

SAFETY & TECHNOLOGY ORGANIZER

FEBRUARY 2012

ENCLOSED

Safety Topic: "Cylinder Delivery at Locations with Stairs and/or Ramps" Please contact GAWDA's OSHA and EPA Consultant, Mike Dodd for more information.

Traffic Bulletin: "Preventing Vehicle Backing Accidents"

Please contact GAWDA's DOT and Security Consultant, Mike Dodd for more information.

Medical Gas Bulletin: Legislative Activities, Medical Gas Roundtables, Training Schedule and 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





CYLINDER DELIVERY AT LOCATIONS WITH STAIRS AND/OR RAMPS

The GAWDA Safety Committee has published a sample policy that our members can use to reduce potential accidents. This policy along with the customer stair and ramp survey mentioned can be found on the GAWDA website under the Resources tab and then under the Reference Materials link. Here is the body of that sample policy:

It is the position of the Safety Committee that the delivery of cylinders, dewars, and cradles should not be made when stairs or ramps are involved.

This is to insure the safety of the delivery driver, to prevent injuries and to prevent the loss of control of cylinders etc. when stairs and or ramps are involved. Following are some guidelines to help establish a working procedure for these deliveries.

For clarification purposes; A curb or step up is not considered a flight of stairs, more than (1) step with less than (3) ft. of tread length is considered a flight of stairs. A grade rise in excess of 10% would be considered a ramp too steep for cylinder deliveries (see diagram below).

Delivery drivers will inform their supervisor of any issue regarding the delivery of cylinders when it involves stairs or ramps.

Stair and Ramp Delivery Survey Form

To help identify a problem delivery, the delivery driver will complete a "Stairs and Ramps Delivery Survey" form (separate document available on the GAWDA Reference Materials website).

The Stairs and Ramp Delivery Survey form must be turned in to supervisor.

Supervisor, can evaluate, address and resolve problem with customer, or notify the appropriate sales person. Customer should be advised of the problem, and offered solutions.

Stairs

Customers may utilize their personnel to move cylinder either down or up a flight of stairs. Should the customer elect to move cylinders etc. down or up stairs and or ramps a chained area should be made available at or near the stairs or ramp for the delivery of cylinders etc.

If no solution can be agreed on, then it must be determined if it is cost effective to continue doing business with this customer.

RAMPS

Grades of 10% or less

Cylinder carts or hand trucks may be used when transporting cylinders on ramps so long as the following applies:

- Ramp has a grade of 10% or less
- Ramp is in good repair
- Person using cylinder cart has the necessary training and is wearing the proper PPE
- Maximum manufacturer load weight of cart is not exceeded

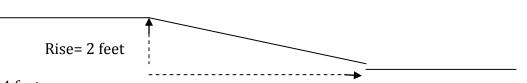
Warning: Under no circumstance shall cylinders be rolled up or down a ramp. Losing control of a cylinder can result in serious injury and property damage.

Grades greater than 10%

It is recommended that a forklift or electric pallet jack be used when traveling on ramps with grades greater than 10%. Cylinders shall be secured/ strapped to prevent load from shifting while being transported. Examples of 10% grade are no more than 6" rise in 5', no more than 1' rise in 10', no more than 2' rise in 20', etc.

Figuring Grade

Grade= Rise/Run x 100 Example:



Run= 14 feet

2 / 14 x 100= <u>14% Grade</u>



Please see the "Safe Cylinder Handling" sample policy for details on handling cylinders in general.

Again, the purpose of this sample policy is to reduce accidents in the workplace and to provide our members with a template that they can use to write their own safety policy.

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February 2012

Preventing Vechicle Backing Accidents

Backing is the single most frequent cause of truck accidents, but all backing accidents are preventable. Many backing accidents are caused by drivers who are in a rush or lose their focus. When backing, drivers should go slowly and concentrate on what they are doing. Avoid over confidence in your backing skills.

Here are some simple guidelines on backing:

- Don't backup if you don't have to. If you can, you should pull into a spot that let's you pull out going forward when you need to leave.
- The closest place is not always the safest place. Most people try to park close to the door so they can do the least walking. The problem is that so does everyone else which increases the activity and traffic. Choose a place farther away and you will avoid potential hazards of the increased traffic which equals increased risk.
- Adjust your mirrors before driving.
- When you do have to back:
 - Check the area behind you first. Get out and look. Many companies have made this mandatory. You may have to get out more than once, especially if blind-side backing.
 - Back up slowly.
 - Remember to keep your blind areas in mind while backing.
 - Look constantly and often to the rear, both sides, and front while backing. Things change and can happen fast.
 - Back up no further than you must.
 - Whenever possible, backing should be completed from the driver's side. Blind-side backing should be the last resort.
 - Let people around you know what you are doing. Use your lights and horn as needed to communicate your intentions.

The driver has the ultimate responsibility for the vehicle when backing. You might receive help while backing, but you are still the responsible person if an accident happens. If you use a spotter, then here are some things to consider:

- Carefully choose a spotter capable of performing the duty.
- Discuss the spotter's responsibilities and the hand signals to be used.
- Discuss the desired final position of the vehicle.
- Inspect the backing site (ground, sides, and overhead) for any obstacle or backing hazard.



- Stress that at no time should the spotter position himself or herself or any part of his or her body behind the vehicle.
- Understand that any time the spotter is not in full view, the vehicle must be stopped and the spotter repositioned before proceeding with the backing maneuver.
- Proceed with caution

Remember, backing accidents are preventable.

Feel free to contact me if you have questions.

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2/01/2012

Legislative Activities - Thanks!

Along with CGA, GAWDA member companies were asked to contact key Senators and Representatives in an effort to move the Medical Gas Modernization Act (HR 2227) forward. Several GAWDA members responded by sending letters to their Congressional representatives and staff. *THANK YOU!!!* for your assistance. We will know later in the year if HR 2227 is attached to the Prescription Drug User Fee Re-Authorization... which would significantly improve the chances of HR 2227 passage.

There are two primary goals of HR 2227:

- 1. To grant the primary medical gases "Approved Drug" status
- 2. To require the FDA to develop specific regulations that make sense for our industry.

February Medical Gas Roundtable

These GAWDA Medical Gas roundtables are excellent sources of CGMP training and the latest industry compliance news. On Friday, February 3, we will cover **Subparts C** - **Buildings and Facilities**. A sample facility maintenance and cleaning record will be available for downloading during the training.

In addition we will be conducting the following additional training on February 3:

- **Specialty Gas** Analytical Math (Precision, Accuracy, Linearity, Chromatography Performance) *Includes and Excel spreadsheet to help make the calculations easier.*
- **ISO 17025** Measurement Uncertainty *Includes an Excel spreadsheet to calculate your own measurement uncertainty.*
- **Food Gas Roundtable** the latest information about food gas regulations is reviewed *The sample Food Gas SOPs are available for downloading during the seminar.*

Contact <u>tom@asteriskllc.com</u> if you need more information about joining these seminars.

Training Schedule - 2012

GAWDA Professional Compliance Seminars

The latest, documented training you need for DOT and FDA compliance...

- March 27-29 Ball Ground, GA
- October 2-4 Aurora, IL



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. **Cryogenic Hoses -** Be sure that your cryogenic fill hoses are capped when not in use. (Homecare vans and large cryogenic containers)
- 2. **Quarantine** Be sure you are quarantining cylinders that have been filled but not yet "released" by the Quality Control Unit.
- 3. **Nitrous Oxide –** Be sure that your nitrous oxide is secure.

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