



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

**FEBRUARY 2019**

### ***ENCLOSED***

**Safety Topic: Electronic Submission of Injury and Illness Records to OSHA**

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

**Traffic Bulletin: Unified Carrier Registration**

Please contact Mike Dodd for more information.

### **Medical, Food/Beverage and Specialty Gases Bulletin**

- 1. New FREE Training Resources**
- 2. GAWDA Professional Compliance Seminars – 2019: dates and places**
- 3. February Medical Gas Roundtable (22 February 2019): Subparts C - Buildings and Facilities**
- 4. Webinars: Specialty Gas – Analytical Math; Food Gas Roundtable – Allergen Awareness & Personal Hygiene Training.**
- 5. Micro Audit Suggestions**

Please contact Tom Badstubner, GAWDA FDA Food, Medical and Specialty Gases Consultant, 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 \_\_\_\_\_

**February 2019 Safety Topic****Electronic Submission of Injury and Illness Records to OSHA**

**March 2<sup>nd</sup> deadline for most of our members.**

**What must be reported?**

Employers with establishments with 250 or more employees and establishments with 20 to 249 employees in certain high-risk industries must submit their previous year 300-A Summary information to OSHA by March 2<sup>nd</sup> of the current year. The high-risk industries are listed by NAICS code in Appendix A to Subpart E to Part 1904. **I can save you a lot of time by just saying that all our member locations that fill cylinders, requalify cylinders or sell gases or welding supplies are included in the high-risk industries. If you have a location with 20 or more employees, then you must do the electronic reporting.** The only example I can think of that would not be included would be locations that are strictly administration and that same location does not have a plant or a store on the property.

**What is my NAICS code?**

Please note that if your location does multiple types of business then you pick the code that is more than the largest segment of revenue out of that location.

325120, Industrial Gas Manufacturing

423840, Industrial Supplies Merchant; Welding Supplies Wholesalers

424690, Welding Gases, Other Chemical and Allied Products Merchant Wholesalers

454390, Other Direct Selling Establishments

**1904.41 Electronic submission of injury and illness records to OSHA.**

Please go to this OSHA website to get the details on who must submit, how to do the submission which require electronic reporting by March 2<sup>nd</sup> starting in 2019.

<https://www.osha.gov/injuryreporting/index.html>

(a) **Basic requirements**— (1) *Annual electronic submission of part 1904 records by establishments with 250 or more employees.* If your establishment had 250 or more employees at any time during the previous calendar year, and this part requires your establishment to keep records, then you must electronically submit information from the three recordkeeping forms that you keep under this part (OSHA Form 300A Summary of Work-Related Injuries and Illnesses, OSHA Form 300 Log of Work-Related Injuries and Illnesses, and OSHA Form 301 Injury and Illness Incident Report) to OSHA or OSHA's designee. You must submit the information once a



year, no later than the date listed in paragraph (c) of this section of the year after the calendar year covered by the forms.

(a)(2) *Annual electronic submission of OSHA Form 300A Summary of Work-Related Injuries and Illnesses by establishments with 20 or more employees but fewer than 250 employees in designated industries.* If your establishment had 20 or more employees but fewer than 250 employees at any time during the previous calendar year, and your establishment is classified in an industry listed in appendix A to subpart E of this part, then you must electronically submit information from OSHA Form 300A Summary of Work-Related Injuries and Illnesses to OSHA or OSHA's designee. You must submit the information once a year, no later than the date listed in paragraph (c) of this section of the year after the calendar year covered by the form.

(a)(3) *Electronic submission of part 1904 records upon notification.* Upon notification, you must electronically submit the requested information from your part 1904 records to OSHA or OSHA's designee.

(b) **Implementation—** (1) *Does every employer have to routinely submit information from the injury and illness records to OSHA?* No, only two categories of employers must routinely submit information from their injury and illness records. First, if your establishment had 250 or more employees at any time during the previous calendar year, and this part requires your establishment to keep records, then you must submit the required Form 300A, 300, and 301 information to OSHA once a year. Second, if your establishment had 20 or more employees but fewer than 250 employees at any time during the previous calendar year, and your establishment is classified in an industry listed in appendix A to subpart E of this part, then you must submit the required Form 300A information to OSHA once a year. Employers in these two categories must submit the required information by the date listed in paragraph (c) of this section of the year after the calendar year covered by the form or forms (for example, 2019 for the 2018 forms). If you are not in either of these two categories, then you must submit information from the injury and illness records to OSHA only if OSHA notifies you to do so for an individual data collection.

(b)(2) *If I have to submit information under paragraph (a)(1) of this section, do I have to submit all of the information from the recordkeeping form?* No, you are required to submit all of the information from the form *except* the following:

(b)(2)(i) Log of Work-Related Injuries and Illnesses (OSHA Form 300): Employee name (column B).

(b)(2)(ii) Injury and Illness Incident Report (OSHA Form 301): Employee name (field 1), employee address (field 2), name of physician or other health care professional (field 6), facility name and address if treatment was given away from the worksite (field 7).

(b)(3) *Do part-time, seasonal, or temporary workers count as employees in the criteria for number of employees in paragraph (a) of this section?* Yes, each individual employed in the establishment at any time during the calendar year counts as one employee, including full-time, part-time, seasonal, and temporary workers.

(b)(4) *How will OSHA notify me that I must submit information from the injury and illness records as part of an individual data collection under paragraph (a)(3) of this section?* OSHA will notify you by mail if you will have to submit information as part of an individual data collection under paragraph (a)(3). OSHA will also announce individual data collections through publication in the *Federal Register* and the OSHA newsletter, and announcements on the OSHA Web site. If you



are an employer who must routinely submit the information, then OSHA will not notify you about your routine submittal.

*(b)(5) How often do I have to submit the information from the injury and illness records?* If you are required to submit information under paragraph (a)(1) or (2) of this section, then you must submit the information once a year, by the date listed in paragraph (c) of this section of the year after the calendar year covered by the form or forms. If you are submitting information because OSHA notified you to submit information as part of an individual data collection under paragraph (a)(3) of this section, then you must submit the information as often as specified in the notification.

*(b)(6) How do I submit the information?* You must submit the information electronically. OSHA will provide a secure Web site for the electronic submission of information. For individual data collections under paragraph (a)(3) of this section, OSHA will include the Web site's location in the notification for the data collection.

*(b)(7) Do I have to submit information if my establishment is partially exempt from keeping OSHA injury and illness records?* If you are partially exempt from keeping injury and illness records under §§1904.1 and/or 1904.2, then you do not have to routinely submit part 1904 information under paragraphs (a)(1) and (2) of this section. You will have to submit information under paragraph (a)(3) of this section if OSHA informs you in writing that it will collect injury and illness information from you. If you receive such a notification, then you must keep the injury and illness records required by this part and submit information as directed.

*(b)(8) Do I have to submit information if I am located in a State Plan State?* Yes, the requirements apply to employers located in State Plan States.

*(b)(9) May an enterprise or corporate office electronically submit part 1904 records for its establishment(s)?* Yes, if your enterprise or corporate office had ownership of or control over one or more establishments required to submit information under paragraph (a)(1) or (2) of this section, then the enterprise or corporate office may collect and electronically submit the information for the establishment(s).

**(c) Reporting dates.**

*(c)(2)* Beginning in 2019, establishments that are required to submit under paragraph (a)(1) or (2) of this section will have to submit all the required information by March 2 of the year after the calendar year covered by the form or forms (for example, by March 2, 2019, for the forms covering 2018).



**1904.46 Definitions.**

**Establishment.** An establishment is a single physical location where business is conducted or where services or industrial operations are performed. For activities where employees do not work at a single physical location, such as construction; transportation; communications, electric, gas and sanitary services; and similar operations, the establishment is represented by main or branch offices, terminals, stations, etc. that either supervise such activities or are the base from which personnel carry out these activities.

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

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# Traffic Bulletin

**February 2019**

## **Unified Carrier Registration**

Everyone operating Commercial Motor Vehicles (CMVs)(power units only) in **interstate** commerce must register and pay a fee based on the number of CMVs operated in interstate commerce. Vehicles used solely in intrastate commerce are exempted from the registration and fees. Please remember that you only pay for the powered commercial motor vehicles that crossed state lines.

The website <https://www.ucr.gov/> is where you go to do the registrations. The 2019 registration deadline was extended this year because of the late decision on the fees. It is normally due by Dec. 31<sup>st</sup> of the previous year.

### **What vehicles are considered commercial motor vehicles for purposes of the UCR fees?**

The number of commercial motor vehicles for purposes of determining a carrier's UCR fees is the number of commercial motor vehicles that are power units and not towed vehicles such as trailers that the carrier reported in the most recent Form MCS-150 it filed with FMCSA or the total number of commercial motor vehicles that are power units it owned or operated under long-term lease for the twelve-month period ending on June 30 immediately prior to the beginning of the UCR Agreement registration year for which the fees are being determined. A commercial motor vehicle is one that is operated in commerce and has a GVW or GVWR of at least 10,001 pounds or, in the case of a passenger vehicle, is one built to carry more than 10 persons, including the driver. It also includes a vehicle that transports hazardous materials in a quantity that requires placarding. It does not include, for this purpose, a vehicle that operates wholly in intrastate commerce.

The UCR Board of Directors has established a National UCR System at <https://www.ucr.gov/> . All UCR registrants may use this online system, regardless of base state, and it is the recommended method to register.



# Traffic Bulletin

## UCR Recordkeeping

1. UCR registrants are required to preserve the UCR records upon which the annual applications and renewals are based for three (3) years from the due date or filing date, whichever is later, plus any time period included as a result of State decisions or inquiries.  
The three (3) year period is the current calendar year and the prior two (2) calendar years.
2. Records may be kept on paper, microfilm, microfiche, or other computerized or condensed record storage system as required by the Base State.

If you have any questions about whether you are still in the program or not, please contact:

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(573) 718-2887  
Email: [MLDSafety@hotmail.com](mailto:MLDSafety@hotmail.com)



# Medical, Food/Beverage and Specialty Gases Bulletin

**Medical Gas Bulletin**  
**02/01/2019**

## **New FREE Training Resources**

In addition to the existing pumper and driver CGMP training, we have developed two additional training programs that are available to GAWDA distributor members.

### **Food and Medical Gas – CGMP Training for Administrative Personnel**



This 11-minute course describes the essential FDA regulations pertaining to non-operations personnel. It also includes lot number tracking and complaint procedures. A quiz and certificate of participation is available.

### **Food Gas – Qualified Facilities and submitting the FDA Attestation**



This 15-minute video discusses the FDA Qualified Facility exemption and how to submit the Attestation. The two sales criteria for a Qualified Facility are discussed as well as the alternate Qualified Facility requirements and meaning of the Attestation.

## **February Medical Gas Roundtable (22 February 2019)**

These GAWDA Medical Gas roundtables are excellent sources of CGMP training and the latest industry compliance news. On Friday, February 23, we will cover **Subparts C - Buildings and Facilities**. *A sample facility maintenance and cleaning record will be available for downloading during the training.*

# Medical, Food/Beverage and Specialty Gases Bulletin

In addition, we will be conducting the following additional training on that date:

- **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 – 2019 Spring - FDA/DOT Audit Survival



- March 19 - 21, 2019 - Ball Ground, GA (at Chart)
- October 29 - 31, 2018 - Aurora, IL (at Weldcoa)

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

# Medical, Food/Beverage and Specialty Gases 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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