

## Comments to the Heat Illness Prevention Draft Text of 5/16/2018.

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- (a) **Scope and Application** – (3) – I am concerned about the threshold of 85-degree Fahrenheit. I recommend a 80 to 85 degrees Fahrenheit range. Also (e) Assessment and Control Measures – (1) and (2), (2) (A), (2) (B), and (2) (C), (2) – An employee who has been newly assigned – I am concerned about the 90-degree Fahrenheit threshold. I recommend 80 to 85 degrees Fahrenheit. When employees are working indoors, there should be greater ability and solutions to controlling the indoor temperature.

**NOTE NO. 1** – Injury and Illness Program - include the word Prevention.

**(b) –definitions** – Environmental risk factors – including air temperature, relative humidity, radiant heat from the sun and other sources...sounds like Heat Index – National Weather Service heat index values – Appendix A - When I research the Index, I see that a safe temperature and relative humidity is 83 degrees with 5% relative humidity. Fatigue is possible with prolonged exposure and/or physical activity at 84 degrees with a 5% relative humidity up to 97 degrees temperature and a 5% relative humidity.

Personal risk factors for heat illness – it is the employer's responsibility to know the factors and the employee's responsibility to share the necessary personal information, if the employee is aware of any personal risk factors. Employers need to check up on employees who arrive to work sick, are elderly and/or working without A/C.

We need consistency in the language – ( c ) Provision of water. -provide one quart of water per employee per hour – (h) Training. – ( c ) - up to 4 cups per hour. If we mandate the drinking of water, we need to mandate bathroom breaks and access to bathrooms.

We need consistency in the language – (2) (A) Engineering Controls – feasible. (2) (B) Administrative Controls – practicable, (2) (C) Personal heat-protective equipment – feasible. Is it feasible or practical?

**(i)– Heat Illness Prevention Plan** – shall be made available at the worksite to employees, add and the employee's representatives. (i) (5) – I appreciate this blanket, all inclusive language that will focus on issues not addressed in this regulation.

Additionally, reference the OSHA-NIOSH Heat Tool for Android and iPhone devices.

**Heat is one of the leading weather-related killers in the United States.**