

From: Joel Cohen [mailto:jcohen@thecohengroup.com]

Sent: Monday, February 27, 2017 9:05 AM

To: Smith, Steve@DIR <SSmith@dir.ca.gov>

Subject: Indoor Heat Advisory Committee

Good morning Steve,

As I mentioned to Amalia, CIHC wants to participate in this committee meeting using me as the point of contact. Unfortunately, I am traveling this week and there is no one from CIHC that can be present. Since 'we' are unable to attend, I thought I'd run by you some general comments I had after looking at the draft. The basis for my general comments is my experience from working in the metals industry (many moons ago) and my review of the ACGIH Documentation and NIOSH Criteria Docs (including the latest version).

Again, these are rough and very general comments:

- 1) Not sure why you are using dry bulb temp (90F) as a trigger. Since the signed bill included that the ACGIH be used, I would put more emphasis on WBGT, which can be calculated with on line apps with just some basic information. Better way to go to measure heat stress and more consistent with bill
- 2) Clothing adjustment is good and very important
- 3) Work activity should be 4 categories and not 3. More consistent with ACGIH and NIOSH
- 4) I am not inclined to use Heat Index. As long as one determines WBGT, employer would have better idea of heat. Heat Index results are highly variable and I even find different results from same environment. I also see problems attempting to use Heat Index on indoor environments, but there is literature that discusses it.
- 5) I am pleased with the term "unacclimatized employee" which is consistent with NIOSH, but the exposure limits in the standard do not track NIOSH or TLV Action Limits

Again, just general comments, but let me know how I can help.

Best,

Joel

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