

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

**FEBRUARY 2017**

### ***ENCLOSED***

**Safety Topic: Chemical Inventory Reporting (Emergency Planning and Community Right-to-Know Act (EPCRA))**

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

**Traffic Bulletin: LPG Vendor Filled Cylinders**

Please contact Mike Dodd for more information.

### **Medical Gas Bulletin:**

**1. New Food/Bev Gas Training Video**

**2. GAWDA Professional Compliance Seminars - 2017**

March 21 - 23, 2017 - Ball Ground, GA (at Chart)

October 17 - 19, 2017 - Aurora, IL (at Weldcoa)

**3. Gas Roundtable: February 24, Subparts C - Buildings and Facilities**

**Specialty Gas - Analytical Math (Precision, Accuracy, Linearity, Chromatography Performance) - Includes and Excel spreadsheet to help make the calculations easier.**

**Food Gas Roundtable – the latest information about food gas regulations is reviewed – Allergen Awareness & Personal Hygiene Training. The new sample Food Gas SOPs are available for downloading during the seminar.**

**4. Micro Audit Suggestions**

*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 \_\_\_\_\_

## Chemical Inventory Reporting

### Emergency Planning and Community Right-to-Know Act (EPCRA)

#### Bulk Storage Tanks or Bulk Trailers at Customer Sites

Do you own any bulk tanks at a customer site? An owner of bulk installations at a customer site has a duty under EPA regulations (Section 312) to notify the customer of their obligation to file Tier Form reports for each hazardous chemical that meets or exceeds the threshold planning quantities. **The reminder must be mailed to an appropriate customer representative by February 15, each year.** The supplier must document its efforts to notify its customers of these requirements.

If the customer owns the bulk unit, then you are not required to remind or notify them on their reporting obligations.

Hospitals are exempted from the notification and reporting obligations. (Section 311(e)(4) of EPCRA and 40 CFR 370.2 and 355.20 of the regulations exclude from the definition of "hazardous chemical" any substance to the extent it is used in a research laboratory or a hospital or other medical facility under the direct supervision of a technically qualified individual.)

A letter from the EPA Office of Enforcement dated March 4, 1991 states that "industrial gas suppliers who retain ownership of gas storage tanks or bulk trailers located on the premises of their customers" must make a good faith effort to notify such customer of the annual inventory reporting requirement. **This language does not include notifying customers who merely store gas in supplier-owned cylinders on the customer's property, however.**

Where the supplier does have a gas storage tank or bulk trailer on the customer's property, a good faith effort to notify the customer includes the following:

1. **Contract Language.** All new, reopened, renewed, or modified gas supply contracts must explicitly state the following language:



It is a responsibility of the Buyer to comply with all relevant reporting obligations under the Emergency Planning and Community right-to-Know Act of 1986, 42 U.S.C. §§11001-11049 (EPCRA, also commonly known as Title III of the Superfund Amendments Reauthorization Act of 1986 (SARA Title III)) resulting from the presence of the chemicals supplied under the agreement. Further, it is a responsibility of the Buyer to warn and protect its employees and others exposed to the hazards posed by the Buyer's storage and use of the product.

**2. Customer Notification.** Industrial gas suppliers must remind their customers by separate mail of the EPCRA reporting obligations the customer may incur from the presence of the chemicals supplied under the agreement, and provide in the reminder a source of EPCRA compliance information such as the EPCRA hotline (1-800-535-0202). The reminder must be mailed to an appropriate customer representative by February 15 of each year. The supplier must also document its efforts to notify its customers of these requirements.

### **SARA Title III Reporting**

**March 1 is the filing deadline for your Hazardous Chemical Inventory Report.** This report usually is submitted on a Tier I or Tier II Form. Keep in mind that your state may require one of these forms be used over the other or even have its own special form. Your state may even have different reporting quantities. Check with your State Emergency Response Commission (SERC) if you have questions regarding what form to use or other possible state requirements.

Please use the following website to check on your state reporting requirements:  
<http://www2.epa.gov/epcra-tier-i-and-tier-ii-reporting/state-tier-ii-reporting-requirements-and-procedures>

To download the Tier2 Submit 2016 software use this link:  
<http://www.epa.gov/epcra/tier2-submit-software>

If you submitted this report last year, use it as a guide. The report(s) must be submitted to your Local Emergency Planning Committee (LEPC), your SERC and the local fire department with jurisdiction over the facility. Use the above website to see how each state wants to receive their reports and get information on the SERC and LEPC.

Contact your SERC to find out the contact information for your LEPC.  
<http://www.epa.gov/epcra/state-emergency-response-commissions-contacts>

The EPCRA hotline for free help is 800-424-9346 or you can email them by going to this website: <http://www.epa.gov/epcra/forms/contact-us-about-emergency-planning-and-community-right-know-act-epcra>



Here is the EPCRA Frequent Questions website:  
[https://emergencymanagement.zendesk.com/hc/en-us#\\_ga=1.223967193.377971968.1446741998](https://emergencymanagement.zendesk.com/hc/en-us#_ga=1.223967193.377971968.1446741998)

Feel free to contact me if you have any questions.

Michael Dodd

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# Traffic Bulletin

## Traffic Bulletin

**February 2017**

### **LPG Vendor Filled Cylinders**

#### **Auditing the vendor**

Do you have LPG cylinders being filled by outside vendors? If yes, you should consider auditing them. There is a sample audit checklist at the end of this Bulletin.

#### **Cylinder Decals**

##### **DOT marking and labeling**

DOT allows several different shipping names to be used as well as using 1075 for the identification number in place of the ID number 1978 shown in the hazmat table. This allowance is shown under special provision 19. The stipulation is that whichever name and ID number you use; you must be consistent on the cylinder decal and on the shipping paper. They must match.

##### **Warning Label**

NFPA 58 (2014) 5.2.8.4 requires warning labels for LPG cylinders. Warning labels shall be applied to all cylinders of 100 pounds of LP capacity or less. An example of this warning label is typically found on the 20 pound cylinders and is the rectangular decal with lots of precautionary words and a diagram of the top of a cylinder and valve.

##### **OSHA Warning Label**

There is also a suggested label with OSHA warning information on all cylinders used in commercial or industrial service. You typically find these on forklift cylinders and it is the decal with the 3 colored diamonds.

#### **Checking Filled Weights (sampling)**

Are you periodically checking the weight of cylinders filled by your vendor? This is an excellent way to double check that your liquefied gas cylinders are being filled to the proper amounts.



# Traffic Bulletin

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

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## **Liquefied Petroleum Gas (LPG) Cylinder Filling Operations – Audit / Evaluation Checklist – of Third Party Cylinder Filling (Insert Company Name Here)**

Facility Name:

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Physical Address:

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Primary Contact: \_\_\_\_\_

Phone: \_\_\_\_\_ Email: \_\_\_\_\_

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Date of Review: \_\_\_\_\_ Reviewed By: \_\_\_\_\_

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# Traffic Bulletin

	Review Item	Yes	No	Remarks
1	Is the facility registered with the state? (some states require registration – for filling LPG cylinders)			
2	Are employees engaged with filling of LPG cylinders trained? (look for training certificate per 172.704 (d) and test for items that were trained on)			
3	Training documents on file – for one to review? (within 3 years?)			
4	Are LPG cylinders filled by weight – using scale? (All cylinders less than 200 lbs. of water capacity (WC) going onto streets must be filled by weight)			
5	If yes, to above, is scale check daily for accuracy? (checking for zero and against known weights)			
6	Is yes, is scale being checked by outside firm periodically – i.e. every six months, once a year per state guidelines?			
7	If no to answer #4 – are LPG cylinders filled by <i>spit-method</i> ? (If the cylinders have less than 200 lbs. WC and going onto the public streets, they must be filled by weight.)			
8	Does firm have a thorough Standard Operating Procedures (SOP) for filling LPG cylinders?			
9	Is firm willing to share written SOPs with you?			
10	Does firm have a cylinder prefill inspection procedure – i.e. visual inspection of cylinder for defects, cylinder markings, current test date, etc? (Are they using CGA C-6 for steel and C-6.3 for low pressure aluminum?)			
11	Are cylinder fillers aware of LPG cylinder visual testing schedule – outlined by DOT / NFPA 58 – i.e. the first requalification for a new cylinder is required within 12 years after the date of manufacture – then every 5 years thereafter if using the visual method?			
	Review Item	Yes	No	Remarks
12	Does firm perform visual requalification of LPG cylinders?			



# Traffic Bulletin

13	If yes to #12 – does firm have RIN issued by DOT? (Ask to see the authorization letter and check the expiration date on the authorization letter)		
14	If no to #12 – how does firm handle the visual inspection of LPG cylinders? (Do they send out of test cylinders to another vendor for requalification?) (If yes, then who do they use?)		
15	When LPG cylinders are requalified – are cylinders stamped or is firm using a decal – for current test dates and method – i.e. month-year-E=RIN (3-13 E V123456)?		
16	Does firm have process and procedure in place in the event a cylinder is overfilled?		
17	After cylinders are filled – is firm applying cylinder labels as needed? (DOT decal, OSHA warning decal, consumer warning decal)		
18	Are cylinder labels current with DOT / CGA regulations?		
19	Is the firm using proper Overfilling Prevention Device (OPD) cylinder valve in 4 lb through 40 lb grill-style cylinders?		
20	Does firm purge new cylinders of air and moisture? In addition to new cylinders – are cylinders that have been open to air due to cylinder maintenance shall be purged as well?		
21	Does the vendor confirm the fill weight after disconnecting the fill assembly?		

Remarks:

(CONTINUED)





# Traffic Bulletin

## Items to consider when the vendor is filling LPG cylinders on our property

(Insert Company Name Here\_

*Please note: The following items are in addition to the preceding pages.*

	Review Item	Yes	No	Remarks
1	Are the proper separation distances from other exposures being followed? (i.e., ignition sources, oxidizers, combustibles)			
2	Are they following your company PPE requirements?			
3	Are cylinders with less than 200 lbs. water capacity (WC) that will be going onto public streets being filled on a scale by weight?			
4	The only cylinders allowed to be filled by volume (spitter valve) are cylinders that will be used on the property where they are filled or if they are more than 200 lbs. WC going onto public streets. Is this policy followed?			
5	The preferred method of filling is to never use the spitter valve. Is this procedure being followed?			

Remarks:





# Medical Gas Bulletin

**Medical Gas Bulletin**  
**02/01/2017**

## **New Food/Bev Gas Training Video**

We have just completed a 60-minute training video on ***How to Implement a Food Safety Program*** in compliance with 21 CFR 117. The video also covers the essential forms available in the sample SOPs as well as details about how to complete the fill logs. This video is free to GAWDA distributor members and can be found in the Food and Beverage Compliance Dropbox. The presentation may be viewed as a PowerPoint slideshow or as a streaming video. Contact [tom@asteriskllc.com](mailto:tom@asteriskllc.com) for a link to the video.

## **February Medical Gas Roundtable**

These GAWDA Medical Gas roundtables are excellent sources of CGMP training and the latest industry compliance news. On Friday, February 24, 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 24:

- **Specialty Gas** - Analytical Math (Precision, Accuracy, Linearity, Chromatography Performance) - *Includes and Excel spreadsheet to help make the calculations easier.*
- **Food Gas Roundtable** – the latest information about food gas regulations is reviewed – Allergen Awareness & Personal Hygiene Training  
*The new 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 [jodie@asteriskllc.com](mailto:jodie@asteriskllc.com).

## **GAWDA Professional Compliance Seminars - 2017**

**- March 21 - 23, 2017 - Ball Ground, GA (at Chart)**

**- October 17 - 19, 2017 - Aurora, IL (at Weldcoa)**

[Click here for information or to register](#)





# Medical Gas Bulletin

## 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. 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. Download CGA P-50 for specific guidance on nitrous oxide security.

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