

October 11, 2004

Cameron Helikson, EMT-Intermediate  
Environmental, Health and Safety Manager  
Sapa, Inc.  
PO Box 11263  
Portland, OR 97211

Dear Mr. Helikson:

This is in response to your letter requesting a variance from OAR 437-002-0161, specifically, the requirement that all first aid supplies must be kept unlocked.

As we understand the situation, your first aid supplies are kept in unlocked cabinets around the workplace, but you also have supplies to be used only by First Responders or EMTs, and these are the supplies you wish to keep locked up and accessible only to First Responders and EMTs.

For this situation, a variance is not necessary. The intent of OAR 437-002-0161 is to allow employees access to first-aid items for first-aid issues. So long as those supplies are available and accessible, you meet the rule. The additional items to be used only by specially-trained personnel can be locked and accessible only to those trained personnel.

Please contact Dave McLaughlin at 503-947-7457 if you have any other questions.

Sincerely,

Marilyn K. Schuster, Manager  
Standards & Technical Resources  
(503) 947-7445