



SAFETY & TECHNOLOGY ORGANIZER

APRIL 2014

ENCLOSED

Safety Topic: “Propane Cylinder Fire”

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

Traffic Bulletin: “Rented or Leased Vehicles”

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

Medical Gas Bulletin: FAQ (What are the FDA issues around security?), Medical Gas Roundtable 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 _____

Propane Cylinder Fire

This is a recap of a propane incident that happened in 2006 and it is still a very important safety topic for today.

A California propane marketer settled a wrongful death lawsuit for \$4.5 million. The suit arose from the death of a high school teacher when propane leaking from a cylinder was ignited. The cylinder manufacturer settled for \$350,000.

There is an article on this accident at the following website. Read pages 14 and 20.

<http://www.georgiapropane.org/uploadedFiles/State/Georgia/Members/11319%20JUNE%20MAG%20GPI%202.pdf>

The lawsuit alleged that the defendant overfilled the cylinders, failed to inspect them for certification, failed to properly train the employee who filled the cylinders, and failed to prevent Albini from transporting them horizontally. The lawsuit alleged that cylinder manufacturer failed to adequately warn consumers of the risks of horizontally transporting propane cylinders and failed to incorporate an OPD into the cylinder's design.

Jim Albini took two 100-pound propane cylinders to defendant Durnall and Campora Propane to be filled. After the cylinders were filled with propane, Albini drove home and parked his pickup truck in the driveway. A couple of hours later, one of the cylinders began hissing and releasing propane. From an article on the accident, it is believed that a valve was either inadvertently opened or broke when Albini attempted to unload the cylinders, or opened after heat of the day warmed up the cylinders while they were in the back of the pickup. The neighbor saw a large cloud of propane vapor venting into the air from the back of Albini's truck. Jim Albini was standing on the ground behind the truck. Suddenly, the propane cloud exploded in a fireball, engulfing him. The skin was burned off more than 80% of his body. Albini was never again able to speak with anyone due to the severity of his pain and injuries. Jim Albini died two months after the explosion due to complications from his severe burn injuries.

In another article on this, it was stated that the propane filling company regularly gave him verbal warnings against transporting cylinders in the bed of his pickup truck in a horizontal position. He had been leasing and filling his cylinders from the marketer for more than 20 years.

Things to Consider:

DOT regulations state the following: *49 CFR 173.301 (f)(2) After December 31, 2003, a pressure relief device, when installed, must be in communication with the vapor space of a cylinder containing a Division 2.1 (flammable gas) material.* Very simply, we don't lay down LPG cylinders unless they are designed to do so, i.e. forklift cylinders but only when positioned so the safety is on the up side. That is the purpose of the indexing pin and hole on the forklift and cylinder.



In this accident, with the cylinders being horizontal, the liquid propane was in contact with the pressure relief device and instead of gas escaping, there would have been liquid propane. Instead of a problem, there was 270 times the problem because the expansion of liquid propane to gas is 270 times.

NFPA 58 also has a couple of more rules that our membership needs to bear in mind. When transporting cylinders in an enclosed vehicle, there is a limit of 45 pounds of product per cylinder and a total of 90 pounds in all cylinders transported in the vehicle.

Please note that GAWDA has issued many warnings over the years about transporting cylinders in vehicles. GAWDA has a brochure on a suggested policy and guidelines entitled "Policy on Auto Transportation of Compressed Gas Cylinders". If you need a copy of this, please ask and I will send it to you.

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Pickup truck bed collapse





TRAFFIC BULLETIN

Rented or Leased Vehicles

A common question I get is “**How do I mark the doors on rented or leased vehicles?**”

Sometimes the rented commercial vehicles are already marked with the name and USDOT number of the rental company/owner. Are you required to display your own company name and DOT number on these vehicles?

The regulations are pretty clear. All commercial motor vehicles operated by your company must be legally marked with your company name as listed on your MCS-150 and your USDOT number. This must be done before the vehicle is operated on public roads. All rented and leased vehicles operated by your company are required to comply with the DOT marking rule.

What about vehicles rented for short periods of time – 30 days or less? The rules still apply; they must be properly identified before you operate them. However, the regulations give you two options for these short-term rental vehicles:

1. The vehicle may display your legal trade name and USDOT number; or
2. The vehicle may display the legal trade name and USDOT number of the owner/lessor of the vehicle and carry in the vehicle the rental agreement between you (the renting carrier) and the lessor/owner. The rental agreement must clearly show:
 - Your legal name and the complete physical address of your principal place of business;
 - Your USDOT number from the FMCSA. If you don't have a USDOT number, you must show the following additional information in the rental agreement:
 - Information stating whether you are engaged in "interstate" or "intrastate" commerce; and
 - Information showing whether you are transporting hazardous materials in the rented CMV.
 - The sentence: "This lessor cooperates with all Federal, State, and local law enforcement officials nationwide to provide the identity of customers who operate this rental CMV."
 - The rental agreement must be carried on the rental CMV during the full term of the rental agreement.

The easy answer for marking rented or leased vehicles is to put your company name and DOT number on the sides of the vehicle. Otherwise, you must make sure the rental agreement contains all the required items and is carried on the vehicle.





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Regardless of which method you choose, you should make sure that the vehicle leasing company knows that you may haul hazardous materials. Also, make sure your insurance company knows about your leased or rented vehicle, and make sure your auto insurance satisfies the insurance requirements of the leasing or rental company, and DOT.

The DOT marking rules are found in 49 CFR 390.21.

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

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MEDICAL GAS BULLETIN

04/01/2014

Frequently Asked Questions

Q – What are the FDA issues around security?

A – The FDA does not have the same type of security regulations as the DOT. However, there are several security related issues.

Drug Storage

The 2003, Draft Guidance for Industry - Current Good Manufacturing Practice for Medical Gases summarizes the FDA thinking and regulations about medical gas security:

B. Security

Medical gas manufacturers are wholesale distributors who are subject to the requirements of § 205.50 - Minimum requirements for the storage and handling of prescription drugs and for the establishment and maintenance of prescription drug distribution records.

All facilities used for medical gas distribution must be secure from unauthorized entry (§ 205.50(b)(1)).

Entry into areas where medical gases are held must be limited to authorized personnel (§ 205.50(b)(1)(iii)). We recommend areas where nitrous oxide is held be especially secure.

The security requirements of § 205.50(b) apply to all facilities used for medical gas distribution. FDA interprets this regulation to include all facilities where loaded medical gas delivery trucks are parked prior to making deliveries, including at an employee's home when a loaded medical gas delivery truck is driven there and parked overnight for early morning runs.

A manufacturer could use an alarm system to secure the building and keep loading docks secure, rather than open and easily accessible.

Keep in mind that the Draft Guidance does not carry the same authority as the underlying regulations. However, it does represent the last published agency thinking about security and medical gases.

Nitrous Oxide

The FDA does not define “especially secure” storage areas for nitrous oxide. The Compressed Gas Association has published excellent guidelines for storing and securing nitrous oxide. GAWDA members can sign up for free access to these CGA resources. For further details, see:

- CGA G-8.3, *Safe Practices for Storage and Handling of Nitrous Oxide*
- CGA P-50, *Site Security Standard*
- CGA P-51, *Transportation Security Standard for the Compressed Gas Industry*
- CGA P-52, *Security Standard for Qualifying Customers Purchasing Compressed Gases*





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Though not all items will apply in all cases, consider the following:

- Inventory control systems to detect theft or loss
- Access controls
- Property fencing
- Secondary fencing for nitrous cylinders and bulk storage
- Lockout devices to secure valves on bulk storage
- Security systems, alarms, etc.
- Procedure to determine if a customer is legitimate

April Medical Gas Roundtable

These GAWDA Medical Gas roundtables are excellent sources of CGMP training and the latest industry compliance news. On **Friday, April 28**, we will cover **CGMP – Internal Auditor Training**. This will be especially useful for the personnel who conduct mock FDA audits in your company.

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

- Specialty Gas** - Analytical Method Validation for Medical Gases
- ISO 17025 Quality Management** - Proficiency Testing
- 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.

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. **Annual Record Review** – Verify that you have conducted and documented an annual records review for your medical gas production facility. Contact tom@asteriskllc.com for a sample form to easily document this requirement.
2. **Food Receipts** – Be sure that your food gas bulk receipt paperwork documents that you are receiving food or beverage grade product into your bulk tanks which are used to produce food gases (especially CO₂ and N₂)
3. **Food Lot Numbers** – Be sure you are using lot numbers on food grade gases. You must also have a lot number record of food gas shipments. This lot number record may be kept electronically.

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