



## DECEMBER 2020

### ENCLOSED

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#### Safety Topic

Hazard Communication and Winter Safety  
Sample Safety Practices

*Please contact [Marilyn Dempsey](#), GAWDA DHS, EPA, & OSHA Consultant for more information.*

#### Traffic Bulletin

Unified Carrier Registration

*Please contact [Mike Dodd](#), GAWDA DOT Consultant for more information.*

#### Medical, Food/Beverage and Specialty Gases Bulletin

1. FAQs: CGA SB-26 now CGA V-23
2. Compliance To Do List – Review your Drug Listings
3. Spring GAWDA Professional Compliance Seminar (3/22-25/2021); December Medical Gas Roundtable (12/18/2020): Subparts J & K – Records and Reports/ Returned and Salvaged Drug Products
4. Micro-Audit Suggestions

*Please contact [Tom Badstubner](#), GAWDA FDA Food, Medical & Specialty Gases Consultant for more information.*

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**\*\* Visit GAWDA's COVID-19 Resource Center at [www.gawda.org/covid-19/](http://www.gawda.org/covid-19/) \*\***

*GAWDA is pleased to distribute this information to: Distributor and Supplier Key Contacts and all Compliance Manual Owners. Please carefully review this mailing and be sure the information is passed to the appropriate person within your organization. Timely Safety data is a benefit of Membership in GAWDA.*



### 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 \_\_\_\_\_



## Hazard Communication



<b>PURPOSE</b>	To provide an outline for a Written Hazard Communication Program
<b>RESPONSIBILITY</b>	Management
<b>AUTHORITY</b>	Operations Management

### Sample Hazard Communication Program Outline (Insert Company Name Here)

Under the provisions of the Hazard Communication Standard (1910.1200), employers are responsible for informing employees of the hazardous material in the workplace. OSHA specifies this information will be maintained through a written Hazard Communication program. The Hazard Communication program ensures that all employees receive the information they need to design and install employee protection systems and train their employees with the information necessary to keep them safe and empowers the employees to assist with maintaining and improving the Hazard Communication Program.

The written program does not have to be lengthy or complicated, but it must have enough information to educate the employees of workplace hazards. The Hazard Communication program must include:

<ul style="list-style-type: none"> <li>● Roles and Responsibilities</li> <li>● Chemical Inventory List</li> <li>● Labeling information</li> <li>● Safety Data Sheet location information</li> </ul>	<ul style="list-style-type: none"> <li>● Training: intervals and topics</li> <li>● Storage of chemicals</li> <li>● Non-routine Task</li> <li>● Program Compliance</li> </ul>
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The GAWDA Safety Committee published a Hazard Communication Sample Safety Practice that outlines each section of the plan. This and other Sample Safety Practices are available on the GAWDA Website/Members Only page/ Sample Safety Practices.





Anyone working in a cold environment may be at risk of cold stress. Some workers may be required to work outdoors in cold environments and for extended periods, for example, snow cleanup crews, sanitation workers, police officers and emergency response and recovery personnel, like firefighters, and emergency medical technicians. Cold stress can be encountered in these types of work environments.

What constitutes extreme cold and its effects can vary across different areas of the country. In regions that are not used to winter weather, near freezing temperatures are considered “extreme cold.” A cold environment forces the body to work harder to maintain its temperature. Whenever temperatures drop below normal and wind speed increases, heat can leave your body more rapidly.



Although OSHA does not have a specific standard that covers working in cold environments, employers have a responsibility to provide workers with employment and a place of employment which are free from recognized hazards, including cold stress (OSHA General Duty Clause).





## COLD INJURIES

### HYPOTHERMIA

- Shivering, confusion and loss of muscular control can occur.
- Can progress to a life-threatening condition.

**WHAT TO DO:**

- Get medical help immediately.
- Get the person indoors and gently remove wet clothing.
- Warm the person gradually and slowly, using available sources of heat.

### FROSTBITE

- Skin appears white and waxy and is hard to the touch.
- No sensation - the area is numb.

**WHAT TO DO:**

- Get medical help immediately. A frostbite can result in amputation.
- **Do not** rub or massage the area.
- Warm the area gradually - use body heat or warm water, and ensure it stays warm.

### FROSTNIP

- Skin appears yellowish or white but is soft to the touch.
- Painful tingling or burning sensation.

**WHAT TO DO:**

- **Do not** rub or massage the area.
- Warm the area gradually - use body heat (a warm hand) or warm water.

*(Saskatchewan Health Authority, Dec 11, 2019)*



## What to do:

- Train workers on how to prevent and recognize cold stress illnesses/ injuries, how to apply first aid treatment and ways to reduce the risk of cold stress.
- Provide engineering controls, e.g., radiant heaters, work shields to break the wind, heated work environments.
- Use safe work practices:
  - Encourage employees to drink water or warm drinks It is easy to become dehydrated in cold weather.
  - Schedule heavy work during the warmer part of the day.
  - Assign employees to tasks in pairs (buddy system) when working outdoors, so they can monitor each other for signs of cold stress.
  - Allow employees to interrupt their work, if they are extremely uncomfortable.
  - Give workers frequent breaks in warm areas.
  - Acclimatize new workers and those returning after time away from work, by gradually increasing their workload, and allowing more frequent breaks in warm areas, as they build up a tolerance for working in the cold environment.

## Winter working/ walking surfaces



Slip and Fall injuries account for 15% of all work-related injuries in the U.S. The risk of slip and fall injuries increase with the accumulation of snow and ice.

SIMA, the national nonprofit organization representing the snow removal industry, has some tips on safe winter walking.

- **Wear proper footwear.** Proper footwear should place the entire foot on the surface of the ground and have visible treads. Avoid a smooth sole and opt for a heavy threaded shoe with a flat bottom and use your toes to 'grip'.
- **Accessorize to see and be seen.** Wear sunglasses so that you can see in the reflective light of the snow. Also, wear a bright coat or scarf so that drivers can easily see you.
- **Plan ahead.** While walking on snow or ice on sidewalks or in parking lots, walk consciously. Instead of only looking down, occasionally pause and scan from left to right to ensure you are not in the way of vehicles or other hazards.
- **Don't jump or slide.** Always focus on keeping your feet on the ground as much as possible while walking slowly. Sliding sounds like fun but can result in serious injury.
- **Be careful when you shift your weight.** When stepping off a curb or getting into a car, be careful since shifting your weight may cause an imbalance and result in a fall.



## Sample Safety Practices

The GAWDA Safety Committee has published dozens of sample safety practices and works diligently to ensure they are accurate and current. Many of these practices may be used as part of a safety training program or as guidelines for business operations.

<u><b>Sample Safety Practices (alphabetical order)</b></u>	
<b>A</b>	Active Shooter Emergency Preparedness
<b>B</b>	Backing-and-Parking 10-15-2020
	Bloodborne Pathogen Program 09-08-2020
<b>C</b>	Contractor Safety Requirements Agreement
	Customer Safety at Member Sites
	Customer Vetting Practices Nov 2019
	Cylinder Connection at Customer Sites
	Cylinder Deliveries at Customers with Stairs and Ramps
	Cylinder Loading Dock Safety 3-2014
<b>D</b>	Delivery Survey
	Driver Distractions Personal Communication Devices
	Dry Ice Sample Safety Practice End User Guide 4-14-2020
<b>E</b>	Earthquake Emergency Preparedness
	Emergency Preparedness
	Ergonomics in the Workplace
<b>F</b>	Facility Securement
	Fire Emergency Preparedness
	Flood Emergency Preparedness
	Forklift cylinder safety
	Forklift Training 11-2020
<b>G</b>	Guidelines for Leaking Cylinders at Customer Locations
<b>L</b>	LPG-Vendor-Audit-Checklist 10-2020
	Ladder Safety 10-2014
	Load Securement rev 8-2020
<b>M</b>	Mechanical Lifting Devices
<b>N</b>	New Employee Safety Orientation Checklist-010813
<b>P</b>	Personal Protective Equipment in Fill Plants



<b>R</b>	Regulatory Agency Visit Guideline 09-04-2019
	Retail Security Premises Safety - Safety Committee - Best Practices draft 12-4-13
<b>S</b>	SIGN IN SAFETY GUIDELINES 12-13-2016
	Safe Cylinder Handling-051011
	Selection and Use of Docking Ramps version 2-18-2015
	Suggestions-Best Practices
<b>T</b>	Tornado Emergency Preparedness
	Training Form Cover Letter-051011
	Training Record_05102011
	Transport of Pressurized Cryogenic Liquid Containers in an Elevator - 05102011
<b>V</b>	Vehicular Accident Incident Considerations 5-12-2020
	updated 11/2020

If you need assistance accessing the documents, please contact [Andrea Levy](#).

If you have any questions regarding the safe practices, please contact me.

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# Traffic Bulletin

## Traffic Bulletin

**December 2020**

### **Unified Carrier Registration**

Everyone operating Commercial Motor Vehicles (CMVs)(power units only) in **interstate** commerce must register and pay a fee based on the number of CMVs operated in interstate commerce. Vehicles used solely in intrastate commerce are exempted from the registration and fees. Please remember that you only pay for the powered commercial motor vehicles, not trailers.

The website <https://www.ucr.gov/> is where you go to do the registrations. They established the fees for 2021 earlier this year so you can register now without having to wait like in past years.

#### **What vehicles are considered commercial motor vehicles for purposes of the UCR fees?**

The number of commercial motor vehicles for purposes of determining a carrier's UCR fees is the number of commercial motor vehicles that are power units and not towed vehicles such as trailers that the carrier reported in the most recent Form MCS-150 it filed with FMCSA or the total number of commercial motor vehicles that are power units it owned or operated under long-term lease for the twelve-month period ending on June 30 immediately prior to the beginning of the UCR Agreement registration year for which the fees are being determined. A commercial motor vehicle is one that is operated in commerce and has a GVW or GVWR of at least 10,001 pounds or, in the case of a passenger vehicle, is one built to carry more than 10 persons, including the driver. It also includes a vehicle that transports hazardous materials in a quantity that requires placarding. It does not include, for this purpose, a vehicle that operates wholly in intrastate commerce.

The UCR Board of Directors has established a National UCR System at <https://www.ucr.gov/> . All UCR registrants may use this online system, regardless of base state, and it is the recommended method to register.





# Traffic Bulletin

## UCR Recordkeeping

1. UCR registrants are required to preserve the UCR records upon which the annual applications and renewals are based for three (3) years from the due date or filing date, whichever is later, plus any time period included as a result of State decisions or inquiries.

The three (3) year period is the current calendar year and the prior two (2) calendar years.

2. Records may be kept on paper, microfilm, microfiche, or other computerized or condensed record storage system as required by the Base State.

If you have any questions about whether you are still in the program or not, please contact:

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Email: [MLDSafety@hotmail.com](mailto:MLDSafety@hotmail.com)



# Medical, Food/Beverage and Specialty Gases Bulletin

12/01/2020

## Frequently Asked Questions – CGA SB-26 now CGA V-23

**Q** – Is CGA SB-26, *Cylinder Connections on Portable Liquid Cryogenic Cylinders*, still in effect since the FDA adopted the new container and closure rules?

**A** – Yes. The relevant portion of the new FDA regulations specify:

*Portable cryogenic medical gas containers that are not manufactured with permanent gas use outlet connections (e.g., those that have been silver- brazed) must have gas-specific use outlet connections that are attached to the valve body so that they cannot be readily removed or replaced (without making the valve inoperable and preventing the containers' use) except by the manufacturer.*

CGA SB-26 was developed in 2000 following several tragic incidents where cryogenic container outlet connections had been switched to connect the wrong gas to a customer's distribution system. In 2017, the FDA has adopted the principles behind CGA SB-26.

In 2020, CGA re-issued SB-26 as a standard publication. The new publication is CGA V-23, *Standard for Cylinder Connections on Portable Cryogenic Liquid Cylinders*.

We strongly encourage you to get your own copy of CGA V-23 and follow its guidance. This publication is available for free to GAWDA members who participate in the CGA safety program ([www.cganet.com](http://www.cganet.com)). If you are not a part of the CGA safety program, this would be a good time to join. Otherwise, the publication's cost is only \$9.00.

We have developed a training course that you can use for your cryogenic cylinder fillers and drivers to reinforce these basic safety principles and regulations. [Medical Gas Liquid Container Valve Outlet and Labeling Regulations](#)



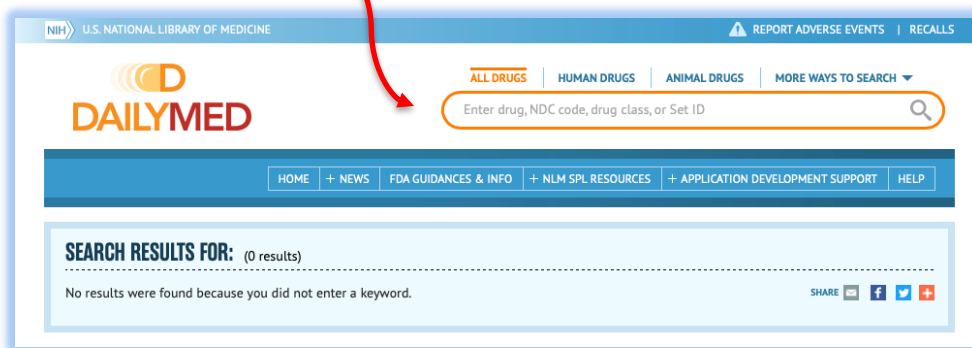
# Medical, Food/Beverage and Specialty Gases Bulletin

## Compliance To Do List – Review your Drug Listings

The FDA drug registration and listing regulations (21 CFR 207) require drug manufacturers to review their online drug labels in June and December each year. Look for obsolete labels, “unapproved medical gas” statements, or errors in the submission.

To verify your Drug Listing log on to: <https://dailymed.nlm.nih.gov/dailymed/search.cfm>

Enter your NDC Code (Labeler Code). Let [jodie@asteriskllc.com](mailto:jodie@asteriskllc.com) know if you would like to look-up your labeler code.



**Hold the Date! – Spring GAWDA Professional Compliance Seminar  
March 22 - 25, 2021**

## December Medical Gas Roundtable (12/18/2020) – Subparts J & K – Records and Reports/ Returned and Salvaged Drug Products.

These GAWDA Medical Gas roundtables are excellent sources of CGMP training and the latest industry compliance news. In December, we will be discussing the various records required by the FDA. In addition, we will have an easy to use handout about how to document your Annual Records Review.

For your information, we are also conducting the following webinars in December:

- **Specialty Gas** - Gas Chromatography Fundamentals
- **Food Gas Roundtable** – 21 CFR Part 117 - Subpart F – Records Policy

These and other webinars are available as a streaming recording at a time convenient to you. If you are unable to view the webinar live, just let us know and we will send you the link to the recording. If you would like to receive invitations to the training webinars, just send an email to [jodie@asteriskllc.com](mailto:jodie@asteriskllc.com).

# Medical, Food/Beverage and Specialty Gases Bulletin

## Micro-audit

This section of the Medical Gas Bulletin lists small steps you can take each month to improve your medical gas management system. These steps are not designed to be a full audit, but rather small steps to sample your compliance.

For this month, simply do these items:

1. **Complaints** - Verify that your complaint file has any instances of customers asking for credit because they thought the cylinder was not full. (Even if the complaint was found to be without merit).
2. **QCU Review** - Verify that your QCU reviews all complaints.
3. **Other Lots?** – Be sure your complaint investigations consider whether any other cylinders from the same or different lots should be investigated. Document your decision to not investigate other cylinders/batches on the complaint record.

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