



SAFETY & TECHNOLOGY ORGANIZER

MARCH 2012

ENCLOSED

Safety Topic: “Acetylene and Oxygen Cylinders on Carts”

Please contact GAWDA's OSHA and EPA Consultant, Mike Dodd for more information.

Traffic Bulletin: “Shipping Papers – Updated Basic Description”

Please contact GAWDA's DOT and Security Consultant, Mike Dodd for more information.

Medical Gas Bulletin: Food Gas Update, Legislative Activities, Medical Gas Roundtables, Training Schedule and Micro-audit

Please contact GAWDA Medical Gas Consultant, Tom Badstubner for more information.

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 _____

Acetylene and Oxygen Cylinders on Carts

Here are a couple of items that will help many of our members and our customers. The first item is 6 years old but the second item is new and the most helpful.

1. OSHA Interpretation regarding cylinders on carts in storage

OSHA issued a letter of interpretation on 5-10-2006 that outlines their viewpoint and how they will handle cylinders stored on cylinder carts.

Here are a few selected high points from the letter:

"With respect to OSHA's general industry standards related to oxygen and gas cylinder storage, 1910.253(b)(2)-1926.253(b)(4), cylinders in general industry workplaces are not considered to be in storage when they are either "in use" or "connected for use". However, with respect to the provisions for oxygen and gas cylinder storage in the construction industry, e.g., 1926.350(a)(10), a cylinder would be considered to be in use only when gas is being drawn or it is reasonably anticipated that gas will be drawn from the cylinder within 24 hours. Absent these conditions, compliance with the storage requirements is required.

The difference in interpretations of the respective provisions is in part attributable to the language of the respective standards. The language of 1910.253 indicates that cylinders are in "storage" if they are not in use or connected for use. See 1910.253(b)(2)(iv) and 1910.253(b)(3). There is no comparable language in the construction standard. Under the language of 1926.350, cylinders could be subject to the storage requirements even though the cylinders are connected for use. In interpreting the term "storage" in 1926.350, therefore, OSHA has focused on balancing the standard's purposes and the dynamics of a construction environment.

In general industry workplaces, oxygen and acetylene cylinders that are in use or are connected for use will not be considered to be in "storage" for purposes of the 1910.253 storage requirements. OSHA also will not cite a general industry employer if a single oxygen cylinder and a single acetylene cylinder are maintained with their cylinder valves closed and valve protection caps affixed. Closing the valves and affixing the valve protection caps can provide an equivalent level of protection to that achieved when the two cylinders are connected to a properly functioning regulator. This conclusion also finds



support in the most recent versions of the consensus standard on which the 1910.253 standard is based. Pursuant to OSHA's de minimis policy, a citation is not justified in such situations.

Although OSHA is not changing its interpretations of the construction and general industry provisions, the agency has taken steps to harmonize the manner in which it administers the respective standards so that employers doing construction work who follow prescribed practices also will not be cited for maintaining oxygen and acetylene cylinders for periods exceeding 24-hours. Moreover, both general industry employers (as detailed above) and construction employers who close cylinder valves and place cylinder protection caps on the cylinders will not be subject to citation for violating the respective cylinder storage provisions regardless of the period of time between uses."

This will be a handy document to have when OSHA visits either your facility or your customer. Please note that you must have cylinder valve protection in place while the cylinders are on the carts and not in use. OSHA uses the word "caps", but I would assume that protective collars would meet the same intent. The use of the split caps would also meet the intent and could be left on the cylinder while in use or storage and the regulators are still attached. Remember, that the cylinder valves must be closed while not in use.

You can read the full interpretation letter at this website:

http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=INTERPRETATION&p_id=25371

2. 29 CFR 1910.102 Acetylene

Effective March 5, 2012, OSHA has modified the following to reference the 2009 edition of CGA G-1.

1910.102 Acetylene.

(a) Cylinders. Employers must ensure that the in-plant transfer, handling, storage, and use of acetylene in cylinders comply with the provisions of CGA Pamphlet G-1-2009 ("Acetylene") (incorporated by reference, see §1910.6).

Here are the keys words of interest from G-1, section 5.2 Rules for Storing Acetylene Cylinders:

Acetylene cylinders should not be stored in close proximity to oxygen cylinders. Unless separated by a minimum distance of 20 ft., a noncombustible partition 5 ft. high having a fire-resistive rating of at least 1 hr. should be between stored acetylene cylinders and oxygen cylinders.



NOTE- Single cylinders of acetylene and oxygen may be stored secured on a cart or used adjacent to each other without a partition. Additionally, single cylinders of acetylene and oxygen located at a work station (e.g. chained to a wall or building column or secured on a cart) shall be considered "in service".

The OSHA Interpretation has been very helpful for the past 6 years, but this new item of actually putting it into the OSHA standards and reference the new CGA G-1 will give you and your customers something to show an OSHA inspector if they try to write up a citation on this item.

Feel free to contact me if you have any questions.

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TRAFFIC BULLETIN

March 2012

Shipping Papers – Updated Basic Description

By January 1, 2013, you must show the Basic Description for your hazardous materials on your shipping papers (manifest) using this order: Identification Number (UN number), Shipping Name, Hazard Class, and Packing Group (if required).

The old method of Shipping Name, Hazard Class, Identification Number, and Packing Group is permitted until 1-1-2013.

The new order was published in the Federal Register in December 2006 and made January 1, 2007 the effective date for the new order of the basic description. In that same Final Rule, they extended the effective date for the change of order of the shipping description for 6 years making the real effective compliance date January 1, 2013. That gave everyone a 6 year phase in period to make changes to their shipping papers and that comes to an end at the end of this year.

Describing Hazardous Materials, 172.202 (a)

Any person who offers a shipment of hazardous materials for transport must describe the hazardous material on shipping papers in a specified manner using the applicable information from the Hazardous Materials Table. At minimum, this shipping description must include the:

1. UN/NA Identification Number
2. Proper Shipping Name
3. Hazard Class and subsidiary hazards shown in column 6 of the hazmat table
4. Packing Group, if required
5. The Total Quantity by net or gross mass, capacity, or as otherwise appropriate.

Please note: For cylinders of Class 2 (compressed gases) materials and bulk packaging, you are not required to have the pounds or total pounds but some indication of total quantity must be shown (e.g., "10 cylinders" or "1 cargo tank").

Basic Description, 172.202(b)

The first four (4) items — often referred to as the material's basic description — must be shown in sequence, with no additional information interspersed unless authorized by the regulations. The identification number must include the letters "UN" or "NA", as appropriate. The packing group must be shown in Roman numerals and may be preceded by the letters "PG" (e.g., UN 1203, Gasoline, 3, PG II).





TRAFFIC BULLETIN

Total Quantity and Type of Package, 172.202

The fifth required item, the material's total quantity and type of package, may be placed either before, after, or both before and after the basic description. In addition, it must include the appropriate unit of measure (such as pounds, gallons, kilograms, and liters). Please note that compressed gases (class 2 materials) are not required to show the volume or weight but we are required to show the unit of measure (cyl.) and quantity. While the regulations do not typically allow abbreviations, they are permitted when specifying the material's weight or volume (lbs, L) or the type of packaging (cyl.).

There are several other items required on shipping papers. Please read the Traffic Bulletins from May and June 2011 for more details. If you need copies of these, just ask.

I have a good example of a proper shipping paper that I can send you upon request.

Feel free to contact me if you have questions.

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MEDICAL GAS BULLETIN

3/01/2012

Food Gas Update

The FDA just issued new guidance about the records we must keep for incoming food gas bulk receipts and outgoing food gas shipments. Join March's GAWDA Food Gas Roundtable (Friday, March 2 at 2:00 PM) for the latest information and sample procedures to comply with the new requirements. Contact [Juliet](#) for a reservation in this webinar.

More Legislative Activities – Thanks!

The State of Maine proposed costly and unnecessary new rules for Verified Accredited Wholesale Distributor (VAWD) compliance. VAWD would have cost each distributor many thousands of dollars each year without any improvement to public health. If successful in Maine, other states would have likely also adopted their own VAWD regulations.

Maine Oxy, along with partners in CGA, was successful in convincing the Maine Board of Pharmacy to not mandate VAWD for any drug distributors. **THANK YOU to Maine Oxy!!!** for your assistance.

March Medical Gas Roundtable

These GAWDA Medical Gas roundtables are excellent sources of CGMP training and the latest industry compliance news. On Friday, March 2, we will cover **Subpart D - Equipment**. Specific maintenance documentation for the Servomex will be available for downloading.

In addition we will be conducting the following additional training on March 2:

- **Specialty Gas** - Measuring and Controlling Uncertainty in Gravimetric Fill Systems (ISO 6142) - Includes a sample Excel spreadsheet to help make the calculations easier.
- **Medical Device Gas** - QSR Subparts C D E & F- Design Controls, Document Controls, Purchasing Controls, Identification and Traceability.

Contact tom@asteriskllc.com if you need more information about joining these seminars.

Training Schedule - 2012

GAWDA Professional Compliance Seminars

The latest, documented training you need for DOT and FDA compliance...

- March 27-29 Ball Ground, GA
- October 2-4 Aurora, IL

Click the link below for more information:

<http://asteriskllc.com/GAWDAProfessionalComplianceSeminarRegistration2012.pdf>





MEDICAL GAS 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. **Servomex Filter Check** – Verify that the filter inspection record is current for your Servomex oxygen analyzer. The frequency of inspection is listed in the operator's manual for your instrument.
2. **Calibrations** – Be sure that your thermometers, vacuum gauges and high pressure gauges are calibrated according to your SOPs.
3. **Daily Vacuum Gauge Verification** – Be sure you have a record that your vacuum gauge needles read zero at atmospheric pressure. This record should be made each day the vacuum gauge is used. **Nitrous Oxide** – Be sure that your nitrous oxide is secure.

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