

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

**JUNE 2015**

### ***ENCLOSED***

---

**Safety Topic: LPG Filling and Storage**

Please contact Mike Dodd, GAWDA DOT, Security, OSHA & EPA Consultant for more information.

**Traffic Bulletin: Drug and Alcohol Policy**

Please contact Mike Dodd for more information.

**Medical Gas Bulletin:**

- 1. What is the correct span gas for the medical oxygen analysis?**
- 2. FDA Issues New Guidelines for Inspections**
- 3. June Medical Gas Roundtable – CGMP - How to Survive an FDA Audit**
- 4. Micro Audit Suggestions**

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 \_\_\_\_\_

## JUNE 2015 Safety Topic

This month's Safety Topic is to remind people of the upcoming hot months of summer and the problems of overfilling LPG cylinders. This Topic is not meant to provide all the details of proper filling and storage of LPG cylinders. See **Filling and Storage** later in this Topic.

### Hot Summer Days

The extreme heat of the summer months will cause overfilled cylinders to begin venting product and this venting product can be liquid which expands 270 times the volume when going from a liquid to a gas. Provide an ignition source and you have the equation for big trouble.

### Key Mistakes

A very common mistake that I find is an employee putting a cylinder on the scale and then sliding the weight on the beam or adding weight to the electronic scale to add the weight of the product to the weight indicated on the scale. This doesn't take into consideration any residual in the cylinder. If product or any foreign substance is inside the cylinder, the result is an overfilled cylinder.

You should be taking every opportunity to check the weight of the cylinder prior to filling. There are times that residual product will still be in the cylinder, but many times the cylinder is empty and this lets you check the tare weight.

Another common mistake I find is the employee not taking into consideration the weight of the filling valve and hose assembly. This results in under filling the cylinder. Not a safety issue but certainly a weights and measures issue and a customer satisfaction issue.

### Filling and Storage

There are many sources of information available on the proper procedures for filling and storage of LPG cylinders. Some of these sources are:

- NFPA 58, Liquefied Petroleum Gas Code; [www.nfpa.org](http://www.nfpa.org)
- National Propane Gas Association; [www.npga.org](http://www.npga.org)
- Your supplier



Some other storage issues to consider are:

**Empties upside down on trucks and docks:** The regulations require that the safety relief valve must be in contact with the gas vapor and not the liquid. Placing forklift style cylinders upside down on the truck or dock to denote they are “empties” is violating the regulations. If the safety would start to vent, you could be releasing liquid which expands about 270 times from liquid to gas.

**Cylinders in racks at customers (not pin indexed):** You should consider training your drivers and customers to place full or “empty” forklift cylinders into a storage rack with the safety relief valve pointed up. The index pins take care of this orientation while on the forklift, but many storage racks do not have the pins.

**Too many together in one place:** You should consider not storing too many flammable gas cylinders in one place or large groups. If you would ever have a problem, you will have a very big problem fast. Smaller groups and spread out between the groups will let you deal with smaller problems should you ever have a leaking / venting cylinders or a fire.

## Training

OSHA requires employees to be trained in the jobs they perform.

DOT requires employees filling cylinders to be trained, tested and certified every 3 years. This falls under the “Function Specific” training requirements in 172.704.

There is an excellent DVD training program, “Dispensing Propane Safely”, available from the Propane Education & Research Council, that includes a test that along with an employer certification will satisfy the DOT requirements.

## Final Thoughts

One of the most important items is the correct filling limit.

Tare Weight + Product Weight + Filling Assembly = Full Cylinder Scale Weight. Check the full cylinder weight prior to removing the filled cylinder from the scale.

Another important item is proper storage. Keep the required distances in mind and think about your cylinder storage. Think about the worst scenario and ask yourself if the way you are storing your cylinders would be a problem if you had a fire situation.

Finally, are your employees properly trained on cylinder inspection, cylinder selection, filling procedures, proper marking and labeling, handling and storage, and what they should do in emergency situations?

If there are any questions regarding this Safety Topic, please contact:

Michael Dodd

GAWDA DOT, Security, OSHA & EPA Consultant

P.O. Box 93

Poplar Bluff, MO 63902

(573) 718-2887

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





# TRAFFIC BULLETIN

**JUNE 2015**

Motor carriers are required to have written materials and a policy outlining their alcohol and drug program. These materials must be provided to each driver and written notice of the availability of these materials must be provided to union representatives. These materials must be distributed **prior** to the start of alcohol and drug testing. The regulations found in section **382.601** outline the eleven areas that **must** be covered in the education materials.

1. The name of the person designated by the employer to answer driver questions about the materials;
2. The categories of drivers who are subject to the provisions of Part 382;
3. Sufficient information about the safety-sensitive functions performed by those drivers to make clear what period of the work day the driver is required to be in compliance with Part 382;
4. Specific information concerning driver conduct that is prohibited;
5. The circumstances under which a driver will be tested for alcohol and/or drugs under Part 382;
6. The procedures that will be used to test for the presence of alcohol and drugs, protect the driver and the integrity of the testing processes, safeguard the validity of the test results, and ensure that those results are attributed to the correct driver;
7. The requirement that a driver submit to alcohol and drug tests administered in accordance with Part 382;
8. An explanation of what constitutes a refusal to submit to an alcohol or controlled substances test and the attendant consequences;
9. The consequences for drivers found to have violated Subpart B, including the requirement that the driver be removed immediately from safety-sensitive functions, and the procedures under Sec. 382.605;
10. The consequences for drivers found to have an alcohol concentration of 0.02 or greater but less than 0.04;
  
11. Information concerning:
  - The effects of alcohol and drug use on an individual's health, work, and personal life;
  - Signs and symptoms of an alcohol or drug problem (the driver's or a co-worker's); and





# TRAFFIC BULLETIN

- Available methods of intervening when an alcohol or drug problem is suspected, including confrontation, referral to any employee assistance program and or referral to management.

**Optional Provision** — The materials may also include information on additional employer policies with respect to the use or possession of alcohol or drugs, including any consequences for an employee found violating the company policies. These additional policies must be clearly identified as based on the employer's independent authority.

Again, these materials must be provided to each driver and written notice of the availability of these materials must be provided to union representatives. These materials must be distributed **prior** to the start of alcohol and drug testing. **Each driver must sign a receipt that he/she has received a copy of the materials.**

During audits of our members, if the member has written their own materials, I consistently find at least one if not many of these elements missing from their written policy. Please take some time to review your current written program to verify that the above items are covered.

A very easy way to comply with this requirement is to purchase a pamphlet from JJ Keller (825-H), ***Alcohol & Drug Testing: What Drivers Need to Know - Driver Handbook***. You simply write in a contact name and phone number on the last page of the pamphlet and then tear out and complete the first page, which is the required signed receipt. You do this for every CDL driver. I always suggest that this receipt be kept in the driver's drug and alcohol file. I also suggest that the receipt be stapled to the inside cover of the file so that it will never be tossed or misplaced by mistake.

Feel free to contact me if you have questions.

Michael Dodd

GAWDA DOT, Security, OSHA, & EPA Consultant

MLD Safety Associates, LLC

P.O. Box 93

Poplar Bluff, MO 63902

(573) 718-2887

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





# MEDICAL GAS BULLETIN

Medical Gas Bulletin  
06/01/2015

## Frequently Asked Questions

Q – What is the correct span gas for the medical oxygen analysis?

A – United States Pharmacopeia revised the Oxygen, USP monograph last year. The paramagnetic method became the official test method for the assay and identity test for medical oxygen. The official span gas has also been changed to 99.99% Oxygen. This is usually Oxygen Ultra High Purity Grade. Be sure you get a certificate of analysis for the individual cylinder you use as the span gas for the Servomex.

## FDA Issues New Guidelines for Inspections

The FDA recently published new guidance for the inspectors to use when visiting medical gas facilities. These guidelines clarify the most common questions to be asked by the inspectors as well as how to conduct an “abbreviated” vs. “full” inspection. The complete text of the FDA Compliance Program Guidance Manual, Compressed Medical Gases (7356.002E) is found at:

<http://www.fda.gov/downloads/ICECI/ComplianceManuals/ComplianceProgramManual/UCM125417.pdf>

We have incorporated the inspection questions from the guidance into the Self Assessment Spreadsheet. This spreadsheet makes it easy to quickly review and score your FDA medical gas compliance status. If you would like a copy of the Self Assessment Spreadsheet, contact [tom@asteriskllc.com](mailto:tom@asteriskllc.com).

## June Medical Gas Roundtable – CGMP - How to Survive an FDA Audit

These GAWDA Medical Gas roundtables are excellent sources of CGMP training and the latest industry compliance news. On June 26, 2015, we will cover strategies to survive an FDA audit. There are some simple items you can do before, during and after an FDA audit that will contribute to a better compliance outcome. In addition, we will make available a proven template document for responding in writing to FDA investigations.

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

- ISO 17025 - ISO 17025 - Establishing Calibration Schedules
- Specialty Gas - Robust and Efficient Gas Sampling Techniques
- 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 [amy@asteriskllc.com](mailto:amy@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:





# MEDICAL GAS BULLETIN

1. Annual Records Review – Verify that you have looked at your records to determine if changes are needed in your medical gas program. This review can be easily completed and documented. Contact Tom if you need a form to document your annual records review.
2. Electronic Registration and Listing – Be sure your electronic registration and listing is correct. Print out the web pages with your information below to document your compliance:  
Facility Registration - <http://www.accessdata.fda.gov/scripts/cder/drls/default.cfm>  
Drug Listing - <http://dailymed.nlm.nih.gov/dailymed/search.cfm>

Tom Badstubner  
GAWDA Medical Gas Consultant  
Telephone: 508-883-0927  
Email: [tom@asteriskllc.com](mailto:tom@asteriskllc.com)

