

SAFETY & TECHNOLOGY ORGANIZER

APRIL 2015

ENCLOSED

Safety Topic: The GAWDA Safety Committee recently published a Sample Safety Practice regarding the selection and use of docking ramps.

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

Traffic Bulletin: Members have asked me how they should keep their DOT files. Please contact Mike Dodd for more information.

Medical Gas Bulletin: How can I get access to the CGA publications? Med Gas Roundtable April Schedule. 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!
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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
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April 2015 Safety Topic

The GAWDA Safety Committee recently published a Sample Safety Practice regarding the selection and use of docking ramps. This and the previous Sample Safety Practices are on the members only section of the GAWDA website.

PURPOSE	To provide guidelines for the selection and use of docking ramps, which are also known as dock plates, dock boards, rail boards, dock levelers, and yard ramps
RESPONSIBILITY	All individuals that select dock ramps and train employees on the use of dock ramps
AUTHORITY	Location Manager and/or Distribution Manager

The Selection and Use of Docking Ramps

(Insert Company Name Here)

Scope

The following suggestions are for your consideration during selection and use of docking ramps, which are also known as dock plates, dock boards, rail boards, dock levelers, and yard ramps. Final dimensions for length and width are dependent on equipment grade or slope, and width.

Background

Injuries have been experienced when employees using docking ramps have fallen between the dock and the truck. These accidents result from one or both of the following:

- Use of inappropriate docking ramps
- Improper use of docking ramps

OSHA References

1910.30 Other working surfaces.

- (a) **Dockboards (bridge plates)**. (1) Portable and powered dockboards shall be strong enough to carry the load imposed on them.
- (a)(2) Portable dockboards shall be secured in position, either by being anchored or

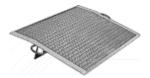


equipped with devices which will prevent their slipping.

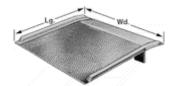
- (a)(3) Powered dockboards shall be designed and constructed in accordance with Commercial Standard CS202-56 (1961) "Industrial Lifts and Hinged Loading Ramps" published by the U.S. Department of Commerce, which is incorporated by reference as specified in §1910.6.
- (a)(4) Handholds, or other effective means, shall be provided on portable dockboards to permit safe handling.
- (a)(5) Positive protection shall be provided to prevent railroad cars from being moved while dockboards or bridge plates are in position.

Types of Docking Ramps

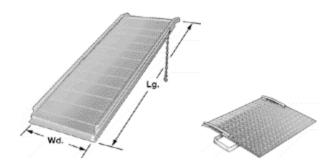
Dock plates - Portable without side curbs for non-powered loading applications. These are primarily used to manually load or unload small vehicles.



Dock boards - Portable with side curbs for forklift (e.g., powered industrial truck) and non-powered loading applications.

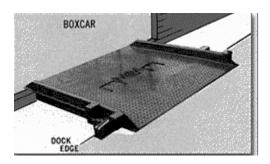


 Hand truck and mini dock boards are designed for specific non-powered loading usage.

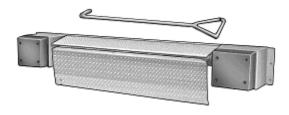


Rail boards - Portable powered industrial truck loading and non-powered loading of railcars. Portable with side curbs for forklift (i.e. powered industrial truck) and non-powered loading of railcars.

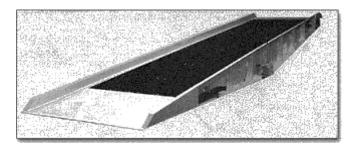




Dock levelers - Devices that are permanent installations on a dock for forklift (i.e., powered industrial truck) and non-powered loading applications.



Yard ramps - Portable or permanent ramps for forklift (i.e. powered industrial truck) freight handling from ground level to a dock or truck bed.



General Requirements

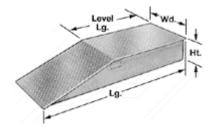
The following requirements apply to all docking ramps, whether permanent or portable:

- 1. Slick or flat plate metal cannot be used as a docking ramp.
- 2. All docking ramps shall have the load limit legibly stenciled on the curb or edge band in letters at least 1 in. (2.5 cm) high.
- 3. The load limit of the docking ramp shall not be exceeded.
- 4. All docking ramps shall have a 3-in. (7.6 cm) yellow or orange safety band painted on both longitudinal edges. Ramps with curbing require yellow or orange paint on the curbing.





- 5. Portable docking ramps are designed to be secured firmly in place while in use (e.g., legs) or are equipped with a means of doing so (e.g., chains). The use of unsecured docking ramps is not authorized except for mini dock boards as noted below.
- 6. All docking ramps shall be thoroughly inspected before use for damage (e.g., cracked welds, loose bolts) and for compliance with these requirements (e.g., safety stripe, load limit).
- 7. The position of the ramp must be checked every time it is traversed to ensure safety.
- Low truck decks may require use of a wheel riser ramp to bring the truck deck to a level at or above dock height. A minimum of two ramps is required, one for each rear wheel.



- 9. Personnel loading or unloading trucks, tractor-trailers or railcars shall not enter the vehicle until they have ensured the vehicle is secured and cannot be moved.
 - a. Wheel chocks are in place
 - b. Measures to ensure a powered vehicle cannot be moved include control of vehicle keys or specific driver communications.
 - c. Semi-trailers that are disconnected from the tractor also require a jack stand installed under the nose of the trailer
 - d. Railcars require wheel chocks or wheel blocks and blue and white warning "Stop" signs on the track to alert railroad crews.
- 10. Rail boards, dock levelers, and yard ramps shall be maintained as recommended by the manufacturer.
- 11. Manual pallet trucks shall be inspected to ensure that they will safely traverse the slope or angle of docking ramps. Longer forks or ramps may be required to reduce the angle.
- 12. Forklift height and under carriage clearance shall be checked before operating on a docking ramp or before entering any truck, trailer, or railcar. Some ramps will require forks to be raised high to clear ramp angle.
- A forklift shall not be driven onto a truck deck that is lower than the dock.



14. Dock boards or plates transported on vehicles for use at locations without proper docking ramps shall be properly secured before use.

Design and Usage

The following applies for selection and intended use of an appropriate ramp. Final dimensions for length and width are dependent on equipment grade or slope and width.

Dock Plates

- 1. Aluminum tread plate design is recommended to minimize weight and increase traction. These plates can be positioned manually. Steel dock plates are also available but positioning requires two people, mechanical assistance, or a forklift.
- 2. A lip bend of 11 degrees should exist 10 to 14 in. (25.4 to 35.6 cm) from the edge.
- 3. Edges shall have an adequate bevel for wheels to transition smoothly.
- 4. Legs long enough to secure the plate from shifting shall be in place.
- 5. All dock plates must be a minimum of 32 in. (81.3 cm) wide and 30 in. (76.2 cm) long.
- 6. Loading and usage should be reviewed locally to prevent the individual or product from slipping off.

Dock boards

- 1. Dock boards are equipped with a minimum 2-inch-high (5.1 cm) curb on each side.
- 2. Dock boards shall have the curbing and edges painted inward to 3 in. (7.6 cm) in safety yellow or orange.
- 3. A lip bend of 11 degrees should exist 10 to 14 in. (25.4 to 35.6 cm) from the edge.
- 4. Edges shall have an adequate bevel for wheels to transition smoothly.
- 5. Legs shall be in-place, positioned to keep the dock board from shifting.
- 6. Dock board legs shall be a minimum of 6 in. (15.2 cm) high.
- 7. Two persons, mechanical assistance, or a forklift shall be used to position a dock board.

Small dock boards

 Hand Truck Dock Board, 800-lb (363-kg) capacity, for truck and dock usage, constructed of aluminum tread plate to minimize weight and increase traction. Width 30 or 36 in. (76.2 or 91.4 cm) length determined by usage with a 2-inch-high (5.1 cm) curb on each side.



2. Mini Dock Board, 500-lb (226.8-kg) capacity for delivery over high curbs or through door thresholds is also constructed of aluminum treadplate to minimize weight and increase traction. Width - 24 in. (61 cm) minimum, length 18 in. (45.7 cm). Painted sides with handles and partial dock board curb.

Rail boards

- 1. Rail boards are equipped with a minimum 2-inch-high (5.1 cm) curb on each side.
- 2. Rail boards shall have the curbing and edges painted inward to 3 in. (7.6 cm) in safety yellow or orange.
- 3. Rail boards spanning railcar and dock must be locked into position with a suitable locking device.
- 4. Rail boards must be positioned by mechanical means.

Dock levelers

- 1. Dock levelers are suitable for forklift and some manual loading operations.
- 2. Local review of dock leveler angle should be completed before manual loading of wheeled cylinder clusters, wheeled liquid vessels, or other top-heavy products.

Please note: Use of a dock board is recommended if dock leveler angle is not sufficient.

3. Manual pallet trucks may require use of a dock board.

Yard ramps

- 1. Yard ramps are equipped with a minimum 6-inch-high (15.2 cm) curb on each side.
- 2. Curbing must be painted safety yellow or orange.
- 3. The elevated end of the ramp must have two permanently attached safety chains with hooks. Hooks must be secured to the vehicle or dock.
- 4. The portable ramp must be moved to the vehicle or dock never move the vehicle to the portable ramp.
- 5. If the portable ramp is attached to a truck or trailer, the vehicle brakes must be set and the wheels chocked.



- 6. The hydraulic lift system is designed to position the height of the elevated end of the ramp. Once the ramp is in place, always release the hydraulic pressure so the vehicle or permanent dock supports the ramp. The hydraulic system, wheels, etc., are designed to support the ramp, not the load.
- 7. Low gear shall always be used when traveling on a ramp. Never change gears on a ramp.
- 8. Forks must be raised to clear the ramp angle. A grade of 14% is normal.
- Portable ramps shall be thoroughly inspected annually for damage, cracked welds, loose bolts, etc. Routine maintenance as recommended by the manufacturer must also be performed.
- 10. Manual freight handling is not recommended on a yard ramp because of the potential for loss of control on the incline.

If you have any questions, please feel free to contact me.

Michael Dodd

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April 2015

DOT Filing System

Members have asked me how they should keep their DOT files. DOT allows you to keep them in just about any fashion that you wish provided the driver qualification and the drug and alcohol files are kept secure with authorized access only. Here is a suggested method that I have put together for members in the past that seems to work well. These items do not cover every situation but they will help 95% of our members.

Here are what the bullets stand for:

- = Hanging File Folders (retention period)
 - = Manila File Folders (retention period)

Here are the files and the suggested tab titles:

- DOT Filing System Table of Contents (place this sheet in the file)
- MCS-150 (current information)
- MCS-90 (current)
- Hazmat Registration (3 years)
- Unified Carrier Registration (only if CMVs in interstate commerce) (3 years)
- List of Drivers (current)
- List of Commercial Motor Vehicles (current)
- Accident Register
 - Accident Register (3 years retention)
 - Accident Register and Accident Report Forms (blank forms)
- DOT Accidents
 - o (place actual DOT accidents into separate manila folders)
- Company Policy regarding Alcohol & Controlled Substances (current version)
- Annual Summaries of Drug & Alcohol testing (5 years of summaries)
- Driver Supervisor D&A Substance Abuse Recognition training (current)
- Documentation of Brake Inspector / Adjusting training (retained by the motor carrier for the period during which that individual is performing annual motor vehicle inspections for the motor carrier, and for one year thereafter)
- Documentation of Annual Inspector qualifications (retained by the motor carrier for the period during which that individual is performing annual motor vehicle inspections for the motor carrier, and for one year thereafter)
- Schedule of Commercial Vehicle Maintenance (current)
- Vehicle Maintenance Files (The records shall be retained where the vehicle is either housed or maintained for a period of 1 year and for 6 months after the motor vehicle leaves the motor carrier's control.)





- Leased Vehicles (maintenance lease only)(copies of the agreement; Schedule A)(current)
- Roadside Inspection Reports (copy of the inspection and any repair bill kept for 1 year)(suggest 2 yrs. because of the SMS program)
- Previous DOT audits (either State or Federal)
- Driver Qualification Files (kept for 3 years after leaving or ceasing driver functions)
 - DQ file folder
 - Driver Drug & Alcohol File folder
- Hazmat Training (training required every 3 years)(current)
- Security Awareness Training (training required every 3 years)(current)
- DOT Security Program (these three items only if you are required to have a security plan)
 - Vulnerability Assessment (used for the security plan)(current)
 - Security Plan (current)
 - o In-Depth Training on Security Plan (training required every 3 years) (current)
- Post Trip Month 1 (only required when some is found defective) (3 months)
- Post Trip Month 2
- Post Trip Month 3
- Post Trip Month you are currently working on
- Special Permits (copies of the permits and training on the permits for anyone that handles the special permitted package) (3 years)

Many people do not have their employees doing their own brake adjustments or annual DOT vehicle inspections, so they would not need the above 2 files documenting the training certifications (Documentation of Brake Inspector / Adjusting training, Documentation of Annual Inspector qualifications).

Many people do not have a maintenance lease set up for their vehicles, so they will not need the file titled "Leased Vehicles".

Having these files set up and together in a filing system will really help you keep organized and look very good during a DOT audit.

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

Michael Dodd

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Medical Gas Bulletin 04/01/2015

How can I get access to the CGA publications?

This is a valuable benefit of your GAWDA membership! By participating in the CGA – GAWDA Distributor Safety program, you get free access to the CGA publications. You can get the subscription details at: http://www.gawda.org/resources/cga-subscription-program/

If you are not already enrolled, we encourage you to consider joining the Safety program and getting the publications for free.

April Medical Gas Roundtable

These GAWDA Medical Gas roundtables are excellent sources of CGMP training and the latest industry compliance news. On Friday, April 24, 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 24:

- Specialty Gas Analytical Method Validation for Medical Gases
- ISO 17025 Quality Management Proficiency Testing
- Food Gas Roundtable
 - CGMP Training 21 CFR 110, Subpart B--Buildings and Facilities
 - § 110.35 Sanitary operations.
 - The latest information about food gas regulations is reviewed –
 - o 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.

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:

- 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.

Tom Badstubner GAWDA Medical Gas Consultant Telephone: 508-883-0927 Email: tom@asteriskllc.com