



SAFETY & TECHNOLOGY ORGANIZER

NOVEMBER 2012

ENCLOSED

Safety Topic: "Carbon Monoxide"

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

Traffic Bulletin: "Qualifying a New Driver"

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

Medical Gas Bulletin: "Hold the Date - November 2, 2012 - Free Online Registration Workshop", and FAQs, Medical Gas Roundtables, 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 _____

Carbon Monoxide

I have a few safety topics that warrant repeating on an annual basis. One is the proper filling and storage of LPG products and another is carbon monoxide asphyxiation. With the heating season coming upon us, now is the time to remind people about carbon monoxide.

Do you know the leading cause of poisoning in the America? It is odorless. It is colorless. It is tasteless. It is deadly. It is carbon monoxide. Mild poisoning can cause such symptoms as nausea, dizziness or headaches while severe poisoning can result in brain or heart damage or even death.

Carbon monoxide (CO) is a gas produced during the incomplete combustion of carbon containing substances (paper, wood, and petroleum products). Forklifts powered by gasoline, natural gas, or propane may emit dangerous levels of CO. Because CO has no warning properties, employees can be exposed to high levels without realizing that there is a problem. This also applies to other gasoline, natural gas, or propane fueled vehicles, power tools, or other equipment used indoors, such as floor buffers, pressure washers, ice cleaners used to resurface ice rinks, or unvented space heaters.

The most effective way to keep CO concentrations below the 35 parts per million of air (ppm) eight hour time-weighted average permissible and the ceiling of 200 ppm (as measured over a 15 minute period) (individual State regulations may be more stringent) is to utilize one or more of the following controls:

Suggestions for Employers:

- Where possible, substitute equipment that doesn't produce CO or Nitrogen Oxides (NO_x) (e.g. electric forklifts).
- Ensure proper maintenance of forklifts to reduce emissions.
- Maintain appliances and equipment in good order, adjusting flames, burners and drafts to reduce the formation of carbon monoxide.
- Do not allow forklifts to idle while waiting to resume operations.
- Ensure proper ventilation of work areas. This is especially a potential problem during periods of cold weather when shop and warehouse doors and windows are shut tight and ventilation is restricted.



Suggestions for Employers (continued):

- Use CO sensors or alarms; conduct periodic sampling of the work area for CO and NOx.
- Provide training to employees on the symptoms, sources, and prevention of CO and NOx poisoning.

Suggestions for Workers:

- Report to your employer any condition which might make carbon monoxide form or accumulate.
- Be alert to ventilation problems, especially in enclosed areas where gases of burning fuels may be released.
- Report complaints early. Don't overexert yourself if you suspect carbon monoxide poisoning. Physical activity increases the body's need for oxygen and thus increases the danger of poisoning.
- If you get sick, don't forget to tell your doctor about the possibility of exposure to carbon monoxide.
- Think carefully about your smoking habits. Tobacco, when burned, releases carbon monoxide which reduces the oxygen-carrying ability of the blood, even before any industrial exposure is added.

Two more areas to consider for fuel burning forklifts are:

1. Catalytic Converter

Recent technology has produced the catalytic converter. Once installed on the exhaust system of a fork lift, the converter works by chemically changing the carbon monoxide to relatively harmless carbon dioxide. This device is particularly valuable in situations where large numbers of fork lifts are operated in a limited space, or they can't be removed from service frequently. Catalytic converters can reduce carbon monoxide levels dramatically. Be aware that catalytic converters are not inexpensive, and the catalyst must be replaced periodically to maintain its effectiveness. Also to work properly, they require high exhaust gas temperatures, so they are not as effective when engines are run cold or for brief periods of time.

2. Carbon Monoxide Controller

This computer operated device detects the level of carbon monoxide in the exhaust pipe and automatically causes the proper air to fuel ration adjustments to be made in the engine. This device not only reduces carbon monoxide emissions, but has the added benefit of better fuel economy.



These control measures should also keep NOx exposures below the permissible exposure limit. It is important to recognize that although adjustment of carburetor balance on fueled engines can reduce CO emissions to safe levels, over-adjustment can actually increase NOx emissions to hazardous levels. It is very important to establish and maintain correct carburetor balance of fueled equipment used indoors.

What about the home?

The Consumer Product Safety Commission (CPSC) recommends installing at least one carbon monoxide detector per household, near the sleeping area. I highly recommend the **Nighthawk** CO Detector which is available almost everywhere. If you have any type of propane or natural gas burning equipment in your home, or a fire place, please consider the purchase of a CO detector. It is a gift of life that you would be giving your family. Don't forget relatives or friends. Many of them may not have heard about CO detectors and how effective they are at saving lives.

In the workplace:

Remember, any fuel burning apparatus will emit carbon monoxide. People think about forklifts and vehicles but tend to forget about the heating system or the hot water heater. I know of many instances where we have installed the Nighthawk CO Detector and found a cracked heat exchanger in a heater or a plugged vent pipe or chimney.

If you suspect carbon monoxide, get out of the area and into the open fresh air. Remove anyone overcome by the gas immediately and give the person artificial respiration. Call for a doctor and continue the artificial respiration until the doctor arrives or the person recovers. Prompt action can make the difference between life and death.

As always, if there are questions or items that I can help you with, please don't hesitate to contact me.

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TRAFFIC BULLETIN

November 2012

Qualifying a new driver

What are the things that I need to do to hire a driver? How fast can I put a new driver on the road? What items do I need to have in my hands before letting a driver go out on the road? What should I look for on the motor violation records when deciding to hire a driver? What minimums should I have for hiring a driver? These are some of the questions that I get when someone is trying to put on a new driver. The following guidance assumes that you want a **driver for loads requiring placards**.

Must have items before letting a person drive

1. DOT employment application
2. CDL with hazmat endorsement (if you have a tank(s) bolted to the vehicle with more than 119 gals of capacity, then you need a cargo tank endorsement)
3. Current medical card
4. A negative pre-employment drug test
5. Road test form and certificate (391.31(g)), or CDL license or certificate accepted in lieu of road test (391.33),
 - a. A CDL is acceptable.
 - b. Doubles / triples or cargo tankers must have a road test certification for the specific vehicle within the previous 3 years.

Items that you must have within 30 days

1. Motor vehicle record from states (391.23),
 - a. Must be obtained within 30 days of employment
 - b. Must be for the prior 3 years
 - c. Please note that the regulations require this within 30 days, but I suggest that you have this and review it prior to letting the driver drive your vehicles.
2. Previous employer information (391.23),
 - a. Must be obtained within 30 days of employment
 - b. Must be for the prior 3 years
 - c. The information must be verification of employment, any DOT accidents (or any other accidents that the previous employer may want to provide), and the drug and alcohol test results/violations.

Items needed later down the road

1. Annual review of driving record (391.25),
 - a. Must be done at least annually
 - b. Must keep a copy of the state inquiry results in the file.





TRAFFIC BULLETIN

Items needed later down the road (continued)

- c. The motor carrier must consider the driver's accident record and any evidence that the driver has violated laws governing the operation of motor vehicles, and must give great weight to violations, such as speeding, reckless driving, and operating while under the influence of alcohol or drugs, that indicate that the driver has exhibited a disregard for the safety of the public
2. List of violations (391.27) (part of the above annual review),
 - a. The driver shall provide a list of driving violations for the previous 12 months. The driver shall sign this list.
 - b. If the driver has already provided this information as required by 383.31, then they don't have to repeat the information. 383.31 requires that drivers notify their carrier within 30 days of any vehicle violations, other than parking tickets, of which they have been convicted. The notification must be in writing and contain the 7 items listed in 383.31.
3. Medical Examiner's Certificate kept current

Suggested items for the DQ file

1. Not required, but highly suggested is to have a copy of their current driver's license in the file.

Common Question

"What do I do about an existing employee that I want to make a driver?" The easiest and best thing to do is to treat the employee as a brand new hire. Make sure you have used a DOT driver application form. If not, then have them fill out a new DOT employee application. You still have to do the previous employer background checks for the previous 3 years, but you do get to count the time the employee was working for you in that 3 year time period. Be sure to do the pre-employment drug screen.

Driver Eligibility Requirements

Next month, I will have some suggestions to consider for driver eligibility requirements. The suggestions will have some minimum requirements and some items that would possibly disqualify a driver from being considered for a driver position.

If there are any questions regarding this Bulletin, please contact:

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MEDICAL GAS BULLETIN

11/01/2012

Hold the Date - November 2, 2012 **Free Online Registration Workshop**

The FDA has just announced that the Food Re-registration system is finally open as of 10/22/2012. All food gas production and warehousing facilities must re-register between 1 October and 31 December of even numbered years (beginning in 2012).

As a FREE benefit to GAWDA members, we will be holding an online GAWDA Food Gas Roundtable at 2:00 PM EDT on 11/2/2012. This roundtable will review the instructions for registration and for re-registration.

The roundtable will be in a workshop format. You will be able to download registration resources and a step-by-step whitepaper. You will be able to actually complete your registration and re-registration while on this webinar.

You can easily register/re-register your own facility. However, if you simply want AsteRisk to do this for you, the cost will be minimal (\$95, no surprises).

As always, we will have a convenient recording available after the webinar in case you are unable to attend the live session.

For more information on the FDA's announcement.... [click here](#)
To learn more about the Food Safety Modernization Act.... [click here](#)

Please [email Juliet](#) to reserve your seat at this workshop or to have us do your registration. You can call 508-883-0927 with questions.

Frequently Asked Questions

Q – Must I receive a Certificate of Analysis (CoA) with my bulk liquid Oxygen USP delivery?

A - Yes and No.... The FDA regulations do not actually require you to have a CoA on your incoming liquid oxygen delivery **IF** you conduct full USP testing (Assay, Identity and Odor). Since most plants do conduct full USP testing on their incoming Oxygen USP, the CoA is optional in many situations. However, **IF** your SOPs require you to have the CoA, you need to get the CoA from your supplier.





MEDICAL GAS BULLETIN

November Medical Gas Roundtable (11/02/2012) – Subparts H & I – Holding and Distribution, Laboratory Controls

These GAWDA Medical Gas roundtables are excellent sources of CGMP training and the latest industry compliance news. In November we will be discussing warehousing and laboratory operations.

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

- **QSR/ISO 17025** - Internal Audits and Management Reviews
- **Specialty Gas** - Gas Chromatography Fundamentals

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 juliet@asteriskllc.com.

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** - Verify that you have records that the filter on the Servomex has been inspected according to the frequency in your instrument manual.
2. **FIFO** - Assure your warehoused medical gases in inventory are rotated so that the oldest stock is distributed first. The inventory is rotated First-In-First-Out (FIFO).

Segregation – Be sure your full medical gas cylinders are segregated from your industrial gas cylinders.

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