

MEMORANDUM TO: Olga Kebis
National Weather Service

FROM: Nancy Briscoe
Senior Counselor for Environmental Compliance

SUBJECT: Availability of First Aid Trained Personnel at NOAA Facilities

DATE: October 10, 2001

You have asked for a legal opinion regarding when 29 CFR Part 1910.151 requires the National Weather Service (NWS) to provide an on-site employee trained in first aid. Occupational Safety and Health regulations at 29 CFR Part 1910.151(b) state that:

In the absence of an infirmary, clinic or hospital in near proximity to the workplace which is used for the treatment of all injured employees, a person or persons shall be adequately trained to render first aid. First aid supplies shall be readily available.

In an OSHA Standard Interpretation Letter on the accessibility of a hospital or physician within the prescribed terms of distance and travel time, OSHA has stated that:

...we recommend that a person trained in first aid be available on the site whenever professional medical attention is more than eight minutes away from any point on the site. However, the conditions on any particular job site may make this eight-minute guideline inadequate. If employees are working with materials that could adversely affect their breathing function, the eight minute period is too long... and the employer should comply with the requirement for a person trained in first aid to be available at the work site. When the hazards on a work site are of a less critical nature, the travel time factor becomes less critical also.

Pursuant to this interpretation, NWS must determine the nature and extent of the hazards posed at its work sites and make decisions for each site according to this guidance. Where it is determined that there is a risk of significant or severe injury and a medical facility is more than eight minutes away, no personnel shall work alone and an employee should be on hand that is trained in first aid. For example, if work is being undertaken on a live circuit system where electrical shock is possible and professional medical help is more than eight minutes away, then a trained first aid employee shall be present. On the other hand, if the work involved is a desk job in an office setting with no extraordinary hazards and the nearest medical facility is fifteen minutes away, it is reasonable to allow the employee to work alone and without the assistance of a first aid trained employee being on hand.

On a final note, while not specifically required under the OSHA standards, it is advisable that the first aid trained personnel required to be on hand also be trained in CPR.