



Mark Farrell  
Mayor

Barbara Garcia  
Director of Health

June 6, 2018

Amalia Neidhardt  
Cal/OHSA Research and Standards Unit  
Elihu Harris State Building  
1515 Clay Street  
Oakland, CA 94612  
[gneidhardt@dir.ca.gov](mailto:gneidhardt@dir.ca.gov)  
[RS@dir.ca.gov](mailto:RS@dir.ca.gov)

RE: Comments on the May 16, 2018 draft, *Heat Illness Prevention Draft Text - draft revisions 5/16/18 compared to 2/15/18*

(a) Scope and Application

(3) The proposed standard applies to all workplaces not specifically identified in the previous subsections where the temperature equals or exceeds 85 degrees Fahrenheit (F) when employees are present.

This standard is trying to address industries, operations and locations where there are exposures to excessive heat that are either already well known or could reasonably be anticipated as being present in the workplace with some regularity due to seasonal changes in temperature, because of the nature of the work process that has radiant heat sources, or because a combination of clothing, heat sources and work process contribute to the potential for heat illness.

Work operations and locations that are *normally well controlled year round below 85 degrees* (such as air conditioned office buildings and clinics) where workers would not normally have any risk for heat illness, should not fall under the scope of this standard. For these facilities, where indoor temperatures may be elevated (due to HVAC maintenance or elevated outdoor temperatures), the provisions of 3203 should apply. In the case of office buildings with HVAC systems, the employer is also required to maintain those systems under the provisions of 5142 to ensure they are inspected and working properly.

We are greatly concerned about keeping our employees safe and healthy and not exposing them to excessive risk factors for indoor heat illness. We are concerned that the provisions of this proposed standard will create unnecessary requirements to address low risk facilities diverting valuable health and safety resources from other areas within the Department.

---

The mission of the San Francisco Department of Public Health is to protect and promote the health of all San Franciscans.

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 ~

Angela.Platzer@sfdph.org – office 415-554-2797; fax 415 554-2562  
101 Grove Street, Room 217, San Francisco, CA 94102

---

(d) Access to Cool-Down Areas

(1) We are concerned about how a large office building would be expected to provide a cool-down area in a building where the outside temperature exceeds the indoor temperature and the indoor temperature within the building is at or equal to 85 F. This is a possible scenario in San Francisco for many public buildings that lack air conditioning systems or where the HVAC systems are not designed for those rare days in San Francisco of outside temperatures exceeding 90 F.

Would a fan be considered an Engineering control? If so, would fans need to be provided to each employee in an affected building?

For a large building with public services, finding alternative work locations for staff while still being able to provide services would be difficult, if not impossible, for facilities such as public health clinics.

If no alternative locations were possible, under this proposed standard, would the facility be required to close? That could be disruptive to public services, including clinic operations.

(e) Assessment and Control Measures

(1) Assessing environmental risk factors for heat illness:

The proposed standard requires taking measurements in work areas where the heat index is expected to be highest.

The San Francisco Department of Public Health has employees located at 80 locations. The proposed standard would require measurements at each location if the temperature equals or exceeds 90 F and therefore, provision of 80 instruments that would also need to be maintained and calibrated by the Department.

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

Sincerely,



Angela Platzer, RN, MS, COHN-S  
Acting Director, Occupational Safety and Health  
City and County of San Francisco, Department of Public Health  
San Francisco, CA 94102  
[Angela.Platzer@sfdph.org](mailto:Angela.Platzer@sfdph.org)  
(415) 554-2786