



# PASMA

PUBLIC AGENCY SAFETY MANAGEMENT ASSOCIATION

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November 20, 2018

Amalia Neidhardt, DOSH Senior Safety Engineer  
Occupational Safety and Health Standards Board  
1515 Clay St., Suite 1901  
Oakland, CA 94612

Subject: Heat Illness Prevention-Indoor Places of Employment Draft

Dear Ms. Neidhardt;

On October 24, 2018, the Division of Occupational Safety and Health (DOSH) published revisions to the 5/16/18 version of the Heat Illness Prevention for Indoor Places of Employee draft standard. The Public Agency Safety Management Association (PASMA), represents over 140 public agencies in California. Our members include municipal and county government agencies, water districts, and other special districts, who would all be affected by this Indoor Heat Illness draft standard.

### **Scope and Necessity**

PASMA opposes the imposition of the 82 degree trigger under section (a)(1). PASMA believes the intent is to protect workers in indoor places of employment; however, the 82 degree trigger appears to be an arbitrary number, or an adoption of an ASHRAE standard. We are not aware of any evidence that suggests that worker safety and health would be protected by establishing this 82 degree trigger. This change will result in a significant amount of staff time to monitor and record the temperature in hundreds of workplaces, which will result in little or no added protection to California workers.

We recommend the following language be adopted in Section (a)(1), “This standard applies to all indoor work areas where the temperature equals or exceeds 85 degrees Fahrenheit when employees are present.”

### **Scope and Necessity**

PASMA has serious concerns regarding the feasibility of implementing Section (e)(1)(A). This section requires the employer to establish and maintain accurate records of temperature or heat index measurements, as applicable. There is confusion among our members regarding what is meant by “applicable”.

Section (e)(1)(B) states the following, “Temperature or heat index measurements, as applicable, shall be representative of employee exposures and include measurements taken at times during the work shift when employee exposures are expected to be the highest.”

It seems that this proposed requirement to conduct representative monitoring conflicts with the requirement that monitoring be conducted at times when employee exposures are expected to be the highest. If we only conduct monitoring at the peak hours of the day, it would not be representative of the work exposure during the other times of the day. Since, heat illness is a result of cumulative exposures, and given that there is no STEL or ceiling limit for heat, this seems to contradict basic industrial hygiene principles.

We recommend the following language be adopted, “Temperature or heat measurements shall be representative of employee exposures.”

We appreciate the opportunity to provide comments on the Heat Illness Prevention for Indoor Places of Employee draft standard. If you have further questions please contact me at (714) 765-4399.

Sincerely,

A handwritten signature in black ink, appearing to read "Bill Taylor", with a long horizontal flourish extending to the right.

Bill Taylor, CSP  
PASMA-South Chapter, Legislative and Regulatory Representative

cc: Briza Morales, PASMA-South Chapter, President  
Stephen Hackett, PASMA-North Chapter, President