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## COORDINATOR

ALICE BERLINER

June 12th, 2019

Chairman David Thomas  
Occupational Safety and Health Standards Board  
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Sacramento, CA 95833  
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Sent via EMAIL: [oshsb@dir.ca.gov](mailto:oshsb@dir.ca.gov)

Dear Chairman Thomas and Members of the Board:

On behalf of the Southern CA Coalition for Occupational Safety & Health, I write to provide the following comments to create a strong emergency standard to help protect outdoor workers from exposure to wildfire smoke.

SoCalCOSH is part of a vibrant network of approximately 20 COSH groups throughout the United States that work at the local, state and national level to ensure worker health and safety protections and a voice for all workers. Locally, SoCalCOSH regularly collaborates with community-based organizations, unions and worker centers to promote safe and healthy jobs through worker outreach, education and policy initiatives. During the fire season, we regularly hear that outdoor workers are forced to work without adequate breaks and personal protective equipment, suffering from poor air quality and exposing them to long-term illness.

Thank you for preparing and circulating the appendices and revised regulatory text. We appreciate all the work that has gone into preparing these drafts. We'd like to note a few concerns that we have.

First, in Appendix B, currently there is just instruction to replace respirator filters when damaged, dirty or difficult to breathe through. There should also be instructions specific to filtering facepiece respirators to replace them at least at the end of the shift, for many reasons including that redonning increases the risk of poor fit, as well as contamination, and to replace sooner if they become damaged, soiled or difficult to breathe through. This change should be made for the emergency regulation.

For the permanent regulation we would recommend trying to reduce the literacy level of Appendix B and getting input from worker organizations on terms and phrasing that workers find more accessible.

Finally, we also hope that the threshold for mandatory respirator use will be reconsidered for adoption in the emergency standard, if not, certainly in the permanent regulation. We are disappointed that the threshold has been raised from an Air Quality Index (AQI) for PM2.5 of 301 to 501, especially since the AQI tops out at 500 so no one can ever know if it is above 501. Levels above 300 are considered hazardous and mandatory use should be triggered. Adequate fit of respirators is critical at this hazardous level.

Thank you for all the work and analysis in preparing a discussion draft and associated documents for the emergency standard to protect outdoor workers from exposure to wildfire smoke. We look forward to working with the agency and other stakeholders throughout this important process

Sincerely,

Alice Berliner  
Coordinator  
Southern CA Coalition for Occupational Safety & Health