

SAFETY & TECHNOLOGY ORGANIZER

MARCH 2015

ENCLOSED

Safety Topic: Cylinder Decals Deadline, CGA C-7, and the CGA Subscription Program

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

Traffic Bulletin: DOT Compliance Review: Would you have the answers to their questions?

Please contact Mike Dodd for more information.

Medical Gas Bulletin: FDA Enforcement Alert

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 _____

Cylinder Decals Deadline, CGA C-7, and the CGA Subscription Program

Deadline Dates for Cylinder Decals

After June 1, 2015, cylinders that your company fills must be shipped with the updated cylinder decals. After Dec. 1, 2015, cylinders that are filled by outside vendors will have to have the updated cylinder decals on them when shipped by your company. Of course, we will have the older decals on cylinders out at customers and will be bringing those back to our locations for many years to come. Currently nothing requires us to change the decals that are already at customers after the above deadlines. Please note that nothing in the DOT portions of the decals has changed so you should have no problems bringing back the old decals from your customers in the future.

The recently published C-7-2014 "Guide to Classification and Labeling of Compressed Gases" is available from CGA for you to use in updating your cylinder decals. If you are not already signed up with the CGA & GAWDA Subscription Program, then you should be. In a few quick words; **this is a fantastic program for our members! I think you would be nuts not to take advantage of this offer.** Here is the reason why. The free program could be potential worth several hundreds of dollars if not into the thousand dollar mark of savings depending on how many of the CGA pamphlets you need in your business.

CGA will provide free subscription access to all electronic publications, except for the *CGA Handbook of Compressed Gases* and all video items, as well as CGA member pricing for hardcopy publications, to one person per location from each GAWDA member in their Distributor and Canadian Distributor membership categories.

All this is in exchange for the GAWDA member submitting their annual OSHA 300A data to the CGA contact. Data of individual companies are held in confidence and are not shared with any person outside of CGA staff, including CGA or GAWDA members. It is only shared with your permission.

Eligibility: To participate in this program, you must be a GAWDA Distributor Member with dues current.

1. Eligible GAWDA members will complete the [Registration Form](#) and [Awards Form](#) and email them to GAWDASubscription@cganet.com.
2. Once CGA receives completed information, we will check the GAWDA member list to ensure that the requestor is a member in good standing with GAWDA. CGA Staff will then enter the information for each GAWDA subscriber into our database. Once they have been entered, the individuals will receive an email with instructions on how to proceed, along with a password to access the site.
3. With that login information, go to gawda.cganet.com.



4. Please direct any questions to:
- Laura Brumsey
Director of Operations & Administration
Compressed Gas Association, Inc.
14501 George Carter Way, Suite 103
Chantilly, VA 20151
703-788-2757 - phone
703-961-1831 - fax
lbrumsey@cganet.com

All of this is explained in more detail along with all the links to the registration form and awards program detail pages can be found at the following link:

<http://www.cganet.com/customer/gawda.aspx>

Please take a few minutes and sign up for this great program.

Michael Dodd

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TRAFFIC BULLETIN

March 2015

DOT Compliance Review: Would you have the answers to their questions?

You have just received a phone call from the U.S. Department of Transportation (USDOT), Federal Motor Carrier Safety Administration stating that you have been scheduled for a Compliance Review. They have scheduled their visit for 2 weeks from the phone call. DOT must give you at least 2 days to gather your information and files, but they usually give you longer notice. They have faxed you several pages of items and questions they want you to have available during their review, which could last from a few hours to several days depending on the size of your company.

You may be requested to present the following records and documents:

1. Current list of drivers
2. Current list of equipment (CMV trucks and trailers)
3. Accident Register listing all USDOT recordable accidents (i.e. fatality, injury and/or tow truck needed) for the last 3 years
4. Insurance Company "Loss Run" report for the last 3 years
5. MCS-150 (your DOT number letter or updates, required every 2 years)
6. MCS-90 (Liability Insurance) coverage (either \$1,000,000 or \$5,000,000 depending on hazard class or quantity being carried)
7. HM registration (for the past 3 years as applicable)
8. Unified Carrier Registration (only if interstate commerce)
9. A copy of the written education materials that you are required to give to your CDL drivers regarding the misuse of Alcohol and Controlled Substances that cover the 11 required elements in 382.601
10. Summaries of Alcohol/Controlled Substances Testing for the last 12 months.
11. Name, address, and telephone number of Drug Testing Consortium – if applicable
12. Documentation of Brake Inspector/Adjuster training (if your drivers are adjusting their vehicle brakes)
13. Documentation of Annual Inspector qualifications (if a certified garage is not used)
14. Documentation of HM Training for drivers and hazmat employees showing that they have been trained within the past 3 years
15. Documentation of security awareness training within the past 3 years for all employees handling or that have access to hazardous materials.
16. Shipping papers / manifests review and keeping for 2 years
17. Commercial Motor Vehicle (CMV) maintenance records: a) vehicle identifying information, b) roadside inspection reports, c) driver post-trip inspection reports





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(last 3 months), d) Periodic inspection of CMV (original copy kept 14 months from report date)

18. Schedule of inspection, maintenance & repair programs for vehicles
19. Copy of previous Compliance Review report or enforcement actions from State or Federal DOT Agency – if applicable
20. Hours of Service documentation for last 6 months (driver logs, detailed time cards or hours summary sheets)
21. Driver Qualification Files for employees who are drivers of Commercial Motor Vehicles
22. Copies of leases for vehicles that are under a maintenance lease
23. Able to provide a copy of the Federal Motor Carrier Safety Regulations (FMCSR)
24. Able to provide a copy of the hazardous materials regulations
25. Have a system to show you are aware of when driver's license and medical card will expire
26. Driver files are in a locked authorized access only area
27. Hazmat security plan only if required to have one.
28. Placards available to give out to customers that need them
29. Current copies of any special permits that you are using and documentation that you have trained any employee that handle the special permitted package

This list is not all-inclusive but will assist in having the majority of the necessary documents during your Compliance Review.

Will you be ready when you get your call for a Compliance Review?

Feel free to contact me on any of these items if you have questions.

Michael Dodd

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MEDICAL GAS BULLETIN

Medical Gas Bulletin
03/01/2015

FDA Enforcement Alert

We have received word of some unusual FDA actions recently. In some cases, the FDA investigator apparently advised end users/hospitals to discontinue the use of Valve Integrated Pressure Regulators, in contradiction to the terms of the recent Western recall of these units. In other cases, the FDA investigator seeks to enforce unusual sections of the regulations for medical gases (full QCU investigations for normal pre-fill inspections, specimens of labels attached to fill logs when none are needed, etc.)

CGA and GAWDA have adopted CGA PS-42, which establishes Current Good Manufacturing Practices for Medical Gases. Two recommendations:

1. Download CGA PS-42 from cganet.com. This represents a consistent industry interpretation of FDA regulations.
2. Advise Tom Badstubner when an FDA or state inspector seeks to enforce provisions that are inconsistent with CGA PS-42 or makes other statements that seem unusual.

March Medical Gas Roundtable

These GAWDA Medical Gas roundtables are excellent sources of CGMP training and the latest industry compliance news. On Friday, March 27, we will cover **Subparts D - Equipment**. *Sample equipment maintenance records will be available for downloading during the training.*

In addition we will be conducting the following additional training on March 28:

- **Specialty Gas** – Gravimetric Filling Safe Practices - *Includes cylinder filling rules for CO/CO2 mixtures, fuel-oxidizer basic rules and other procedures to maximize safety.*
- **Medical Device Gas Compliance** - QSR Subparts C D E & F– Design Controls, Document Controls, Purchasing Controls, Identification and Traceability
- **Food Gas Roundtable** –
 - CGMP Training – 21 CFR 110, Subpart B--Buildings and Facilities
 - 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 amy@asteriskllc.com.

Training Schedule - 2015

GAWDA Professional Compliance Seminars

In addition to the latest, documented training you need for DOT and FDA compliance, Chart Inc. will be presenting a four-hour class on the operation and maintenance of your standard liquid cylinder. During the class you will receive a refresher on design and safe handling of liquid cylinders, proper filling techniques, and the internal workings of a liquid cylinder.

- March 31 - April 2 at Chart Inc., Ball Ground, GA

[Click here for registration form and more information](#)

Micro-audit





MEDICAL GAS BULLETIN

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. **Servomex Filter Check** – Verify that the filter inspection record is current for your Servomex oxygen analyzer. The frequency of inspection is listed in the operator's manual for your instrument.
2. **Calibrations** – Be sure that your thermometers, vacuum gauges and high pressure gauges are calibrated according to your SOPs.
3. **Daily Vacuum Gauge Verification** – Be sure you have a record that your vacuum gauge needles read zero at atmospheric pressure. This record should be made each day the vacuum gauge is used.

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