Heat Illness Prevention Discussion Draft for 2/8/18, Side-by-Side Comparison of Section 3395, Option A, Option B

Section 3395. Heat Illness Prevention (outdoor places of employment)	OPTION A: Amend Section 3395 (to include indoor places of employment)	OPTION B: Create Standalone Standard (indoor places of employment)
(a) Scope and Application	 (a) Scope and Application Expanded to cover indoor places of employment where the temperature ≥ 80 degrees Includes an exception that modifies the applicable requirements of this section where employees work only indoor work areas, do not work in a high radiant heat work area, and perform only light work and the employer demonstrates that the work area ≥ 90 degrees only four or fewer calendar days per year 	 (a) Scope and Application Covers indoor places of employment where the temperature ≥ 80 degrees Includes an exception that modifies the applicable requirements of this section where employees work only indoor work areas, do not work in a high radiant heat work area, and perform only light work and the employer demonstrates that the work area ≥ 90 degrees only four or fewer calendar days per year
(b) Definitions	 (b) Definitions Includes definitions applicable to indoor places of employment 	 (b) Definitions Includes definitions applicable to indoor places of employment Excludes definitions inapplicable to indoor places of employment
(c) Provision of Water	(c) Provision of Water • Same as section 3395	(c) Provision of Water • Same as section 3395
(d) Access to Shade	 (d) Access to Cool-Down Areas Includes provisions applicable to indoor places of employment No change in the requirements applicable to outdoor places of employment 	 (d) Access to Cool-Down Areas Includes provisions applicable to indoor places of employment Omits requirements in section 3395 that are applicable only to outdoor places of employment

(e) High-Heat Procedures	(e) High-Heat Procedures in Outdoor Work Areas No change in the requirements applicable to outdoor places of employment	
	 (f) High-Heat Control Measures in Indoor Work Areas When heat index ≥ 95 degrees, requires an assessment of environmental risk factors and use of feasible or practicable engineering controls, administrative controls, and PPE Regardless of the heat index, in high radiant heat work areas requires shielding to the extent practicable 	 (e) High Heat Control Measures When heat index ≥ 95 degrees, requires an assessment of environmental risk factors and use of feasible or practicable engineering controls, administrative controls, and PPE Regardless of the heat index, in high radiant heat work areas requires shielding to the extent practicable
(f) Emergency Response	(g) Emergency Response Procedures	(f) Emergency Response Procedures
Procedures	Same as section 3395	Same as section 3395
(g) Acclimatization	 (h) Close Observation during Acclimatization Includes provisions applicable to indoor places of employment 	 (g) Close Observation during Acclimatization Includes provisions applicable to indoor places of employment Omits a reference in section 3395 to work performed outdoors
(h) Training	(i) Training	(h) Training
	Same as the requirements in section 3395	 Same as the requirements in section 3395 Omits a reference in section 3395 to work performed outdoors
(i) Heat Illness Prevention Plan	(j) Heat Illness Prevention Plan	(i) Heat Illness Prevention Plan
	 Same as the requirements in section 3395 	Same as the requirements in section 3395
	(k) Contingency Plan • Applicable to places of employment where employees work only indoor work areas, do not work in a high radiant heat work area, and perform only light work and the employer demonstrates that the work area ≥ 90 degrees only four or fewer calendar days per year	(j) Contingency Plan • Applicable to places of employment where employees work only indoor work areas, do not work in a high radiant heat work area, and perform only light work and the employer demonstrates that the work area ≥ 90 degrees only four or fewer calendar days per year