

## OSHA, NFPA 70e and AEDs

First off, automated external defibrillators (AEDs) save lives. If you don't have one, get one. But to comply with OSHA and/or NFPA 70e, is an AEDs **required**?

Does OSHA require an AED?

*1910.151(a) Employer shall ensure the ready availability of medical personnel for advice and consultation on matters of plant health.*

*1910.151(b) 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.*

An OSHA Interpretation from 2007 defines "near proximity" as 3-4 minutes; but for General Industry, strictly speaking, an AED is not required.

OSHA 1910.269 Electric Power Generation, Transmission, and Distribution does actually say 4 minutes outside emergency response time; but it does not require AEDs and does not usually apply most manufacturing facility.

Does complying with **NFPA 70E**, the Standard for Electrical Safety in the Workplace, require AED? NFPA 70E 110.2 Training Requirements says:

*(C) Emergency Response Training.*

*Employees responsible for responding to medical emergencies shall be trained in cardiopulmonary resuscitation (CPR).*

*Employees responsible for responding to medical emergencies shall be trained in the use of an automated external defibrillator (AED) if an employer's emergency response plan includes the use of this device.*

So if employees are not responsible for responding to medical emergencies, you do not need an AED to comply with NFPA 70E.

All this said, we do recommend you get one. 

## Silica Standard

The Occupational Safety and Health Administration (OSHA) issued final rules for Respirable Crystalline Silica for Construction and for General Industry / Maritime.

Crystalline Silica is a natural material (beach sand is about 100% Crystalline Silica), found in concrete and various quarried stones. It is used in brick manufacture, and foundries for casting. It is used slurries for hydraulic fracturing ('fracking').

People are exposed to Respirable Crystalline Silica (RCS) when drilling, cutting, crushing, or grinding silica-containing materials; in short, any operation that generates fine dust.

The concern with RCS, as opposed to say beach sand, is hinted at in the word "respirable." The particle have to be small enough to travel deeply into the lung, where after time - and aided by cigarette smoke - can lead to silicosis or lung cancer.

The standard reduces the OSHA permissible exposure limit (PEL) for RCS to 50 micrograms per cubic meter of air. It also requires the use engineering controls to limit worker exposure; provide respirators when engineering controls are not feasible; limit worker access to high exposures; develop a written exposure plan, offer medical exams, and train workers.

Both standards contained in the final rule take effect on 06/23/'16; Construction industries must comply by 06/23/'17, General Industry / Maritime (including Hydraulic Fracturing) has until 06/23/'18. Hydraulic Fracturing has until 06/23/'21 to comply with the engineering controls requirement.

Exposure assessments can be conducted by A-EHS highly qualified staff. To sample for RCS, a special miniature cyclone (just like you might have for dust collection) is used, along with a calibrated pump, to draw air at a constant flow rate. 