

**Los Angeles County
Metropolitan Transportation Authority
Office of the Inspector General**

**Review of Metro
First Aid Kits and Supplies Program**

Report No. 23-AUD-06

March 3, 2023



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DATE: March 3, 2023

TO: Metro Board of Directors
Metro Chief Executive Officer

FROM: Yvonne Zheng, Senior Manager, Audit E-SIGNED by Yvonne Zheng
Office of the Inspector General on 2023-03-03 15:29:20 PST

SUBJECT: Final Report: Review of Metro First Aid Kits and Supplies Program
(Report No. 23-AUD-06)

INTRODUCTION

The American National Standards Institute (ANSI) that administers and coordinates the US voluntary standards and conformity assessment system approved the updated American National Standard for Minimum Requirements for Workplace First Aid Kits and Supplies: ANSI/ISEA Z308.1-2021, which was effective October 15, 2022. This is the sixth revision of a voluntary industry consensus standard that was first published in 1978. ANSI/ISEA Z308.1-2021 includes several updates for workplace first aid kit requirements:

- Foil blanket is now mandatory.
- More specificity for tourniquets.
- Greater guidance on bleeding control kits.
- Enhanced workplace hazard assessment. The updated standard is to assist the employer in assessing risks, identifying potential hazards and selecting additional first-aid supplies relevant to a particular application or work environment, including mobile workstations or field offices.

We performed a review of Metro's First Aid Kits and Supplies Program as part of our ongoing effort to assist Metro in improving the safety, effectiveness, and efficiency of its operations.

OBJECTIVES, METHODOLOGY AND SCOPE OF REVIEW

The key objectives of this review are to determine whether:

- Metro has adopted ANSI/ISEA Z308.1-2021 Standards, which were effective October 15, 2022;
- Metro has written policies and procedures for the first aid kits and supplies program;
- Metro provides first aid kits and supplies at the workplace;
- Metro conducts a thorough workplace hazard assessment to determine which first aid kits and supplies are needed and provided in each location warranted.

To achieve the review objectives, we performed the following procedures:

1. Researched and reviewed the updated “American National Standard for Minimum Requirements for Workplace First Aid Kits and Supplies (ANSI/ISEA Z308.1-2021)” approved by the American National Standards Institute (ANSI).
2. Requested Metro’s policies and procedures for the first aid kits program;
3. Interviewed Metro’s officials and staff to determine whether Metro has adopted ANSI/ISEA Z308.1-2021;
4. Discussed with Metro’s Risk, Safety and Asset Management Department to determine whether and when Metro performed Hazard Assessment at workplaces;
5. Requested and reviewed Metro’s contract for first aid kit supplies and services at Metro facilities;
6. Clarified issues related to Metro’s first aid kits and supplies;
7. Obtained a list of locations with the first aid kit cabinets installed;
8. Selected sample locations to verify items in the first aid kits cabinets;
9. Compared items found in the first aid kit cabinets, via sampling, with the list of items required by the contract and industry standards;
10. Selected sample locations to verify the frequencies that first aid kits are refilled in the cabinets;
11. Compared the sample first aid kits cabinets refill frequencies with the contract requirement; and
12. Conducted other work deemed necessary to achieve the review objectives.

This review was not an audit and limited in scope. The Government Auditing Standards were not strictly applied in this review.

BACKGROUND

The American National Standards Institute (ANSI) approved an update to the American National Standard for Minimum Requirements for Workplace First Aid Kits and Supplies: ANSI/ISEA Z308.1-2021, which was effective October 15, 2022 with new and additional requirements. This is the sixth revision of a voluntary industry consensus standard that was first published in 1978.

[ISEA+ANSI+Standard+Just-The-Facts+5-2022.pdf](#)

A. Workplace First Aid Kits and Supplies

First Aid kits are classified based on the assortment and quantity of first aid supplies intended to manage most types of injuries and sudden illnesses that may be encountered in the workplace. These may include major and minor wounds; minor burns; sprains and strains; and eye injuries. As each work environment is unique, it is expected that the contents of each first aid kit will be supplemented as needed based upon the recommendations of a person competent in First Aid.

[New-ANSI 2021 Standards Take Effect 10/15, Are You Ready?](#)

B. Class A and Class B Kits

According to an article titled “[Workplace First Aid Kits – ANSI/ISEA Z308.1-2021 – Classes, Types, and the Standard](#)” published on ANSI website, the first aid kits are classified below:

- **Class A Kits:** provide a basic range of products to deal with most common types of injuries encountered in the workplace, such as major wounds, minor wounds (cuts and abrasions), minor burns, and eye injuries. Class A kits include adhesive bandages, adhesive tape, antibiotic application, antiseptic, breathing barrier, burn dressing, burn treatment, cold pack, eye covering, first aid guide, hand sanitizer, medical exam gloves, eye/skin wash, roller bandage, scissors, sterile pads, trauma pads, and triangular bandages.
- **Class B Kits:** provide a broader range and quantity of supplies to deal with injuries that personnel may encounter in more populated, complex, and/or high-risk work environments. Class B kits contain all the items found in Class A first aid kits, but in greater quantity and two additional items not found in Class A kits: a splint and a tourniquet.

ANSI/ISEA Z308.1-2021 includes several updates for the first aid kits requirements:

- Foil blanket is now mandatory.
- More specificity for tourniquets.
- Greater guidance on bleeding control kits.
- Enhanced workplace hazard assessment. The updated standard is to assist the employer in assessing risks, identifying potential hazards and selecting additional first-aid supplies relevant to a particular application or work environment, including mobile workstations or field offices.

In addition to designating classes and types of first aid kits, the new standard details the requirements for and first aid kits, first-aid supplies marking and labeling.

C. Conducting a Hazard Assessment

The new standard acknowledges that there are many ways to conduct a workplace hazard assessment, but offers three guiding questions to help determine what first-aid supplies should be added or upgraded:

1. What hazards exist?
2. What kinds of injuries have occurred or could occur in relation to these hazards?
3. What types of first-aid supplies are needed to treat these injuries?

The revised standard adds that field (mobile) workers shall also have access to first-aid supplies whether they are on a remote work site or in a work vehicle. A thorough workplace hazard assessment, also known as a Personal Protective Equipment (PPE) hazard assessment, entails a comprehensive review to determine what parts of a worker’s body are at risk of injury or illness, and the potential for any types of injuries. For example:

- Bodily exposure: head, eyes, ears (hearing), face, respiratory system, torso, hands, legs and feet.
- Potential injury types: trips and falls, dropped objects, puncture and abrasion wounds, burns, crushing, entanglement, and dismemberment.
- Potential injury sources: machinery, vehicles, heat, chemicals and other toxins.
- Potential illness types and sources: The COVID-19 pandemic has raised awareness of, and risk from, airborne viruses. But that is only one of many potential illness exposures, depending on the nature and location of a workplace.

The American Society of Safety Professionals provides some industry guidance on conducting a Hazard Assessment - [Best Practices - Updating Workplace First Aid Kits](#)

For Class A and B first aid kit requirements and minimum quantity required by ANSI standards, see Table 1.

(Please see next page)

Table 1: Classes of First Aid Kits and Required Supplies

First Aid Supply	Minimum Quantity		Minimum Size or Volume	
	Class A Kits	Class B Kits	(US)	(metric)
Adhesive Bandage	16	50	1 x 3 in.	2.5 x 7.5 cm
Adhesive Tape	1	2	2.5 yd (total)	2.3 m
Antibiotic Application	10	25	1/57 oz	0.5 g
Antiseptic	10	50	1/57 oz	0.5 g
CPR Breathing Barrier	1	1		
Burn Dressing (gel soaked)	1	2	4 x 4 in.	10 x 10 cm
Burn Treatment	10	25	1/32 oz	0.9 g
Cold Pack	1	2	4 x 5 in.	10 x 12.5 cm
Eye Covering, with means of attachment	2	2	2.9 sq. in	19 sq. cm
Eye Wash	1 fl oz total			29.6 ml
	4 fl oz total			118.3 ml
First Aid Guide	1	1	N/A	N/A
Hand Sanitizer	10	20	1/32 oz	0.9 g
Medical Exam Gloves	2 pair	4 pair	N/A	N/A
Roller Bandage				
2 inch	1	2	2in. x 4yd	5cm x 3.66m
4 inch	0	1	4 in. x 4yd	10cm x 3.66m
Scissors	1	1	N/A	N/A
Splint	0	1	4.0 x 24 in.	10.2 x 61 cm
Sterile Pad	2	4	3 x 3in.	7.5 x 7.5 cm
Tourniquet	0	Tourniquet 1	N/A	N/A
Trauma Pad	2	4	5 x 9 in.	12.7 x 22.9 cm
Triangular Bandage	1	2	40 x 40 x 56 in.	101 x 101 x 142 cm
Foil Blanket	1	1	52 x 84in	132 x 213cm

Source: <https://firstaidsuppliesonline.com/ansi-z308-1-2021-compliance/>

RESULTS OF REVIEW

Our review found that Metro follows Cal/OSHA California Department of Industrial Relations §3400 Medical Services and First Aid Regulations, and contracted with SafetyMax to provide first aid kits and supplies for Metro. However, Metro does not have written policies and procedures for the placement, number and periodic review of the first aid kits program. In addition, Metro has not adopted the updated ANSI/ISEA Z308.1-2021 standards for its first aid kits, which were effective October 15, 2022. The following are the results of our review:

A. ANSI/ISEA Z308.1-2021 Minimum Requirements for First Aid Kits and Supplies

The American National Standard for Minimum Requirements for Workplace First Aid Kits and Supplies ANSI/ISEA Z308.1-2021 was effective October 15, 2022. ANSI/ISEA standards are widely considered as industry's best practices in the development of personal protective equipment and related services.

Based on our discussion with Metro's Principal Safety Specialist, Metro has not adopted this updated standard. He responded to our inquiry below:

"We do not have the most current ANSI standard for first aid kit. Also, this particular standard only considered as a guideline for General Industry. According to Cal-OSHA, Section 3400, it states "(c) There shall be adequate first-aid materials, approved by the consulting physician, readily available for employees on every job. Such materials shall be kept in a sanitary and usable condition. A frequent inspection shall be made of all first-aid materials, which shall be replenished as necessary." When I took over the program, I assumed all our first aid kits were approved by a physician."

Cal-OSHA Section 3400 is a set of regulations specific to the state of California that relates to safety and health protection of employees in the workplace. While it is good that Metro follows the legal requirements set by Cal-OSHA Section 3400, adopting the updated ANSI/ISEA standards may help Metro operate its safety program beyond the legal requirements for its workplace safety such as identify the discrepancies between Metro's operations in workplace safety and the updated ANSI/ISEA standards, and determine appropriate actions to be taken to ensure Metro's workplaces are equipped with appropriate first aid kits and supplies.

B. Written Policies and Procedures for First Aid Kits Program

Our review found that Metro does not have written policies and procedures for Metro's first aid kits and supplies program. A well-drafted set of policies and procedures for the first aid kits and supplies program should be an essential part for Metro's safety and risk management operations.

Written policies and procedures ensure Metro's compliance with relevant laws, regulations, and industry standards. The written policies should provide general guidelines that outline Metro's plan for the first aid kits and supplies program, and procedures should explain a specific action plan for carrying out the policies such as how and when to respond update laws, regulations, and industry standards.

C. Agency-Wide Hazard Assessment

Our review found Metro has not performed agency-wide hazard assessment.

According to an article titled “Updating Workplace First Aid Kits to the Revised ANSI/ISEA Z308.1 Standard” published by Professional Safety, 67(8), 12-1, Randall, N. (2022, Aug.),

Each work environment is unique. Making additions to the minimum requirements of first aid kits should take place based on the hazards and injuries that could occur specific to the workplace, ... Employers should conduct a thorough workplace hazard assessment to help them determine which supplies to augment.

Best Practices - Updating Workplace First Aid Kits

A thorough workplace hazard assessment helps Metro management determine what hazards exist, what parts of a worker’s body are at risk of injury or illness, and the potential for any type of injuries so the first aid kits and supplies can be updated accordingly.

D. Contract and Performance Review for First Aid Kits Supply Services

Metro signed a Contract with Safetymax Corporation (Contractor) on January 1, 2018 to provide Metro’s first aid supply services (Contract No. PS95899000) for two-year base with two (2) one-year option period.

The Contract, which was effective on January 1, 2018, is funded in whole or in part with federal funds. The Period of Performance of this Contract shall commence on the date the Contract is fully executed by LACMTA (Metro). Contractor shall complete all services under the Contract no later than 730 calendar days ("Contract Completion Date"), unless this Contract is terminated earlier or extended by LACMTA (Metro), in writing, as provided in the Contract.

1. Contract Key Provisions

Metro will pay the Contractor the Firm Fixed Price of \$198,547.20 for the Contractor’s performance of the Services based on Contract terms Exhibit B for two base years as shown on Table 2 below:

Table 2: Base Year Contract Period

Base Year 1	Base Year 2	Contract Period (2 years)
\$99,273.60	\$99,273.60	\$198,547.20

Source: Contract No. PS95899000, Exhibit B

According to Contract Exhibit A, Statement of Work, provision 3.0 B. 1, the Contractor shall supply 90 Large Industrial First Aid Cabinets to specified Metro’s locations on a bi-monthly basis

or as directed by Metro's Project Manager, or within five working days of a telephonic or electronic request from Metro's Project Manager.

At its sole discretion, Metro may exercise an option by written notice to the Contractor at any time during the term of the Contract but shall exercise an option within thirty (30) days of the Contract Completion Date. If Metro has elected multiple option periods, the Contract Completion Date for exercising the second and subsequent options shall be within thirty (30) days of the expiration of the option period for any preceding option Metro has exercised.

There are two contract modifications to the Contract. Modification No. 1 signed December 6, 2018 was to clarify the two option periods, as follows:

Option Period 1: Revised Contract End Date: 12/31/20
Option Period 2: Revised Contract End Date: 12/31/21

Table 3: Recapitulation of Option Periods

Option Period #1	Year 3	From: 1/2/20 – 12/31/20
Option Period #2	Year 4	From: 1/2/21 – 12/31/21

Source: Contract No. PS95899000, Modification No. 1

Metro did exercise an option based on Contract Exhibit B. 1 Pricing Agreement for the option years as shown on Table 4 below:

Table 4: Pricing Agreement for Options Years

Option No.	Year	Total	New Contract Total	New Contract End date
1	3	\$102,400.20	\$300,947.40	12/31/21
2	4	\$102,400.20	\$403,347.60	12/31/22

Source: Contract No. PS95899000, Exhibit B.1

The total Contract amount for the two base years and two option years is \$403,347.60.

On April 28, 2021, Modification No. 2 to the Contract was made to extend the Contract to December 31, 2023. The extended amount for the last year (Year 5) is \$105,840 or approximately 3% price increase over Option Period 2. The total contract price for five years amounted to \$509,187.60.

Table 5 shows Modification No. 2 pricing for various items.

Table 5: Modification No. 2 Pricing Sheet

LA Metro 2022 Price List				
Item #	Product Description	2019	2022 Price	2023 Price
10100	Plastic Bandages 3/4" 100/bx	4.57	4.68	4.80
10110	Flexible Fabric Bandages 50/bx	4.57	4.68	4.80
10115	Knuckle Bandages 40/bx	5.73	5.87	6.02
10120	Large Patch Bandages 25/bx	6.37	6.53	6.69
10125	Fingertip Bandages, Reg 40/bx	5.73	5.87	6.02
10127	Fingertip Bandages, XL 25/bx	6.88	7.05	7.23
10136	Butterfly Bandages, MD, 5ct	1.95	2.00	2.05
10215	Gauze Pads 3"x3" 10/bx	3.42	3.51	3.59
10240	ABD Absorbent Dressing 5"x9"	2.23	2.29	2.34
10255	Triangular Bandage	3.09	3.17	3.25
10272	Roller Gauze 3"	2.32	2.38	2.44
10290	Cotton Tip Applicators 100ct	3.75	3.84	3.94
10322	Medi Rip Self Adherent 3"	5.73	5.87	6.02
10400	Adhesive Tri-Cut Tape (3 sz)	4.05	4.15	4.26
10480	Elastic Tape 1"x 5 yds	4.55	4.66	4.78
12110	Antiseptic Wipes 20/bx	4.05	4.15	4.26
12115	Alcohol Wipes 50/bx	4.05	4.15	4.26
12216	Hand Sanitizer Packets 25ct	4.05	4.15	4.26
12252	Skin Lotion Packets 25ct	5.73	5.87	6.02
12255	Lip-Guard Medicated 20ct	3.59	3.68	3.77
12300	Antibiotic Ointment 25/bx	7.08	7.26	7.44
12310	Hydrocortisone Cream 25/bx	6.88	7.05	7.23
12500	Antiseptic Spray	2.95	3.02	3.10
12710	Burn Free Gel 6/bx	6.37	6.53	6.69
12715	Water-Jel Burn Dressing 2"x6"	7.71	7.90	8.10
13130	Xtr Str Non-Aspirin Tabs 100ct	7.29	7.47	7.66
13310	Antacid Tablets 100ct	8.05	8.25	8.46
13475	Pepto Bismol Tablets 48ct	14.64	15.01	15.38
14100	Scissors Kit	1.95	2.00	2.05
14200	Disposable Tweezers	1.00	1.03	1.05
14300	Splinter Out 10/bx	3.96	4.06	4.16
15100	Cold Compress, Small 1/bx	1.73	1.77	1.82
15105	Cold Compress, Large 1/bx	2.36	2.42	2.48
16200	Eye Wash 8oz	4.95	5.07	5.20
16312	Lubricant Eye Drops 30ct (a)	19.62	20.11	20.61
33100	CPR Mouth Barrier+1-way Valve	2.36	2.42	2.48
33200	Medical Gloves Unit - Bag	2.25	2.31	2.36

Source: Contract PS95899000, Modification No. 2

Based on Exhibit A - Scope of Services on the Contract, the Contractor shall provide 38 items of First Aid supplies as shown on Table 6 to approximately 90 First Aid cabinets throughout the Agency.

Table 6: Corporate Safety First Aid Cabinets Approved Content List

	Description	Qty
1.	Clean wipes 50/bx	2
2.	Antiseptic swabs 50/bx	2
3.	Antiseptic spray 3oz	1
4.	Hydrogen peroxide 3oz pump	1
5.	Tri-cut tape 2" x 5 yd spool	1
6.	Elastic tape 1" x 5 yd spool	1
7.	Cotton tip applicator sterile 24/bx	1
8.	Eye & skin buffered solution 8oz	2
9.	Individual eye drops 30/bx	2
10.	Fingertip bandage xlg 25/bx	2
11.	Fingertip reg 40/bx	1
12.	Knuckle 40/bx	2
13.	Sheer strip 1" 100/bx	2
14.	Elastic strip 50/bx	2
15.	Large patch bandage 25/bx	2
16.	Sterile dressing 5" x 9"	1
17.	Gauze pads 3" x 3" 10/bx	2
18.	Elastic roller gauze 3" x 4.5 yd	1
19.	Coban 3" x 5 yd	2
20.	Un-aspirin 100/bx	2
21.	Trial antacid 100/bx	1
22.	Pept-ez 42/bx	1
23.	Antibiotic ointment 25/bx	2
24.	Lip balm, ointment 25/bx	1
25.	Hydrocortisone cream 1% 25/bx	2
26.	Hand lotion pkts 25/bx	2
27.	CPR/First Aid guide booklet	1
28.	Ice pack sm.	2
29.	Ice pack med.	3
30.	Triangular bandage	1
31.	Anti-bacterial moist towelette 10/bx	2
32.	Water-gel burn gel 6/bx	2
33.	Nitrile gloves 2 per/bag	1
34.	Scissor bandage 5 1/2"	1
35.	Splinter out 10/pk	1
36.	Disposable forceps, sterile	1
37.	Water-gel burn dressing 2" x 6"	1
38.	Butterfly bandage med. 10/ea	1

Source: Contract PS95899000 Exhibit A Statement of Work, Appendix A

2. Physical Count for Sampled First Aid Kits Cabinets Listed

Metro's Risk, Safety and Asset Management Department provided us a list of 116 first aid kit cabinets installed in Metro's various workplace locations. See Table 7.

Table 7: List of Metro's Locations with First Aid Kit Cabinets Installed

Organization	Location / Address	City	Frequency	# FA Kits
Metro	Div 1 / 1130 E. 8th Street	Los Angeles	Route 60	2
Metro	Div 24 / 1600 California Ave	Monrovia	Route 60	2
Metro	Div 2 / 720 East 15th Street	Los Angeles	Route 60	3
Metro	Div 3 / 630 West Avenue 28	Los Angeles	Route 60	2
Metro	Div 5 / 5425 Van Ness Avenue	Los Angeles	Route 60	2
Metro	Div 7 / 8800 Santa Monica Blvd	Los Angeles	Route 60	2
Metro	Div 8 / 9201 Canoga Avenue	Los Angeles	Route 60	2
Metro	Div 9 / 3449 Santa Anita Avenue	El Monte	Route 60	2
Metro	Div 15 / 11900 Branford Street	Sun Valley	Route 60	2
Metro	Div 18 / 450 West Griffith Street	Gardena	Route 60	2
Metro	Div 20 / 320 South Santa Fe Avenue	Los Angeles	Route 60	6
Metro	Div 21 / 1800 Baker Street	Los Angeles	Route 60	2
Metro	Loc 34 / 4462 Pacific Blvd	Vernon	Route 60	2
Metro	Loc 64, Non-Rev / 590 S. Santa Fe Avenue	Los Angeles	Route 60	2
Metro	RRC / 900 Lyon Street	Los Angeles	Route 60	9
Metro	Div 4 / 7878 Telegraph Rd	Downey	Route 120	2
Metro	Div 11 / 4350 East 208th Street	Long Beach	Route 60	3
Metro	Div 22 / 14724 Aviation Blvd	Lawndale	Route 60	2
Metro	Loc 60 / 2000 East Imperial Hwy	Los Angeles	Route 60	1
Metro	Loc 66 / 1680 East Imperial Hwy	Los Angeles	Route 60	1
Metro	Div 99 / One Gateway Plaza	Los Angeles	Route 60	31
Metro	Sierra Madre Station / 149 N. Halstead St	Pasadena	On Request	1
Metro	Atlantic Station / 5150 Pomona Blvd	East Los Angeles	Route 60	1
Metro	Loc 63 / 100 S. Santa Fe Ave	Los Angeles	Route 60	2
Metro	Loc 67 / 120 N. Santa Fe Ave	Los Angeles	On Request	1
Metro	Div 13 / 920 N. Vignes	Los Angeles	Route 60	2
Metro	Div 14 / 1805 Stewart St	Santa Monica	Route 120	2
Metro	901 B North Citrus Ave (citrus and foothill)	Azusa	Route 60	1
Metro	Downtown Santa Monica (Need Address)	Los Angeles	Route 60	1
Metro	Div 16 / 5600 Arbor Vitea St.	Los Angeles	Route 120	3
Metro	Hollywood Highland (Need address)	Los Angeles	On Request	1
Metro	Hollywood Western (Need address)	Los Angeles	On Request	1
Metro	Civic Center (Need address)	Los Angeles	On Request	1
Metro	Hollywood Vine (Need address)	Los Angeles	On Request	1
Metro	Universal City (Need address)	Los Angeles	On Request	1
Metro	Pershing Square (Need address)	Los Angeles	On Request	1
Metro	Vermont Sunset (Need address)	Los Angeles	On Request	1
Metro	7th & Metro (Need address)	Los Angeles	On Request	1
Metro	Wilshire Western (Need address)	Los Angeles	On Request	1
Metro	Wilshire Normandie (Need address)	Los Angeles	On Request	1
Metro	MacArthur Westlake (Need address)	Los Angeles	On Request	1
Metro	Wilshire Vermont (Need address)	Los Angeles	On Request	1
Metro	Vermont Santa Monica (Need address)	Los Angeles	On Request	1
Metro	Union Station (Need address)	Los Angeles	On Request	1
Metro	Vermont Beverly (Need address)	Los Angeles	On Request	1
Metro	Mariachi (Need address)	Los Angeles	On Request	1
Metro	Soto (Need address)	Los Angeles	On Request	1
Metro	11720 Wilmington Ave	Los Angeles	Route 120	1
Metro	Div. 10 742 N. Mission Rd.	Los Angeles	Route 60	2
Total Number of First Aid Kits:				116

Source Provided by: Metro's Risk, Safety and Asset Management Department

We judgmentally selected 51 of 116 (44%) cabinets installed in the following locations to perform sampled counts of first aid kit cabinets listed on Table 7:

- a. **Division 2**, listed 3 first aid kit cabinets installed. We found all 3 cabinets in Transportation Operations, Maintenance Operations, and Cash Counting workplaces.
- b. **Division 20**, listed 6 first aid kit cabinets installed. We found all 6 cabinets in Red Line, Rail Transportation, Facility Maintenance, and Yard Control workplaces.
- c. **RRC**, listed 9 first aid kit cabinets installed. We only found 8 cabinets in CMF (Central Maintenance Facility) workplaces.
- d. **Division 99/One Gateway Plaza**, listed 31 first aid kit cabinets installed. We found all 31 cabinets in Gateway building including Gold Line Union Station break room and USG Amoroso Trailer Park.

(1)	99-P2	Printing Room
(2)	99-Plaza	Record Room
(3)	99-Plaza	LAPD
(4)	99-2	ITS Break Room
(5)	99-5	Board Briefing Room
(6)	99-6	USG 4th Floor Break Room
(7)	99-5	USG 5th Floor Break Room
(8)	99-6	Bus Operation Control (BOC)
(9)	99-7	Service Planning Break Room
(10)	99-8	Vendor Management Break Room
(11)	99-9	Vendor Management Kitchen
(12)	99-10	Risk Management, Claim
(13)	99-11	Assets Management, Corporate Safety
(14)	99-12	Marketing
(15)	99-13	Community Relation
(16)	99-14	Human Capital and Development
(17)	99-15	General Services
(18)	99-16	Environmental Compliance
(19)	99-17	Program Management
(20)	99-18	Construction Management
(21)	99-19	Marketing, Metro Arts
(22)	99-20	Accounting
(23)	99-21	OMB, MAS, Treasury
(24)	99-22	Planning – Systemwide
(25)	99-23	Long Term Planning
(26)	99-24	County Counsel, OMB
(27)	99-25	Office of CEO
(28)	99-26	Facilities
(29)	99-27	USG 27th Floor, Room 2707
(30)	Gold Line	Union Station Break Room

(31) Amoroso USG Amoroso Trailer Park

- e. **Division 10**, listed 2 first aid kit cabinets installed. We found both cabinets in Maintenance Operations and Rail Communications workplaces.

In summary, we found all sampled cabinets except missing one from RRC/CMF (Central Maintenance Facility), which listed 9 and we only found 8.

3. Detailed Checks of Items in the Sampled First Aid Kit Cabinets

Based on our discussion with Metro's Risk, Safety and Asset Management Department, there are 116 first aid kit cabinets installed in various Metro workplace locations. Each cabinet should contain 38 items approved by Metro Corporate Safety and required by the Contract. See Tables 6 and 7 above.

We judgmentally selected 22 cabinets installed in Division 2, Division 20, CMF (Central Maintenance Facility), Gateway, and Division 10 (see Table 8) to perform a detailed check on November 14 and 21, 2022, and December 5 and 19, 2022. We found:

Most first aid kits cabinets checked had majority of the 38 required items. However, we found all first aid kits cabinets were either missing three or more required items.

- ☒ 13 of 38 approved items were in all 22 first aid kit cabinets when we checked, including fingertip bandage, sheer strip, elastic strip, large patch bandage, gauze pads, coban, un-aspirin, trial antacid, CPR/first aid guide, ice pack, water-gel burn gel, and disposable forceps.
- ☒ 25 of 38 approved items were missing from one or more of the 22 first aid kit cabinets, such as antiseptic swabs 50/box, antiseptic spray 3 oz, hydrogen peroxide, elastic roller gauze 3", lip balm-ointment, scissor bandage 5 1/2", and butterfly bandage med. Some of the 25 items were commonly missing across all first aid kit cabinets.

For these 22 first aid kit cabinets, we found cabinets were missing 3 to 15 approved items when we checked them at the following locations:

- ☒ Missing 3 approved items. 1 cabinet installed at CMF Building 5, Bodyshop (Sample # 18).
- ☒ Missing 4 approved items. 6 cabinets installed at Division 2 Transportation (Sample #1), Division 2 Cash Count Room (Sample # 2), Division 10 Maintenance Office (Sample # 4), Division 10 Rail Communication (Sample # 5), Division 20 Red Line 1st Floor Rail Facility Maintenance (Sample # 10), and CMF Building 4 Shop Area (Sample # 19).
- ☒ Missing 5 approved items. 6 cabinets installed at Division 20 Red Line 2nd Floor (Sample # 7), Division 20 Red Line 2nd Floor Front Building Rail Transportation Break Room (Sample # 9), Division 20, 4th Floor Yard Control (Sample # 11), CMF 1st Floor Hallway (Sample # 13), CMF 2nd Floor OCI Administrative Office (Sample # 14), and CMF Building 1 2nd Floor Maintenance Executive Office (Sample # 16).

- ❑ Missing 6 approved items. 5 cabinets installed at Division 20 Red Line Front Building 2nd Floor General Services (Sample # 8), CMF Building 6 Room 206 Copy Room (Sample # 12), CMF Building 1, 2nd Floor Office (Sample # 15), USG 3rd Floor Board Briefing Room Kitchen (Sample # 20), and USG 2nd Floor Break Room (Sample # 21).
- ❑ Missing 7 approved items. 2 cabinets installed at Division 2 Maintenance Supervisor Office (Sample # 3), and USG 4th Floor Break Room (Sample # 22).
- ❑ Missing 12 approved items. 1 cabinet installed at Division 20 Red Line Rail Indoor (Sample # 6).
- ❑ Missing 15 approved items. 1 cabinet installed at CMF Building 3, 1st Floor Hallway (Sample # 17).

Picture 1 shows the cabinet (Sample # 18) that had the least missing approved items (3):

Picture 1: 3 Approved Items Missing



Picture Taken 12/05/2022 ~ 11:32 AM at CMF Building 5, Bodyshop

Report No. 23-AUD-06

Picture 2: 15 Approved Items Missing



See Table 8 for the summary of the check result.

Table 8: Sampled Check on Metro's 22 First Aid Kit Cabinets

Item #	Description	S1-D2	S2-D2	S3-D2	S4-D10	S5-D10	S6-D20	S7-D20	S8-D20	S9-D20	S10-D20	S11-D20	S12-CMF	S13-CMF	S14-CMF	S15-CMF	S16-CMF	S17-CMF	S18-CMF	S19-CMF	S20-USG	S21-USG	S22-USG	Item Missing Frequency In Cabinets
1	Clean wipes 50/box							X																1
2	Antiseptic swabs 50/box			X	X	X	X	X	X	X	X		X	X	X	X	X	X	X	X	X	X	X	19
3	Antiseptic spray 3 oz			X			X			X			X	X				X				X	X	8
4	Hydrogen peroxide	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X			X	X	X	X	21
5	Tri-cut tape 2" x 5 yd										X	X				X		X				X	X	4
6	Elastic tape 1" x 5 yd			X							X							X			X	X		5
7	Cotton tip applicator							X										X						2
8	Eye & skin buf. solution																	X						1
9	Individual eye drops						X								X			X						3
10	Fingertip bandage xlg																							0
11	Fingertip reg 40/box																							0
12	Knuckle 40/box																	X						1
13	Sheer strip 1" 100/box																							0
14	Elastic strip 50/box																							0
15	Large patch bandage																							0
16	Sterile dressing	X			X												X							3
17	Gauze pads 3"x3"																							0
18	Elastic roller gauze 3"	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		X	X	X	21
19	Coban 3" x 5 yd																							0
20	Un-aspirin 100/box																							0
21	Trial antacid 100/box																							0
22	Pept-ez 42/box												X			X								2
23	Antibiotic ointment						X		X							X								2
24	Lip balm, ointment	X	X	X			X		X	X		X			X	X	X	X		X	X			13
25	Hydrocortison cream						X					X												2
26	Hand Lotion pkts 25/box																			X				1
27	CPR/First Aid guide																							0
28	Ice pack sm.																							0
29	Ice pack med.																					X		1
30	Triangular bandage																	X						1
31	Anti-bacterial towelette						X																	1
32	Water-gel burn gel 6/bx																							0
33	Nitrile gloves 2/bar																						X	1
34	Scissor bandage 5 1/2"		X				X						X					X					X	5
35	Splinter out 10/pk																	X						1
36	Disposable forceps																							0
37	Water-gel burn dressing						X											X	X		X			4
38	Butterfly bandage med.			X		X	X		X					X										5
Total Items Missing:		4	4	7	4	4	12	5	6	5	4	5	6	5	5	6	5	15	3	4	6	6	7	
Number of common items present in the 22 sampled cabinets:																								13
Number of unique items missing in the 22 sampled cabinets:																								25
Cabinets missing:																								3 items
																								4 items
																								5 items
																								6 items
																								7 items
																								12 items
																								15 items

*Legend: S=Sample, D=Division, CMF=Central Maintenance Facility, USG=Union Station, Gateway
X=Items Listed Missing in the First Aid Kits Cabinet*

Table 8 shows that some first aid kits cabinets were missing more approved items than other cabinets, which may be interpreted that these items are used by employees more often or in higher demand, such as Antiseptic Swabs, 50/box, Hydrogen Peroxide, Elastic Roller Gauze 3", Lip Balm, ointment.

Metro should perform a comprehensive assessment for each of the locations and determine the appropriate quantity for the items with a high demand, e.g., Sample 6, Division 20 (S6-D20) and Sample 17, Central Maintenance Facility (S17-CMF).

4. Review of Refill Frequency for the Sampled First Aid Kits

For the 22 sampled first aid kit cabinets, we also checked the frequencies that the first aid kit cabinets were inspected and/or refilled.

Table 9 shows the details of our checks of Inspection Records by Contractor SafetyMax taped on the 22 first aid kit cabinets.

Table 9: Sampled Check on Metro's 22 First Aid Kit Cabinets Inspection Records

Item #	Sample # - Locations	Date Checked	Last 6 Dates on SaetyMax First Aid Kit Inspection Record						Frequency In Number of Month	Notes
1	S1-D2	11/14/2022	12.21	02.22	04.22	06.22	08.22	10.22	2, 2, 2, 2, 2	
2	S2-D2	11/14/2022	08.21	10.21	12.21	02.22	06.22	08.22	2, 2, 2, 4, 2	
3	S3-D2	11/14/2022	12.21	02.22	04.22	06.22	08.22	10.22	2, 2, 2, 2, 2	
4	S4-D10	11/14/2022	10.21	12.21	02.22	06.22	08.22	10.22	2, 2, 2, 2, 2	
5	S5-D10	11/14/2022	12.21	02.22	04.22	06.22	08.22	10.22	2, 2, 2, 2, 2	
6	S6-D20	11/21/2022	12.21	02.22	04.22	06.22	08.22	10.22	2, 2, 2, 2, 2	
7	S7-D20	11/21/2022	02.22	04.22		06.22	08.22	10.22	2, ?, ?, 2, 2	<a>
8	S8-D20	11/21/2022				06.22	08.22	10.22	?, ?, ?, 2, 2	
9	S9-D20	11/21/2022	12.21	02.22	04.22	06.22	08.22	10.22	2, 2, 2, 2, 2	
10	S10-D20	11/21/2022	12.21	02.22	04.22	06.22	08.22	10.22	2, 2, 2, 2, 2	
11	S11-D20	11/21/2022	10.21	12.21	02.22	04.22	06.22	10.22	2, 2, 2, 2, 2	
12	S12-CMF	12/5/2022	12.21	02.22	04.22	06.22	08.22	10.22	2, 2, 2, 2, 2	
13	S13-CMF	12/5/2022	08.10		09.06	10.04	11.09	11.12	?, ?, ?, ?, ?	<c>
14	S14-CMF	12/5/2022	12.21	02.22	04.22	06.22	08.22	10.22	2, 2, 2, 2, 2	
15	S15-CMF	12/5/2022	12.21	02.22	04.22	06.22	08.22	11.22	2, 2, 2, 2, 2	
16	S16-CMF	12/5/2022	12.21	02.22	04.22	06.22	08.22	10.22	2, 2, 2, 2, 2	
17	S17-CMF	12/5/2022						11.22	?, ?, ?, ?, ?	<d>
18	S18-CMF	12/5/2022	10.21	12.21	02.22	04.22	06.22	11.22	2, 2, 2, 2, 2	
19	S19-CMF	12/5/2022	10.21	12.21	02.22	04.22	06.22	11.22	2, 2, 2, 2, 2	
20	S20-USG	12/19/2022			04.22	06.22	08.22	11.22	?, 2, 2, 2, 3	<e>
21	S21-USG	12/19/2022			04.22	06.22	08.22	11.22	?, 2, 2, 2, 3	<e>
22	S22-USG	12/19/2022			04.22	06.22	08.22	11.22	?, 2, 2, 2, 3	<e>
Notes:										
<a> Date between 04.22 and 06.22 is not clear, see Picture 3.										
 Dates before 06.22 cannot be determined because they are covered, see Picture 4.										
<c> Dates could not be determined because they were written inconsistently, see Picture 5.										
<d> Dates before 11.22 cannot be determined because they are covered, see Picture 6.										
<e> Dates before 04.22 cannot be determined because they are covered, see Picture 7.										

Legend: S=Sample, D=Division, CMF=Central Maintenance Facility, USG=Union Station Gateway

Our review found that seven cabinets (Samples 7, 8, 13, 17, 20, 21, and 22) where the dates written on the Inspection Records were either unclear or covered (see Pictures 3-7 in this report). Most cabinets were inspected and/or refilled every two months, which complied with the Contract terms to provide first aid supplies on a bi-monthly basis.

Picture 3: Sample 7 - Date between 04.22 and 06.22 Not Clear

2021 ME

FIRST AID KIT INSPECTION RECORD			
DATE		BY	
4-20	DO	7-22	NS
6-22	DO	4-22	RP
7-22	DO	7-22	ME
8-22	DO	8-22	WML
10-22	DO	10-22	WML
4-21	DO		
6-19	NS		
8-21	NS		
10-21	NS		
12-21	NS		

SafetyMax
Emergency Preparedness Solutions
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Picture Taken 11/21/2022 ~ 11:10 AM, Division 20, 2nd Floor

Picture 4: Sample 8 - Dates before 06.22 Covered

FIRST AID KIT INSPECTION RECORD			
DATE		BY	
6-22	WML		
8-22	WML		
10-22	WML		

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Picture Taken 11/21/2022 ~ 11:32 AM, Division 20, 2nd Floor, General Services

Picture 5: Sample 13 - Dates Written Inconsistently

The form is titled "FIRST AID KIT INSPECTION RECORD" and features a table with two columns: "DATE" and "BY". The entries are as follows:

DATE	BY
6.22	hpr
07.28	o.b.
08.10	o.b.
09.06	o.b.
10.04	o.b.
11.09	o.b.
11.22	hpr

The form also includes the SafetyMax logo and contact information at the bottom.

Picture Taken 12/05/2022 ~ 9:53 AM, CMF 1st Floor

Picture 6: Sample 17 - Dates before 11.22 Covered

The form is titled "FIRST AID KIT INSPECTION RECORD" and features a table with two columns: "DATE" and "BY". The entry for 11.22 is visible, and the entries for dates before 11.22 are covered.

DATE	BY
11.22	hpr

The form also includes the SafetyMax logo and contact information at the bottom.

Picture Taken 12/05/2022 ~ 11:18 AM, CMF 1st Floor Hallway

Picture 7: Samples 20, 21, 22 - Dates before 04.22 Covered



Pictures Taken 12/19/2022

Left: ~ 9:15 AM, 99-3 Board Briefing Room

Middle: ~ 9:55 AM, 99-2 ITS Break Room

Right: ~ 10:46 AM, 99-4 Break Room

OBSERVATION

In addition to the review of first aid kit cabinets that are installed and refilled at Metro divisions and its headquarters based on Metro's Contract with SafetyMax, we asked the Metro's Risk, Safety and Asset Management Department to provide us information about the first aid kits cabinets installed/provided in Metro's buses, railcars, non-revenue work vehicles, and construction sites. Our review found:

1. Metro's buses and railcars are not equipped with first aid kits cabinets.
2. Metro's non-revenue work vehicles are not equipped with full size first aid kits cabinets. According to Risk, Safety and Asset Management Department, some of them may have been provided with small first aid kits.
3. Metro does not manage first aid kits at its construction sites.

CONCLUSION

The American National Standards Institute (ANSI) approved the American National Standard updated Minimum Requirements for Workplace First Aid Kits and Supplies: ANSI/ISEA Z308.1-2021, which was effective October 15, 2022, and includes several updates for the first aid kits requirements:

- Foil blanket is now mandatory.
- More specificity for tourniquets.
- Greater guidance on bleeding control kits.
- Enhanced workplace hazard assessment.

Our review found that Metro has not adopted American National Standard for Minimum Requirements for Workplace First Aid Kit and Supplies: ANSI/ISEA Z308.1-2021. As a result, the above new requirements for first aid kits and supplies have not been implemented at Metro's workplace.

We also found Metro does not have written policies and procedures for the first aid kits and supplies program. Well-written policies and procedures help ensure Metro's compliance with relevant laws, regulations, and industry standards.

According to our review, Metro signed a Contract with Safetymax Corporation (Contractor) on January 1, 2018 to provide first aid supply services for Metro's divisions and its headquarters. The Contract has been extended to the 5th year of the operation ending December 31, 2023. The total amount of this 5-year Contract is \$509,187.60.

Our review found that the Contractor provided 116 first aid kit cabinets, more than the 90 required by the contract. We judgmentally selected 51 of the 116 cabinets (44%) to perform physical counts and found 50 cabinets were on the locations listed: Division 2 has 3, Division 20 has 6, RRC/CMF has 8, Division 99/One Gateway Plaza has 31 and Division 10 has 2. The list provided by Metro's Risk, Safety and Asset Management Department indicated that RRC/CMF has 9 first aid kit cabinets, but we only found 8.

Based on the Contract, each cabinet should contain 38 items approved by Metro Corporate Safety, see Table 6. We judgmentally selected 22 cabinets installed in Division 2, Division 10, Division 20, Central Maintenance Facility, and Gateway Plaza to perform detailed verification/check on November 14 and 21, 2022, and December 5 and 19, 2022. For the 22 sampled first aid kits cabinets, we found some of the cabinets were missing 3 to 15 approved items when we checked the cabinets items.

For first aid kits cabinets that were missing more approved items than other cabinets, it could mean that these items are used by employees more often or in higher demand. Metro should perform a comprehensive assessment for each of the locations and determine the appropriate quantity for the items in high demand.

Our sample review of the 22 sample cabinets found seven cabinets (Samples 7, 8, 13, 17, 20, 21, and 22) where the dates written on the Inspection Records were either unclear or covered, see Pictures 3-7 on this report. Most cabinets were inspected and/or refilled every 2 months, which complied with the Contract terms to provide first aid supplies on a bi-monthly basis.

During our visits of divisions, we found some of the employees do not know where the first aid kits cabinets are installed but division representatives know where the cabinets are located.

RECOMMENDATIONS

We recommend Risk, Safety and Asset Management Department:

1. In addition to following Cal/OSHA regulations, consider adopting the updated “American National Standard for Minimum Requirements for Workplace First Aid Kits and Supplies (ANSI/ISEA Z308.1-2021)” approved by the American National Standards Institute (ANSI), which was effective October 15, 2022, and include the additional items recommended in first aid kits and supplies such as a foil blanket.
2. Develop written policies and procedures for the first aid kits and supplies program to ensure compliance with industry standards and meet Agency needs.
3. Perform agency-wide workplace hazard assessment to determine the quantity of the first aid kits and supplies, and the frequencies of the refills at each of the workplace locations according to the result of hazard assessment.
4. Monitor the consumption of the first aid kits and supplies; and request Contractor to refill the high-use items when the quantity runs low.
5. Routinely check the first aid kits located in Metro’s Gateway and Division locations for proper and adequate contracted supplies.
6. Consider placing additional first aid kit cabinets in locations where the level of required items is regularly depleted.
7. Request the Contractor to record the dates clearly and consistently on their First Aid Kit Inspection Record taped on the first aid kit cabinets.
8. Provide information and training to employees for the locations that are equipped with first aid kits and supplies.
9. Consider providing first aid kits and supplies on non-revenue work vehicles, if the result of agency-wide hazard assessment warrants.
10. Work with Metro’s contractors to ensure construction site’s safety and provide first aid kits and supplies at its construction sites.

MANAGEMENT COMMENTS TO RECOMMENDATIONS

On February 16, 2023, we provided Metro Management a draft report. On February 28, 2023, Metro Management had submitted their response summarizing their corrective actions as shown in Attachment A.

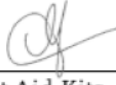
OIG EVALUATION OF MANAGEMENT RESPONSE

Metro Management's response and corrective actions taken are responsive to the findings and recommendations in the report, except for recommendation 1. Risk, Safety and Asset Management Department believes compliance with the OSHA regulation is sufficient and they chose not to adopt the updated American National Standard for Minimum Requirements for Workplace First Aid Kits and Supplies (ANSI/ISEA Z308.1-2021). We consider all issues related to the recommendations resolved and closed based on the corrective actions taken.

Management Comments to Draft Report


Metro

Interoffice Memo

Date	February 27, 2023
To	Yvonne Zheng, Sr. Manager, Audit, Office of the Inspector General
From	Gina Osborn, Chief Safety Officer 
Subject	Draft Report: Review of Metro First Aid Kits and Supplies Program (Report No. 23-AUD-06)

Thank you for allowing us to respond to your draft audit. Risk, Safety and Asset Management department appreciates the time and recommendations in the Audit, Office of the Inspector General draft report titled *Review of Metro First Aid Kits and Supplies Program, Report No. 23-AUD -06*.

This memo includes responses to the recommendations in the report for Risk, Safety and Asset Management:

Recommendation #1 – Risk, Safety & Asset Management Department: Consider adopting the updated “American National Standard for Minimum Requirements for Workplace First Aid Kits and Supplies (ANSI/ISEA Z308.1-2021)” approved by the American National Standards Institute (ANSI), which was effective October 15, 2022, and include the additional items recommended in first aid kits and supplies such as a foil blanket.

Response #1: Metro is required to comply with the mandatory California Code of Regulations, Title 8, section 3400, which states that “There shall be adequate first-aid materials, approved by the consulting physician, readily available for employees on every job.” Corporate Safety had obtained such a letter which is attached. It is important to note that the regulation does not reference ANSI standard for Minimum Requirements for Workplace First Aid Kits and Supplies (ANSI/ISEA Z308.1-2021). Therefore, after considering both – legal requirements and recommended practices, (such as an ANSI standard), Corporate Safety believes it is more important to comply with the legal obligation in the OSHA regulation.

Recommendation #2: Develop written policies and procedures for the first aid kits and supplies program to ensure compliance with industry standards and meet Agency needs.

Response #2: Corporate Safety agrees with this recommendation and has developed a standard operating procedure (SOP) for the first aid kits and will provide instructions to the divisions/locations on: inspections of the first aid kits; how to request the kits to be restocked when items are used faster than scheduled services; frequency of restocking; the locations of first aid kits; and training.

Management Comments to Draft Report

Recommendation #3: Perform agency-wide workplace hazard assessment to determine the quantity of the first aid kits and supplies, and the frequencies of the refills at each of the workplace locations according to the result of hazard assessment.

Response #3: Corporate Safety agrees with this recommendation and addresses this recommendation in the attached SOP.

Recommendation #4: Monitor the consumption of the first aid kits and supplies; and request Contractor to refill the high-use items when the quantity runs low.

Response #4: Corporate Safety agrees with this recommendation and addresses this recommendation in the attached SOP.

Recommendation #5: Routinely check the first aid kits located in Metro's Gateway and Division locations for proper and adequate contracted supplies.

Response #5: Corporate Safety agrees with this recommendation and addresses this recommendation in the attached SOP.

Recommendation #6: Consider placing additional first aid kit cabinets in locations where the level of required items is regularly depleted.

Response #6: Corporate Safety agrees with this recommendation and addresses this recommendation in the attached SOP.

Recommendation #7: Request the Contractor to record the dates clearly and consistently on their First Aid Kit Inspection Record taped on the first aid kit cabinets.

Response #7: Corporate Safety agrees with this recommendation and will request Contractor to diligently record the dates clearly and consistently on their first aid kits and supplies.

Recommendation #8: Provide information and training to employees for the locations that are equipped with first aid kits and supplies.

Response #8: Corporate Safety agrees with this recommendation and will ask divisions/locations to have tailgate meetings to inform employees regarding the locations of the first aid kits.

Recommendation #9: Consider providing first aid kits and supplies on Non-Revenue work vehicles if the result of agency-wide hazard assessment warrants.

Management Comments to Draft Report

Response #9: Corporate Safety agrees with this recommendation and addresses this recommendation in the attached SOP.

Recommendation #10: Work with Metro contractors to ensure construction site's safety and provide first aid kits and supplies at Metro construction sites.

Response #10: Construction sites have their own first aid kits as part of the contract for each project. See attached document.

cc: K. Hernandez V. Khawani C. Kalu N. Nguyen

Management Comments to Draft Report

Los Angeles County Metropolitan
Transportation Authority



Metro

Prepared by Approved by Approved by

Page 1 of 2

Hoan Nguyen, Collins Kalu, Vijay
Prncpl. Safety Sr. Director, Khawani,
Specialist Safety Cert. EO, RSAM

SOP – Industrial First Aid Cabinets

Originator:	Hoan Nguyen
Area of application:	SOP for Industrial First Aid Kit Cabinets
Document location:	Corporate Safety O-Drive
Distribution List:	Electronic version will be kept up to date. Printed copies will be distributed
Original issue date:	2/27/2023
Revisions	
Rev. No.	Date
	Description
001	2/27/2023 Initial SOP Issuance
Recurring action items	
Activity	Responsibility
	Frequency

Procedure Index

1.0 Purpose

2.0 Scope

Management Comments to Draft Report

Los Angeles County Metropolitan
Transportation Authority



Metro

Prepared by Approved by Approved by

Page 2 of 2

Hoan Nguyen, Prncpl. Safety Specialist	Collins Kalu, Sr. Director, Safety Cert.	Vijay Khawani, EO, RSAM
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SOP – Industrial First Aid Cabinets

1.0 Purpose

- 1.1 The purpose of this Standard Operating Procedure (SOP) is to provide guidelines to management and employees regarding acquisition, maintenance, and reporting usage of industrial first aid cabinets in compliance with the California Code of Regulations, Title 8, section 3400.

2.0 Scope

- 2.1 This SOP applies to all Metro personnel working at divisions, locations, and Gateway building who utilize the first aid kits for treatment due to minor job-related injuries.

3.0 Responsibilities

- 3.1 Corporate Safety is responsible for providing and restocking of industrial first aid cabinets at divisions, locations, and the Gateway building.
- 3.2 Corporate Safety will maintain adequate first-aid materials, approved by the consulting physician, and make available the materials for employees.
- 3.3 Corporate Safety will provide first aid training to employees whose jobs are required by Cal-OSHA regulations and other interested employees.
- 3.4 Corporate Safety monitors the First Aid Contract to ensure contract compliance.
- 3.5 Department Directors, Managers or Supervisors will monitor the consumption of the first-aid materials.
- 3.6 Department Directors, Managers or Supervisors will inform Corporate Safety when first-aid materials are depleting.
- 3.7 Department Directors, Managers or Supervisors will also inform employees that first-aid classes are available if the employees are interested.
- 3.8 Department Directors, Managers or Supervisors will inform employees regarding the locations of the first aid cabinets through safety meetings.
- 3.9 Non-Revenue Cost Center managers have at their discretion elected to install the First Aid Kits in Non-Revenue maintenance vehicles. It is also their responsibility to maintain the First Aid Kits in those Non-Revenue maintenance vehicles.

4.0 References/Related Documents

- 6.1 California Code of Regulations, Title 8, Section 3400

Warning: This document is uncontrolled when printed. Document ID: CSFAKSOP001.18

Management Comments to Draft Report

Scott J. Campbell MD, MPH
3038 Steiner Street
San Francisco, California
94123

Emergency Department Physician
Consulting Physician for
SafetyMax Corporation

Subject: OSHA requirements for first aid kits and supplies 29CFR1910.151 (b)

To all customers:

As **SafetyMax Corporation's** consulting physician, I have inspected the contents of the company's first aid kits and cabinets. Based on that inspection and review of the Occupational Safety and Health (OSHA) Code of Federal Regulations 29CFR1910.151 (b) governing first aid kits and supplies, I find as follows:

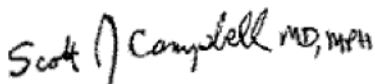
SafetyMax Corporation's first aid kits for use in boats, trucks, school buses and farm vehicles meet or exceed all industry standards.

SafetyMax Corporation's first aid cabinets for the workplace fulfill all OSHA requirements since they fully incorporate the mandates of industrial first aid treatments outlined below:

1. Sterile, one time use products for eye decontamination.
2. Sterile dressings for temporary treatment of major injuries.
3. Sterile bandages, creams, ointments, sprays and swabs for minor cuts, burns scrapes, bruises, strains and insect bites.
4. Tablets, which are individually packaged with proper product warnings and identification with written instructions included for each specific use. These tablets include products for the relief of headaches, sore throat, cough, backache, sinus trouble, hay fever, colds, cramps and indigestion.

This opinion is based on a review, (as of this date), of the requirements and contents of the above mentioned kits and cabinets. If either of OSHA requirements change, or the contents as reviewed this day of **SafetyMax Corporation's** products change, the kits and cabinets would be subject to further review.

Sincerely,



Scott J. Campbell MD, MPH
6/1/2012

Management Comments to Draft Report

Gonzalez, Lizzet

From: Nguyen, Hoan
Sent: Tuesday, February 21, 2023 11:36 AM
To: Carol Manner; Krystle Busby
Cc: Kalu, Collins
Subject: First Aid Cabinets Sign-off
Importance: High

Hi Carol and Krystle,

Please instruct Mike Rudes to ALWAYS sign-off on the Inspection Record on the first aid cabinets. There are some that he sometimes misses. Attached is an example.



Thanks,

Hoan Nguyen
 LA Metro
 Principal Safety Specialist
 Risk, Safety, and Asset Management
 213.922.4915



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Inspector General
Chief Operations Officer
Chief Program Management Officer (Interim)
Chief Safety Officer
Deputy Chief Vendor/Contract Management Officer
DEO, Administration (Interim), Management Audit Services