



OCTOBER 2021

ENCLOSED

Safety Topics

Winter Safety

Please contact [Marilyn Dempsey](#), GAWDA DHS, EPA, & OSHA Consultant for more information.

Traffic Bulletin

Placarding

Please contact [Mike Dodd](#), GAWDA DOT Consultant for more information.

Medical, Food/Beverage and Specialty Gases Bulletin

1. FAQs: Medical Gas Cylinders
2. October Medical Gas Roundtable (10/29/2021) – Subparts H & I – Holding and Distribution, Laboratory Controls; GAWDA Professional Compliance Training (10/25-29/2021)
3. Micro-Audit Suggestions

Please contact [Tom Badstubner](#), GAWDA FDA Food, Medical & Specialty Gases Consultant for more information.

**** Join us for our Monthly LIVE “Safety Managers’ Safety Meeting” ****

Our next meeting is [November 10th](#) @ 1PM Eastern.

Visit us at www.gawda.org/safety-meeting/ to learn more and sign up today.

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 _____

October 2021**Winter Safety**

Winter will soon be upon us and for most of us that means rain, ice or snow. Although OSHA does not have a specific standard that covers working in cold environments, employers have a responsibility to provide workers with employment and a place of employment which are free from recognized hazards, including cold stress (OSHA General Duty Clause).

Below are a few areas worth reviewing and some suggestions to help keep you and your employees safe.

1. Review your Facility Emergency Action Plan
 - Do you have a plan for a winter storm?
 - Do you have the necessary equipment at each location?
 - Do you have a communication plan?
2. Vehicle Maintenance
 - Are the vehicles on a regular PM schedule?
 - Are the Drivers completing the DVIR after every shift, so you're aware of a problem before a truck breaks down?
 - Do they have/need supplies for a winter storm event?
3. Winter driving

AAA offers the following driving tips:

 - Avoid using cruise control in wintry conditions
 - Steer in the direction of a skid, so when your wheels regain traction, you don't have to overcorrect to stay in your lane
 - Accelerate and decelerate slowly
 - Increase following distance to 8 to 10 seconds, more for CMVs
 - If possible, don't stop when going uphill
 - If visibility is severely limited due to a whiteout, pull off the road to a safe place and do not drive until conditions improve. Avoid pulling off onto the shoulder unless it is an absolute emergency. Limited visibility means other vehicles can't see yours on the shoulder.



4. Personnel preparedness

Slip and Fall injuries account for 15% of all work-related injuries in the U.S. The risk of slip and fall injuries increase with the accumulation of snow and ice. SIMA, the national nonprofit organization representing the snow removal industry, has some tips on safe winter walking.

- Do you have heaters or windshields to protect employees?
- Do you have a plan for work rotation during times of extreme cold?
- Schedule exterior work during the warmer parts of the day.
- Assign employees in pairs when working outside - they can monitor each other for signs of hypothermia.
- Encourage employees to take breaks and drink warm fluids. The warm drink will only warm the body and prevent dehydration.
- Acclimatize workers to the cold, gradually increasing the time spent in the cold.
- Wear proper footwear. Proper footwear should place the entire foot on the surface of the ground and have visible treads. Avoid a smooth sole and opt for a heavy threaded shoe with a flat bottom and use your toes to 'grip' or use traction devices on the bottom of safety shoes.
- Accessorize to see and be seen. Wear sunglasses so that you can see in the reflective light of the snow. Also, wear a bright coat or scarf so that drivers can easily see you.
- Plan ahead. While walking on snow or ice on sidewalks or in parking lots, walk consciously. Instead of only looking down, occasionally pause and scan from left to right to ensure you are not in the way of vehicles or other hazards.
- Don't jump or slide. Always focus on keeping your feet on the ground as much as possible while walking slowly. Sliding sounds like fun but can result in serious injury. Walk like a Penguin! Point your feet out slightly - spreading your feet out slightly while walking on ice increases your center of gravity.
- Be careful when you shift your weight. When stepping off a curb or getting into a car, be careful since shifting your weight may cause an imbalance and result in a fall.



*Do all personnel have safety shoes with good treads?
Do you have the correct PPE for cold weather?
Do employees know the signs of Hypothermia?*

Below is a list of Winter PPE available from GAWDA supplier members.
I have also included flyers from NOAA the CDC and a quick card to help train your employees.

Winter gloves

[JTillman](#), Robin Whitman <Robin.Whitman@jtillman.com>

Shoe traction for ice and snow

Pioneer Winter apparel

[Surewerx](#) -- Andrew Basso <abasso@surewerx.com>
Chris Holmes <cholmes@surewerx.com>,
Jay Feist <jfeist@surewerx.com>,
Lance Desmarais <ldesmarais@surewerx.com>

If you have any questions, please feel free to contact:

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FROSTBITE

A victim is often unaware of frostbite because frozen tissue is numb.



Signs & Symptoms

- Redness or pain in any skin area may be the first sign of frostbite.

Other signs include:

- a white or grayish-yellow skin area
- skin that feels unusually firm or waxy
- numbness



HYPOTHERMIA

Hypothermia often occurs at very cold temperatures, but can occur at cool temperatures (above 40°F), if a person is wet (from rain, sweat or cold water) and becomes chilled.



Signs & Symptoms

Adults:

- shivering
- exhaustion
- confusion
- fumbling hands
- memory loss
- slurred speech
- drowsiness

Infants:

- bright red, cold skin
- very low energy



If a person's temperature is below 95° get medical attention immediately.





Each year,
weather-related
crashes cause more than
6,000 deaths and 480,000 injuries.
If the outside temperature is near freezing,
drive like you're on ice. You may be!





Protecting Workers from Cold Stress

Cold temperatures and increased wind speed (wind chill) cause heat to leave the body more quickly, putting workers at risk of cold stress. Anyone working in the cold may be at risk, e.g., workers in freezers, outdoor agriculture and construction.

Common Types of Cold Stress

Hypothermia

- Normal body temperature (98.6°F) drops to 95°F or less.
- **Mild Symptoms:** alert but shivering.
- **Moderate to Severe Symptoms:** shivering stops; confusion; slurred speech; heart rate/breathing slow; loss of consciousness; death.

Frostbite

- Body tissues freeze, e.g., hands and feet. Can occur at temperatures above freezing, due to wind chill. May result in amputation.
- **Symptoms:** numbness, reddened skin develops gray/white patches, feels firm/hard, and may blister.

Trench Foot (also known as Immersion Foot)

- Non-freezing injury to the foot, caused by lengthy exposure to wet and cold environment. Can occur at air temperature as high as 60°F, if feet are constantly wet.
- **Symptoms:** redness, swelling, numbness, and blisters.

Risk Factors

- Dressing improperly, wet clothing/skin, and exhaustion.

For Prevention, Your Employer Should:

- Train you on cold stress hazards and prevention.
- Provide engineering controls, e.g., radiant heaters.
- Gradually introduce workers to the cold; monitor workers; schedule breaks in warm areas.

For more information:



U.S. Department of Labor

www.osha.gov (800) 321-OSHA (6742)

OSHA 3156-02R 2014





How to Protect Yourself and Others

- Know the symptoms; monitor yourself and co-workers.
- Drink warm, sweetened fluids (no alcohol).
- Dress properly:
 - Layers of loose-fitting, insulating clothes
 - Insulated jacket, gloves, and a hat (waterproof, if necessary)
 - Insulated and waterproof boots

What to Do When a Worker Suffers from Cold Stress

For Hypothermia:

- Call 911 immediately in an emergency.
- To prevent further heat loss:
 - Move the worker to a warm place.
 - Change to dry clothes.
 - Cover the body (including the head and neck) with blankets, and with something to block the cold (e.g., tarp, garbage bag). Do **not** cover the face.
- If medical help is more than 30 minutes away:
 - Give warm, sweetened drinks if alert (no alcohol).
 - Apply heat packs to the armpits, sides of chest, neck, and groin. Call 911 for additional rewarming instructions.

For Frostbite:

- Follow the recommendations “For Hypothermia”.
- Do not rub the frostbitten area.
- Avoid walking on frostbitten feet.
- Do not apply snow/water. Do not break blisters.
- Loosely cover and protect the area from contact.
- Do not try to rewarm the area unless directed by medical personnel.

For Trench (Immersion) Foot:

- Remove wet shoes/socks; air dry (in warm area); keep affected feet elevated and avoid walking. Get medical attention.

For more information:



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Placarding

The Hazardous Materials Regulations (HMR) sections 172.500-560 cover the requirements for placarding. This bulletin will narrow the focus to the requirements for the typical gas distributor and try to give you some simple guidelines to follow. (See **Simple Placarding Rules** below.)

Placards alert people to the potential dangers associated with the particular hazmat contained in a motor vehicle, rail car, freight container, cargo tank or portable tank. Placards help emergency response personnel properly identify and respond to potential hazards when responding to a hazardous materials incident.

Who must placard?

172.504 starts off by saying that you must placard for any quantity of a hazardous material but then proceeds to give several exceptions to the rules. I will give you some simple rules later. (See **Simple Placarding Rules** below.)

The shipper (that is you) is responsible for supplying or affixing the appropriate placards. Carriers (your vehicles or the customer vehicles) may not transport a shipment unless it is placarded in accordance with the regulations.

Highway-Specific Requirements §177.823

No person may move a transport vehicle carrying hazardous materials unless it is properly placarded. However, in an emergency, transportation may occur if:

- The vehicle is escorted by a representative of a state or local government, or
- The carrier has received permission to move the vehicle from the Department of Transportation, or
- Movement of the vehicle is necessary to protect life and property.

Placard Specifications §172.519

This section covers the size, color and design specifications that govern the production and use of hazardous materials placards. The main things to remember are to purchase your placards from someone like JJ Keller and then later make sure the colors haven't faded. If they have, replace them.

Placard Placement §172.516

Each bulk packaging, freight container, unit load device, transport vehicle, or rail car containing hazardous material must be placarded on each side and each end (with some exceptions) with the type of placards specified in Table 1 or Table 2 of section 172.504.



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Placards must be readily visible from the direction they face, except from the direction of another vehicle or rail car to which the motor vehicle or rail car is coupled. Placards displayed on freight containers, or on portable tanks loaded on a vehicle or rail car, may satisfy this requirement.

The placard placement for the front of a motor vehicle may be on the front of the truck-tractor instead of, or in addition to, the placard on the front of the cargo-carrying body (trailer, semi trailer, etc.).

Each placard on a transport vehicle, bulk packaging, freight container or aircraft unit load device must be:

- Located clear of any appurtenances and devices (e.g., ladders, pipes, etc.).
- Located away from any markings (such as advertising) that might substantially reduce its effectiveness (a minimum distance of 76 mm (3 inches) is required).
- Maintained by the carrier so that the format, legibility, color, and visibility of the placard will not be reduced in any way – due to damage, deterioration, or obscured by dirt, etc.
- Displayed to be read horizontally.
- Placed, as far as practicable, so that dirt or water is not directed to it from the wheels of the vehicle.
- Affixed to a background of contrasting color, or have a dotted or solid line outer border that contrasts with the background color.
- Securely attached or affixed or placed in a placard holder.

The regulations prescribed recommended specifications for placard holders (Appendix C to Part 172). Placard holders are not required.

Placarding Tables §172.504

The placarding tables tell you when you must placard. The key word is “must”. Remember, you may placard any amount of hazardous material on your vehicle so long as there is at least some quantity of that hazard on board. (See **Simple Placarding Rules** below.)

Any quantity of a hazardous material falling within the categories of material listed in Table 1 **must be placarded**. For our members, this is typically poison gas (hazard class 2.3) and calcium carbide (hazard class 4.3).

Any quantity of a hazardous material falling within the categories of material listed in Table 2 must be placarded, with the following exceptions:

- A transport vehicle or freight container, which contains less than 454 kg (1,001 lb) aggregate gross weight of hazardous materials covered by Table 2, is not required to display placards. (This exception does not apply to bulk packages or materials subject to Section 172.505 - Placarding for Subsidiary Hazards.)



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- If a vehicle, rail car, freight container, or unit load device contains non-bulk packaging of two or more categories of Table 2 materials, the DANGEROUS placard may be displayed instead of the separate placards specified in Table 2. However, when 1,000 kg (2,205 lb) or more of one hazard category is loaded at one facility, the placard specified in Table 2 must be displayed. (I don't recommend this one. See **Simple Placarding Rules** below.)
- Non-bulk packaging that contains only the residue of a Table 2 material need not be included in determining the required placards.

Placarding Exceptions §172.504(f)

- A NON-FLAMMABLE GAS placard is not required on a transport vehicle containing a non-flammable gas if the vehicle also contains flammable gas or oxygen and is placarded FLAMMABLE GAS or OXYGEN, as required.
- The OXYGEN placard may be used on domestic shipments of oxygen (compressed or refrigerated liquid) in place of a NON-FLAMMABLE GAS placard.
- For domestic transportation, a POISON INHALATION HAZARD placard is not required on a transport vehicle or freight container that is already placarded with a POISON GAS placard.

Simple Placarding Rules

Here are the simple rules for our distributors whenever they are transporting either flammable, nonflammable, or poison gas cylinders. (If you haul other hazard classes, other rules may apply.)

First simple rule: Yellow equals green and red covers green. Therefore, if you have only flammable gas, nonflammable gas and oxygen cylinders on your truck, then you would only need to have the red FLAMMABLE GAS placard showing on all 4 sides. Remember, this rule works as long as you have at least one flammable gas cylinder on the vehicle.

Explanation: The OXYGEN placard is 100% optional in this country. The hazard class for oxygen is nonflammable gas; green. Not carrying the OXYGEN placard is one less placard to have to worry about. The regulations also say that if you are showing the FLAMMABLE GAS placard (red), then you don't have to show the NONFLAMMABLE GAS placard (green).

Add any amount of a poison gas to the vehicle and you must display the POISON GAS placard.

Second simple rule: If you placard the truck to match the labels (the miniature placards) on the cylinder decals you have loaded on the vehicle, you will never be wrong. You will need more placards on all 4 sides, but you will never be wrong.



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One last thought, you must have at least some amount of the hazard on the vehicle in order to display the placard on the vehicle. You can be fined for placarding a vehicle when the hazard is not present; i.e., an empty truck.

Feel free to contact me if you have questions.

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Medical, Food/Beverage and Specialty Gases Bulletin

10/01/2021

Frequently Asked Question

Q - Can I fill medical gas cylinders with my customers' labels?

A - You can fill cylinders with your customers' labels. You just need to have a copy of their label (approved by your QCU) in your Label Master Record so your pumpers know that the label is approved. If the label is not also "FDA Listed" by your customer, it should be listed by you with the FDA. If you fill cylinders with their labels, the label must have a qualifier before the company name on the label.

FDA Requirements:

1. Labels shall bear the actual corporate name or the name under which business is conducted; this name may be preceded or followed by the name of the division or parent company.
2. If a company is distributing medical gas cylinders that were filled by a third party, and the name of the company is on the label, the company name must be identified with an appropriate qualifying statement, such as:
Manufactured for _____
Manufactured by _____ for _____
Manufactured for _____ by _____
Distributed by _____
3. A company name appearing on the label without qualification simply means that the company is the manufacturer. Otherwise, the product shall be misbranded.
4. The street address, city, state, and zip code of the manufacturer shall be on the label unless it is shown in the current city or telephone directory.
5. The principal place of business address may be used for product manufactured at a branch.

There cannot be two product labels on the cylinder.

GAWDA Professional Compliance Training – HOLD THE DATES

This year, the Fall Professional Compliance Training will be held via Teleconference
October 25 to 29, 2021



Medical, Food/Beverage and Specialty Gases Bulletin

October Medical Gas Roundtable (10/29/2021) – Subparts H & I – Holding and Distribution, Laboratory Controls

These GAWDA Medical Gas roundtables are excellent sources of CGMP training and the latest industry compliance news. In October we will be discussing warehousing and laboratory operations.

For your information, we are also conducting the following additional webinars in October:

- **Specialty Gas Operations** - Measuring and Controlling Uncertainty in Gas Chromatographs (ISO 6143)
- **Food Gas Roundtable** – Part 117 Subpart C Food Safety Plan

These and other webinars are available as a streaming recording at a time convenient to you. If you are unable to view the webinar live, just let us know and we will send you the link to the recording. 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. **Filling Procedures** – Copy the fill procedure from the SOPs and watch a cylinder filling operator actually perform the procedure. This is the same technique the FDA uses to see if we are following our fill procedures.
2. **Documented Training** – Complete a training record for the cylinder filling operator that was observed. Attach a copy of the completed SOP to the training record.

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