

SAFETY & TECHNOLOGY ORGANIZER

APRIL 2017

ENCLOSED

Safety Topic: Published GAWDA Sample Safety Practices

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

Traffic Bulletin: Driver Eligibility Requirements

Please contact Mike Dodd for more information.

Medical Gas Bulletin:

1. 1. FAQ's:

- 1. If liquid nitrogen is used to freeze ice cream, must the liquid nitrogen be food grade?**
- 2. Must Dry Ice be food grade if it is used to refrigerate food?**

2. Medical Gas Roundtable: April 28: Internal Auditor Training

Specialty Gas: Analytical Method Validation for Medical Gases

Food Gas Roundtable – CGMP Training – 21 CFR 117, Subpart B Current Good Manufacturing Practice

4. Micro Audit Suggestions

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 _____

Published GAWDA Sample Safety Practices

Here are the sample safety practices that the GAWDA Safety Committee has published to date. The committee is always looking for new items to work on so if you have any suggestions for future topics please let me know.

- Backing and Parking
- Customer Safety at Member Sites
- Cylinder Connection at Customer Sites
- Cylinder Deliveries at Customers with Stairs and Ramps
- Stairs and Ramps Delivery Survey
- Driver Distractions Personal Communications Devices
- Ergonomics in the Workplace
- Guidelines for Leaking Cylinders at Customer Locations
- Load Securement
- New Employee Orientation
- Retail Security Premises Safety
- Safe Cylinder Handling
- Training Form
- Transporting Liquid Containers in Elevators

Here are some more that are not on the GAWDA website. Until we get them posted on the website you can ask me for them and I'll be happy to send these or any of the above to you.

- Cylinder Loading Dock Safety
- Forklift Cylinder Safety
- Ladder Safety
- Selection and Use of Docking Ramps
- Sign-in Safety Guidelines



All the above are simply suggested guidelines that each member can take and use as is or modify to meet their company requirements.

Feel free to contact me if you have any questions.

Michael Dodd

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Traffic Bulletin

April 2017

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

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

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Medical Gas Bulletin

APRIL 2017

Frequently Asked Questions

Q – If liquid nitrogen is used to freeze ice cream, must the liquid nitrogen be food grade?

A – Yes. If the liquid nitrogen contacts the ice cream, then the liquid nitrogen must be food grade and the supplier must be registered with the FDA.

Q – Must Dry Ice be food grade if it is used to refrigerate food?

A – Maybe. If the Dry Ice is in contact with the food, it must be made with food grade carbon dioxide. If the food is protected by packaging such that the Dry Ice does not contact the food, the Dry Ice may not need to be made with food grade carbon dioxide.

If the Dry Ice is in contact with the food, it must be produced/supplied by an FDA registered facility. In this case the Dry Ice must meet the Current Good Manufacturing Practices detailed in 21 CFR 117. (Written procedures, training, records, cleanliness, lot numbers, supplier and raw material qualification, records, pest control, allergen awareness, HARPC, etc.)

Please contact tom@asteriskllc.com if you need sample Dry Ice procedures.

Q – Where can I find the security requirements for storing nitrous oxide cylinders?

A – The FDA does not specifically define the security of the storage areas for nitrous oxide. The Compressed Gas Association has published excellent guidelines for storing and securing nitrous oxide. GAWDA members can sign up for free access to these CGA resources. For further details, see:

- CGA G-8.3, *Safe Practices for Storage and Handling of Nitrous Oxide*
- CGA P-50, *Site Security Standard*
- CGA P-51, *Transportation Security Standard for the Compressed Gas Industry*
- CGA P-52, *Security Standard for Qualifying Customers Purchasing Compressed Gases*

Though not all items will apply in all cases, consider the following:

- Inventory control systems to detect theft or loss
- Access controls
- Property fencing
- Secondary fencing for nitrous cylinders and bulk storage
- Lockout devices to secure valves on bulk storage
- Security systems, alarms, etc.
- Procedure to determine if a customer is legitimate

April Medical Gas Roundtable

These GAWDA Medical Gas roundtables are excellent sources of CGMP training and the latest industry compliance news. On Friday, April 28, we will cover **CGMP – Internal Auditor Training**. This will be especially useful for the personnel who conduct mock FDA audits in your company.



Medical Gas Bulletin

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

- **Specialty Gas** - Analytical Method Validation for Medical Gases
- **Food Gas Roundtable** –
 - CGMP Training – 21 CFR 117, Subpart B Current Good Manufacturing Practice
 - §117.10-117.110
 - 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 jodie@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. **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.

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