



SAFETY & TECHNOLOGY ORGANIZER

OCTOBER 2013

ENCLOSED

Safety Topic: “Eye and Face Protection”

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

Traffic Bulletin: “DOT Records Retention: What to Keep and How Long”

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 _____

EYE AND FACE PROTECTION

Thousands of people are blinded each year from work-related eye injuries that could have been prevented with the proper selection and use of eye and face protection. Eye injuries alone cost more than \$300 million per year in lost production time, medical expenses, and worker compensation.

Personal protective equipment (PPE) alone should not be relied on to protect against hazards. Use PPE in conjunction with guards, engineering controls, and sound manufacturing practices.

The following selected information was obtained from OSHA's website "*Eye and Face Protection*" found at the website: <http://www.osha.gov/SLTC/eyefaceprotection/index.html>

What OSHA Standards apply? (follow the links in blue for more information)

- [1910 Subpart I](#), Personal protective equipment
 - [1910.132](#), General requirements [[related topic page](#)]
 - [1910.133](#), Eye and face protection
 - [Appendix B](#), Non-mandatory compliance guidelines for hazard assessment and personal protective equipment selection
- [1910 Subpart Q](#), Welding, cutting, and brazing
 - [1910.252](#), General requirements [[related topic page](#)]
 - [1910.252\(b\)\(2\)](#), Eye protection

What are the hazards and possible solutions associated with eye and face protection?

Many workers are unaware of the potential hazards in their work environments making them more vulnerable to injury. Personal protective equipment (PPE) for the eyes and face is designed to prevent or lessen the severity of injuries to workers when engineering the administrative controls are not feasible or effective in reducing these exposures to acceptable levels. **The following references aid in recognizing and evaluating eye and face hazards and provides possible solutions for these hazards.**

- [Eye and Face Protection](#). OSHA eTool. Provides a comprehensive hazard assessment, information about selecting protective devices for the workplace, as well as OSHA requirements.
 - [Selecting PPE for the Workplace](#). Provides a hazard assessment to determine the risk of exposure to eye and face hazards, including those which may be encountered in an emergency, and offers controls.
 - [OSHA Requirements](#). Focuses on PPE requirements, training and qualification, and the ability to anticipate and avoid injury from job-related hazards.



- [Personal Protective Equipment](#). OSHA Publication 3151-12R, (2003). Also available as a 629 KB [PDF](#), 46 pages. Discusses the types of equipment most commonly used to protect the head, torso, arms, hands, and feet. Additional topics include requirements, hazard assessment, selection, and employee training.
- [Eye Safety](#). National Institute for Occupational Safety and Health (NIOSH) Workplace Safety and Health Topic.
[Eye Safety for Emergency Response and Disaster Recovery](#). Includes information about eye safety, types of eye and face protection, and first aid for eye injuries.
- [Current Intelligence Bulletin 59: Contact Lens Use in a Chemical Environment](#). US Department of Health and Human Services (DHHS), National Institute for Occupational Safety and Health (NIOSH) Publication No. 2005-139, (2005, June). Provides safety guidelines for contact lens wearers working in chemical environments.
- [Eye Washes & Deluge Showers](#). Environmental Protection Agency (EPA). Discusses the need to install and maintain an emergency eye wash unit wherever a chemical or physical hazard may pose a serious risk of injury to someone's eye.
- [Toolbox Talk: Eye Safety](#). Electronic Library of Construction Occupational Safety & Health (elcosh). Discusses how and why eye injuries occur in the workplace and what to do to prevent them.
- [How Much Eye Protection Is Enough?](#) Electronic Library of Construction Occupational Safety & Health (elcosh), (2002, February). Provides help in determining when more eye protection is needed.
- [Eye Safety at Work](#). Prevent Blindness America. Provides questions and answers to commonly asked questions about workplace eye safety.
- [Emergency Eyewash Equipment](#) [175 KB PDF, 2 pages]. Manitoba Labour and Immigration, Workplace Safety and Health Division Safe Work Bulletin No. 104, (2002, December). Includes a summary of the ANSI requirements.
- [Eye Injury Prevention Month](#). US Department of Health and Human Services (DHHS), Federal Occupational Health (FOH).

As always, if there are questions or items that I can help you with, please don't hesitate to contact me.

Michael Dodd
GAWDA DOT, Security, OSHA, and EPA Consultant
MLD Safety Associates, LLC
P.O. Box 93
Poplar Bluff, MO 63902
(573) 718-2887
Email: MLDSafety@hotmail.com





TRAFFIC BULLETIN

October 2013

DOT Records Retention What to Keep and How Long

You are required to maintain certain records on your drivers and vehicles for specified periods of time. (For Drug & Alcohol Recordkeeping, see the July 2002 Traffic Bulletin.)

Accident Records (390.15)

Motor carriers shall maintain for a period of three years after an accident occurs, an accident register (a list of accidents) containing at least the following information:

- Date of accident,
- 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, and
- Whether hazardous materials, other than fuel spilled from the fuel tanks of motor vehicles involved in the accident, were released.
- Copies of all accident reports required by State or other governmental entities or insurers.

If you need any sample forms for the **Accident Register** and **Accident Report**, then **please contact me**.

Driver Qualification File (391.51)

You must retain the driver qualification file for 3 years after you no longer employ the person as a driver. There are several items required in the DQ file.

Hours of Service (395.1 & 395.8)

You are required to keep driver hours of service records for 6 months. This is kept via driver logs unless you meet the exceptions in 395.1 where you are allowed to keep other records of driver hours which must contain at least; the start time, the stop time and the total hours worked for each day, and the total time for the preceding 7 days in accordance with 395.8(j)(2) for drivers used for the first time or intermittently.

Insurance (387)

You are required to show proof of financial responsibility. Our members need a current copy of the DOT MCS-90 form, which is supplied by your insurance company. If you ship hazard zone A poisons or have cargo tanks exceeding 3500 gals. of water capacity, then you will need to show \$5,000,000 in coverage. Everyone else will need \$1,000,000 in coverage.





TRAFFIC BULLETIN

Post-trip Vehicles Inspections (396.11)

The driver is required to perform a post-trip inspection on their vehicle at the end of each day. The report must note any defects found and the certification of the repairs if any defects were noted. The following day, the next driver must review the report and certify the repairs were made. These must be kept for 3 months.

Periodic Inspection (396.21)

Each vehicle must be inspected at least once per year and a copy of the inspection must be kept for 14 months. A copy of the report or a decal containing minimal information (see 396.17(c)(2)) must be on the vehicle.

Roadside Inspection (396.9)

You must keep for one year any roadside inspections that were done on your vehicles. You have 15 days to fix any noted defects, sign the report and return it to the authorities. I suggest you keep the reports for 2 years because the Safety Management System shows roadside inspections for 2 years.

Vehicle Maintenance Files (396.3)

You are required to keep maintenance records for one year on any vehicle you have controlled for one month or longer. These records must be maintained where the vehicle is housed or they may be kept by the servicing location. The file must contain the vehicle information (company number, make, serial number, year, and tire size) and the inspection, repair and maintenance records. You must keep these records for 6 months after the vehicle is sold, traded or scrapped.

Hazardous Materials

If you handle hazardous materials, then you must keep a copy of the following items:

1. Federal Hazardous Materials Registration (107.608)(3 years)
2. State Hazardous Materials Registration (if your State has a program)
3. Training records for all affected hazardous materials employees. The training must be done at least every 3 years. (172.704)
 - a. Hazmat training
 - b. Security In-depth training
 - c. Security Awareness training
4. Shipping papers (Hazardous Materials Manifest) must be kept for 2 years.

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

Michael Dodd
GAWDA DOT, Security, OSHA, and EPA Consultant
MLD Safety Associates, LLC
P.O. Box 93
Poplar Bluff, MO 63902
(573) 718-2887
Email: MLDSafety@hotmail.com





MEDICAL GAS BULLETIN

10/01/2013

Frequently Asked Questions

Q – I understand that we can qualify food gases without testing if we have a COC or COA that states the product meets FCC specifications. My question is, where can I find the official regulation that permits this?

A – Here is the pertinent section of **21 CFR 110 - Subpart E—Production and Process Controls** (*see highlighted section*)

§ 110.80 Processes and controls. All operations in the receiving, inspecting, transporting, segregating, preparing, manufacturing, packaging, and storing of food shall be conducted in accordance with adequate sanitation principles. Appropriate quality control operations shall be employed to ensure that food is suitable for human consumption and that food-packaging materials are safe and suitable. Overall sanitation of the plant shall be under the supervision of one or more competent individuals assigned responsibility for this function. All reasonable precautions shall be taken to ensure that production procedures do not contribute contamination from any source. Chemical, microbial, or extraneous- material testing procedures shall be used where necessary to identify sanitation failures or possible food contamination. All food that has become contaminated to the extent that it is adulterated within the meaning of the act shall be rejected, or if permissible, treated or processed to eliminate the contamination.

(a) Raw materials and other ingredients.

(1) Raw materials and other ingredients shall be inspected and segregated or otherwise handled as necessary to ascertain that they are clean and suitable for processing into food and shall be stored under conditions that will protect against contamination and minimize deterioration. Raw materials shall be washed or cleaned as necessary to remove soil or other contamination. Water used for washing, rinsing, or conveying food shall be safe and of adequate sanitary quality. Water may be reused for washing, rinsing, or conveying food if it does not increase the level of contamination of the food. Containers and carriers of raw materials should be inspected on receipt to ensure that their condition has not contributed to the contamination or deterioration of food.

(2) Raw materials and other ingredients shall either not contain levels of microorganisms that may produce food poisoning or other disease in humans, or they shall be pasteurized or otherwise treated during manufacturing operations so that they no longer contain levels that would cause the product to be adulterated within the meaning of the act. Compliance with this requirement may be verified by any effective means, including purchasing raw materials and other ingredients under a supplier's guarantee or certification.

(3) Raw materials and other ingredients susceptible to contamination with aflatoxin or other natural toxins shall comply with current Food and Drug Administration regulations and action levels for poisonous or deleterious substances before these materials or ingredients are incorporated into finished food. Compliance with this requirement may be accomplished by purchasing raw materials and other ingredients under a supplier's guarantee or certification, or may be verified by analyzing these materials and ingredients for aflatoxins and other natural toxins.





MEDICAL GAS BULLETIN

(4) Raw materials, other ingredients, and rework susceptible to contamination with pests, undesirable microorganisms, or extraneous material shall comply with applicable Food and Drug Administration regulations and defect action levels for natural or unavoidable defects if a manufacturer wishes to use the materials in manufacturing food. Compliance with this requirement may be verified by any effective means, including purchasing the materials under a supplier's guarantee or certification, or examination of these materials for contamination.

October Medical Gas Roundtable (10/04/2013) – CGMP - High Pressure Prefill Inspection and Filling High Pressure Cylinders

These GAWDA Medical Gas roundtables are excellent sources of CGMP training and the latest industry compliance news. In October we will be discussing basic procedures to conduct a prefill inspection and how to fill medical high-pressure cylinders.

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

- **QSR/ISO 17025** - Complaints, Non-Conformances, Corrective Action/Preventive Action (CAPA)
- **Specialty Gas** - Measuring and Controlling Analytical Uncertainty (ISO 6143)

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. **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.

Tom Badstubner
GAWDA Medical Gas Consultant
Telephone: 508-883-0927
Email: tom@asteriskllc.com

