



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

**APRIL 2013**

### ***ENCLOSED***

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#### **Safety Topic: “Abrasive Wheel Grinder”**

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

#### **Traffic Bulletin: “Drug and Alcohol Recordkeeping”**

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.

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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 \_\_\_\_\_

## Abrasive Wheel Grinders

Abrasive wheels and grinding machines come in many styles, sizes, and designs. Both bench-style and pedestal (stand) grinders are commonly found in many industries. These grinders often have either two abrasive wheels, or one abrasive wheel and one special-purpose wheel such as a wire brush, buffing wheel, or sandstone wheel. These types of grinders normally come with the manufacturer's safety guard covering most of the wheel including the spindle end, nut, and flange projection. These guards must be strong enough to withstand the effects of a bursting wheel. In addition, a tool/work rest and transparent shields are often provided.

## Hazards

Bench-style and pedestal grinders create special safety problems due to the potential of the abrasive wheel shattering; exposed rotating wheel, flange and spindle end; and a naturally occurring nip point that is created by the tool/work rest. This is in addition to such concerns as flying fragments, sparks, air contaminants, etc. Cutting, polishing, and wire buffing wheels can create many of the same hazards.

Grinding machines are powerful and are designed to operate at very high speeds. If a grinding wheel shatters while in use, the fragments can travel at more than 300 miles per hour. In addition, the wheels found on these machines (abrasive, polishing, wire, etc.) often rotate at several thousand rpms. The potential for serious injury from shooting fragments and the rotating wheel assemblies (including the flange, spindle end, and nut) is great. To ensure that grinding wheels are safely used in your workplace, know the hazards and how to control them.

## Solutions

Abrasive wheels used on bench and pedestal grinding machines must be equipped with safety guards. The safety guard encloses most of the wheel — covering the flange, spindle end, and nut projection — while allowing maximum exposure of the wheel periphery. The exposure of the wheel should not exceed 90 degrees or one-fourth of the periphery.

Because the safety guard is designed to restrain the pieces of a shattered grinding wheel, the distance between the safety guard and the top periphery of the wheel must not be more than 1/4-inch. If this distance is greater because of the decreased size of the abrasive wheel, then a "tongue guard" must be installed to protect workers from flying fragments in case of wheel breakage. This "tongue guard" should be adjustable to maintain the maximum 1/4-inch distance between it and the wheel.



An adjustable tool/work rest must also be installed and maintained at a maximum clearance of 1/8-inch between it and the face of the wheel. **(Failing to maintain this maximum of 1/8" is one of the most common OSHA citations.)** In addition to offering a stable working position, this small clearance must be maintained to prevent the operator's hands or the work from being jammed between the wheel and the rest, which may cause serious injury or wheel breakage. Plastic glass (Plexiglas) shields are optional. They are not a substitute for eye/face protection and are not included as a part of the guard (unless they are adjusted accordingly and have strength equal to that of the safety guard). OSHA's regulation at 1910.243 goes into detail on the type of equipment and the guarding required.

All abrasive wheels must be closely inspected and ring-tested before mounting to ensure that they are free from cracks or other defects. Wheels should be tapped gently with a light, nonmetallic instrument. A stable and undamaged wheel will give a clear metallic tone or "ring." If a wheel sounds cracked (dead), do not use it. This is known as the "ring test."

The spindle speed of the machine must also be checked before mounting the wheel to be certain that it does not exceed the maximum operating speed marked on the wheel.

### **Portable abrasive grinders**

These types of grinders normally come with the manufacturer's safety guard covering most of the wheel. Abrasive grinder exposure must not exceed a maximum angle of 180 degrees and the top half of the wheel must be enclosed at all times. The guard must be mounted so it maintains proper alignment with the wheel.

Vertical "right angle" grinders must have a 180 degree guard between the operator and wheel. The guard must be adjusted so that pieces of a broken wheel will be deflected away from the operator.

Cup wheel grinders must be guarded as described above or be provided with special "revolving cup guards," which mount behind the wheel and turn with it.

**Note:** There are exceptions in the OSHA standards for guarding based on work practices and for other grinders. (See 1910.243(c)(1)(i) and (c)(1)(ii))

**Always follow the manufacturer's recommendations.**

Feel free to contact me if you have any questions.

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# TRAFFIC BULLETIN

**April 2013**

## **Drug and Alcohol Recordkeeping**

### **What records must employers keep?**

I have compiled the drug and alcohol recordkeeping requirements for 49 CFR Part 40 and Part 382 into the following information. Sorry for the length and amount but there are a lot of requirements.

As an employer, you must keep the following records for the following periods of time:

#### **Five Years**

- ☐ Records of alcohol test results indicating an alcohol concentration of 0.02 or greater;
- ☐ Records of verified positive drug test results;
- ☐ Documentation of refusals to take required alcohol and/or drug tests (including substituted or adulterated drug test results);
- ☐ Substance Abuse Professional reports; and
- ☐ All follow-up tests and schedules for follow-up tests.
- ☐ Calibration documentation,
- ☐ Records related to the administration of the alcohol and controlled substances testing programs, and
- ☐ A copy of each annual calendar year summary required by §382.403. The Federal Motor Carrier Safety Administration (FMCSA) requires a motor carrier to prepare an annual summary only if a carrier is notified by FMCSA. A motor carrier is also required to submit a summary upon demand of a federal, state, or local official with proper authority as part of an inspection, investigation, or special study.

#### **Three Years**

- ☐ Information obtained from previous employers under §40.25 concerning drug and alcohol test results of employees.

#### **Two Years**

- ☐ Records of the inspection, maintenance, and calibration of EBTs.
- ☐ Records related to the alcohol and controlled substances collection process.





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## One Year

- ☐ Records of negative and cancelled drug test results and alcohol test results with a concentration of less than 0.02.

## Indefinite period

- ☐ Records related to the education and training of breath alcohol technicians, screening test technicians, supervisors, and drivers shall be maintained by the employer while the individual performs the functions which require the training and for two years after ceasing to perform those functions.
- ☐ See "Other Records" below.

You do not have to keep records related to a program requirement that does not apply to you (e.g., a maritime employer who does not have a DOT-mandated random alcohol testing program need not maintain random alcohol testing records).

You must maintain the records in a location with controlled access.

A service agent may maintain these records for you. However, you must ensure that you can produce these records at your principal place of business in the time required by the DOT agency. For example, as a motor carrier, when an FMCSA inspector requests your records, you must ensure that you can provide them within two business days.

If you store records electronically, where permitted by this part, you must ensure that the records are easily accessible, legible, and formatted and stored in an organized manner. If electronic records do not meet these criteria, you must convert them to printed documentation in a rapid and readily auditable manner, at the request of DOT agency personnel.

## Other Records

The 49 CFR 382.401 (c) has the following records being maintained but doesn't say for how long, therefore I would keep them indefinitely. The following specific types of records shall be maintained. "Documents generated" are documents that may have to be prepared under a requirement of this part. If the record is required to be prepared, it must be maintained.

- ☐ Records related to the collection process:
  - Collection logbooks, if used;
  - Documents relating to the random selection process;
  - Calibration documentation for evidential breath testing devices;
  - Documentation of breath alcohol technician training;





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- ☐ Records related to the collection process (continued):
  - Documents generated in connection with decisions to administer reasonable suspicion alcohol or controlled substances tests;
  - Documents generated in connection with decisions on post-accident tests;
  - Documents verifying existence of a medical explanation of the inability of a driver to provide adequate breath or to provide a urine specimen for testing; and
- ☐ Records related to a driver's test results:
  - The employer's copy of the alcohol test form, including the results of the test;
  - The employer's copy of the controlled substances test chain of custody and control form;
  - Documents sent by the MRO to the employer, including those required by §382.407(a).
  - Documents related to the refusal of any driver to submit to an alcohol or controlled substances test required by this part; and
  - Documents presented by a driver to dispute the result of an alcohol or controlled substances test administered under this part.
  - Documents generated in connection with verifications of prior employers' alcohol or controlled substances test results that the employer:
    - ☐ Must obtain in connection with the exception contained in §382.301 of this part, and
    - ☐ Must obtain as required by §382.413 of this subpart.
- ☐ Records related to other violations of this part.
- ☐ Records related to evaluations:
  - Records pertaining to a determination by a substance abuse professional concerning a driver's need for assistance; and
  - Records concerning a driver's compliance with recommendations of the substance abuse professional.
- ☐ Records related to education and training:
  - Materials on alcohol misuse and controlled substance use awareness, including a copy of the employer's policy on alcohol misuse and controlled substance use;
  - Documentation of compliance with the requirements of §382.601 (Company written drug and alcohol policy, see Traffic Bulletin May 2001), including the driver's signed receipt of education materials;
  - Documentation of training provided to supervisors for the purpose of qualifying the supervisors to make a determination concerning the need for alcohol and/or controlled substances testing based on reasonable suspicion, §382.603;
  - Documentation of training for breath alcohol technicians as required by §40.51(a) of this title, and
  - Certification that any training conducted under this part complies with the requirements for such training.





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- Administrative records related to alcohol and controlled substances testing:
  - Agreements with collection site facilities, laboratories, breath alcohol technicians, screening test technicians, medical review officers, consortia, and third party service providers;
  - Names and positions of officials and their role in the employer's alcohol and controlled substances testing program(s);
  - Quarterly laboratory statistical summaries of urinalysis required by §40.29(g)(6) of this title; and
  - The employer's alcohol and controlled substances testing policy and procedures.

The information collection requirements of this part are found in the following sections: Section 40.333, 382.105, 382.113, 382.301, 382.303, 382.305, 382.307, 382.309, 382.311, 382.401, 382.403, 382.405, 382.407, 382.409, 382.411, 382.413, 382.601, and 382.603.

There are a lot of recordkeeping items for drug and alcohol and I hope this has not confused you. As always, if there are any questions, just ask.

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# MEDICAL GAS BULLETIN

04/01/2013

## Frequently Asked Questions

**Q** – What's the latest information about the USP testing for medical gases?

**A** – After several years of consideration, USP is proposing to change the official monograph for Oxygen, USP and Medical Air. The revision would largely mirror current industry practice.... paramagnetic oxygen analysis. Most cylinder fill plants already use a Servomex percent oxygen analyzer to perform this test.

The only significant change for the Oxygen, USP test would be a change in the calibration gas from a mixture (99% to 100%) to a certified pure Oxygen, 99.99% (typically, Ultra High Purity) calibration gas.

### Schedule

USP has published this proposed revision in their "Pharmacopeial Forum", PF 39(1).

The proposed revisions will likely become official in six months and mandatory in 18 months.

### Action Item

When your current calibration gas for the Servomex percent oxygen analyzer is empty, order certified Oxygen, Ultra High Purity cylinder. This will prepare you for the revision.

## April Medical Gas Roundtable

These GAWDA Medical Gas roundtables are excellent sources of CGMP training and the latest industry compliance news. On Friday, April 5, 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 5:

- ☐ **Specialty Gas** - Analytical Method Validation for Medical Gases
- ☐ **ISO 17025 Quality Management** - Proficiency Testing
- ☐ **Food Gas Roundtable** – the latest information about food gas regulations is reviewed – The 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 [juliet@asteriskllc.com](mailto: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. **Annual Record Review** – Verify that you have conducted and documented an annual records review for your medical gas production facility. Contact [tom@asteriskllc.com](mailto: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 CO<sub>2</sub> and N<sub>2</sub>)
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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