

SAFETY & TECHNOLOGY ORGANIZER

JUNE 2012

ENCLOSED

Safety Topic: "CGA Subscription Program"

Please contact GAWDA's OSHA and EPA Consultant, Mike Dodd for more information.

Traffic Bulletin: "LPG Filling and Storage"

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

Medical Gas Bulletin: FAQs, Medical Gas Roundtables, 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



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 _____

CGA Subscription Program

In an effort to get the word out on a great program, I want to use this month's Safety Topic to promote the CGA Subscription Program. In a few quick words; **this is a fantastic program for our members! I think you would be nuts not to take advantage of this offer.** Here is the reason why. The free program could be potential worth several hundreds of dollars if not into the thousand dollar mark of savings depending on how many of the CGA pamphlets you need in your business.

CGA will provide free subscription access to all electronic publications, except for the *CGA Handbook of Compressed Gases* and all video items, as well as CGA member pricing for hardcopy publications, to one person per location from each GAWDA member in their Distributor and Canadian Distributor membership categories.

All this is in exchange for the GAWDA member submitting their annual OSHA 300A data to the CGA contact. Data of individual companies are held in confidence and are not shared with any person outside of CGA staff, including CGA or GAWDA members. It is only shared with your permission.

Eligibility: To participate in this program, you must be a GAWDA Distributor Member with dues current.

1. Eligible GAWDA members will complete the [Registration Form](#) and [Awards Form](#) and email them to GAWDASubscription@cganet.com.
2. Once CGA receives completed information, we will check the GAWDA member list to ensure that the requestor is a member in good standing with GAWDA. CGA Staff will then enter the information for each GAWDA subscriber into our database. Once they have been entered, the individuals will receive an email with instructions on how to proceed, along with a password to access the site.
3. With that login information, go to gawda.cganet.com.
4. Please direct any questions to:

- Laura Brumsey
Director of Operations & Administration
Compressed Gas Association, Inc.
14501 George Carter Way, Suite 103
Chantilly, VA 20151
703-788-2757 - phone
703-961-1831 - fax
lbrumsey@cganet.com



All of this is explained in more detail along with all the links to the registration form and awards program detail pages can be found at the following link:

<http://gawda.org/Resources/CGA-Subscription-Program/CGA-Subscription-Program/>

Please take a few minutes and sign up for this great program.

Feel free to contact me if you have any questions.

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TRAFFIC BULLETIN

June 2012

LPG Filling and Storage

The primary purpose of this Bulletin is to remind people of the upcoming hot months of summer and the problems of overfilling LPG cylinders. This Bulletin is not meant to provide all the details of proper filling and storage of LPG cylinders. See **Filling and Storage** later in this Bulletin.

Hot Summer Days

The extreme heat of the summer months will cause overfilled cylinders to begin venting product and this venting product can be liquid which expands 270 times the volume when going from a liquid to a gas. Provide an ignition source and you have the equation for big trouble.

Key Mistakes

A very common mistake that I find is an employee putting a cylinder on the scale and then sliding the weight on the beam or adding weight to the electronic scale to add the weight of the product to the weight indicated on the scale. This doesn't take into consideration any residual in the cylinder. If product or any foreign substance is inside the cylinder, the result is an overfilled cylinder.

You should be taking every opportunity to check the weight of the cylinder prior to filling. There are times that residual product will still be in the cylinder, but many times the cylinder is empty and this lets you check the tare weight. I know of one major gas supplier that has found brand new cylinders with tare weights off 5% from the actual cylinder weight. Filling the cylinder using the stamped tare weight would have resulted in a 5% overfill. An alert and well-trained employee found this problem. This company has made the decision to fill all LPG 5% less than DOT permits just to have an extra safety factor. Remember, that if you do this, you need to take off the same amount from your advertised and invoiced volumes.

Another common mistake I find is the employee not taking into consideration the weight of the filling valve and hose assembly. This results in under filling the cylinder. Not a safety issue but certainly a weights and measures issue and a customer satisfaction issue.





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Filling and Storage

There are many sources of information available on the proper procedures for filling and storage of LPG cylinders. Some of these sources are:

NFPA 58, Liquefied Petroleum Gas Code; www.nfpa.org

National Propane Gas Association; www.npga.org

Your supplier

Some other storage issues to consider are:

Empties upside down on trucks and docks: The regulations require that the safety relief valve must be in contact with the gas vapor and not the liquid. Placing forklift style cylinders upside down on the truck or dock to denote they are “empties” is violating the regulations. If the safety would start to vent, you could be releasing liquid which expands about 270 times from liquid to gas.

Cylinders in racks at customers (not pin indexed): You should consider training your drivers and customers to place full or “empty” forklift cylinders into a storage rack with the safety relief valve pointed up. The index pins take care of this orientation while on the forklift, but the storage racks do not have the pins.

Too many together in one place: You should consider not storing too many flammable gas cylinders in one place or large groups. If you would ever have a problem, you will have a very big problem fast. Smaller groups and spread out between the groups will let you deal with smaller problems should you ever have a leaking / venting cylinders or a fire.

Training

OSHA requires employees to be trained in the jobs they perform.

DOT requires employees filling cylinders to be trained, tested and certified every 3 years. This falls under the “Function Specific” training requirements in 172.704.

There is an excellent DVD training program, “Dispensing Propane Safely”, available from the Propane Education & Research Council, that includes a test that along with an employer certification will satisfy the DOT requirements.

On a consulting basis, I can provide this training to our members.





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Final Thoughts

One of the most important items is the correct filling limit.

Tare Weight + Product Weight + Filling Assembly = Full Cylinder Scale Weight. Check the full cylinder weight prior to removing the filled cylinder from the scale.

Another important item is proper storage. Keep the required distances in mind and think about your cylinder storage. Think about the worst scenario and ask yourself if the way you are storing your cylinders would be a problem if you had a fire situation.

Finally, are your employees properly trained on cylinder inspection, cylinder selection, filling procedures, proper marking and labeling, handling and storage, and what they should do in emergency situations?

If there are any questions regarding this Bulletin, please ask.

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MEDICAL GAS BULLETIN

6/01/2012

Frequently Asked Questions

Q – What are the testing requirements for food grade CO₂?

A - Please get a copy of the sample Food Gas SOPs (Juliet@asteriskllc.com). All specifications are listed in the procedures. The critical issue is that the bulk product be qualified. If your bulk product is qualified as food grade, no testing is necessary for the full CO₂ cylinders.

May Medical Gas Roundtable (06/01/2012) – CGMP - How to Survive an FDA Audit

These GAWDA Medical Gas roundtables are excellent sources of CGMP training and the latest industry compliance news. In May we covered 21 CFR 211, Subpart E – Control of Components Training.

In June, we will cover how to survive an FDA audit. There are some simple items you can do before, during and after an FDA audit that will contribute to a better compliance outcome.

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

- **ISO 17025** - ISO 17025 - Establishing Calibration Schedules
- **Specialty Gas** - Robust and Efficient Gas Sampling Techniques

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 juliet@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 Records Review** – Verify that you have looked at your records to determine if changes are needed in your medical gas program. This review can be easily completed and documented. Contact Tom if you need a form to document your annual records review.
2. **Electronic Registration and Listing** – Be sure your electronic registration and listing is correct. Print out the web pages with your information below to document your compliance:
Facility Registration - <http://www.accessdata.fda.gov/scripts/cder/drls/default.cfm>
Drug Listing - <http://dailymed.nlm.nih.gov/dailymed/search.cfm>

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