

**From:** Ross, David K@DOT  
**To:** [DIR RS](#)  
**Cc:** [Takigawa, Kelly A@DOT](#); [Nelson, Gabriel G@DOT](#)  
**Subject:** Re: Comments for Heat Illness Prevention in Indoor Places of Employment  
**Date:** Thursday, June 07, 2018 2:44:01 PM

---

Good Afternoon –

After review of the draft revisions dated 5/16/18, the Department of Transportation would like to submit the following comments:

- All Caltrans Division of Equipment (DOE) Heavy Equipment Mechanics (HEM's) wear coveralls therefore will be subject to the 80 degree rule. This seems low.
- All Shops have swamp coolers that will not provide cooling to 80 degrees during hot/humid days.
- HEMs are also at Maintenance Stations where the same applies.
- **This new temperature setting could potentially shut down production during heat waves.**
- Assessments will need to be done when the heat index increases by 10 degrees. How will this be managed and where will the records be maintained.
- Need to purchase instruments for every facility.
- "Cool down" places will be supervisors offices and break rooms.
- Replacement of swamp coolers with HVAC is a solution.
- Shift changes on short notice will be required when temperatures exceed the limits (BU12 Issues).
- Policy will need to be written.
- How will these new standards impact the Standard Efficiency Procedures established by the Department of General Services? See Management Memo 14-07.
- How will these new standards impact CCR Title 24 Part 4 CA Mechanical Code (CMC)?
- These standard changes will have a huge impact to Caltrans Division of Equipment operations and possibly other locations.

Appreciate the opportunity to respond to the latest updates. If there are any questions, please advise. Thanks.

David Ross  
Associate Safety Engineer  
Caltrans Office of Health & Safety  
(916) 227-1824