



SAFETY & TECHNOLOGY ORGANIZER

DECEMBER 2012

ENCLOSED

Safety Topic: "Incident Report: Slip/Fall on Ice"

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

Traffic Bulletin: "Drive Eligibility Requirements"

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

Medical Gas Bulletin: FAQs, 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 _____

Here is a safety incident that we published a year ago that is very timely now that we are getting into the winter weather season.

Incident: Slip/Fall on Ice

WHAT HAPPENED

An employee walking to cylinder storage, stepped on snow covered ice and fell hard on left elbow and twisted back. This employee required surgery on his elbow, along with physical therapy and chiropractic work on his back. The employee missed 50 weeks of work. The Workers Compensation claim will cost over \$125,000.

INVESTIGATION REVEALED

- Ice was present in the yard, which had not been properly salted and cleared
- Footwear the employee was wearing was not adequate for slippery conditions

ACTIONS TAKEN

1. Designate "Snow Care Team" at each Location – when winter weather is present, with the responsibility to monitor parking lots, yards, retail store entrances and any other applicable areas; take action in clearing snow, salting or calling in contractors for additional work.
2. Conducted monthly safety reminders during the winter season, with the following tips:
 - Wear proper footwear
 - Never put hands in pocket when navigating snow/ice – need them for balance and to break your fall
 - Take small steps or shuffle your feet
 - Approaching slick area, test with toe or go slowly
 - Don't carry large loads

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

December 2012

Driver Eligibility Requirements

Following up on last month's Traffic Bulletin "Qualifying a New Driver", here are some suggestions to consider for driver eligibility requirements. These suggestions have some minimum requirements and some items that would possibly disqualify a driver from being considered for a driver position. These are only suggestions and you are free to modify these to meet your local hiring environment and driver availabilities.

Eligible drivers must:

- ☐ Between the ages of 21 and 65
- ☐ Have at least two years driving experience or have completed a course of instruction from a driver training school that operates equipment similar to the company
- ☐ The appropriate license for the type of vehicle to be operated and the applicable endorsements.
- ☐ A current medical examiner's certificate
- ☐ The ability to read and write in English
- ☐ Have an acceptable driving record.

Acceptable Driving Record Means:

- ☐ No major violations in the last three years
- ☐ Maximum of three minor moving violations in the last 3 years
- ☐ Maximum of one at-fault accident in the last 3 years

Major violation is a citation that involves:

- ☐ Any drug or alcohol violation in connection with the operation of a motor vehicle
- ☐ Homicide, manslaughter or use of a motor vehicle for felonious purposes.
- ☐ Hit and run
- ☐ Reckless driving
- ☐ A speeding violation 15 MPH or more above the posted limit
- ☐ Speed contests, drag racing, or attempting to elude an officer of the law
- ☐ Driving while license is suspended or revoked
- ☐ Use of a cell phone while driving





TRAFFIC BULLETIN

Minor violations:

- ☐ Any moving traffic citation (speeding less than 15 MPH above the posted limit, failure to stop or yield, improper lane change etc.) other than a major violation.
- ☐ The following are not moving citations:
- ☐ Motor vehicle equipment, load or size requirements
- ☐ Improper display or failure to display license plates
- ☐ Failure to sign or display registration card

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

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MEDICAL GAS BULLETIN

12/01/2012

Frequently Asked Questions

Q – Do I still need to do a daily settled pressure test for medical gas cylinders?

A – No ... unless your procedures require it. The DOT no longer requires the daily settled pressure test for high pressure cylinders. The FDA only requires that you fill the cylinders to their labeled contents. As a good management practice, you should periodically use some test to confirm that the cylinders are filled to the right settled pressure, though you might choose some frequency other than daily.

Q – I do not fill my own food grade carbon dioxide. I buy it from my supplier. I simply warehouse the CO₂ and sell it to restaurants. Do I need to register as a food facility?

A – Yes. All food production and warehousing facilities must register with the FDA. The process is much simpler than the drug registration process. We have a video and PowerPoint presentation about the process... or we can do the registration on your behalf. Please email Juliet@asteriskllc.com for the video or for help with registration.

December Medical Gas Roundtable (12/07/2012)

Subparts J & K – Records and Reports/ Returned and Salvaged Drug Products

These GAWDA Medical Gas roundtables are excellent sources of CGMP training and the latest industry compliance news. In December we will be discussing the various records required by the FDA. In addition, we will have an easy to use handout about how to document your Annual Records Review.

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

- **ISO 17025** - ISO 17025 - Propagation of Errors (developing an uncertainty budget)
- **Specialty Gas** - Gas Chromatography Column & Detector Selection / Troubleshooting

These and other webinars are available as a streaming recording at a time convenient to you. If you are unable to view the webinar live, just let us know and we will send you the link to the recording. If you would like to receive invitations to the training webinars, just send an email to juliet@asteriskllc.com.





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. **Complaints** - Verify that your complaint file has any instances of customers asking for credit because they thought the cylinder was not full. (Even if the complaint was found to be without merit).
2. **QCU Review** - Verify that your QCU reviews all complaints.
3. **Other Lots?** – Be sure your complaint investigations consider whether any other cylinders from the same or different lots should be investigated. Document your decision to not investigate other cylinders/batches on the complaint record.
4. **Annual Records Review** – Review a representative sample of records (production, analytical, complaint, recall, etc.) to determine if changes are needed in your procedures. Document this review.

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