Regulatory Standards

The Occupational Health and Safety Administration (OSHA) does not have a regulation that mandates first aid kits at specific locations. The OSHA First Aid standard (29 CFR 1910.151) only requires trained first-aid providers at all workplaces of any size if there is no “...infirmary, clinic, or hospital in near proximity to the workplace which is used for the treatment of all injured employees...”

The facility-types and locations associated with the University of Chicago and suburban satellite sites are not subject to the regulation since they are supported by fire departments and hospitals in the immediate area. If you are unsure of your facility’s designation, please contact Environmental Health and Safety.

OSHA has published a non-mandatory guidance document to assist facilities that elect to purchase a first aid kit and furnish a list of common items to stock based on the potential hazards in the workplace (29 CFR 1910.151- Appendix A). The guidance document recommends following the consensus standard outlined in ANSI Z308.1-2003, which summarizes basic items present in a first aid kit.

Training

If an employee is expected to render first aid to other employees as part of his or her job duties, the employee is covered by the requirements of the Bloodborne Pathogens standard (29 CFR 1910.1030). The employee must complete the on-line Bloodborne Pathogen training class on an annual basis. However, if an employee’s use of the first aid kit is incidental in nature and individuals will treat their own wounds, the Bloodborne Pathogen training requirements do not apply.

The training for designated responders must also cover the potential hazards in the workplace. An employee that is prepared will respond quicker and with more confidence. A formal medical response plan must be approved by a physician. The manufacturers of first aid kits usually include a standardized summary of basic first aid procedures based on a physician’s consultation/recommendation. Request that the distributor enclose formal documentation of the physician’s endorsement if it’s not specifically mentioned in the product description.

Please note that creating a response plan to a hazard is not the first line of defense. An evaluation should be performed to develop corrective actions to remove the hazard, if feasible (e.g., replacing a hazardous chemical with a non-hazardous substitute for a laboratory process, installing guards to protect moving parts in equipment, installing insulation on high temperature equipment, eliminating extension cords to remove trip hazards).

Factors to consider when selecting a kit

A majority of first aid kits ordered through a commercial vendor (e.g., Grainger via Buysite) meet the minimum requirements outlined in the consensus standard.

- Beware of first aid kits claiming to be “OSHA compliant.” It may be compliant for a different industry and may be stocked with too many items that do not apply to your facility. It will become a burden to keep stocked;
- Supplies should be consistent with the types of injuries anticipated for the work space (e.g., burns, cuts, scrapes);
- Size must be appropriate to the number of people who will be using the kit; and
- Supplies should be provided in single-use packs with suitable wrapping to ensure sterility and hygiene.
Basic contents - Offices, dormitories, conference rooms, shops (per ANSI Z308.1-2003): First aid kits should be regularly inspected to ensure completeness, condition of contents and expiration dates to maintain compliance with this standard. Any item beyond its marked expiration date should be removed from the kit and replaced.

<table>
<thead>
<tr>
<th>ITEM</th>
<th>QUANTITY</th>
</tr>
</thead>
<tbody>
<tr>
<td>Absorbent compress (32 sq. in. with no side smaller than 4 in.)</td>
<td>1</td>
</tr>
<tr>
<td>Adhesive bandages (1 x 3 in.)</td>
<td>16</td>
</tr>
<tr>
<td>Adhesive tape</td>
<td>5 yards</td>
</tr>
<tr>
<td>Individual-use antiseptic applications (0.5 g each)</td>
<td>10</td>
</tr>
<tr>
<td>Individual-use burn treatment applications (0.5 g each)</td>
<td>6</td>
</tr>
<tr>
<td>Nitrile exam gloves (no latex)</td>
<td>2 pair</td>
</tr>
<tr>
<td>Sterile pads (3 x 3 in.)</td>
<td>4</td>
</tr>
<tr>
<td>Triangular bandage (40 x 40 x 56 in.)</td>
<td>1</td>
</tr>
</tbody>
</table>

**Medicine and Antiseptics/Ointments**

Do not buy kits with medicine (e.g., aspirin, ibuprofen). If someone is hurt at work, only a doctor should prescribe medicine. If they refuse medical attention, the individual can elect to use their own medicine.

Make sure antiseptics such as alcohol or burn cream are in single use form. If someone opens and then uses a large bottle of alcohol and places it back in the cabinet for an extended period of time, it can become contaminated. Single pack alcohol wipes or small one-time use pouches of burn cream are ideal.

**Kitchen Installation**

If a first aid kit is installed in a kitchen the case must be metal to ensure it is heat resistant and has a cleanable surface. Installation of plastic cases is prohibited.

**Laboratory Considerations**

The hazards within the lab must be evaluated to ensure the kit addresses the potential exposures. Please seek medical attention immediately in the event of an exposure. A first aid kit should not be used as a substitution for emergency medical care.

Where the eyes or body of any person may be exposed to injurious corrosive material, suitable facilities for quick drenching or flushing of the eyes and body shall be provided within the work area for immediate emergency use (OSHA 1910.151). Additional details related to eyewashes and emergency showers can be found on Environmental Health and Safety’s website under the Emergency Eyewashes and Showers Policy.

Please note, that research work with select corrosives and acutely toxic chemicals may require immediate application of specific first aid measures (e.g., calcium gluconate readily available when using hydrofluoric acid). If lab personnel will work with such substances, a standard operating procedure must be developed and reviewed with each employee. Also, an emergency response plan must be in place to ensure personnel are aware of and comfortable with the first aid measures specific to the hazards of their research.

**ALWAYS REMEMBER**

If a person requires medical treatment

Call the University of Chicago Police Department (UCPD)

123 or 773.702.8181

and report all injuries to Human Resources