

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

**FEBRUARY 2015**

### ***ENCLOSED***

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#### **Safety Topic: “Cylinder Decals”**

*. The following was published in the Gases & Welding Today magazine but I wanted to make sure this was available to those that might not see the magazine article.*

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

#### **Traffic Bulletin: “34 Hour Restart and Post Trip Inspections”**

Please contact Mike Dodd for more information.

#### **Medical Gas Bulletin: FAQs, Medical Gas Roundtable, GAWDA Professional Compliance Seminars, 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 Decals

The following was published in the Gases & Welding Today magazine but I wanted to make sure this was available to those that might not see the magazine article.

Revisions to the Occupational Safety and Health Administration's (OSHA) Hazard Communication Standard (29 CFR Part 1910.1200) brought the United States into alignment with the Globally Harmonized System of Classification and Labeling of Chemicals (GHS). These GHS changes require our cylinder decals to be revised by June 1st, 2015.

The Compressed Gas Association has published the new guidelines for compressed gas decals to comply with GHS. The new decal guidelines are found in CGA C-7-2014, "Guide To Classification And Labeling Of Compressed Gases" (10th Edition). We recommend that you download CGA C-7 at [http://www.cganet.com/customer/publication\\_detail.aspx?id=C-7](http://www.cganet.com/customer/publication_detail.aspx?id=C-7). After downloading the new labeling standard, compare your existing decals to the standard and ask your decal printer to make changes, as needed. The cylinder decal producing companies need to be using the 2014 edition of C-7. Ultimately, your company will be held accountable by DOT or OSHA for any cylinder decal errors found during inspections on the road, in your facilities, or at your customer locations so be sure your cylinder decals are done correctly.

This, and other CGA publications, is available at no charge to GAWDA members who participate in the GAWDA / CGA subscription program. For additional information about this program, click: <http://gawda.org/Resources/CGA-Subscription-Program/CGA-Subscription-Program/>

For more information about GHS and the OSHA Hazard Communication Standard, see: <https://www.osha.gov/dsg/hazcom/HCSFactsheet.html>

## Key Cylinder Decal Changes

The precautionary statements found on our cylinder decals are being updated to meet the new Globally Harmonized System (GHS) requirements. Most of the cylinder decal precautionary wording has changed in some fashion with either key warning words or added or modified warnings statements.

Another change is that many of the decals will need to have additional GHS pictograms added to the cylinder decal. These possible extra pictograms are specified at the bottom of each precautionary statement section in C-7. The pictograms have a specified size, color, and shape as outlined in section 5.2 of C-7. The pictogram shall be at least 16mm (0.63in) on each side inclusive of the red border and oriented as a square-on-point (diamond). If the required pictogram is already shown in the DOT label (the colored 1 1/4in on each side diamond), then you don't add it onto the cylinder decal as an additional pictogram.

## Deadline Dates

After June 1, 2015, cylinders that your company fills must be shipped with the updated cylinder decals. After Dec. 1, 2015, cylinders that are filled by outside vendors will have to have the updated cylinder decals on them when shipped by your company. Of course, we will have the older decals on



cylinders out at customers and will be bringing those back to our locations for many years to come. Currently nothing requires us to change the decals that are already at customers after the above deadlines.

By now, you should have already taken care of the first deadline item in the GHS program. By December 1, 2013, employers were required to train their workers on the new label elements and the Safety Data Sheet (SDS) format. Here is the OSHA website on this for more details: <http://www.osha.gov/Publications/OSHA3642.pdf>. This can be accomplished with a simple safety meeting talking about the new label elements and the SDS standardized 16-section format. Be sure to document the meeting.

Feel free to contact me if you have any questions.

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# TRAFFIC BULLETIN

## February 2015

### 34 Hour Restart and Post Trip Inspections

Congress Passed Appropriations Bill Revising 34-Hour Restart. President Obama has signed the fiscal year 2015 omnibus appropriations legislation that includes a provision to suspend changes to the 34-hour reset in the driver hours of service regulations.

The provision suspends the restrictions imposed on drivers using the 34-hour restart: requiring two periods between 1:00 a.m. and 5:00 a.m., and limiting the use of the restart to once every 168 hours. For now, companies no longer need to comply with these two requirements.

These changes to the restart rule will be in place through September 30, 2015, which will give Congress additional time to reconsider the restart requirements as part of the highway reauthorization legislation next year. All other parts of the 34-hour restart remain in place in the meantime.

In addition, the Federal Motor Carrier Safety Administration must conduct a field study on the effect of the restart requirements on carrier operations, safety performance, driver health and fatigue. The DOT Inspector General is mandated to review the FMCSA study plan and report to Congress on whether it meets the requirements of this directive.

FMCSA Announces Final Rule Eliminating No-Defect Inspection Reports. The Federal Motor Carrier Safety Administration has published a final rule eliminating the requirement to create and maintain driver vehicle inspection reports when no defect is noted. 79 Fed. Reg. 75437 (December 18, 2014).

The final rule is effective immediately. Drivers must still conduct pre- and post-trip vehicle inspections, but are no longer required to create a written report unless a defect is detected.

President Obama launched the Administration's Regulatory Review and Reform initiative in January 2011 by issuing Executive Order 13563. The order commenced a government-wide review of regulations with the goal of eliminating or modifying out-of-date, ineffective or overly-burdensome rules and reducing regulatory burdens on the private sector. The FMCSA claims the paperwork reduction from eliminating the no-defect DVIR reports will save companies \$1.7 billion annually.

Feel free to contact me on any of these items if you have questions.

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# MEDICAL GAS BULLETIN

Medical Gas Bulletin

02/01/2015

## Frequently Asked Questions

Q – It's a pain to remove the clear-coat on aluminum "Medical E" style cylinders in order to change to the new GHS compliant label. Can I simply put the GHS pictogram on a separate sticker on top of the clear-coat? Or, can I put the complete new GHS compliant label on top of the clear-coat?

A – No... on both questions. If you only put the pictogram on top of the clear-coat, the old style warnings are still visible on the old label. The old warning text does not comply with CGA C-7-2014 and would increase your compliance exposure and potentially your liability exposure. If you put a new label over the clear-coat on top of the old label, you would not be following FDA's Current Good Manufacturing Practice--- in that the container would have multiple and conflicting labels.

## February Medical Gas Roundtable

These GAWDA Medical Gas roundtables are excellent sources of CGMP training and the latest industry compliance news. On Friday, February 27, we will cover Subparts C - Buildings and Facilities. A sample facility maintenance and cleaning record will be available for downloading during the training.

In addition we will be conducting the following additional training on February 27:

- Specialty Gas - Analytical Math (Precision, Accuracy, Linearity, Chromatography Performance) - Includes an Excel spreadsheet to help make the calculations easier.
- ISO 17025 - Measurement Uncertainty – Includes an Excel spreadsheet to calculate your own measurement uncertainty.
- Food Gas Roundtable – the latest information about food gas regulations is reviewed – 21 CFR Part 110 Subpart A--General Provisions
  - § 110.10 - Personnel.
  - § 110.19 - Exclusions.

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).

## Training Schedule - 2015

GAWDA Professional Compliance Seminars

The latest, documented training you need for DOT and FDA compliance...

- March 31 – April 2 Chart, Ball Ground, GA
- October 20 - 22 Weldcoa, Aurora, IL

## 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. Cryogenic Hoses - Be sure that your cryogenic fill hoses are capped when not in use. (Homecare vans and large cryogenic containers)
2. Quarantine – Be sure you are quarantining cylinders that have been filled but not yet “released” by the Quality Control Unit.
3. Nitrous Oxide – Be sure that your nitrous oxide is secure.

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