



Alameda County Water District

43885 S. Grimmer Blvd.

Fremont, Ca 94538

Ms. Amalia Neidhardt

Sr. Industrial Engineer

Division of Occupational Safety and Health

Dear Ms. Neidhardt,

The Alameda County Water District in partnership with Operating Engineers Local 3 thank you for the opportunity to comment on the most recent draft of the Indoor Heat Illness Prevention Program.

We have the following concerns with the language and requirements of this program.

1. ***(d) The cooldown areas- shall be maintained at less than 82°Fahrenheit unless the employer can demonstrate that this is infeasible.*** This isn't an issue on its own, the concern is that we would need to verify that the temperature is consistent and appropriately cool in this locations. There is no temperature requirement in 3395 for shade areas, and the outdoor heat standard is for arguably a higher level of risk to the employee. This section should mirror the requirements in 3395 and have employees in a reasonably/practicably cool area.
2. ***(e) 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. Temperature or heat index measurements, whichever are required, shall be taken where employees work and at times during the work shift when employee exposures are expected to be the highest.***

Initial measurements shall be taken when it is reasonable to suspect that subsection (e) applies.

Measurements shall be taken again when they are reasonably expected to be 10 degrees or more above the previous measurements.

Temperature or heat index records shall be retained for 12 months or until the next measurements are taken, whichever is later, and made available at the worksite to employees and to representatives of the Division upon request.

We believe this section creates an unnecessary burden to employees. There are hundreds of locations throughout our district alone that are infrequently visited that meet the standards definition for "Indoor". This would distract employees from safely completing their jobs by asking them to interrupt their work to frequently to monitor the heat index and account for a substantial difference in humidity at each location they visit and every time the heat increases



by 10 degrees. This requirement is not practicable and does not add value to the safety of our employees.

We again thank you for the opportunity to comment on these drafts.

Sincerely,

A handwritten signature in black ink that reads "Kathleen Roberts".

Kathleen Roberts ASP

Safety and Human Resources Development Officer

Alameda County Water District

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