



## FEBRUARY 2020

### ENCLOSED

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#### 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

##### Accident Register and Accident Reports

*Please contact Mike Dodd for more information.*

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

1. FREE Food/Beverage Gas Training Resources; FREE Medical Gas Training Resources; FREE e-Learning Resources from CGA
2. February Medical Gas Roundtable (2/29/20): Subparts C - Buildings and Facilities.
3. GAWDA Professional Compliance Seminars 2020: March 10-12 & 17-19, Ball Ground, GA and October 27-29 & November 3-5, Aurora, IL.
4. Micro-Audit Suggestions

*Please contact Tom Badstubner, GAWDA FDA Food, Medical & 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 \_\_\_\_\_



## 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.

Michael Dodd  
GAWDA DOT, Security, OSHA, & EPA Consultant  
MLD Safety Associates, LLC  
P.O. Box 93  
Poplar Bluff, MO 63902  
(573) 718-2887  
Email: [MLDSafety@hotmail.com](mailto:MLDSafety@hotmail.com)



# Traffic Bulletin

## Traffic Bulletin

**February 2020**

### **Accident Register and Accident Reports**

The requirement to keep DOT accident records is found in 49 CFR 390.15 and the definition for a DOT accident is found in 390.5.

Motor carriers must maintain an accident register containing specific information for each accident. The information to be included for each accident is as follows:

- Date of accident,
- City of town in which or most near where the accident occurred and the state in which the accident occurred,
- Driver name,
- Number of injuries,
- Number of fatalities, and
- Whether hazardous materials, other than fuel spilled from the fuel tanks of vehicles involved in the accident, were released.

The information must be retained for three years after the accident occurs. Copies of all accident reports required by state or other governmental entities or insurers must also be retained.

I have made two simple forms that you may use to record the required information.

The first form is the accident report, which helps you determine if the accident meets the definition for a "DOT accident" and if so, then directs you to the Accident Register form. Please see both of these forms below.

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

Michael Dodd

GAWDA DOT, Security, OSHA, & EPA Consultant

MLD Safety Associates, LLC

P.O. Box 93

Poplar Bluff, MO 63902

(573) 718-2887

Email: [MLDSafety@hotmail.com](mailto:MLDSafety@hotmail.com)



Traffic Bulletin  
**Traffic Bulletin**  
ACCIDENT REPORT

Company Name: \_\_\_\_\_

Date of Accident: \_\_\_\_\_

Location of Accident: \_\_\_\_\_

\_\_\_\_\_  
(City or town and state where the accident occurred or most near where the accident occurred)

Driver Name: \_\_\_\_\_

1. Any Fatalities? YES OR NO (CIRCLE ONE)

2. Anyone injured requiring immediate treatment away from the scene of the accident?  
YES OR NO (CIRCLE ONE)

3. Any Disabling damage to a vehicle requiring it to be towed from the scene?  
YES OR NO (CIRCLE ONE)

- Disabling damage includes vehicles that could have been driven, but would have been further damaged if so driven. Excluded from disabling damage is:
- Damage which can be remedied temporarily at the scene without special tools or parts,
- Tire disablement without other damage (even if no spare is available),
- Headlamp or taillight damage,
- Damage to turn signals, horn, or windshield wipers, which makes them inoperative.

Were any hazardous materials released, other than fuel spilled from the fuel tanks of motor vehicles involved in the accident? YES OR NO (CIRCLE ONE)

Other optional information: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Report Prepared By: \_\_\_\_\_

Instructions:

1. Make a manila folder and put everything and anything to do with this accident into it. File in the DOT Accident folder.
2. If you answered yes to any of the questions 1 thru 3, then this is a DOT Accident and needs to be added to your DOT Accident Register.



# Traffic Bulletin

## ACCIDENT REGISTER FOR DOT ACCIDENTS (390.15)

*Company Name and Address:* \_\_\_\_\_

*Reporting Period:* \_\_\_\_\_

This is a list of DOT accidents that have occurred in the above calendar period.

Date	City or town in which or most near where the accident occurred and the State in which the accident occurred	Driver Name	Number of injuries	Number of fatalities	Were hazardous materials, other than fuel spilled from the fuel tanks of motor vehicles involved in the accident, released?





# Medical, Food/Beverage and Specialty Gases Bulletin

02/01/2020

## FREE Food/Beverage Gas Training Resources

- **Food Gas – Qualified Facilities and submitting the FDA Attestation**  
[Click here for the recorded discussion of Qualified Facilities and Attestations.](#) (15 min.)
- **Food Gas – CGMP Training for Pumpers**  
[Click here for Food Gas CGMP Training for pumpers.](#) (28 minutes)
- **Food Gas – For Owners and Managers**  
This video for food/beverage gas company owners and managers discusses how to set up a compliant food/beverage gas program.... Here is the link to the 62 minute video and other food gas resources... [Click here for Food Gas Resources and owners' video.](#)

## FREE Medical Gas Training Resources

- **Food and Medical Gas – CGMP Training for Administrative Personnel**  
[Click here for CGMP Training for administrative personnel.](#) (11 minutes)
- **Medical Gas – CGMP Training for Pumpers**  
[Click here for Medical Gas CGMP Training for pumpers.](#) (25 minutes)
- **Medical Gas – CGMP Training for Drivers**  
[Click here for Medical Gas CGMP training for drivers.](#) (23 minutes)

## FREE e-Learning Resources from CGA

These, and other, high quality e-Learning modules are available to GAWDA members who participate in the FREE GAWDA/CGA Safety Program. See: <https://www.gawda.org/resources/cga-subscription-program/>

- TM-4 Filling of Uninsulated Carbon Dioxide Cylinders
- TM-5 Filling of High Pressure Medical Oxygen Cylinders



# Medical, Food/Beverage and Specialty Gases Bulletin

## February Medical Gas Roundtable (28 February 2020)

These GAWDA Medical Gas roundtables are excellent sources of CGMP training and the latest industry compliance news. On Friday, February 28, 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 that date:

- **Specialty Gas – ISO/IEC 17025:2017 transition workshop**  
***Are you prepared for your next assessment?***

This session will summarize the changes and consider aspects of restructuring and realignment. Learn how to leverage existing policies and SOPs to make the transition more efficient! Several major changes from the 2005 version include:

- The new structure, closely aligned with all recent 17000-series standards (ISO 9000 model);
  - the risk-based thinking has enabled some reduction in prescriptive requirements and their replacement by performance-based outcomes;
  - there is greater flexibility in the requirements for processes, procedures, documented information and organizational responsibilities;
  - terminology has been updated; new CoA requirements;
  - the requirements in the 2005 version of the standard relating to “Purchasing services and supplies” and “Subcontracting of tests and calibrations” have been combined;
  - The standard now recognizes and incorporates the use of computer systems, electronic records, and the production of electronic results and reports
  - the “decision rule” to apply when reporting a statement of conformity now is to be confirmed with the customer at the review of request stage and for the rule to be included in the report.
- **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).



# Medical, Food/Beverage and Specialty Gases Bulletin

## GAWDA Professional Compliance Seminars – 2020 Spring - FDA/DOT Audit Survival



## GAWDA Professional Compliance Seminars - 2020

March 10 to 12 and 17 to 19 - Ball Ground, GA (at Chart)

October 27 to 29 and November 3 to 5 - Aurora, IL (at Weldcoa)

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

### 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.

Tom Badstubner  
GAWDA Medical Gas Consultant  
Telephone: 508-883-0927  
Email: [tom@asteriskllc.com](mailto:tom@asteriskllc.com)

