



SAFETY & TECHNOLOGY ORGANIZER

OCTOBER 2014

ENCLOSED

Safety Topic: *Forklift Maintenance and Inspection*

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

Traffic Bulletin: *Medical Examiner Verification*

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

Medical Gas Bulletin: *CGA PS-42, Appropriate and Effective Regulations For Medical Gases within 21 CFR Parts 201, 205 and 210/211*

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



Forklift Maintenance and Inspection

The OSHA standard for powered industrial truck training requires that an employer provide training to truck operators on a variety of topics. Among these topics are vehicle inspection and maintenance that the operator will be required to perform.

Maintenance

1910.178 (q)(1) Any power-operated industrial truck not in safe operating condition shall be removed from service. All repairs shall be made by authorized personnel.

1910.178 (q)(7) Industrial trucks shall be examined before being placed in service, and shall not be placed in service if the examination shows any condition adversely affecting the safety of the vehicle. Such examination shall be made at least daily. Where industrial trucks are used on a round-the-clock basis, they shall be examined after each shift. Defects when found shall be immediately reported and corrected.

1910.178 (q)(10) Industrial trucks shall be kept in a clean condition, free of lint, excess oil, and grease. Noncombustible agents should be used for cleaning trucks. Low flash point (below 100 deg. F.) solvents shall not be used. High flash point (at or above 100 deg. F.) solvents may be used. Precautions regarding toxicity, ventilation, and fire hazard shall be consonant with the agent or solvent used.

1910.178 (q)(6) Additional counterweighting of fork trucks shall not be done unless approved by the truck manufacturer.

Inspection

The following checklists are being provided as part of OSHA's ongoing effort to assist employers and employees in ensuring that a safe and healthful workplace is provided. The lists serve as a guide only and may not be totally inclusive. Each type of powered industrial truck is unique and checklists pertinent to each type of vehicle should be modified accordingly. It is recommended that the manufacturer's instructions on vehicle maintenance and owner's and operator's responsibilities also be consulted.

Here are two OSHA websites that have sample inspection forms that you can copy into your word processor and modify to your particular powered industrial truck.

This first one is easier to copy from and make your inspection forms:

http://www.osha.gov/dte/library/pit/daily_pit_checklist.html

This site has information on most types of powered materials handling equipment:

http://www.osha.gov/dte/library/pit/pit_checklist.html



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

Michael Dodd

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TRAFFIC BULLETIN

October 2014

Medical Examiner Verification

As of May 21, 2014, the motor carrier must verify that their driver that had a DOT physical on or after May 21, 2014 was examined by a medical examiner that was listed on the National Registry of Certified Medical Examiners as of the date of the exam.

391.23 Investigation and inquiries.

(m)(1) The motor carrier must obtain an original or copy of the medical examiner's certificate issued in accordance with §391.43, and any medical variance on which the certification is based, and, beginning on or after May 21, 2014, verify the driver was certified by a medical examiner listed on the National Registry of Certified Medical Examiners as of the date of issuance of the medical examiner's certificate, and place the records in the driver qualification file, before allowing the driver to operate a CMV.

You can access the National Registry of Certified Medical Examiners at this website:

<https://nationalregistry.fmcsa.dot.gov/NRPublicUI/home.seam>

I have made a simple form shown below that you can use to document this verification process or you can make your own form.

This will be a new item to maintain in the driver's qualification file. The regulations do not specify a retention period but I would suggest attaching it to your copy of the driver's medical examination certificate that you are required to keep for 3 years.

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

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Medical Examiner Verification by the Motor Carrier





TRAFFIC BULLETIN

I have verified that the following medical examiner was on the National Registry of Certified Medical Examiners for the following driver:

Driver Name: _____

Medical Examiner Name: _____

National Registry Number: _____

Motor Carrier Company Name: _____

Verified by Motor Carrier Representative:

Print Name: _____

Signature: _____ Date: _____





MEDICAL GAS BULLETIN

Medical Gas Bulletin
10/01/2014

CGA PS-42, *Appropriate and Effective Regulations For Medical Gases within 21 CFR Parts 201, 205 and 210/211*

During the closing business meeting at the GAWDA Annual Convention in San Diego (9/23/2014), CGA President/CEO, Mike Tiller, urged all GAWDA members to download the new PS-42 and review it as a part of their FDA compliance program. When FDA or state inspectors have questions about how to interpret Current Good Manufacturing Practices, open PS-42 and review the section with them. The publication is organized according to the federal regulations in 21 CFR and should be easy to navigate. PS-42 provides:

- The text of relevant regulations
- The industry position on the regulation, and, most importantly
- The rationale for the industry position.

Mike Tiller further urged GAWDA members to notify Tom Badstubner if an inspector issues a violation contrary to a position in PS-42. This will allow GAWDA and CGA to contact agency leadership on your behalf and help develop more enforcement consistency.

You can get CGA PS-42, *Appropriate and Effective Regulations For Medical Gases within 21 CFR Parts 201, 205 and 210/211* at: http://www.cganet.com/customer/publication_detail.aspx?id=PS-42

October Medical Gas Roundtable (10/31/2014) – CGMP - High Pressure Prefill Inspection and Filling High Pressure Cylinders

These GAWDA Medical Gas roundtables are excellent sources of CGMP training and the latest industry compliance news. In October we will be discussing basic procedures to conduct a prefill inspection and how to fill medical high-pressure cylinders.

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

- **QSR/ISO 17025** - Complaints, Non-Conformances, Corrective Action/Preventive Action (CAPA)
- **Specialty Gas** - Measuring and Controlling Analytical Uncertainty (ISO 6143)

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 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:

1. **Filling Procedures** – Copy the fill procedure from your SOPs and watch a cylinder filling operator actually perform the procedure. This is the same technique the FDA uses to see if we are following our fill procedures.





MEDICAL GAS BULLETIN

2. **Documented Training** – Complete a training record for the cylinder filling operator that was observed. Attach a copy of the completed SOP to the training record.

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