in width.
 - 6.1.4.5. Flammable and combustible liquids are not to be stored for longer than two years without being sold, consumed, or discarded.

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- 6.1.4.6. Portable storage containers for flammable liquids must meet regulations.
 - 6.1.4.6.1. The purity of the liquid could be affected by the container or the liquid could cause excessive corrosion of the container.
 - 6.1.4.6.2. The capacity of the container confirms with the volume restrictions.
- 6.1.4.7. Flammable liquids shall not be handled in or next to basement or pits as vapor emitted by flammable liquids are heavier than air and will accumulate in low lying areas.
- 6.1.5. When taking samples of flammable liquids, the rules stated above shall apply, an appropriate sample container shall be used, and measures shall be taken to ensure proper ventilation. In addition, the bonding and grounding practice and the hot work practices shall also apply.
 - 6.1.5.1. When transferring hot fluids (60°C and above), one shall wear a liquid and fire-resistant rain jacket and pants or overalls, insulated rubber gloves, rubber boots, and chemical goggles or a face shield.
 - 6.1.5.2. When handling sour (H₂S), flammable or combustible liquid product, one shall adhere to the Hydrogen Sulfide Code of Practice in addition to this practice.
 - 6.1.5.3. Abide by Company's Personal Protective Equipment Practice.
- 6.2. Flammable Liquids Loading and Off-loading
 - 6.2.1. Loading and off-loading flammable liquids to and from trucks, railcars, and tanks presents a special hazard. The Company's policy on Bonding and Grounding Practice must be followed, in addition to this practice. This applies to fluid handling and transportation by tank, vacuum trucks, and rail cars that transport flammable fluids:
 - 6.2.2. To and from well operations.
 - 6.2.3. To and from process facilities.
- 6.3. To and From Process Facilities – Minimum Requirements.
 - 6.3.1. There shall be an approved written procedure for all loading and off-loading operations involving flammable and combustible liquids. In addition to the other requirements presented in this document, all flammable liquid loading and off-loading procedures must include the following requirements:
 - 6.3.1.1. Instructions and precautions for safe facility entry are communicated, including any specific instructions that may be required for sweet or sour facility Personal Protective Equipment requirements.
 - 6.3.1.2. Personal Protective Equipment (PPE) requirements
 - 6.3.1.3. Hazard assessment and risk mitigation requirements are met.
 - 6.3.1.4. Potential for all environmental impacts (e.g. drip trays under hose connection points) are addressed.

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- 6.3.1.5. Appropriate bonding and grounding activities are practiced prior to the loading/off-loading of fluids commencing.
 - 6.3.1.6. Hot work permits are used
 - 6.3.1.7. Parking brakes and wheel chocks are appropriately used.
 - 6.3.1.8. No loading or unloading is performed during hazardous events (e.g. electrical storms, while conducting maintenance on the tanks or trucks).
 - 6.3.1.9. The placement of tank truck vent lines is not in, or directed at, the immediate work area.
 - 6.3.1.10. Switch loading precautions are made. Switch loading refers to the switch of product load types (e.g. between sour water and crude oil). Switch loading can result in ignition when low-vapor pressure products are loaded into a tank that had contained a flammable vapor product from its previous usage.
 - 6.3.1.11. The potential for outdoor complaints when transporting sour fluids through populated areas is addressed.
- 6.4. Switch Loading
- 6.4.1. The term “switch loading” describes a situation when a Class II or Class III liquid is loaded into a tank vehicle that previously contained a Class I liquid. To prevent hazards due to a change in flash point of liquids, any tank car or tank vehicle that has previously contained a Class I liquid shall not be loaded with a Class II or Class III liquid unless proper precautions are taken.
 - 6.4.2. When a tank is emptied of a cargo of Class I liquid, a mixture of vapor and air is left, which can be, and often is, within the flammable range. When such a tank is refilled with a Class I liquid, any charge that reaches the tank shell will be bled off by the required bond wire. Also, there will be no flammable mixture at the surface of the rising liquid level because the Class I liquid produces at its surface a mixture too rich to be ignitable. This is the situation commonly existing in tank vehicles in gasoline service. If, as occasionally happens, a static charge does accumulate on the surface sufficient to produce a spark, it occurs in a too-rich, non-ignitable atmosphere and thus causes no harm.
 - 6.4.3. A very different situation arises if the liquid is “switch loaded,” that is, when a Class II or Class III liquid is loaded into a tank vehicle that previously contained a Class I liquid. Class II or Class III liquids are not necessarily more potent static generators than the Class I liquid previously loaded, but the atmosphere in contact with the rising liquid surface is not enriched to bring it out of the flammable range. If circumstances are such that a spark should occur either across the liquid surface or from the liquid surface to some other object, the spark occurs in a mixture that can be within the flammable range, and an explosion can result.

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- 6.4.4. It is emphasized that bonding the tank to the fill stem is not enough; a majority the recorded explosions have occurred when it was believed the tank had been adequately bonded. The electrostatic potential that is responsible for the spark exists inside the tank on the surface of the liquid and cannot be removed by bonding.
- 6.4.5. Measures to reduce the change of such internal static ignition can be one or more of the following:
- 6.4.5.1. Avoid spark promoters.
 - 6.4.5.2. Conductive objects floating on the liquid surface increase the charge of sparking to the tank wall.
 - 6.4.5.3. Metal gauge rods or other objects projecting into the vapor space can create a spark gap as the rising liquid level approaches the projection.
- 6.4.6. A common precaution is to require that fill pipes (downspouts) reach as close to the bottom of the tank as practicable. Any operation such as sampling, taking liquid temperature, or gauging that involves lowering a conductive object through an opening into the vapor space on the liquid should be deferred until at least 1 minute after flow has ceased. This will permit any surface charge to relax.
- 6.4.7. Reduce the static generation by one or more of the following:
- 6.4.7.1. Avoid splash filling and upward spraying of liquid where bottom filling is used.
 - 6.4.7.2. Employ reduced fill rates at the start of filling through downspouts, until the end of the spout is submerged. A fill rate of 3 ft/sec (0.9 m/sec) is thought to be a suitable precaution.
 - 6.4.7.3. Where filters are employed, provide relaxation time in the piping downstream from the filters. A relation time of 30 seconds is considered to be a suitable precaution.
 - 6.4.7.4. Eliminate the flammable mixture before switch loadings by gas freeing or Inerting.
- 6.5. Fueling
- 6.5.1. Employees shall take the following precautions:
- 6.5.1.1. Prior to fueling a vehicle, ensure that the vehicle is turned off and that a fire extinguisher is located nearby (in the vehicle or at the gas pump).
 - 6.5.1.2. While fueling a vehicle, do not smoke or use electronic devices.
 - 6.5.1.3. When fueling a vehicle, do not enter and then exit the vehicle while it is being filled. If you do so, you must dissipate any static charges away from the fueling nozzle prior to touching the nozzle.

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6.5.1.4. Do not fill fuel containers placed on a truck tailgate or bed surface. Follow the service station recommended practice of placing portable gasoline containers on the ground while filling.

6.5.1.5. When fueling on a Company worksite, wear Company approved, flame resistant antistatic clothing and antistatic footwear to minimize static accumulation on clothing.

6.6. Vehicles

6.6.1. Vehicles with internal combustion engines (gas or diesel) will not be permitted within the following limits, unless a hot work permit has been issued and adequate gas monitoring is in place:

6.6.1.1. Within electrically classified areas such as dikes

6.6.1.2. No closer than 3 meters to a producing well where the wellhead is intact or when the transfer is part of the work.

6.6.1.3. No closer than 25 meters to a well when continuous work is being undertaken on the well.

6.6.1.4. No closer than 7.5 meters from the vents of a production tank, a gas process, or pigging enclosures.

6.6.1.5. No closer than 7.5 meters from an open production or rig tank

6.6.1.6. Note: During swabbing operations, the tank truck must be at least 50 meters from the well bore.

6.7. Transportation of Dangerous (TDG) Requirements

6.7.1. Documentation and Safety Markings

6.7.1.1. All goods that are regulated under the Transportation of Dangerous Goods (TDG) legislation must be documented and marked in accordance with the TDG regulations and FMSCA guidelines.

6.7.1.2. At a minimum, all loads should include a complete bill of lading, vehicle placards, safety data sheets and emergency contact information.

6.7.1.3. A permit may apply to certain shipments.

6.8. Dangerous Goods Transport Tanks (Canada)

6.8.1. All tanks used in the service of transporting dangerous goods must have a plate attached to the shell or to an integral part of the structure of the tank. Any tank built after July 1, 1995, must be built to CSA B620 standard and must have a plate attached to it. To confirm the tank type and quality, verify the following information:

6.8.1.1. TC specification

6.8.1.2. Date of Manufacture

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6.8.1.3. Tank vehicle completion and certification date (month and year)

6.9. Petroleum Crude

6.9.1.1. Petroleum crude oil and condensate are classified as Flammable Liquids, Class 3 and can be designated packing group I, II, or III. The packing group depends on the flash point of the product. The SDS should always be consulted for packing class.

6.10. Purging

6.10.1. Where work or manufacturing processes involve the use of a flammable liquid, vapor, or gas, the concentration of the liquid, vapor, or gas in the work area shall not be greater than 10% of the lower explosive limit (LEL) of the substance involved. Workers must not enter or remain in a work area if more than 10% of the lower explosive limit (LEL) of an explosive substance is present in the atmosphere.

6.10.2. Purging is used to reduce the risk of creating a flammable mixture of oxygen and flammable vapor in pipes, vessels, and other equipment. It is possible that a flammable vapor may meet oxygen during the purging process. It is important to know the lower explosive limit (LEL) and upper explosive limit (UEL) of the flammable vapors involved when purging and to continuously monitor the vapor concentration to avoid approaching the flammable range of the vapor and air mixture.

6.10.3. Additional precautions shall be taken to eliminate any possible sources of ignition. Review the Company policy on Purging Practice.

6.11. Bonding and Grounding

6.11.1. Bonding and grounding are required to prevent the build-up of static electricity, which can be a source of ignition in a flammable environment. For this to occur, four conditions must be fulfilled:

6.11.1.1. A means of generating an electrostatic charge must be present.

6.11.1.2. A means of accumulating an electrostatic charge across a spark must be present.

6.11.1.3. A means of discharging the accumulated electrostatic charge across a spark gap must be present.

6.11.1.4. An ignitable vapor-air mixture must be present in spark gap in all cases where flammable liquids and or vapors can be present.

6.11.1.5. Company's bonding and ground practices shall be consulted.

6.12. Bonding and Grounding for Liquid Transfer

6.12.1. During the transfer of flammable liquids from a tank or drum to a smaller container, employees shall adhere to the following in addition to the Company's bonding and ground policy.

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- 6.12.1.1. Ground the wire from the drum to the grounded pipe, building framework, or other ground.
- 6.12.1.2. Use an approved drum dispensing faucet with a metallic flexible fill line, which can be placed in contact with the safety can and inserted into can avoid splashing.
- 6.12.1.3. Use an approved steel safety can/container for handling flammable solvents or chemicals. The safety can/container should include several fire safety features:
 - 6.12.1.3.1. Self-closing, spring loaded dispensing and fill spout, which prevent spills.
 - 6.12.1.3.2. Integral flame arrestor on fill spout.
 - 6.12.1.3.3. Pressure vent on fill spout to avoid can exploding when exposed to fire.
 - 6.12.1.3.4. Bond wire clipped onto drum and safety can/container to ensure electrical continuity.
- 6.12.1.4. Pressure or vacuum the drum safety vent to protect the drum against over and under-pressuring and to limit the venting of vapors.
- 6.12.1.5. Bonding and grounding alone do not provide adequate fire safety for flammable liquids transfer. Approved safety cans, dispensing devices and drum safety vents are required.
- 6.13. Bonding and Grounding for Fluid Transfer from Truck-in and -out
 - 6.13.1. During the transfer of flammable liquids from truck-in and -out, one shall adhere to the following statements in addition to Company's Bonding and Grounding Practice:
 - 6.13.2. Ensure that bonding and grounding connections are used for truck-in and truck-out. Signage and written Company and contract truck company procedures shall emphasize these practices.
 - 6.13.2.1. Inspect ground wires, clamps, and terminals and connections during facility and equipment inspections.
 - 6.13.2.2. Some bonding and grounding systems include a warning light indicating when proper bonding is achieved, or even an interlock (permissive) to prevent fluid transfer when un-bonded. Ensure that these warning lights and interlocks are operational and tested as part of the facility maintenance management system.
 - 6.13.2.3. Ensure that the hoses used for the fluid transfer are approved for the fluids they convey, are in good operating condition, and that there is adequate electrical continuity in the hose for bonding.

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6.13.2.4. Ensure that an annual test of the facility bonding and grounding is conducted as part of the facility maintenance management system.

6.14. Hot Work

6.14.1. Hot work refers to any task involving an open flame or producing heat or sparks including, but not limited to:

6.14.1.1. Cutting, welding, burning, air gouging, riveting, drilling, grinding, and chipping.

6.14.1.2. Using electrical equipment not classified for use in a hazardous location.

6.14.1.3. Introducing a combustion engine to a work process.

6.14.2. When hot work is taking place, the presence of a flammable mixture of vapor and air can result in a fire or an explosion. Anytime hot work is involved, follow the Company's hot work policy.

6.15. Quality Assurance

6.15.1. Performance Measurement

6.15.1.1. Compliance with this policy and program effectiveness shall be assessed through program assessments and internal audits, or other measurement criteria.

6.15.1.2. Business functions or departments impacted by this practice must include compliance and program effectiveness verifications in their business assurance program. Performance will be monitored and reported within the responsible departments at least every three years.

6.15.2. Management of Change

6.15.2.1. The policy will be reviewed at least every three years, if there is a significant regulation or industry best practices change that indicates the need to review or if an incident investigation indicates the causes were related to unclear or inadequate written instructions within the policy.

7. Training

7.1. All employees will receive training upon initial hire and annually thereafter in the safe handling of flammable combustible gas liquids.

7.2. Employees that handle or work around flammable or combustible substances must be trained in the safe handling, use, storage, and disposal of the substance.

7.3. They must be provided with adequate information concerning the identity, nature, and potential hazards of the substance. Training may be performed in-house or by a 3rd Party.

7.4. Employees shall have competency, knowledge and skills required to successfully perform the technical aspects of a job. A worker must be able to demonstrate competency in safely performing work tasks or using equipment.

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8. Recordkeeping

- 8.1. Training records shall include the dates of training, names of persons conducting the training and all job titles of all persons attended the training sessions.

9. Reference

- 9.1. OSHA 1910.106