From: Neidhardt, Amalia@DIR
To: Coburn, Douglas W.
Subject: RE: Proposed Wildfire Smoke Draft Rule
Date: Thursday, May 02, 2019 4:14:38 PM
Attachments: image001.png

Good afternoon Mr. Douglas. We are in receipt of your comments on the Draft Regulatory text for proposed Title 8, Sections 5141.1 Protecting Workers from Wildfire Smoke.

We appreciate your interest in this occupational health and safety matter and can assure you that your comments will be given full consideration. These comments will be listed as an individual, not the company's name.

Thank you for participating in this rulemaking project.

- Amalia Neidhardt

From: Coburn, Douglas W. [redacted]
Sent: Thursday, May 02, 2019 3:09 PM
To: Neidhardt, Amalia@DIR <ANeidhardt@dir.ca.gov>
Subject: RE: Proposed Wildfire Smoke Draft Rule

Hi Amalia,
Yes- go ahead and use my questions in your comments, but please keep my Employer [redacted] out of print.

So based on your response, we currently possess a TSI SidePak AM 520 aerosol monitor with detection level of 1 µg/M^3 and with a particle size range that meets the criteria you provided. It is designed to measure $PM_{2.5}$, among other size ranges. I believe this monitor is at least as good as the Dust Trak monitor and our SidePak also has data logging capability.

It is our intent to make sure that if we are collecting measurements in a wildfire scenario, our sampling approach and reported data meets Cal-OSHA's intent and is deemed satisfactory in determining workplace exposures to $PM_{2.5}$ particulates.
So, I thought I would share with you a proposed approach for monitoring. Please consider the following proposed approach and please give any comments or feedback on whether this approach is reasonable (this is referencing 5141.1 (a) Scope, (2)(c) employer demonstrates that the concentrations…).

In the event of a wildfire which is impacting [redacted], is it reasonable for Safety Services to choose our sampling location, set the monitor inlet at breathing zone height, data log a given location for approximately 1 hour to identify the $PM_{2.5}$ level, add in accuracy/error to determine a conservative result, and finally compare that adjusted result (adjusted result would also include

temperature/pressure adjustments) to the AQI equivalent value?
We would then repeat this process at several locations to verify/document our AQI values at various locations around the [redacted]. We would also document the AQI values posted by AQMD (from their website) using the monitoring station in closest proximity to our property. During the sampling process we would also document atmospheric conditions (e.g. temp, RH, wind, etc.). Safety Services would then generate a complete report describing our process, equipment, any rationale, results and conclusions relative to compliance and recommendations of any proposed control measures.
Please advise if this sounds like a reasonable approach to meet compliance.

Thank you for your quick response and guidance.

Doug Coburn, CIH
[redacted] Safety Services - CA

From: Neidhardt, Amalia@DIR [mailto:ANeidhardt@dir.ca.gov]
Sent: Thursday, May 02, 2019 1:30 PM
To: Coburn, Douglas W. [redacted]
Subject: RE: Proposed Wildfire Smoke Draft Rule

Hello Mr. Coburn. Maybe this information can help you.
Dusttrak real-time particulate monitors and similar devices are an acceptable method of determining PM2.5 levels provided they do not underestimate employee exposures. If the instruments underestimate exposures and the underestimate can be accurately determined, the instrument may also be used provided any possible underestimation is properly accounted for in determining the actual exposure.

Some important issues to consider to ensure that PM2.5 levels are not underestimated are:

1. The instrument is designed and manufactured to measure the concentration of PM2.5 in the air and takes into account particle sizes ranging from 0.1 µm up to and including 2.5 µm. An instrument that measures a greater particle size range would be acceptable.
2. The instrument is calibrated, maintained, and used (including the use of necessary accessories) in accordance with the manufacturer's instructions for accurately measuring the concentration of PM2.5.
3. The employer takes into account the possible error of the instrument to ensure that exposure levels are not underestimated. The employer should obtain information on the possible error of an instrument from the manufacturer.

Also, please let me know if you would like me to consider your question as a comment that was submitted by you?

- Amalia Neidhardt

From: Coburn, Douglas W. [redacted]
Sent: Thursday, May 02, 2019 11:31 AM
To: Neidhardt, Amalia@DIR <ANeidhardt@dir.ca.gov>
Subject: Proposed Wildfire Smoke Draft Rule

Hi Amalia,

I read the proposed rule in the Cal-OSHA Reporter.
I was wondering if Cal-OSHA has some guidance on what type of sampling methods/equipment would be considered acceptable for Employers to determine AQI values at their specific work place.

Has this topic come up in any questions from the public?

I appreciate your advisement.

Doug Coburn, CIH®
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