



## ***SAFETY & TECHNOLOGY ORGANIZER***

**MARCH 2014**

### ***ENCLOSED***

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#### **Safety Topic: “Cylinder Loading Dock Safety”**

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

#### **Traffic Bulletin: “Hazmat Security Program Update”**

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

#### **Medical Gas Bulletin: FAQs, Medical Gas Roundtable, 2014 Training Schedule and Micro-audit**

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

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*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 \_\_\_\_\_

## CYLINDER LOADING DOCK SAFETY

This month's Safety Topic is the latest sample safety practice developed by the GAWDA Safety Committee. To see all of the published sample safety practices, please see the GAWDA website under the "News and Publications" tab and then the "Members Only Publications" and then scroll to the bottom of the page for the "Sample Safety Practices".

The purpose of this sample safety practice is to bring awareness to cylinder loading docks and the dangers they pose. This is an inspection criterion that may be used to inspect docks and loading areas in an effort to reduce injuries on loading docks.

### Dock Safety

- Make sure walkways, barriers including dock edges are marked or identified. Example would be yellow paint (as in picture below) yellow tape or any other means of identification.
- Display "authorized personnel only" sign
- Keep cylinders out of walkways
- Safety chains can be used for railing in the event a permanent railing system is not practical
- Anchor posts for railing chains must withstand at least 200 pounds of force from any direction
- Docks of 4' or higher must be protected by a standard railing system (not required for working side)
- Ensure area is clean by removing accumulated debris and containing spills
- Eliminate fall hazards in the loading dock area to reduce slips and trips
- Inspect area to ensure emergency equipment is not blocked or damaged
- Ensure dock and loading area are properly lighted
- Prevent jumping from ground to dock, dock to dock, or dock to ground
- Use appropriate ladders or walkways to access the dock
- Verify ladders from dock floor to dock surface meet current OSHA specifications





### **Dock to Vehicle Safety**

- Ensure that dock plates, if provided, are designed for appropriate loads
- Toe cleats or similar are needed for dock plates to prevent movement during loading
- Dock levelers, if provided, are returned to a level, stored position after use
- Inspect trailer or truck floor before entering it with a forklift
- Provide cover to keep rain or snow off loading docks
- Identify and mark overhead hazards such as pipes, doors, or electric wires
- Keep a safe distance from the edge of the dock
- Avoid backing to the edge of the dock
- If loading by forklift, provide wheel chocks for vehicles and enforce their usage
- If trailer is spotted at your dock, inspect landing gear and jack stands for integrity

Many thanks to the members of the Safety Committee for the work on items like the above.

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# TRAFFIC BULLETIN

March 2014

## Hazmat Security Program Update

**Back in 2010**, the Pipeline and Hazardous Materials Safety Administration published a final rule in HM-232F narrowing the list of materials subject to the security plan requirements and reducing the regulatory costs and paperwork burden. The final rule, issued in consultation with the Transportation Security Administration, was developed in response to petitions from industry groups arguing that not all placardable amounts of hazardous materials were capable of being used as weapons and thus did not require security plans.

PHMSA published its final rule so that the list of materials requiring a security plan corresponds with the United Nations Model Regulations for the Transport of Dangerous Goods and the TSA's list of Highly Security Sensitive Hazardous Materials. A variety of changes have been made to the requirements for various classes of hazardous materials. Please refer to 49 CFR 172.800 for all the details on whom this applies to.

The following table is a summary of the hazard classes that affect most of our members.

Class	Current threshold	Proposed threshold	Change
2.1	A quantity requiring placarding	>3,000 L in a single packaging	Security plan not required for 3,000 L (793 gallons) or less.
2.2	A quantity requiring placarding	Not subject except for oxygen and gases with a subsidiary 5.1 hazard (<3,000 L (793 gallons) in a single packaging).	Security plan not required for most non- flammable, non-poisonous compressed gas shipments.
2.3	Any quantity	Any quantity	None.
3	A quantity requiring placarding	>3,000 L (793 gallons) in a single packaging and any quantity of Class 3 desensitized explosives.	Security plan not required for 3,000 L (793 gallons) or less except for desensitized explosives.
5.1	A quantity requiring placarding	PG I and II liquids, perchlorates, ammonium nitrate (including fertilizers) in quantities >3,000 L (793 gallons) in a single packaging.	Security plan not required for PG III liquids or unlisted solids.
6.1	A quantity requiring placarding; any quantity of PIH material.	Any quantity of PG I; >3,000 L (793 gallons) for PG II and III.	Security plan not required for 3,000 L (793 gallons) or less of PG II and III.





# TRAFFIC BULLETIN

Here is the list of gases in the final rule that have a subsidiary hazard of 5.1 and still require the security plan.

Proper shipping name	Hazard class	Identification Nos.	Label code
Air, refrigerated liquid, (cryogenic liquid)	2.2	UN1003	2.2, 5.1
Air, refrigerated liquid, (cryogenic liquid) non-pressurized	2.2	UN1003	2.2, 5.1
Compressed gas, oxidizing, n.o.s.	2.2	UN3156	2.2, 5.1
Gas, refrigerated liquid, oxidizing, n.o.s. (cryogenic liquid)	2.2	UN3311	2.2, 5.1
Liquefied gas, oxidizing, n.o.s.	2.2	UN3157	2.2, 5.1
Nitrous oxide	2.2	UN1070	2.2, 5.1
Nitrous oxide, refrigerated liquid	2.2	UN2201	2.2, 5.1
Oxygen, compressed	2.2	UN1072	2.2, 5.1
Oxygen, refrigerated liquid (cryogenic liquid)	2.2	UN1073	2.2, 5.1

The final rule became effective on October 1, 2010, but voluntary compliance was authorized as of April 8, 2010. **This means that many of the GAWDA members were no longer required to have the hazmat security plan as of 4-8-2010.**

For those still required to have a security plan, there are some new changes required in the written plan. Please read 49 CFR 172.802 for details on all the required components of the written security plan. Here is a sample of the changes that came with the 2010 revision:

172.802 (b) The security plan must also include the following:

- (1) Identification by job title of the senior management official responsible for overall development and implementation of the security plan;
- (2) Security duties for each position or department that is responsible for implementing the plan or a portion of the plan and the process of notifying employees when specific elements of the security plan must be implemented; and
- (3) A plan for training hazmat employees in accordance with § 172.704 (a)(4) and (a)(5) of this part.

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

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# MEDICAL GAS BULLETIN

03/01/2014

## Frequently Asked Questions

**Q** – Why does my Drug Listing have the “Unapproved Medical Gas” warning statement? How can I remove this statement?

**A** – Medical gases, like oxygen, have been in use for well over a hundred years... Even before the creation of the FDA. The FDA has approved many drugs over the years... but the common medical gases were never actually formally approved.

Several years ago, we began to see statements on our medical gas listings that said “unapproved medical gas”. Other safety warnings were also placed on the listings that could have been a concern to consumers.

Category	DEA Schedule	Marketing Status
HUMAN PRESCRIPTION DRUG LABEL		unapproved medical gas

NOTE: THIS DRUG HAS NOT BEEN FOUND BY FDA TO BE SAFE AND EFFECTIVE, AND THIS LABELING HAS NOT BEEN APPROVED BY FDA. For further information about unapproved drugs, click here.

Just recently, the FDA has established a process to remove these “unapproved” statements and warnings. On January 31, 2014, we conducted an 18-minute teleconference explaining how to remove the “unapproved medical gas” warning statement from your listing. You can get the teleconference handout and sample forms/letter from:

[http://www.gawda.org/uploadedFiles/Site\\_Framework/Home\\_Page/FDA Medical Gas Certificati on Compliance Alert 20140131.pdf](http://www.gawda.org/uploadedFiles/Site_Framework/Home_Page/FDA_Medical_Gas_Certificati_on_Compliance_Alert_20140131.pdf)

You can also listen to a recording of the consultants teleconference about Medical Gas Certification on the GAWDA home page. You can reach it here:

[http://www.aws.org/GAWDA/audio/Medical Gas Update 20140131.WAV](http://www.aws.org/GAWDA/audio/Medical_Gas_Update_20140131.WAV)

## March Medical Gas Roundtable

These GAWDA Medical Gas roundtables are excellent sources of CGMP training and the latest industry compliance news. On Friday, March 28, we will cover **Subparts D - Equipment**. Sample equipment maintenance records will be available for downloading during the training.

In addition we will be conducting the following additional training on March 28:

- **Specialty Gas** – Gravimetric Filling Safe Practices - Includes cylinder filling rules for O<sub>2</sub>/CO<sub>2</sub> mixtures, fuel-oxidizer basic rules and other procedures to maximize safety.
- **Medical Device Gas Compliance** - QSR Subparts C D E & F- Design Controls, Document Controls, Purchasing Controls, Identification and Traceability
- **Food Gas Roundtable** – the latest information about food gas regulations is reviewed – The sample Food Gas SOPs are available for downloading during the seminar.

If you would like to receive invitations to the training webinars, just send an email to [juliet@asteriskllc.com](mailto:juliet@asteriskllc.com).





# MEDICAL GAS BULLETIN

## Training Schedule - 2014

### GAWDA Professional Compliance Seminars

In addition to the latest, documented training you need for DOT and FDA compliance, Chart Inc. will be presenting a four-hour class on the operation and maintenance of your standard liquid cylinder. During the class you will receive a refresher on design and safe handling of liquid cylinders, proper filling techniques, and the internal workings of a liquid cylinder.

- April 22 – 24 at Chart Inc., Ball Ground, GA

Click the link below for more information:

<http://asteriskllc.com/GAWDAProfessionalComplianceSeminarRegistration2014.pdf>

### 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.

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