

South Carolina Department of Labor, Licensing and Regulation  
Division of Labor  
Office of Occupational Safety and Health  
Columbia, South Carolina 29211

**OSH Program Directive Number 81-1926.350-1**

**Subject:** Article VII, Section 1926.350 (a) (9), Securing of Compressed Gas Cylinders.

**Standard:** Article VII, Section 1926.350 (a) (9), Rules and Regulations, Commissioner of Labor, State of South Carolina.

**Cross Reference to Federal Standards:** 29 CFR 1926.350 (a) (9)

**Background:** The National Welding Supply Association has brought to the federal OSHA attention that citations were issued to its manufacturer and distributor members in various parts of the country by compliance officers who are attempting to apply the standard, 29 CFR 1926.350 (a) (9), to the activity of these manufacturers and distributors. The intent of the standard applies to gas welding or cutting on a construction site; it does not apply to the manufacturers and distributors of welding gases prior to delivery at the construction site. In addition, manufacturers and distributors have personnel experienced in the handling of the cylinders, who cap, carefully rack, and store the cylinders in an upright position. Continual chaining and unchaining, for example, of hundreds of cylinders as they are moved out of the plant and off the loading docks may produce other hazards.

**Interpretation:** The Assistant Director/OSH Compliance and OSH Supervisors shall ensure that Compliance Officers do not apply Article VII, Section 1926.350 (a) (9) to the manufacturers and distributors of welding gases based on the following:

- a. The construction standard, Article VII, Section 1926.350 (a) (9), does not apply to welding gas supply manufacturers or distributors who do not secure compressed gas cylinders in an upright position on their premises.
- b. The general industry standards, Article VI, Section 1910, Subpart Q – Welding, Cutting, and Brazing (Source Standard is in NFPA-51-1969) do not contain any standard comparable to the construction standard, Article VII, Section 1926.350 (a) (9).

- c. Article VI, Section 1910.101 (b) references, through CGA Pamphlet P – 1 – 1964 article 3.3.1, the source standard, NFPA No. 51 – 1969 paragraph 1023, which states: “This Standard does not apply to the manufacture of gases and the filling of cylinders.”

**Effective Date:** This instruction is effective upon receipt and will remain in effect until cancelled or superseded by amendment to the Rules and Regulations.

William M. Lybrand, Director  
June 12, 1981