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RE: Comments on the February 16, 2018 draft, "Option B-Standalone Indoor Standard" Heat Illness Prevention in Indoor Places of Employment

(a) Scope and Application

(1)

Clarification on determination of 80 F: The scope of the draft standard applies to an indoor work area where the temperature equals or exceeds 80 F when employees are present. As written, a work setting with a single measurement of 80 F or above, would fall under the scope of the standard. The standard doesn't define how the employer will determine when the standard applies.

*We ask the Standards Unit to clarify how this measurement is obtained: As a single measurement at typical or peak temperature?, as an average across a defined period?, or by some other method that is representative of the temperature in a particular work setting.*

Exception: Professional and Administrative Office settings:

The San Francisco of Public Health has 89 locations within San Francisco. Some are purely office and administrative facilities, but many are mixed use, such as primary care clinics, hospitals and public health laboratories. Would all of these locations be designated as "Professional" and fall under the Exception?

If clinics, hospitals and laboratories are not designated as Professional, would the office and administrative settings of these facilities be treated differently than the non-office settings? In our facilities, that would mean one room could have an 80 F requirement and the room next to it could have an 85 F requirement.

As written, a single measurement of 85F requires an office or administrative setting to comply with the full standard. Facilities with only brief or intermittent temperatures at or above 85F would be required to meet all of the requirements, including annual training, which is costly to employers who have low risk facilities located in cooler climates or where there is normally a functioning air conditioning system designed to control temperatures below 85F.

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We shall ~ Assess and research the health of the community ~ Develop and enforce health policy ~ Prevent disease and injury ~  
~ Educate the public and train health care providers ~ Provide quality, comprehensive, culturally-proficient health services ~ Ensure equal access to all ~

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*We've previously recommended, and continue to recommend, that these types of low risk work settings be exempted from the standard since any short-term increases in temperature due to elevated outdoor temperatures or maintenance/repair of cooling systems can be addressed by section 3203.*

*If the Standards Unit does not exempt low risk work settings then we recommend using an average temperature at or below 85F across a work shift with the measurements taken in a representative location within the work area.*

(b) Definition: Cool Down Area and (d) Access to Cool-Down Areas

For an office or administrative work area that falls under the scope of the standard, provision of a cooldown area needs greater clarification. As written, a cool-down area would have to be provided for office workers if the work area is 85F, but Section (d) (1) indicates that a cool-down area must be present when temperatures exceed 80F. We recommend that this be amended for office and administrative areas to 85F.

Thank you for the opportunity to provide these comments on this important proposal.

Sincerely,



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