

**OCCUPATIONAL SAFETY
AND HEALTH STANDARDS BOARD**

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**FINAL STATEMENT OF REASONS**

CALIFORNIA CODE OF REGULATIONS

TITLE 8: Division 1, Chapter 4, Subchapter 4, Construction Safety Orders,
Article 3, Section 1512 and Subchapter 5, Electrical Safety Orders, Group 1,
Article 3, Section 2320.10 and Group 2, Article 36, Section 2940.10

First Aid for Electrical Workers – Application & Scope**MODIFICATIONS AND RESPONSE TO COMMENTS RESULTING FROM
THE 45-DAY PUBLIC COMMENT PERIOD**

There are no modifications to the information contained in the Initial Statement of Reasons.

Summary and Responses to Written and Oral Comments:**I. Written Comments**

Mr. Terry D. Thedell, Ph.D., CIH, CSP, Health and Safety Advisor, Sempra Energy, by letter dated May 29, 2012.

Comment: Mr. Thedell stated that Sempra Energy fully supports the alignment of Cal/OSHA ESO standards to the existing Fed/OSHA First Aid for Electrical Workers as they have been successful in already implementing these provision for electrical worker first aid in their company electrical operations.

Response: The Board thanks Mr. Thedell for his comment and participation in the Board's rulemaking process.

Mr. David Shiraishi, MPH, Area Director - Region IX, United States Department of Labor, Occupational Safety and Health Administration, by letter dated June 22, 2012.

Comment: Mr. Shiraishi stated that the proposed occupational safety and health standard appears to be commensurate with federal standards

Response: The Board acknowledges Region IX approval of the proposal as being commensurate with federal standards.

II. Oral Comments

There were no oral comments received at the June 21, 2012, Public Hearing in Sacramento.

ADDITIONAL DOCUMENTS RELIED UPON

None.

ADDITIONAL DOCUMENTS INCORPORATED BY REFERENCE

None.

DETERMINATION OF MANDATE

This regulation does not impose a mandate on local agencies or school districts as indicated in the Initial Statement of Reasons.

ALTERNATIVES CONSIDERED

No reasonable alternatives have been identified by the Board or have otherwise been identified and brought to its attention that would be more effective in carrying out the purpose for which the action is proposed, would be as effective and less burdensome to affected private persons than the proposed action, or would be more cost-effective to affected private persons and equally effective in implementing the statutory policy or other provision of law.