

Antarctic Support Contract
29 CFR 1904- Recordkeeping Recordability Determination
OCONUS Considerations

1. Acute Mountain Sickness (AMS)

Medical treatment beyond first aid. See § 1904.7(b)(5)

Due to the altitudes of some remote locations as well as the South Pole (10,000+ feet) many Antarctic support employees experience some form of AMS. Employees are often times being flown from sea level to high altitudes in a matter of hours without having the time to allow their bodies to adjust to the environmental changes. Under normal circumstances, such as mountain climbing events, a schedule would be implemented to climb at increments, allowing the body to adjust. The flight from McMurdo to South Pole is approximately 3 hours which is not enough time for the body to adjust. AMS can be quite debilitating and if left untreated or under treated, can result in more serious conditions, including death. Currently, ASC Medical is taking a more proactive approach by administering the medication prophylactically before the worker flies from sea level to elevation. In some cases, even early administration of medication is not enough. Employees are still affected by AMS. ASC requests an exemption from recording cases due to AMS because there are no feasible or economical means of scheduling incremental elevation changes to ease the symptoms of AMS.

2. Sea Sickness

Medical treatment beyond first aid. See § 1904.7(b)(5)

ASC transports workers to and from Palmer Station by ship. Crossing the Drake Passage and the Straights of Magellan are infamously noted for having the worst crossings in the world and sea sickness is common. Prescription drugs are administered to prevent the onset of sea sickness. In cases where the initial dose of prescription medication is ineffective, a different prescription medication may be administered by the onboard EMT. ASC requests an exemption from recording cases due to motion sickness on ships because ships are the only method of travel to Palmer Station and the rough seas and/or sea swells cannot be prevented nor mitigated.

3. Designated Work Environment

See § 1904.5(b)(1)

What is the "work environment"? OSHA defines the work environment as "the establishment and other locations where one or more employees are working or are present as a condition of their employment. The work environment includes not only physical locations, but also the equipment or materials used by the employee during the course of his or her work."

In Antarctica, employees work where they live and live where they work. They are all present as a condition of their employment. What constitutes the work area in Antarctica? The proposal here is to define the working environment in terms of task performed and working hours versus work location. If the employee is performing authorized work for the benefit of the Company (within normal working hours or not), then the employee is in the working environment for the purposes of the recordability standard. If the employee is performing work as a volunteer or if the employee is not performing work for the benefit of the Company (lunch, recreation, participation in a wellness program, personal, etc.), then the employee is considered to not be in the working environment.

4. **New Zealand Medication**

See § 1904.7(b)(5)(ii)(A)

What is the definition of medical treatment? "Medical treatment" means the management and care of a patient to combat disease or disorder.

Some New Zealand medications are offered at higher over the counter (OTC) dosage levels than those offered in the United States. ASC saves the client valuable funding by purchasing New Zealand OTC medication because of the Logistics of flying the medications down to Antarctica. The shipment of U.S. medications by vessel transport is not effective in that the shelf life (6-12 months) of the medications does not allow for the required stocking of inventories. ASC requests an exemption from recording cases where New Zealand OTC medications were administered and/or prescribed to injured employees at the New Zealand OTC strength.

5. **Administration of Rigid Wrist Brace as PPE or preventative care**

See §1904.7(b) (5)(ii)(F)

OSHA defines any devices with rigid stays or other systems designed to immobilize parts of the body as considered medical treatment for recordkeeping purposes. Often employees report to medical with concerns of minor wrist soreness or tightness. To prevent the soreness from developing into a severe injury such as a strain/sprain or tendonitis, or carpal tunnel-type injury – medical will provide the employee with a Velcro removable wrist braces as preventative care – to limit further aggravation of minor injury. ASC requests that temporary/removal-able wrist braces be included as an exemption from recording cases if brace is provided as a form of preventative care. If prescribed like medication, as form for treatment for an injury or a non-removable devise immobilization devise is used (such as cast to immobilize a fracture injury), this exemption would not be invoked.