Building a Safer Butane Hash Oil Extraction Facility

An Industrial Hygiene Perspective

Disclaimer

It is not the intention of Havelick & Associates LLC (HAL) to provide safety or industrial hygiene advice in this booklet but rather to provide users with information to better understand their butane hash oil extraction systems. Specific safety or industrial advice is not provided in this booklet. This booklet is not intended to take the place of industrial hygiene advice or legal advice. HAL advises readers to consult with a qualified Certified Industrial Hygienist or Professional Engineer for system design and an attorney for answers to your questions about system design decisions or for guidance about a specific equipment installation or compliance.

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# Table of Contents

I. **COST CONSIDERATIONS – PROPER INSTALLATION CAN BE EXPENSIVE** .......................... 4  
II. **VENTILATION – REMOVING FLAMMABLE GAS** ........................................................................ 5  
III. **IGNITION PREVENTION – REMOVE EXPLOSIVE TRIGGERS** .................................................. 7  
IV. **GAS DETECTION AND MONITORING** ......................................................................................... 8  
V. **BUTANE STORAGE AND MANAGEMENT** ..................................................................................... 10  
VI. **TRAINING IS ESSENTIAL** ........................................................................................................... 11  
VII. **PERSONAL PROTECTIVE EQUIPMENT** .................................................................................... 12  
VIII. **SANITATION** ........................................................................................................................... 13  
IX. **FIRE AND EMERGENCY RESPONSE** .......................................................................................... 14  
X. **MATERIAL SAFETY DATA SHEETS & HAZARD COMMUNICATION** ........................................... 15  
XI. **EQUIPMENT AND INSTALLATION REVIEW AND CERTIFICATION** ............................................ 16  
XII. **OPEN BLASTING IS DANGEROUS, STUPID AND ILLEGAL** ..................................................... 18  
XII. **SELECTING AN EXTRACTION SYSTEM** .................................................................................... 19  
XIII. **CHECKLIST – ITEMS FOR CONSIDERATION** ....................................................................... 20
Maybe you are an ambitious new entrepreneur. Medical marijuana is now legal in your state. Maybe even recreational marijuana is legal. You have just purchased a shiny new butane closed-loop extraction system and that system may have received an engineer’s review as being safe. You have a stock of trim or premium bud to process. You are going to make thousands of dollars of hash oil, shatter, or budder every day. You are ready to go, right? Wrong.

In the states of Colorado and Washington, the use of closed-loop systems that recover butane and prevent it from being released to the environment are the only systems that meet regulatory standards. Although a closed-loop system by itself significantly reduces risks to operators, the installation and operation of such systems can also result in serious hazards. This brochure is intended to look at some techniques that have been used to reduce the hazards of use of these systems in buildings.

**SOME FACTORS FOR CONSIDERATION**

- Room Dilution Ventilation
- Fire and Life Safety Systems
- Airflow Pathways, Exchange Rates, and Velocities
- Local Area Exhaust Ventilation
- Interior and Exterior Storage of Flammable Solvents
- Ignition Source Control
- Flammable Gas Monitoring
- Training
- Personal Protective Equipment
- Hazardous Materials Management
- Sanitation
- Fire and Emergency Management

Developing a safer installation can be a complex task, with a number of factors to consider.

Many of these measures are part of a belt-and-suspenders system – so that if your belt fails, your suspenders are still there to keep you from getting embarrassed. Only with butane you risk more than embarrassment – your life or your employee’s lives are on the line.

In the United States, the chemical process industry has an excellent safety history. Operating a butane closed-loop system is a complex industrial process. If you start up your system without addressing the installation safety hazards, you are not going to get close to the existing industry safety experience. You are likely to get shut down by some regulator from any one of the many agencies looking over your shoulder. To be not only the ambitious entrepreneur, but the successful one, you need to not only pay attention to safety and compliance, you have to plan for it.

In 2015 the U.S. Occupational Health and Safety Administration (OSHA) started taking a close look at these systems after a closed loop system explosion nearly killed two operators. Safety standards have become more stringent since the first edition of this booklet.
I. COST CONSIDERATIONS – PROPER INSTALLATION CAN BE EXPENSIVE

The proper installation of a closed-loop hash oil extraction system (“CL System”) can be expensive and time-consuming. When the costs of a properly installing a CL System for safer operation are counted up, those costs can easily exceed the costs of the extraction system itself.

COST FACTORS TO CONSIDER WHEN SETTING UP A CLOSED-LOOP BUTANE EXTRACTION SYSTEM

- Explosion-proof equipment and facilities
- Purchase and installation of a proper ventilation system
- Updating and improving room layout
- Finishing room flooring, walls and ceilings with cleanable surfaces
- Certified Industrial Hygienist or Professional Engineer review and support
- Training program development and implementation
- Spark-less Tools
- Electrical upgrades
- Reduction of spark and ignition hazards
- Flammable Gas Detection Instruments
- Signage
- Personal Protective Equipment
- Butane Storage Cages
- Sprinkler System Installation
- Fire Extinguisher Purchase & Maintenance

This document is not intended to assess the function, safety, or engineering of any particular closed-loop hash oil extraction system. Rather, it is intended to inform users of the installation and use of such systems in industrial or commercial operations in a manner that may reduce risk.
II. VENTILATION – REMOVING FLAMMABLE GAS

A Closed-Loop Butane Extraction System ("CL System") can capture most of the butane used to extract hash oil. Some butane will escape. Loose fittings, cracks in tubing, operator error, or even emptying spent trim from the extraction vessel will cause some butane to escape. The Closed-Loop System itself is significantly safer than open blasting as it is intended to capture butane rather than automatically releasing it to the atmosphere. Capturing and exhausting butane when it is released by a leak, spill, error, or operation is the purpose of the ventilation system.

The goal of the ventilation system is to keep the concentration of butane in the operating area low enough to be well below the concentration at which it can ignite or explode. The Lower Explosive Limit (LEL) is the minimum amount of butane in air that can ignite or explode. For butane, the LEL is approximately 1.6 percent in air.

The Canadian Centre for Occupational Health and Safety has an excellent web page that discusses industrial ventilation at http://www.ccohs.ca/oshanswers/prevention/ventilation/. The ventilation example images used here and selected text are from the CCOHS website.

Local exhaust ventilation captures gases such as butane at their source by placing the working system inside a hood to capture gases as they are released.

TWO TYPES OF MECHANICAL VENTILATION SYSTEMS USED IN INDUSTRIAL SETTINGS

Dilution (or general) ventilation reduces the concentration of the contaminant by mixing the contaminated air with clean, uncontaminated air.

Local exhaust ventilation captures contaminants at or very near the source and exhausts them outside.

Figure 1. Local Exhaust Ventilation Hood
Local exhaust ventilation has advantages in that a relatively small amount of air is exhausted to capture the contaminant.

**Dilution Ventilation** uses general room supply and exhaust to dilute the contaminant even if it has left the vicinity of the extraction system. Dilution systems can take many configurations and some examples from the CCOHS are reproduced here. Dilution requires large amounts of air supply to keep concentrations low.

Generally, dilution ventilation systems should be constructed to move air across the room rather than having both supply and exhaust near each other. The exhaust should be near the work. Butane is heavier than air, so having both low and high supply and exhaust locations may be recommended.

![Diagram of dilution ventilation](image)

*Figure 2. Dilution Ventilation Low Ducted Supply*

![Diagram of unacceptable dilution ventilation](image)

*Figure 3. Unacceptable Dilution Ventilation Configuration*
Ventilation systems are mandatory for CL Systems. Without ventilation, even a small leak or release of butane can quickly approach explosive levels.

Ventilation is very important during emptying of the extraction vessel of wet spent trim after leaching. Plant material wet with butane is extremely explosive.

Fans and motors used in ventilation systems should be explosion-proof. The use of a manufactured Extraction Booth can meet ventilation and explosion-proof system requirements when used for a butane extraction system. Manufactured Extraction Booths are supplied with explosion-proof ventilation, flammable gas sensors, and lighting. A butane extraction system placed into an Extraction Booth designed for marijuana extraction will more easily meet fire department, industrial hygiene and engineering requirements. Another company started by the author, HAL Extraction Technology Ltd., designed, patented, and manufactures Extraction Booths for the marijuana and cannabis hash oil industry. See ExtractionBooth.com.

CL System work areas should be kept free of clutter and unnecessary equipment or materials. Unneeded objects can easily disrupt air flow and create potential eddies where flammable gas could accumulate.

### III IGNITION PREVENTION – REMOVE EXPLOSIVE TRIGGERS

Ventilation reduces the potential for gas to be present in concentrations above the Lower Explosive Limit. Since systems and humans are not often perfect, we need to reduce the potential for ignition of butane if the LEL is exceeded due to unexpected release, errors, or accidents.

**Electrical equipment** can often provide ignition sources. The number of electrical outlets, switches, light fixtures and equipment in the area of the Closed-Loop Extraction System should be kept to a minimum. When possible, place electrical switches and equipment outside of the CL System area. Electrical equipment and light fixtures should be explosion proof (intrinsically safe) or placed out of the work room. Circuits should be ground-fault protected.

Some building and fire codes allow limited amounts of butane (up to 30 gallons) in a building without requiring hazardous materials (“H Occupancy”) rated space. However, most regulators familiar with marijuana extraction systems require hazardous-materials rated space for any quantity of butane used for extraction. In
In addition, OSHA rules do not recognize the volume limits in the codes, so any use of even a few gallons of butane is considered very hazardous. **Explosion proof electrical fixtures, rated fire walls and doors, sprinkler systems, and other special building components are required by building codes for high-hazard areas.** The use of a [HAL Extraction Booth](#) can help meet these requirements at a fraction of the cost of site-built facilities.

Hand tools such as corded or battery tools can be ignition sources. **Electric hand tools should be prohibited** from use during operation of a CL System.

Tools used directly on CL Systems such as wrenches or screwdrivers should be made of non-sparking materials. The opening of extraction vessels can produce micro-environments where the LEL is exceeded. **Non-sparking tools** can help to reduce risks of ignition around leaking fittings and equipment.

**Pilot lights** on water heaters, area heaters, stoves, furnaces or other gas-fueled appliances can be a source of ignition for butane. Since butane is heavier than air, and cools when it evaporates, it can easily form a layer of flammable gas over a floor. When that flammable gas layer reaches a pilot light, explosions will occur. Do not place CL Systems in rooms or areas near any equipment with pilot lights.

**Static can be a hazard around CL Systems.** The use of anti-static mats at CL Systems may reduce risks from static-created sparks. Keeping light switches out of work areas and grounding of equipment may reduce risks.

The flow of liquid butane through non-conductive tubing or vessels can create a buildup of static electricity charge, providing an ignition source. Avoid the use of non-conductive materials on a CL System.

**Smoking of any substance** is prohibited around CL Systems. This includes the product that is created in your CL System. Post flammable gas and no-smoking signs in and around work areas.

### IV GAS DETECTION AND MONITORING

Butane is a colorless and nearly odorless gas, particularly at the low concentrations needed to form explosive mixtures in air. Unlike natural gas, no odorant is added to give the gas a warning smell. When butane concentrations rise to the levels where you can first detect an odor, the concentration is already near the lower explosive limit. If you can smell butane in your work area you need to immediately stop work, shut down your equipment, maintain active ventilation, and figure out where a leak or release is occurring.

Because you cannot smell butane until it is at dangerous concentrations, **gas detection and monitoring devices are needed for your protection.** Several types of detection equipment are used. These include fixed, in-place area instruments that continuously monitor for dangerous levels of flammable gas and hand-held portable instruments that detect flammable gas. Instruments may provide a readout that shows a percentage
of the Lower Explosive Limit ("LEL") or may simply provide warning clicks or tones to indicate increasing concentrations of gas.

Area gas monitoring systems typically report readings in percentages of the LEL. They are often set to alarm at different levels and may be set to close valves or shut down equipment at a set percentage of the LEL. Area systems may have more than one gas detector with detectors located in different parts of the work area. Often, one detector is located at the CL System to give immediate warning of a leak. A second detector can be located in the general work area around the CL System to indicate overall room concentrations. Sometimes detectors can also be placed at the exhaust ventilation port for the work area. Monitoring systems should be set to alarm at ten percent of the LEL. A well-designed system would shut down the butane supply and turn off heat sources at ten percent of the LEL.

Some butane closed-loop systems are built with area gas detection systems as an integral part of the equipment. If a CL System is installed that does not have an integrated gas detection system, a separate continuous area monitoring system must be installed. Without a continuous area monitoring system, a leak or release may go undetected with risk of serious injury or death. HAL Extraction Booths are supplied with appropriate gas sensors and integrated alarms and ventilation systems.

A hand-held flammable gas detector is used to check area levels of flammable gas and is very useful for detecting small leaks from a CL System. Every operator of a CL System should own and use a hand-held flammable gas detector to check for leaks on a daily basis.

CALIBRATION IS IMPORTANT

Many gas detection systems are calibrated to gases other than butane. The detectors respond differently to different gases. Lots of systems are calibrated to liquefied petroleum gas or methane (natural gas). If your detector was calibrated to methane and you are using butane, the LEL reading you see will be significantly low. If your methane-calibrated meter reads 10% LEL around your butane, you are really at 20% of the LEL of butane. Thus, when your meter reads 50% LEL, you already have an explosive atmosphere. Know and understand your instrument calibrations and get them recalibrated on a regular basis. Set the zero reading for your meter in a clean area well away from your CL System.
V BUTANE STORAGE AND MANAGEMENT

Purchasing, storing and moving butane is more complicated than it seems. First, operators of a butane closed-loop systems need to understand what butane is, what varieties of butane exist, how butane is graded, and what the properties of butane are.

Many CL System operators prefer to use n-butane due to its lower operating pressure and its very low vapor pressure at the freezing point of water. Some CL Systems use the differences between room temperature and freezing to recover the n-butane.

n-Butane is also known as “normal” butane which is usually 99% pure. Instrument grade or pharmaceutical grade gas may be 99.5% pure. In order to receive iso-butane (which you probably do not want anyway), you must specify that to the supplier. ISO-butane is also more expensive than n-butane.

BUTANE CHEMISTRY

n-Butane has four carbon atoms connected in single file and ten hydrogen atoms (C₄H₁₀). n-Butane is the solvent used by most CL Systems. Iso-Butane is also C₄H₁₀, but the carbon atoms are connected in a “T”. This changes the properties significantly.

At room temperature n-Butane has a pressure of about 20-25 psi. At 30°F, the pressure is zero psi. Iso-Butane has higher pressures at room temperature and at 32°F.

NEVER FILL A BUTANE BOTTLE MORE THAN 2/3 FULL WITH LIQUID

Expansion space is needed since butane liquid expands as temperature increases.
Whenever possible, store your extra stock of butane outside your building in a secure, locked cage. Limit the quantity of butane in the building to 30 gallons or less unless you have specially designed buildings and settings for your system. Place bollards (posts) in front of cages if vehicles could strike the cage.

**VI TRAINING IS ESSENTIAL**

If you have read this far, you are aware that the use of butane in industrial settings has many dangers. Allowing an untrained person to operate a butane closed-loop extraction system will increase risks to everyone involved.

Training programs must be provided by a live in-person instructor. Computer-based training programs or e-seminars are not sufficient according to State of Colorado regulations.

Havelick & Associates LLC regularly presents a two-day training course on Cannabis Extraction Technology. See the course page for dates and times.

Cannabis Extraction Technology Course

http://www.havelickindustrialhygiene.com/cannabis-extraction-technology-course.html
One of the first principles of safety and industrial hygiene is to first set up and systems that keep hazards away from workers. Most of this document focuses on establishing such systems that keep workers safe without active attention.

Unfortunately, butane is an extremely flammable gas and fire and explosions will sometimes occur in butane closed-loop extraction systems facilities. Even in the best-run operations, an oversight, a moment of inattentiveness, or failure of a seal or fitting and result in incidents. Personal protective equipment is necessary to help protect workers and visitors for those occasions when problems occur.

Flame-resistant coveralls or lab coats should be required for operators. Full-length pants, closed-top shoes and long sleeves should be worn at all times in the CL System area. Clothing should be made of fabric with a tight weave that can help resist ignition. Long hair should be worn up, under a hat (again-tight weave fabric).

SAFETY GLASSES ARE MANDATORY
Operating or visiting a butane extraction system can place a person in harm’s way. The use of safety glasses is a standard throughout industrial production systems and hash oil workers should not be exempt.

The owner should pay for safety glasses, install signs requiring their use, and keep a bin of safety glasses next to the entrance to the CL System area.

Prescription glasses are usually NOT safety glasses. Safety glasses can be purchased that fit over prescription glasses.

Eyewash stations must be installed in the work area of the butane closed loop extraction system according to Colorado Law. Plumbed systems with automatic temperature control systems built in are best. Place the eyewash station in the room where a temporarily blinded worker can still find it.
VIII  SANITATION

The manufacture of butane hash oil requires that food-grade sanitary measures be used. Avoiding clutter, regular disinfection of surfaces, periodic deep cleaning, and personal hygiene are all involved.

Make sure that signs requiring employees to wash hands are posted in each restroom and each area sink.

Employers have an obligation to enforce the hand-washing rules.

Wiping down of all working surfaces with commercially available disinfectant is required at least on a daily basis. Floors must be mopped with cleaning solution on a daily basis.

Deep cleaning of all equipment and surfaces is required at least on a weekly basis.

Extraction equipment, Pyrex dishes and utensils used for drying or whipping of wax must be thoroughly washed between each use.

Floors, walls and ceilings must have cleanable surfaces. Use of plastic milk-board on walls and ceilings is recommended. Tile flooring is recommended. Carpeting is unsuitable for operation of a CF System.
IX  FIRE AND EMERGENCY RESPONSE

Part of an effective safety program is to have systems and procedures in place to respond when bad things happen. Several items can help businesses and workers deal with emergencies on a more effective basis.

**SPRINKLER SYSTEMS**
Everyone involved with Safety loves building sprinkler systems. They save lives and dramatically reduce property damage. While sprinkler systems are expensive, they can easily be cheaper over the life cycle of a building.

Even a small sprinkler system limited to the area of the closed-loop butane extraction system is preferable to none at all.

Every facility with a closed-loop butane extraction system should have a written emergency response plan. Even a brief plan will help an organization prepare for and deal with emergencies.

The route to the nearest emergency room should be mapped out and posted near the CL System room. A copy of the map should be kept with the emergency response plan.

The plan should include a portion on building evacuation. How will you notify people to evacuate? Where will they gather? Who notifies the Fire Department? How do you make sure everyone is out of the building? Answering these questions and writing down the answers will save lives.

**LEAK AND SPILL RESPONSE**
If a monitoring device detects a leak:

- Close valves to all tanks
- Vent vessels to outside and depressurize systems
- Shut down vacuum/recovery pump
- Turn off heat to solvent evaporation vessels
- Remove buckets from hot water
EMERGENCY PROCEDURES - FIRE

- Sound Alarm – Notify Others
- Call 911
- Evacuate area
- Use ABC rated fire extinguishers
- Use extinguishers only for small fires
- To assist escape
- To assist people
- Aim at base of fire
- If you need a second extinguisher – evacuate instead

X MATERIAL SAFETY DATA SHEETS & HAZARD COMMUNICATION

Butane is a hazardous chemical product and butane closed-loop extraction system businesses must have a Material Safety Data Sheet from the manufacturer on site at all times. However, an MSDS is only part of a Hazard Communication Program. Failure to have and follow a written Hazard Communication Program is the number one general industry compliance problem cited by the Occupational Safety and Health Administration (OSHA).

Link to AIRGAS n-Butane MSDS
The Colorado Marijuana Enforcement Division requires that all butane closed-loop extraction systems and installations be professionally reviewed. Section D of R 605 – Retail Marijuana Products Manufacturing Facility: Retail Marijuana Concentrate Production and Section D of M605 - M 605 – Medical Marijuana-Infused Products Manufacturer: Medical Marijuana Concentrate Production list these requirements in detail.

**CLOSED LOOP EXTRACTION SYSTEM LISTING OR REVIEW**

Every professional grade, closed-loop extraction system capable of recovering the solvent used to produce Solvent-Based Medical Marijuana Concentrate must obtain:

a. UL or ETL Listing
b. Non-listed solvents for an extraction device requires approval by the manufacturer or a Professional Engineer
c. If not UL or ETL Listed, there must be a designer of record and the extraction device must be “peer reviewed” by a Professional Engineer.
A Colorado Marijuana-Infused Products Manufacturer that engages in the production of Solvent-Based Marijuana Concentrate must **obtain a report from an Industrial Hygienist or a Professional Engineer** that certifies that the equipment, Licensed Premises and standard operating procedures comply with these rules and all applicable local and state building codes, fire codes, electrical codes and other laws.

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**LOCAL FIRE DEPARTMENT**

**DO NOT START CONSTRUCTION OF YOUR EXTRACTOR UNTIL YOU HAVE CONTACTED YOUR LOCAL FIRE MARSHALL**

Your Fire Department has the authority to inspect buildings, fire hazards, equipment installations, and prevention measures. Your Fire Department may require a permit for the use of flammable gases inside of buildings.

*Keep your life simpler and work with your Fire Marshall from the start.*
XII OPEN BLASTING IS DANGEROUS, STUPID AND ILLEGAL

The use of Butane Hash Oil (BHO) extraction systems has been increasing rapidly in Colorado and other states. In the underground markets, the use of open blasting through a tube such as is pictured here seems to be the method usually chosen.

Open blasting is where a canister of butane is emptied through a tube filled with marijuana. The liquid mixture of butane and hash oil is then collected in a dish. **Open blasting is inherently dangerous.**

- In Colorado alone, during the first four months of the 2014, firefighters in the state have raced to at least 31 butane hash oil explosions. The use of open blasting is causing a large number of injuries and significant property damage.
- The use of solvent-based extraction systems to recover hash oil by anyone other than a licensed facility is a felony in Colorado.
- Users have faced arson and numerous other charges from using these systems.
- Owners and managers at a marijuana grow operation (even legal ones) that instruct employees to use open blasting techniques may face criminal charges.

If your business is relying on the use of open blasting for production of hash oil you need to STOP BLASTING IMMEDIATELY! One incident, fire, explosion, inspection or burn...and your entire entrepreneurial accomplishments will be gone. **Do not open blast. Do not think about doing it.**

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It is in the interest of the newly legal, legitimate industry that uses properly installed closed loop to stop everyone from open blasting. If you own or run a retail operation, stop selling blasting tubes and cans of butane. They may come back to burn you.
SELECTING AN EXTRACTION SYSTEM

Business owners face difficult decisions when selecting extraction systems. In 2014, butane had most of the extraction market, with carbon dioxide in second place. In 2016, the market is wider.

CO₂ systems are expensive per unit of oil produced, but provide extraction selectivity and do not necessarily use explosive gases. Therefore facility costs are less for CO₂ than butane.

Propane and butane can be used together in some systems, but operating pressures are higher with propane. Facility costs continue to escalate for butane and propane systems while the system costs are moderate.

In 2016, ethanol and isopropyl alcohol systems are becoming widely used and are often less expensive than pressurized butane systems. Alcohol system operators claim that they can produce the same products at the same quality as butane or CO₂ systems. Alcohol is somewhat less hazardous to work than butane, so facility costs can be lower.

Whatever type of system you purchase, the operation of these devices can and will present hazards to you, your employees, and your business. Careful system selection, planning, training, documentation, and facility preparation will pay for itself many times over.
## XIII CHECKLIST – ITEMS FOR CONSIDERATION

<table>
<thead>
<tr>
<th>Ventilation System Design</th>
<th>Butane Storage</th>
</tr>
</thead>
<tbody>
<tr>
<td>□ Ventilation Air Flow Pattern</td>
<td>□ Butane Bottle Fill Limits at 2/3 Volume Capacity</td>
</tr>
<tr>
<td>□ Sufficient Supply/Makeup Air</td>
<td>□ Storage Outside in locked cage</td>
</tr>
<tr>
<td>□ Fan Type and Construction</td>
<td>□ Interior Total Volume (Including in Process) Limits Set and Observed</td>
</tr>
<tr>
<td>□ Ventilation Volumetric Flow</td>
<td>□ Bottle Restraints in Place</td>
</tr>
<tr>
<td>□ Air Flow Speed at Extractor</td>
<td>□ Butane/Air Mixture Separation Procedures</td>
</tr>
<tr>
<td>□ Ventilation Always On</td>
<td>□ 99% Plus n-Butane in Use</td>
</tr>
<tr>
<td>□ Clutter Does Not Impact Air Flow</td>
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</tbody>
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| Limit Volume of Butane                                                                   | Personal Protective Equipment                                                  |
| □ High-Hazard Occupancy Limits Evaluated                                                 | □ Safety Glasses Free & Available                                              |
| □ Explosion-proof equipment                                                              | □ Safety Glasses Worn in Work Area                                             |
| □ If H-Occupancy - Is Architectural/Engineering Designer Involved                        | □ Flame-resistant coveralls or lab coats                                       |
| □ Outdoor Butane Storage                                                                 | □ Safe Work Clothing                                                          |
|                                                                              | □ Closed-Top Shoes                                                            |

| Ignition Sources                                                                       | Training Program Documents                                                       |
| □ Placement and Type of Electrical Equipment (Switches, Outlets, Lighting)              | □ Training Outline/Agenda                                                        |
| □ No Pilot Light Appliances Near Work Area                                               | □ Presentation Materials                                                         |
| □ Static Control                                                                        | □ Performed In-Person                                                           |
| □ Non-Sparking Tools                                                                    | □ Standard Operating Procedures Covered                                         |
| □ No-Smoking Area                                                                       | □ Safety Procedures Covered                                                     |
| □ No Portable Electric Tools During Operation                                           | □ Key Employee and Operators Trained                                            |
|                                                                              | □ Training Records – Signed/Maintained                                          |

| Flammable Gas Monitoring                                                                | Sanitation                                                                      |
| □ Hand-Held Combustible Gas Meter/Leak Detector In Use                                  | □ Written Cleaning Procedures                                                   |
| □ Area Flammable Gas Detection Systems In Place and Operational                         | □ Daily & Weekly Cleaning                                                        |
| □ Solenoid Valves Connected to Detection System                                         | □ Hand-Washing Required                                                          |
| □ %LEL Alarm and Shutdown Levels Set                                                    | □ No Sick Operators Allowed                                                     |
| □ Calibration of Detectors                                                              | □ Dishwashing                                                                    |
| □ Daily Leak Check                                                                      | □ Cleanable Walls, Floors, Ceilings                                             |
|                                                                              |                                                                              |

| Signage & Posting                                                                       | Emergency Response                                                               |
| □ No-Smoking Area                                                                        | □ Written Emergency Response Plan                                               |
| □ Flammable Materials                                                                   | □ Fire Extinguishers in Place                                                   |
| □ Hand-Washing Mandatory                                                                 | □ Fire Extinguishers Maintained                                                 |
| □ Area Butane Volume Limits                                                              | □ Work Area Fire Sprinkler System Considered                                    |
| □ Extraction Room Identification                                                         | □ Leak and Spill Response Procedures                                            |
| □ Route to Nearest Emergency Room                                                        |                                                                              |
|                                                                              |                                                                              |
| □ Hazard Communication Program                                                          | Extractor System Engineer Peer-Reviewed                                         |
| □ Material Safety Data Sheets Kept for All Chemical Products                             | □ Extractor System Venting System in Place                                      |
| □ Written Hazard Communication Program                                                   | □ Fire Department Flammable Compressed Gas Permit                              |
| □ Manufacturers Labels Maintained                                                        | □ Fire Marshall Contacted                                                        |
| □ Employee Training                                                                     | □ Certified Industrial Hygienist or Professional Engineer Review Documented    |