



## San Francisco Department of Public Health

Greg Wagner  
Acting Director of Health

City and County of San Francisco  
London N. Breed  
Mayor

November 20, 2018

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

RE: Comments on the October 24th 2018 draft Heat Illness Prevention in Indoor Places of Employment

The San Francisco Department of Public Health appreciates the opportunity to provide input and recommendations to the most recent draft of the proposed Heat Illness Prevention in Indoor Places of Employment.

Our comments are provided below:

(a) Scope and Application

(1) This standard applies to all indoor work areas where the temperature equals or exceeds 82 degrees Fahrenheit when employees are present.

(d) Access to Cool-Down Areas

- The San Francisco Department of Public Health has concerns that lowering the threshold for application of this standard from 85 F to 82 F will unnecessarily impact our administrative and outpatient clinic settings where indoor temperatures are normally controlled well below 82 F but where elevated outdoor conditions may cause indoor temperatures to increase to 82 F just a few days per year. Many of our older buildings that provide outpatient primary care and mental health services do not have cooling systems. Although infrequent, San Francisco may have several days per year where elevated outside temperatures cause the indoor temperatures to exceed 82 F. These facilities deploy fans to provide comfort for staff and patients, but they do not have the ability to provide dedicated cool-down areas for staff and we anticipate having to discontinue patient care services under the provisions of this standard.

*We recommend that the 85 F threshold continue to apply to Office work areas and other work areas without radiant heat sources and where employees do not wear heat restrictive clothing.*

- We would like to have some additional language that establishes a timeframe for triggering the standard. Unlike outdoor temperatures, where hot weather may be consistent across many hours of the day, indoor conditions may fluctuate or exist for only short durations.

For example, in the case of an office building in San Francisco, there may be a period where the HVAC system temporarily lags behind the outdoor temperature, or is shut down for maintenance, causing the indoor temperature to reach 82 F. In this case, all employees working in the building would now fall under the proposed standard even if the 82 F threshold was exceeded for a limited time.

*We recommend that the standard include language that outlines timeframes for employee exposure to temperatures at or above the threshold. For office work areas and all other work areas where there is no radiant heat source or use of heat restrictive clothing, the determination of indoor temperature is the average temperature measured over the employee's work shift.*

*In addition, Facilities without significant radiant heat sources, where there is normally a functioning HVAC system that is designed to control the indoor temperature below 85 F should be exempt from the provisions of the standard when the HVAC system may be shut down for routine maintenance or intermittent repair for a period of time not to exceed 48 hours. In those cases, the provisions of 3203 are still applicable.*

We recognize that elevated temperatures in indoor environments is a health and safety issue for workers in California and for our employees in San Francisco and we are committed to protecting our employees where exposure to indoor heat is a concern. We are asking the Standards Board to consider the impacts of this standard to work areas with very low risk of indoor heat illness.

Sincerely,



Angela Platzer, RN MS, COHN-S  
Acting Director, Occupational Safety and Health Section  
San Francisco Department of Public Health  
101 Grove Street, Room 217  
San Francisco, CA 94102  
[Angela.Platzer@sfdph.org](mailto:Angela.Platzer@sfdph.org)



Karen Heckman, CIH  
Senior Industrial Hygienist  
San Francisco Department of Public Health  
[Karen.Heckman@sfdph.org](mailto:Karen.Heckman@sfdph.org)



Shawn Holle, CSP  
Safety Officer  
San Francisco Department of Public Health  
[Shawn.Holle@sfdph.org](mailto:Shawn.Holle@sfdph.org)



Nancy Terranova, CSP  
Safety Officer  
San Francisco Department of Public Health  
[Nancy.Terranova@sfdph.org](mailto:Nancy.Terranova@sfdph.org)



Frederick Huynh, MS  
Industrial Hygienist  
San Francisco Department of Public Health  
[Frederick.Huynh@sfdph.org](mailto:Frederick.Huynh@sfdph.org)



Anthony G. Boone, CIH, CSP, CHMM, CEI  
Safety Officer  
San Francisco Department of Public Health  
[Anthony.Boone@sfdph.org](mailto:Anthony.Boone@sfdph.org)