GAWDA
GASES AND WELDING DISTRIBUTORS ASSOCIATION

SAFETY & TECHNOLOGY ORGANIZER

AUGUST 2015

ENCLOSED

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Safety Topic: CGA Subscription Program. You could save hundreds, if not thousands of dollars by using this FREE GAWDA benefit.
Please contact Mike Dodd, GAWDA DOT, Security, OSHA & EPA Consultant for more information.

Traffic Bulletin: Unified Registration System (URS). The way you apply for a new DOT number file and your biennial updates to your MCS-150 (your USDOT number) will be changing in the near future.
Please contact Mike Dodd for more information.

Medical Gas Bulletin:

1. We need validation volunteers: We intend to conduct a validation study comparing the official USP span gas results with the manufacturers' recommended span gas.
2. GAWDA Professional Compliance Seminar – Audit Survival. (October 20 – 22, 2015) Weldcoa, Aurora, IL
3. August Medical Gas Roundtable (08/28/2015) – CGMP – Practical validation for the cylinder plant.
4. Webinars: ISO 17025 - ISO 17025 – Establishing NIST Traceability for analytical measurements; Specialty Gas - Fuel/Oxidizer Mixture Safe Practices ; Food Gas Rndtble.
5. Micro Audit Suggestions.

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

GASES AND WELDING DISTRIBUTORS ASSOCIATION
One Oakwood Blvd. Suite 195, Hollywood, Fl 33020 P(954)367-7728 F(954)367-7790

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.

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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 _____

August 2015 Safety Topic

CGA Subscription Program

In an effort to get the word out on a great program, I want to use this month's Safety Topic to promote the CGA Subscription Program. In a few quick words; **this is a fantastic program for our members! I think you would be nuts not to take advantage of this offer.** Here is the reason why. The free program could potential be worth several hundreds of dollars if not into the thousands of dollars of savings depending on how many of the CGA pamphlets you need in your business.

CGA will provide free subscription access to all electronic publications, except for the *CGA Handbook of Compressed Gases* and all video items, as well as CGA member pricing for hardcopy publications, to one person per location from each GAWDA member in their Distributor and Canadian Distributor membership categories.

All this is in exchange for the GAWDA member submitting their annual OSHA 300A data to the CGA contact. Data of individual companies are held in confidence and are not shared with any person outside of CGA staff, including CGA or GAWDA members. It is only shared with your permission.

Safety Awards - To date, the following members have been recognized for their safety improvement at the CGA Annual Convention and the GAWDA Annual Convention (Less than / More than 100,000 Employee Exposure Hours):

- 2011 - Willard C. Starcher, Inc. and Coastal Welding Supply, Inc.
- 2012 - Minneapolis Oxygen Company and Melo's Gas and Gear
- 2013 - Cryo Weld Corporation and Lampton Welding Supply
- 2014 – To be announced at the 2015 GAWDA Annual Convention

Requirements? To qualify, you must:

- Be a distributor member of GAWDA in good standing,
- Be from GAWDA's Distributor or Canadian Distributor membership category,
- Not be a former member of CGA with a membership termination date later than October 10, 2011,
- Provide the required safety data for a minimum of the calendar year prior to the subscription access request for access to the publications plus the prior four years to be eligible to win the safety improvement award.

Cost?

- This is a free benefit of GAWDA membership

What Publications Should I Get? There are approximately 300 publications available. Here are a small sampling of the "must have" publications:

- **CGA C-10**, Guidelines to Prepare Cylinders and Tubes for Gas Service and Changes in Gas Service
- **CGA C-13**, Guidelines for Periodic Visual Inspection and Requalification of Acetylene Cylinders
- **CGA C-6**, Standard for Visual Inspection of Steel Compressed Gas Cylinders
- **CGA C-7**, Guide to Classification and Labeling of Compressed Gases
- **CGA G-4.1**, Cleaning Equipment for Oxygen Service
- **CGA M-10.2**, Food Safety Management Systems and Good Manufacturing Practices for Food Gas Manufacturers at Cylinder Filling and Small Bulk Locations
- **CGA M-2**, General Guide for the Manufacture of Medical Gases Classified as Drugs
- **CGA P-15**, Filling of Industrial and Medical Nonflammable Compressed Gas Cylinders
- **CGA PS-40**, CGA Position Statement on Requirements for Installers of Bulk Medical Gas Supply Systems
- **CGA PS-42**, CGA Position Statement on Appropriate and Effective Regulations for Medical Gases within 21 CFR Parts 201, 205, and 210/211
- **CGA SA-22**, Safety Alert, Potential of Carbonated Beverage Systems to Create a Life-Threatening Environment

I can suggest many more publications that would should have for your business based on your operations. If you would like more suggestions, just contact me. Please remember that there are several CGA publications incorporated into Federal law via the 49 CFR 171.7 section. For those that apply to your business you will need the versions referenced in the CFR plus you should also have the most current version to follow.

How Do I Sign Up?

- Visit: http://www.cganet.com/customer/gawda.aspx
- Or email: GAWDASubscription@cganet.com
- Or call: 703-788-2757

It's simple…. It's a great benefit…. Do it. Take a few minutes and get signed up for this great CGA Subscription Program.

Michael Dodd

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TRAFFIC BULLETIN

August 2015

Unified Registration System (URS)

Overview

The way you apply for a new DOT number file and your biennial updates to your MCS-150 (your USDOT number) will be changing in the near future.

The Federal Motor Carrier Administration (FMCSA) has published a final rule that will combine various forms that carriers, freight forwarders and brokers currently use to register and update their information with the agency into a single, electronic "smart form." The new Unified Registration System will increase efficiency by streamlining the registration process for industry and enabling FMCSA to maintain more accurate information on the entities it regulates.

The streamlined web-based system will begin operating in 2015. At that time, all new applications and updates to existing records will be handled through the new system.

What is the URS?

The Unified Registration System (URS) is a new electronic on-line registration system that will streamline and simplify the Federal Motor Carrier Safety Administration's (FMCSA) registration process and serve as a clearinghouse and depository of information on all entities regulated by the Agency, including motor carriers, brokers, freight forwarders, intermodal equipment providers (IEPs), hazardous materials safety permit (HMSP) applicants/holders, and cargo tank manufacturing and repair facilities. The URS will combine multiple registration processes, information technology systems and forms into a single, electronic online registration process.

Who is required to comply with the URS rule?

This rule applies to all interstate motor carriers (private and for-hire motor carriers of passengers and freight), freight forwarders, brokers, IEPs, HMSP applicants/holders, and cargo tank manufacturing and repair facilities under FMCSA jurisdiction.

Effective Dates

There are two effective dates for this rule:

- On November 1, 2013, (1) the new enforcement provisions for failing to file biennial updates according to the schedule in 49 CFR 390.19(b)(2), and (2) a prohibition on operating with an inactive USDOT Number will take effect.
- On October 23, 2015, the Agency will require all entities registering or providing information to the Agency to do so through the URS electronic online registration process.

TRAFFIC BULLETIN

FMCSA set November 1, 2013 as the compliance date for the biennial update requirements because motor carriers are already required to update their registration information biennially under 49 CFR 390.19 and the information is very valuable to the Agency in carrying out its safety mission.

The October 23, 2015 effective date to comply with the remaining URS requirements is to provide sufficient time for the Agency to launch the new URS website.

Benefits of the new URS rule

The new rule will streamline manual processes and combine several forms regulated entities are required to submit into one unified online registration process, thereby saving time and money for the industry and FMCSA. The Agency estimates that industry will see total savings of almost $9 million from time and fees over a ten year period.

This rule will also improve the ability for FMCSA to locate small and medium-sized private and exempt for-hire motor carriers for enforcement action, because investigators will be able to work with designated process agents to locate and/or serve documents on hard-to-find motor carriers.

The Agency estimated in its Regulatory Impact Analysis that 16 percent of new registrations are submitted through paper applications. These entities without access to the internet may use third party processing agents, internet access at public libraries, and kiosks at trucks stops and travel centers, among other options.

About the Rulemaking

FMCSA undertook this rulemaking to simplify and reduce the amount of time entities must spend filling out paperwork as part of the registration process as well as enable the Agency to maintain more accurate information on the entities subject to FMCSA's jurisdiction.

The DOT website for this new program is not up and running yet. When it becomes available, I will let everyone know through a GAWDA Connection notice or an updated Traffic Bulletin. For now I just wanted to let you know this program is coming.

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

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TRAFFIC BULLETIN

Medical Gas Bulletin
08/01/2015

We need validation volunteers

Last year, the United States Pharmacopeia (USP) revised the medical oxygen analysis monograph. The most significant change in the revised monograph was the instrumentation specified to analyze oxygen. The paramagnetic analytical method replaced the wet chemical (Orsat) method of analyzing medical oxygen. This change was long anticipated and welcome. The other, less well-known, change was the adoption of the official span gas for the paramagnetic oxygen analysis. The new span gas became Oxygen, 99.99+% (O_2, UHP).

Some GAWDA members have expressed interest in an alternate span gas for the oxygen analysis. The proposal is to use the same span gas that the instrument manufacturer specifies in the operator manual. Most paramagnetic oxygen analyzer manuals permit certified oxygen in the 99.2% to 100% range. We intend to conduct a validation study comparing the official USP span gas results with the manufacturers' recommended span gas. If the validation is successful, GAWDA members will have the option to use a more readily available span gas for their operations.

If you are interested in participating in the validation study, let Tom Badstubner know (tom@asteriskllc.com). There will be no charges for participating in this study, except your independent purchase of the challenge span gases and the time to complete the validation tests.

GAWDA Professional Compliance Seminar – Audit Survival

Hold The Date (October 20 – 22, 2015)… GAWDA Professional Compliance Seminar at Weldcoa, Aurora, IL. This seminar focuses on surviving DOT and FDA inspections.

August Medical Gas Roundtable (08/28/2015) – CGMP – Practical validation for the cylinder plant

These GAWDA Medical Gas roundtables are excellent sources of CGMP training and the latest industry compliance news. In August we will be discussing practical validation techniques for cylinder fill operations:

- sample systems
- check valves
- fill processes
- portable fill manifolds
- analytical methods.

This seminar focuses on ways to save money while improving compliance.

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

- ***ISO 17025 -*** ISO 17025 – Establishing NIST Traceability for analytical measurements
- ***Specialty Gas*** - Fuel/Oxidizer Mixture Safe Practices
- ***Food Gas Roundtable*** – Free resources, procedures and training for your food gas compliance.

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 trinh@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. **Portable Oxygen Manifolds –** If you are using a portable oxygen manifold, be sure you have validated and documented the manifold.
2. **Automatic, mechanical or electronic equipment –** Be sure all major equipment used to produce your medical gases are covered in a maintenance program. The equipment that needs calibration should be within the calibration date (gauges, thermometers, etc.).

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