



SAFETY & TECHNOLOGY ORGANIZER

APRIL 2012

ENCLOSED

Safety Topic: “Driver Distractions: Personal Communication Devices”

Please contact GAWDA's OSHA and EPA Consultant, Mike Dodd for more information.

Traffic Bulletin: “Tire and Load Checks”

Please contact GAWDA's DOT and Security Consultant, Mike Dodd for more information.

Medical Gas Bulletin: Food Gas Alert, Medical Gas Roundtables, and Micro-audit

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 _____

Driver Distractions: Personal Communication Devices

Driving a company vehicle while distracted can significantly increase the risk of causing a collision. One of the most common distractions while driving is the use of cellular phones or other communication devices. Our company desires to protect our employees and others on the highways by adopting the following policy on the use of communication devices.

Definitions

Company Vehicle

A “company vehicle” is a company-owned vehicle operated on or off the job, a company-rented or leased vehicle operated on or off the job, or an employee-owned or leased vehicle operated for company business.

Communications Devices

“Communication devices” include: cellular phones, pagers, Personal Digital Assistants, Citizens’ Band radios or handheld radios.

Safe Location

A safe location is a legal parking or stopping location on public or private property. It is not the side of the road or highway. Highway shoulders are for emergency stopping and are not considered a safe location. Examples of safe locations are parking lots, gas stations, etc.

Driving

Driving” means that the driver is behind the steering wheel, the engine is on, and the vehicle is in gear.

Company Policy

- **Handheld** communication devices may not be used while driving in a company vehicle. This includes talking on or listening to a **handheld** cellular phone, text messaging, reading, or responding to email messages or accessing voice mail.
- **Handheld** communication devices may only be used in vehicles when the vehicle is stopped in a safe location, out of the lanes of travel and off the roadway. Bluetooth or other hands-free communication devices may only be used when a company vehicle is parked in a safe location.



- Cellular phones, pagers, Bluetooth, or other hands-free communication devices may be kept on while the vehicle is in motion to alert drivers that a call or message has been received and the driver may receive, terminate, or initiate a call only if this can be done by pushing one button.
- Employees who are charged with traffic violations resulting from the use of a communication device (whether company provided or personal) while driving on company business will be solely responsible for all liabilities that result from such actions.
- Communication devices are not to be used while fueling vehicles.
- Safety must come before all other concerns. Under no circumstances are employees allowed to place themselves at risk to fulfill business needs.
- Violation of this policy may result in disciplinary action up to and including termination.

This is only a suggested policy and GAWDA member companies may adjust their company policies as their individual needs require.

Feel free to contact me if you have any questions.

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TRAFFIC BULLETIN

April 2012

Tire and Load Checks

The regulations can be confusing because they talk about tire checks in one part of the regulations and load securement checks in another part of the regulations and the time and miles for each don't always match up.

Tire Checks

Tire checks are only required at the beginning of each trip and **each time the vehicle is parked**. Here are the words from the regulations:

397.17 Tires

- (a) A driver must examine each tire on a motor vehicle at the beginning of each trip and each time the vehicle is parked.
- (b) If, as the result of an examination pursuant to paragraph (a) of this section, or otherwise, a tire is found to be flat, leaking, or improperly inflated, the driver must cause the tire to be repaired, replaced, or properly inflated before the vehicle is driven. However, the vehicle may be driven to the nearest safe place to perform the required repair, replacement, or inflation.
- (c) If, as the result of an examination pursuant to paragraph (a) of this section, or otherwise, a tire is found to be overheated, the driver shall immediately cause the overheated tire to be removed and placed at a safe distance from the vehicle. The driver shall not operate the vehicle until the cause of the overheating is corrected.
- (d) Compliance with the rules in this section does not relieve a driver from the duty to comply with the rules in 397.5 (attendance and surveillance of motor vehicles) and 397.7 (parking).

When originally enacted, this rule was intended to prevent possible fires caused by overheated tube-type tires. Thus, hazardous material drivers with dual tires were required to stop every two hours or 100 miles to inspect their tires.

With advancements in tire technology, fires caused by overheating are much less common today. In addition, the terrorist attacks of September 11, 2001, stressed the importance of maintaining security around hazardous materials shipments, and reducing the number of stops required reduces the risk that a hazmat shipment could be stolen.





TRAFFIC BULLETIN

Load checks

The safety regulations (under 49 CFR 392.9) require drivers to periodically check their cargo and securement devices to ensure that the cargo is properly secured, and make adjustments as necessary.

The regulations have the load being checked:

- Before the trip starts;
- Within the first 50 miles after beginning the trip; and
- Whenever the driver makes a change of his/her duty status or;
- After the vehicle has been driven for 3 hours or 150 miles, whichever occurs first.

So when do I check the tires and/or the load?

Here is a simple table to help with the decision process.

WHEN	WHAT TO CHECK
Before starting trip	Tires and load securement
Within first 50 miles	Load securement (and tires since you are stopped)
Each time the vehicle is parked	Tires and load securement
Every 3 hours or 150 miles (whichever comes first)	Load securement (and tires since you are stopped)

If there are any questions regarding this Bulletin, please ask.

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MEDICAL GAS BULLETIN

4/01/2012

Food Gas Alert

Recently a GAWDA member had a food audit in which the FDA inspected the incoming bulk Carbon Dioxide shipment paperwork. A couple delivery receipts (out of many) did not specify that the CO₂ was food grade.

At this time, we are not required to test the incoming bulk food grade products. However, we are required to have “qualified” food grade bulk receipts. We recommend that you review your bulk food grade gas receipt paperwork. Assure that the delivery ticket specifies food grade or beverage grade. You should also have a Certificate of Conformance (CoC) from your suppliers declaring that they deliver food grade product into your bulk tanks, where appropriate. A Certificate of Analysis (CoA) is not required for each delivery, though you may have that on file as well.

Contact [Juliet](#) to be sure you are on the distribution list for the monthly GAWDA Food Gas Roundtables. The next roundtable webinar will be on Friday, April 6 at 2:00 PM EDT. We discuss the latest FDA enforcement and regulations in these free webinars.

H.R 2227

The House Energy and Commerce Committee held a hearing about the proposed Medical Gas Safety Act, HR 2227. The FDA’s Director for the Center for Drug Evaluation and Research, Janet Woodcock, MD, testified as well as the President of Lifegas, Mike Walsh. Their testimony can be viewed at:

<http://energycommerce.house.gov/hearings/hearingdetail.aspx?NewsID=9346>

We expect continued discussion between CGA/GAWDA, FDA and Congress about medical gas regulations. In addition, we are earnestly discussing the “unapproved drug” status of medical gases. Since before 1938, when the Food Drug and Cosmetic Act was passed, Oxygen, and other medical gases, have been extensively produced without actually being “approved”. This unapproved status has never been an issue until recently when the FDA began an initiative to reduce unapproved drugs. The agency has not taken action on medical gases, though they have required the “unapproved” status to be listed on the electronic registration and listing forms. Through HR 2227, CGA/GAWDA are seeking a path to officially authorize medical gases.





MEDICAL GAS BULLETIN

April Medical Gas Roundtable

These GAWDA Medical Gas roundtables are excellent sources of CGMP training and the latest industry compliance news. On Friday, April 6, we will cover CGMP – Internal Auditor Training. This will be especially useful for the personnel who conduct mock FDA audits in your company.

In addition we will be conducting the following additional training on April 6:

- **Specialty Gas** - Analytical Method Validation for Medical Gases
- **ISO 17025 Quality Management** - Proficiency Testing

Contact tom@asteriskllc.com if you need more information about joining these seminars.

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 Record Review** – Verify that you have conducted and documented an annual records review for your medical gas production facility. Contact tom@asteriskllc.com for a sample form to easily document this requirement.
2. **Food Receipts** – Be sure that your food gas bulk receipt paperwork documents that you are receiving food or beverage grade product into your bulk tanks which are used to produce food gases (especially CO₂ and N₂)
3. **Food Lot Numbers** – Be sure you are using lot numbers on food grade gases. You must also have a lot number record of food gas shipments. This lot number record may be kept electronically.

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