March 2, 1994

Mr. Gary A- Benson Pendleton Woolen Mills 220 N W Broadway Portland, OR 97209

Dear Mr. Benson:

This is in response to your letter of February 3, 1994, requesting further clarification of the Oregon OSHA standards on first aid.

You asked if having a medically trained person available to a work site within certain response times would satisfy the requirements of the standard. The exact response time is only one factor to consider and must be evaluated in conjunction with the nature of the injuries that might happen at that work site.

This is a key element of your evaluation of the medical needs at each work site as required by the standard. A site where people might suffer amputations in machinery may result in the employer determining that a medically trained person should be used rather than local providers. However, a site where workers could at best suffer some type of minor injury could possibly rely on response times much greater than those you mentioned.

The bottom line is that each work site must be evaluated as to the likely types of injuries that are possible. Then the local response system must be evaluated in light of all attendant circumstances. From this analysis, a decision can be made by management as to where to place reliance. Bear in mind that the evaluation is to be based on incidents that may be anticipated by a reasonable person.

Please call one of our technical specialists at 378-3272 if you need additional guidance.

Sincerely,

Marilyn K. Schuster, Manager Standards and Technical Resources Section Oregon Occupational Safety & Health Division (503) 378-3272

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