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Requestor:	Darren Brown		Field Element:	Savannah River Ops Office	
Notes:	None				

Subject: Compressed Gas Cylinder Storage Requirements for Welding

Question:

For general industry applications, where a welding cart is available for use, does the time interval between uses determine whether compressed gas cylinders with regulators and equipment attached for use, can be cited under storage requirements?

For example, are the cylinders considered to be attached and ready for use regardless of the time interval since the last use (e.g., days, weeks) or between uses, as long as the regulators are in place on the cylinders?

Background Information:

Gas welding is utilized extensively in both General Industry and Construction environments. Typical use involves the placement of one oxygen and one acetylene compressed gas cylinder secured on a cart to facilitate safe movement and use in the work environment. Regulators, hoses and a torch are typically attached to the cylinders creating a mobile gas welding unit/cart. Title 29 CFR 1910.253 and 29 CFR 1926.350 list storage requirements for compressed gas cylinders, but they appear to differ as to when cylinders are considered to be “in storage” compared to when they are considered to be “in use” or “attached ready for use.”

Three OSHA interpretations from May 2006 including Yotz, Trammell, and Guess appear to be in unison in indicating that the primary determining factor to whether the cylinder storage requirements can be invoked/cited is whether the cylinders are “in use” or “attached ready for use” as opposed to the time interval between uses.

Policy Clarification:

For general industry workplaces where 29 CFR 1910.253¹ applies, the time interval between uses of gas cylinders is not used to determine gas cylinder storage requirements.² Oxygen and

¹ DOE 10 CFR Part 851, Worker Safety and Health Program incorporates by reference 29 CFR parts 1910 and 1926. DOE regulates worker safety and health of contractor employees by implementing the DOE Worker Safety and Health Program (10 CFR part 851) at its facilities which are operated under the authority of sections 161(i)(3) and 234C of the Atomic Energy Act of 1954. Title 10 CFR 851.23 *Worker Safety and Health Program*, Safety and health standards, paragraph (a) states that “Contractors must comply with the following safety and health standards that are applicable to the hazards at their covered workplace,” to include, 29 CFR part 1910, “Occupational Safety and Health Standards” and 29 CFR part 1926, “Safety and Health Regulations for Construction.”

² OSHA considers “storage” of oxygen and acetylene gas cylinders in the construction industry differently than for general industry. For construction workplaces where 29 CFR 1926.350 applies “...[s]torage is based on whether it is reasonably anticipated that gas will be drawn from the cylinder in 24 hours” as stated in an OSHA interpretation letter to Mr. Kenneth J. Yotz, dated May 8, 2006. OSHA provides an explanation, in an interpretation letter to Mr. Kenneth J. Yotz, dated September 9, 1993, on why the provisions differ between general industry and construction.

acetylene gas cylinders on a welding cart that are “in use” or “connected for use” are not considered to be “in storage.” For the example in the question, if a properly functioning regulator is attached to welding gas cylinders, this is considered “in use” or “ready for use” regardless of the time interval since the last use.³ OSHA considers a welding cutting unit consisting of a single oxygen cylinder and a single acetylene cylinder to be “in use” or “connected for use” provided the following conditions are met:

- 1) No more than a single acetylene cylinder and a single oxygen cylinder are on a cylinder cart. The cylinder cart must be specifically designed to hold/carry oxygen and acetylene cylinders in the upright position. The cylinders must be securely held to the cart (such as by straps, chains or other securing device).
- 2) The cart is on a firm, level surface.
- 3) The cart is not in an area where there is a reasonably foreseeable risk of being struck by vehicles, equipment, or materials (such as in a pathway for vehicles on a construction site).
- 4) Both cylinders either have valves closed with protection caps on or are connected to a properly functioning regulator.⁴

Also, in accordance with the requirement of § 1910.253(b)(5)(ii)(G), cylinder valves shall be closed when work is finished.

OSHA has provided several letters of interpretation related to this subject for both general industry and construction and links are provided in the Additional Information section below.

Applicable Regulations:

1. 29 CFR 1910.253, *Oxygen-fuel gas welding and cutting*
2. 29 CFR 1926.350, *Gas welding and cutting*

Additional Information:

- OSHA Interpretation letter to Mr. Kenneth J. Yotz, dated September 9, 1993.
<https://www.osha.gov/laws-regs/standardinterpretations/1993-09-09-2>
- OSHA Interpretation letter to Mr. Bill Trammel, dated May 10, 2006.
<https://www.osha.gov/laws-regs/standardinterpretations/2006-05-10>
- OSHA interpretation letter to Mr. William H. Guess, dated May 12, 2006.
<https://www.osha.gov/laws-regs/standardinterpretations/2006-05-12-2>
- OSHA interpretation letter to Mr. Kenneth J. Yotz, dated May 8, 2006.
<https://www.osha.gov/laws-regs/standardinterpretations/2006-05-08>

³ OSHA interpretation letter to Mr. Bill Trammel, dated May 10, 2006.

⁴ OSHA interpretation letter to Mr. Kenneth J. Yotz, dated May 8, 2006.

Concurrence:

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Approval:

Approved December 9, 2019 by James R. Dillard, Director, Worker Safety and Health Policy and received non-substantive enhancements during triennial review on September 30, 2024.