

DEPARTMENT OF TRANSPORTATION
DIVISION OF SAFETY AND MANAGEMENT SERVICES
OFFICE OF HEALTH AND SAFETY
P.O. BOX 168040, MS-53
SACRAMENTO, CA 95816
PHONE (916) 227-2640
FAX (916) 227-2639
TTY 711
www.dot.ca.gov



*Making Conservation
a California Way of Life.*

November 30, 2018

Ms. Amalia Neidhardt
Research and Standards
Division of Occupational Safety and Health
California Department of Industrial Relations
1515 Clay Street
Oakland, CA 94612

Dear Ms. Neidhardt:

The California Department of Transportation (Caltrans) appreciates the opportunity to provide comment to the proposed Heat Illness Prevention in Indoor Places of Employment standard.

The following are questions and/or comments based on the current draft dated October 24, 2018.

- Is there a phase in period for the standard?
- (a) Scope and Application:
 - Note No. 1 – add “Prevention” to Injury and Illness Prevention Program.
- (b) Definitions:
 - Temperature – Will dry bulb or global thermometers be a requirement in all indoor environments?
- (c) Provision of Water – Recommend adding “written replenishment” to the second to last sentence.
 - Employers may begin the shift with smaller quantities of water if they have effective written replenishment procedures.
- (e) Assessment and Control Measures:
 - (1) – As specified in subsections (e)(1)(a) through (e)(1)(D), the employer shall measure and record the temperature or heat index, whichever is greater, and shall identify and evaluate all other environmental risk factors for heat illness.
 - How often shall the employer measure and record the temperature?
 - (1)(A) – The employer shall establish and maintain accurate records of temperature or heat index measurements, as applicable. The records shall include the date, time, and specific location of all measurements.
 - Preferred format – paper or electronic?

Ms. Neidhardt
November 30, 2018
Page 2

- Note states that the records shall be retained and made available in accordance with section 3204. Please be more specific. Following T8 CCR 3204 (d)(B)(1)?
- (1)(A)(1) – Measurements shall be taken again when they are reasonably expected to be 10 degrees or more above the previous measurements.
 - Temperatures can change relatively quickly. What is reasonable?
- (h) Training:
 - What is the expected timeline for compliance with training?

Sincerely,



SHANNA EVERTS
Office Chief
Office of Health and Safety
Division of Safety and Management Services