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## Safety & Technology Organizer for October 2010

### ENCLOSED

Safety Topic: "Hazardous Work Permits"

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

Traffic Bulletin: "Hiring a New Driver"

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

Medical Gas Bulletin: "Medical Gas Roundtable"

Please contact GAWDA Medical Gas Consultant, Tom Badstubner for more information.

### October 2010

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

**ROUTE TO:**

- General Manager
- Safety Coordinator
- Supervisor Dept. \_\_\_\_\_
- Other \_\_\_\_\_
- Date of Meeting \_\_\_\_\_

**Safety Meetings are important.** They 1) get your employees actively involved, 2) encourage safety awareness, 3) help identify problems before they become accidents and 4) motivate employees to follow proper safety meetings and is happy to provide you with a monthly topic for your agenda.

## Hazardous Work Permits

There are times when we must do work in our facilities that would be deemed extremely hazardous or have fatality potential. Work of a non-routine nature that requires pre-job discussion, planning, and reviewing of the potential hazards. A hazardous work permit (HWP) is a tool that documents that pre-job discussion and planning process. The purpose of the HWP is to communicate the hazards and to have that discussion with all persons involved.

### Examples of work covered:

1. All work or entry into areas, tanks, blow-down pits, pipeline streams, relief device emission, power house or heating boilers or equipment where oxygen enrichment or deficiency may be encountered.
2. Insulation handling, removal or replacement.
3. All indoor or confined area cleaning operations using approved toxic chemicals (such as Chloro-thene, Tri-Ethane, Perm-Ethane, etc.)
4. Non-Routine Maintenance, repair, or testing of process piping and equipment involving unusual requirements or requiring special care.
5. Maintenance or repairs in areas or equipment containing hazardous materials such as acids, ammonia, carbon monoxide, chlorine, hydrogen, etc.
6. Torch work (Arc and/or Gas) away from designated Welding Shop or Welding Area.
7. Deactivation or Shutting Off Safety Interlocks, Water Control Valves to Fire Fighting System or Personnel Safety Equipment such as Sprinklers, Hose Cabinets, Showers, Eye Washes, etc.
8. All repairs on overhead cranes.
9. All work on scaffolds, temporary platforms, two-legged ladders, tanks and elevated positions in excess of 3 meters above floor level, excluding routine work on platform ladders with guard rails.
10. All electrical installation, repair work and troubleshooting.

**When it is issued?**

This permit must be issued before authorized work is started.

**How long is the HWP good for?**

It must be canceled immediately after completion of authorized work or at the end of shift on which it is issued.

**Recordkeeping**

I suggest that you keep canceled permits on file in chronological order in a central plant file and retained for 30 days, but there are no required retention periods.

**Here is the link to a sample Hazardous Work Permit.**

[http://gawda.org/uploadedFiles/GAWDA\\_Site\\_Home/News\\_and\\_Publications/Safety\\_Organizer/Hazardous\\_Work\\_Permit.doc](http://gawda.org/uploadedFiles/GAWDA_Site_Home/News_and_Publications/Safety_Organizer/Hazardous_Work_Permit.doc)

If you have any questions on this program, please contact me at:

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# Traffic Bulletin

## Traffic Bulletin

**October 2010**

### **Hiring a new driver**

What are the things that I need to do to hire a driver? How fast can I put a new driver on the road? What items do I need to have in my hands before letting a driver go out on the road? These are some of the questions that I get when someone is trying to put on a new driver. The following guidance assumes that you want a **driver for loads requiring placards**.

#### **Must have items before letting a person drive**

1. DOT employment application
2. CDL with hazmat endorsement (if you have a tank(s) bolted to the vehicle with more than 119 gals of capacity, then you need a cargo tank endorsement)
3. Current medical card
4. A negative pre-employment drug test
5. Road test form and certificate (391.31(g)), or CDL license or certificate accepted in lieu of road test (391.33),
  - a. A CDL is acceptable.
  - b. Doubles / triples or cargo tankers must have a road test certification for the specific vehicle within the previous 3 years.

#### **Items that you must have within 30 days**

1. Motor vehicle record from states (391.23),
  - a. Must be obtained within 30 days of employment
  - b. Must be for the prior 3 years
  - c. Please note that the regulations require this within 30 days, but I suggest that you have this and review it prior to letting the driver drive your vehicles.
2. Previous employer information (391.23),
  - a. Must be obtained within 30 days of employment
  - b. Must be for the prior 3 years
  - c. The information must be verification of employment, any DOT accidents (or any other accidents that the previous employer may want to provide), and the drug and alcohol test results/violations.

## **Items needed later down the road**

1. Annual review of driving record (391.25),
  - a. Must be done at least annually
  - b. Must keep a copy of the state inquiry results in the file.
  - c. The motor carrier must consider the driver's accident record and any evidence that the driver has violated laws governing the operation of motor vehicles, and must give great weight to violations, such as speeding, reckless driving, and operating while under the influence of alcohol or drugs, that indicate that the driver has exhibited a disregard for the safety of the public
2. List of violations (391.27) (part of the above annual review),
  - a. The driver shall provide a list of driving violations for the previous 12 months. The driver shall sign this list.
  - b. If the driver has already provided this information as required by 383.31, then they don't have to repeat the information. 383.31 requires that drivers notify their carrier within 30 days of any vehicle violations, other than parking tickets, of which they have been convicted. The notification must be in writing and contain the 7 items listed in 383.31.
3. Medical Examiner's Certificate kept current

## **Suggested items for the DQ file**

1. Not required, but highly suggested is to have a copy of their current driver's license in the file.

## **Common Question**

"What do I do about an existing employee that I want to make a driver?" The easiest and best thing to do is to treat the employee as a brand new hire. Make sure you have used a DOT driver application form. If not, then have them fill out a new DOT employee application. You still have to do the previous employer background checks for the previous 3 years, but you do get to count the time the employee was working for you in that 3 year time period. Be sure to do the pre-employment drug screen.

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

Michael Dodd

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# Medical Gas Bulletin

## October 2010

### Medical Gas Roundtable

These GAWDA Medical Gas roundtables are excellent sources of CGMP training and the latest industry compliance news. In September we covered Subpart G – Packaging and Labeling Control. In October, we will cover. Subparts H & I – Holding and Distribution and Laboratory Controls. In addition a Certificate of Analysis checklist will be distributed at the webinar.

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

- ISO 17025 - Measurement Traceability
- High Pressure Prefill Inspection and Filling High Pressure Cylinders

These and other webinars are available as a streaming recording. 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 are not already receiving invitations to the training webinars, just send an email to [tom@asteriskllc.com](mailto:tom@asteriskllc.com).

### FDA Electronic Registration?

If you registered by the paper based Form 2656 before June 1, 2009, your registration is still current (until 12/31/2010). We have been suggesting for 18 months to delay the registration until the process becomes more well defined and simpler. Well... the time has come when you cannot wait for the FDA to clarify the process any further.... If you have not registered yet, you need to get registered.

Several distributors have tried to do the registration themselves. It is possible, but it is also very difficult. We are supportive of firms self-registering. However, if you have not yet established the FDA WebTrader Production Account , it's time to consider alternative registration strategies.

AsteRisk, and other firms, can still get you registered in time if you start now. Contact [tom@asteriskllc.com](mailto:tom@asteriskllc.com) for a description of the process.

In general, this is the information you need:

- Company Corporate Name:\_\_\_\_\_
- Company Corporate Address:\_\_\_\_\_
- Company Corporate Contact:\_\_\_\_\_
- Company Corporate Contact phone number:\_\_\_\_\_
- Company Corporate Contact email:\_\_\_\_\_
- Company Corporate DUNS Number:\_\_\_\_\_
- Company Corporate Labeler Code(s):\_\_\_\_\_

- Production Site Name: \_\_\_\_\_
- Production Site Address: \_\_\_\_\_
- Production Site Contact: \_\_\_\_\_
- Production Site Contact phone number: \_\_\_\_\_
- Production Site Contact email : \_\_\_\_\_
- Production Site DUNS Number: \_\_\_\_\_
- Production Site Registration Number: \_\_\_\_\_

### **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. **Servomex Filter** - Verify that you have records that the filter on the Servomex has been inspected according to the frequency in your instrument manual.
2. **FIFO** - Assure your warehoused medical gases in inventory are rotated so that the oldest stock is distributed first. The inventory is rotated First-In-First-Out (FIFO).

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