



SAFETY & TECHNOLOGY ORGANIZER

JUNE 2017

ENCLOSED

Safety Topic: LPG Filling and Storage

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

Traffic Bulletin: Do Your Drivers Have Second Jobs?

Please contact Mike Dodd for more information.

Medical Gas Bulletin:

- 1. GAWDA Professional Compliance Seminars – Summer 2017**
- 2. FDA Compliance ToDo List: FDA Drug Listing Review**
- 3. FAQ: How often must I send the Servomex to the factory for recalibration?**
- 4. June Medical Gas Roundtable – CGMP - How to Survive an FDA Audit**
- 5. June Webinars and Food Gas Roundtable**
- 6. 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 _____

LPG Filling and Storage

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
- National Propane Gas Association; 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:

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Traffic Bulletin

June 2017

Do Your Drivers Have Second Jobs?

Do your drivers have a second job? This is one of the those questions where many employers want to use the attitude of “Don’t ask, Don’t tell”, but that is not how DOT will handle it. DOT will hold the motor carrier responsible for all hours worked by the driver, whether it is at your business or any other job they may work (with selected exemptions for fire fighters and military time).

I have selected several DOT interpretations (specific questions and answers) that are directed to this question of a second job by a driver.

395.2

Question 11: Must non-transportation-related work for a motor carrier be recorded as on-duty time?

Guidance: Yes. All work for a motor carrier, whether compensated or not, must be recorded as on-duty time. The term "work" as used in the definition of "on-duty time" in §395.2 of the FMCSRs is not limited to driving or other non-transportation-related employment.

395.3

Question 7: What is the liability of a motor carrier for hours of service violations?

Guidance: The carrier is liable for violations of the hours of service regulations if it had or should have had the means by which to detect the violations. Liability under the FMCSRs does not depend upon actual knowledge of the violations.

Question 8: Are carriers liable for the actions of their employees even though the carrier contends that it did not require or permit the violations to occur?

Guidance: Yes. Carriers are liable for the actions of their employees. Neither intent to commit, nor actual knowledge of, a violation is a necessary element of that liability. Carriers "permit" violations of the hours of service regulations by their employees if they fail to have in place management systems that effectively prevent such violations.

395.8

Question 11: Is a driver who works for a motor carrier on an occasional basis and who is regularly employed by a non-motor carrier entity required to submit either records of duty status or a signed statement regarding the hours of service for all on-duty time as "on-duty time" as defined by §395.2?

Guidance: Yes.



Traffic Bulletin

Suggested way to handle this

I have people asking my opinion on how to handle and record these second job hours for their drivers. My best suggestion is to have the driver complete a driver log and list all the hours for their work and then have the driver list the hours worked for other employers on the same log. Have the driver sign and submit the log to you for the 6 month retention period. This will allow you to monitor the hours and ensure that the driver does not violate any of the hours of service rules. You should pay particular attention to the required 10 hours off between work cycles and that they don't exceed the 60 hours in 7 days and be behind the wheel of a commercial motor vehicle after the 60th hour.

If you have any particular situations where you may have questions, please contact me for help and clarification.

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

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Medical Gas Bulletin

Medical Gas Bulletin
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GAWDA Professional Compliance Seminars – Summer 2017

We will be hosting two compliance seminars this summer:

- Food/Bev Gas – Preventive Control Qualified Individual (PCQI) and HARPC workshop
 - June 7-8 at nexAir, Memphis, TN
 - July 25-26 at Norris Cylinder, Longview, TX (also being web-casted)
- DOT – LPG and Acetylene cylinder requalification and High-Pressure cylinder inspection
 - July 26-27 at Norris Cylinder, Longview, TX (also being web-casted)

Contact tom@asteriskllc.com if you would like more information about these seminars

FDA Compliance ToDo List

FDA Drug Listing Review – 21 CFR 207.30(a) specifies that drug manufacturers review their Drug Listings in June and December and make revisions, if needed. For example, verify that:

- The purity and cylinder sizes are correct
- The label is up-to-date. Be sure your GHS compliant label is posted to the FDA website.
- The locations distributing the drug are correctly identified.
- The “unapproved medical gas” marketing category has been removed and replaced with “New Drug Application”.

See item 2, below, under the “Micro-Audit” for website information. Contact tom@asteriskllc.com if you need any assistance with this.

Frequently Asked Questions

Q – How often must I send the Servomex to the factory for recalibration?

A – The Servomex oxygen analyzers are robust instruments. The instrument should be sent for repair when it is no longer stable or will not calibrate. The annual maintenance frequency mentioned in the operating manual is generally not needed to maintain the instrument’s reliability.

Servomex prepared a letter to explain the position. Contact jodie@asteriskllc.com if you would like a copy of this explanatory letter.

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 30, 2017, 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 for responding in writing to FDA investigations.

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

- **Specialty Gas** - Robust and Efficient Gas Sampling Techniques
- **Food Gas Roundtable** – Part 117 Subpart C - Preventive Controls - The latest information about food gas regulations is reviewed – The sample Food Gas SOPs are available for downloading during the seminar.



Medical Gas Bulletin

If you would like to receive invitations to the training webinars, just send an email to jodie@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. **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>

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