



JOINT STATE OFFICE

June 30, 2017

VIA E-MAIL & U.S. POST

Amalia Neidhardt, MPH, CSP, CIH
Research and Standards
Division of Occupational Safety and Health
California Department of Industrial Relations
1515 Clay Street
Oakland, CA 94612
aneidhardt@dir.ca.gov

Re: Heat Illness Prevention in Indoor Places of Employment

Dear Ms. Neidhardt,

The California Refuse Recycling Council (“CRRC”) is a non-profit trade association representing solid waste and recycling companies with operations in California, which is largely privatized, including private and government customers. Most Californians receive solid waste services from the private sector represented by the CRRC. Our members engage in every aspect of solid waste handling, and are responsible for the development and operation of most of the solid waste handling programs and infrastructure in the state, including waste collection, transfer, disposal, processing, recycling, conversion, and composting facilities. We are also in the process of meeting California’s ambitious waste diversion targets to reduce methane emissions and support our climate change goals, with substantial advancements in technology and operational expansion. With respect to this action, CRRC members are employers subject to the eventual subject regulation and have a beneficial interest in this matter.

The CRRC is submitting these comments on the revised Discussion Draft presented at the May 25, 2017 advisory meeting on behalf of its members, and in the interest of effective and practical heat illness prevention for employers engaged in any activity subject to regulation by the Division of Occupational Safety and Health. This letter serves as an introduction to our membership, as well as our intent and commitment to participating in this regulatory process.

Our members are currently reviewing the latest discussion draft regarding heat illness preventing in indoor places of employment with their facility staff, in particular Human Resources. Members are also responding to a distributed survey to identify how to reasonably achieve a standard that minimizes heat-related illness in our industry, per the passage of SB

1167 and the discussion draft document. To that end, we look forward to submitting more comments in the future and engaging in the advisory committee process.

In the meantime, we have several questions pertaining to the current draft:

- To reduce complexity and misunderstanding in implementation, why wouldn't these regulations mirror that of the outdoor heat illness prevention standard?
- How will facilities with open sides, such as refuse transfer stations, fall under these regulations?
- Are you considering industry sector flexibility to meet these regulations?

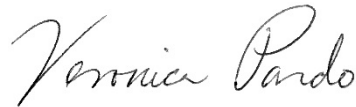
As mentioned previously, our membership is currently reviewing the discussion draft in order to respond specifically to areas of concern. We look forward to being involved in this process and would like to schedule an informal introductory meeting with Cal/OSHA staff in the near future. Additionally, our regulatory staff has requested to be added to the advisory workgroup.

The CRRRC regulatory staff is pleased to respond to any questions or comments you may have regarding this letter.

Sincerely,



Kathryn Lynch
Regulatory Affairs



Veronica Pardo
Regulatory Affairs

cc: CRRRC State Executive Committee Members