



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

**MAY 2015**

### ***ENCLOSED***

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**Safety Topic: Sample Backing & Parking Policy**

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

**Traffic Bulletin: Accident Register and Accident Reports .**

Please contact Mike Dodd for more information.

**Medical Gas Bulletin:**

- 1. What is this HARPC issue in food and beverage gases?**
- 2. Medical Gas Roundtable Training May 29<sup>th</sup> and 30<sup>th</sup>, 2015**
- 3. 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 \_\_\_\_\_

## May 2015 Safety Topic

**This month's Safety Topic is a sample Backing & Parking Procedure that was put together by the GAWDA Safety Committee. The Safety Committee is working on a series of sample procedures for the membership to take and modify or use for their company needs.**

**I want to thank the Safety Committee volunteers for all their hard work on this project. This is a great example of GAWDA members getting together to work on a common problem and coming up with a solution to share with everyone.**

**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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Backing & Parking Policy/Procedure      Policy No.: XXXXXXXXXXXX-XX-XX  
Effective Date: XX-XX-XX      Supercedes: None

Policy: Safety cones must be used when backing commercial motor vehicles (trucks, vans, etc.). In addition, safety cones must be used when entering/exiting garages. When possible, employees are expected to avoid backing situations. If backing is necessary, employees are expected to back into parking spaces, as opposed to backing out of parking spaces. The exception is where prohibited by law, or where the policy creates a greater hazard.

Purpose:      To prevent or minimize the likelihood for potential death, injury, and/or property damage, from backing and/or parking activities.



Scope: All personnel who operate company vehicles, and/or operate vehicles in the course of business, must follow these procedures. These procedures apply both on and off company premises. These procedures must be followed by all contractors on company property and working at XXXXXXXXXXXX locations.

Appropriate Equipment (i.e. 3 cones):

Cones should be at least 18 inches tall and meet the standards of the Manual on Uniform Traffic Control Devices. The cones should be reflective for nighttime visibility.

Procedure:

Cones must be placed behind company vehicles before backing.

Cones must also be placed on the ground in front of a truck anytime there is a hazardous point at any height above a vehicle; i.e., when a truck is entering/exiting a garage. This obviously does not apply to general roadway obstructions like bridges, etc.

Upon approaching a site that requires a backing maneuver:

1. Drivers are to exit their vehicle and evaluate the maneuvering area. Typically, the wheel chock policy is not applicable during this brief assessment period. The exception is if it is an unsafe environment (i.e., grade on hill) or if the assessment period will take more than a minute. The truck can be left running, as long as the assessment takes a minimal amount of time and the truck remains in the driver's view/control and proper gear/brake applied at all times. During the assessment, the driver must ensure there is adequate clearance from adjacent and overhead objects.
2. Use safety cones to mark the final vehicle position. When marking your final stopping point, use the following procedure:
  - i. cones must be placed at final stopping point, one cone must be placed on driver's side of vehicle and one cone at the passenger side of vehicle.
  - ii. Always try to walk against the traffic flow or walk on the non-traffic side when returning to the front of the vehicle.
  - iii. Visually check the area around the vehicle before returning to the cab of the vehicle.
  - iv. Back up until the driver's door is next to the second cone. The rear of the vehicle should be at the desired stopping point.
  - v. If you lose sight of the stopping point cone, STOP your vehicle, re-evaluate your backing area, and reposition the cone. Nighttime tip: Place a flashlight in the final stopping point cone to better visualize your final stopping point.



3. Backing - Avoid backing if possible. Consider other delivery methods first and back-up only as a last resort.
  - i. Whenever possible, complete backing from the driver's side. Blind-side backing should be the last resort.
  - ii. Before backing your vehicle, do the following:
    - LOOK, and evaluate the backing area. Is it safe to back into?
    - Stand at the rear of your vehicle, facing the direction you plan to back into.
    - Carefully inspect the area around the vehicle and where the final stopping point of the vehicle will be.
    - Look for any overhangs, especially those that do not have a height marking sign. Consider using a spotter.
    - Look for any vehicles, posts, or other obstructions in close proximity (within 3 ft [1 m]) of your vehicle.
    - When walking back to re-enter your vehicle, walk completely around the vehicle (360 degrees) to ensure that you are aware of all potential hazards.
    - Do not turn your back on traffic. Always try to walk against the traffic flow or walk on the non-traffic side when returning to the front of the vehicle.
    - Place safety cones as appropriate. See the "Safety Cones" section.
    - Ensure that your four-way flashers are on.
    - Tap your horn to alert others of your intended move.
    - Back SLOWLY and carefully (no more than 1-2 mph).
    - Check mirrors and be aware of blind spots.
    - Look front, side, and rear as you back. Scan constantly. Conditions can change rapidly.
    - Back only as far as you must.
    - If necessary, exit the vehicle a number of times to re-inspect the area behind and above it during the backing operation.
4. Ensure that all side windows and mirrors are clean and do not present any glare.
5. Turn on available work lights; only at night and if off roadway.
6. Place a safety cone at the spot you are backing to and wish for the rear of your trailer to stop at.
  - On tanks leave approximately 10 feet or three large spaces
  - On docks or other flatbeds, it should be approximately 1 foot away
7. Two cones should be placed at the intended stopping point. One can be used to mark a possible hazard.
8. Return to your vehicle and turn off any radios, CBs, AM/FM, Digital Devices or any noise-producing device.
9. Roll down your drivers and passenger windows to reduce any glare that might be present
10. Release the parking brake and place the unit in reverse.
11. Listen for audible back up alarm and verify that it is working properly.
12. Use a light tap on the horn to make others aware of your backing process.
13. Allow the vehicle to proceed backwards at the slowest pace possible.
14. Using a scanning motion, check the front half of your vehicle and mirrors frequently.



15. Maintain a 360-degree field of vision or as much of your area of site as is practical.
  16. Back only as far as your first cone. If field of site is lost at any time, place truck in neutral and set the parking brake. Get out of the cab and make a reassessment of the backing maneuver.
  17. Once you have walked the lane of backing and have regained your perception of the maneuver, continue on to your end cone or next obstacle.
  18. Once you have completed the backing maneuver, exit your vehicle and place your cones at the front and rear of your tractor and trailer.
    - Front cones should be placed approximately 1 foot in front and left of the driver's side bumper
    - Rear cone should be placed at the rear of the trailer, passenger side approximately 1 foot back and right of the trailer
    - Third cone will be used for any nearby hazard.
- Note: Placement of this cone will allow the driver to walk around his or her unit prior to departure
19. Backing with the liftgate extended is to be avoided. On the rare event that backing must be performed with the liftgate extended, any applicable overhead dock doors must be opened prior to backing.
  20. A single safety cone may be sufficient. However, in some situations, several walkabouts may be necessary to reestablish the safety cone reference points. In some cases, several cones (spread out over a path) may be necessary to create a backing path. In the event of a long driveway (i.e., several hundred feet), the manager may waive the cone requirement (documented on the delivery ticket) until the last 50 feet between fixed objects/living area, or potential pedestrian areas.
  21. Drivers must use extreme caution when backing a vehicle. Speed while backing should not exceed 1 mile per hour. Drivers may have to exit the vehicle a number of times to re-inspect the area behind and above the vehicle during the backing operation.
  22. If someone is directing the driver, both parties must have a clear understanding of the hand signals being used. However, the use of a director does not relieve the driver of responsibility for any damage caused by or to the vehicle.
  23. When backing vehicles equipped with functional back-up cameras, the use of cones is currently not required, but is encouraged.

After entering an area with a hazardous point at any height above a vehicle (i.e., a garage with an overhead door), the following must occur:

1. The driver exits the vehicle and places a cone in front of the vehicle (near, but not underneath or in harms way of the overhead door). At this point, an employee will typically perform some delivery activities, so the wheel chock and security policies would be in effect.
2. After completing work activities, the driver goes back to the cone/overhead object to verify that there is adequate overhead clearance (i.e., verifies that the door hasn't been lowered enough to become an obstruction).

Before leaving the site, drivers are to ensure that cones are properly secured to the vehicle.



The cone policy is not required for backing automobiles or other non-delivery vehicles. Additionally, the procedures for placing cones should not be used when it creates a greater hazard. For example, if a driver has to back a truck in heavy traffic, it may be too dangerous to exit the vehicle and place a cone. As an option, the driver may need to use the hazard lights and exit from the driver's door (for safety purposes). If this alternative is unsafe, the driver should solicit help or consider some alternative to backing.

Regardless of the use of cones or cameras, mirrors must always be used during backing activities. Also, drivers must always look over shoulders, when applicable.

Equipment: A steel cone holder or appropriate equipment will be attached to each truck; the exact location varies by truck type/model. Traffic cones for this procedure are to be fluorescent orange. The part numbers in **HOWEVER THEY ORDER PARTS** are XXXXXX and XXXXX, respectively. Sites that operate vehicles at night need to use reflective safety cones; XXXXX in **HOWEVER THEY ORDER PARTS**.

#### APPROVALS:

Signature  
Name  
XXXXXOfficer  
Safety Director

Signature  
Name

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# TRAFFIC BULLETIN

**May 2015**

## Accident Register and Accident Reports

The requirement to keep DOT accident records is found in 49 CFR 390.15 and the definition for a DOT accident is found in 390.5.

Motor carriers must maintain an accident register containing specific information for each accident. The information to be included for each accident is as follows:

- Date of accident,
- City of town in which or most near where the accident occurred and the state in which the accident occurred,
- Driver name,
- Number of injuries,
- Number of fatalities, and
- Whether hazardous materials, other than fuel spilled from the fuel tanks of vehicles involved in the accident, were released.

The information must be retained for three years after the accident occurs. Copies of all accident reports required by state or other governmental entities or insurers must also be retained.

I have made two simple forms that you may use to record the required information.

The first form is the accident report, which helps you determine if the accident meets the definition for a "DOT accident" and if so, then directs you to the Accident Register form. Please see both of these forms below.

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

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# TRAFFIC BULLETIN

## ACCIDENT REPORT

Company Name: \_\_\_\_\_

Date of Accident: \_\_\_\_\_

Location of Accident: \_\_\_\_\_

\_\_\_\_\_  
(City or town and state where the accident occurred or most near where the accident occurred)

Driver Name: \_\_\_\_\_

1. Any Fatalities? YES OR NO (CIRCLE ONE)

2. Anyone injured requiring immediate treatment away from the scene of the accident?  
YES OR NO (CIRCLE ONE)

3. Any Disabling damage to a vehicle requiring it to be towed from the scene?  
YES OR NO (CIRCLE ONE)

Disabling damage includes vehicles that could have been driven, but would have been further damaged if so driven. Excluded from disabling damage is:

- Damage which can be remedied temporarily at the scene without special tools or parts,
- Tire disablement without other damage (even if no spare is available),
- Headlamp or taillight damage,
- Damage to turn signals, horn, or windshield wipers, which makes them inoperative.

Were any hazardous materials released, other than fuel spilled from the fuel tanks of motor vehicles involved in the accident? YES OR NO (CIRCLE ONE)

Other optional information: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_







# TRAFFIC BULLETIN

Report Prepared By: \_\_\_\_\_

## Instructions:

1. Make a manila folder and put everything and anything to do with this accident into it. File in the DOT Accident folder.
2. If you answered yes to any of the questions 1 thru 3, then this is a DOT Accident and needs to be added to your DOT Accident Register.

## ACCIDENT REGISTER FOR DOT ACCIDENTS (390.15)

Company Name and Address:  
\_\_\_\_\_

Reporting Period: \_\_\_\_\_

This is a list of DOT accidents that have occurred in the above calendar period.

Date City or town in which or most near where the accident occurred and the State in which the accident occurred Driver Name Number of injuries Number of fatalities  
Were hazardous materials, other than fuel spilled from the fuel tanks of motor vehicles involved in the accident, released?

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# MEDICAL GAS BULLETIN

Medical Gas Bulletin  
05/01/2015

## Frequently Asked Questions

Q – What is this HARPC issue in food and beverage gases?

A – HARPC (Harp-C) stands for “Hazard Analysis and Risk-Based Preventive Controls.” It is a new program mandated by the Food Safety Modernization Act (FSMA). The short answer is that most GAWDA members will have several years to adopt the program... after the final guidance is released. We are working with the CGA Food Gas Committee to develop the industry standard approach to HARPC. We will supply a template, program and integrated solution as a part of the GAWDA Food Gas Program well before you will need it. Let us know if you need information about HARPC for a customer concern before it is required by the FDA.

## May Medical Gas Roundtable - Subpart E – Control of Components Training

These GAWDA Medical Gas roundtables are excellent sources of CGMP training and the latest industry compliance news. On Friday, May 29, we will cover Subpart E – Control of Components Training. This training covers the qualification of your raw materials (including bulk products) used in making medical gases.

In addition we will be conducting the following additional training on May 30:

- Medical Device Gas - QSR Subparts G, H, I & J - Production and Process Controls, Acceptance Activities, CAPA, Non-Conforming Product
- Specialty Gas - Making Your Own Working Standards
- Food Gas Roundtable –
  - o CGMP Training – 21 CFR 110, Subpart E—Production/Process Controls § 110.80 - Processes and controls.
  - o 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](mailto: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:

1. Dead Ring Test – Verify that the dead ring test is actually being performed on high-pressure steel oxygen cylinders. Of course, the dead ring test should not be performed on aluminum cylinders. This simple item has appeared in recent FDA audits.
2. Certificate of Analysis (CoA) – Be sure that the CoAs you receive for your bulk medical product and for your Servomex span/zero gas cylinders have the following mandatory items:
  - Name and address of the calibration standard supplier
  - Name of the product
  - Lot number or unique identification number specific for each cylinder





# MEDICAL GAS BULLETIN

- ☑ Analytical methodology used to assay the calibration standard
- ☑ Actual analytical results (for example, 99.9 percent nitrogen)
- ☑ The responsible person's signature and the date signed

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