

From: [Berg, Eric@DIR](mailto:Berg.Eric@DIR)
To: [Neidhardt, Amalia@DIR](mailto:Neidhardt,Amalia@DIR); [Kirkham, Chris@DIR](mailto:Kirkham,Chris@DIR)
Subject: FW: Protection from Wildfire Smoke Comments
Date: Friday, May 10, 2019 9:21:32 AM

From: Kip B. Fout <kipfout@stanford.edu>
Sent: Friday, May 10, 2019 8:57 AM
To: Berg, Eric@DIR <EBerg@dir.ca.gov>
Cc: Yong C. Kim <yongck@stanford.edu>
Subject: Protection from Wildfire Smoke Comments

Eric,

Stanford would like to submit a written comment for the proposed wildfire smoke protection emergency regulation. I couldn't find a webpage for comments so am assuming that we send them directly to you and/or Amalia Neidhardt. I was at the Advisory Committee meeting on Wednesday so I am aware that today is the last day to submit such comments.

Our comment applies to limiting the scope under Section (1)(A) and also applies to Section (f)(1) in controlling harmful exposures.

The Stanford campus has over 600 buildings and our employees, such as professors, typically move from building to building throughout the day. To qualify for the exception under (f)(1) we would have to track these travel times to ensure they do not exceed one hour, which is not feasible.

Since the focus of the emergency regulation is to protect outside workers we propose that you add a Section (a)(1)(C) that reads: "(C) Workers are assigned outside work tasks that last for more than one hour per shift" or something to that affect. This would eliminate the burden on employers to track incidental exposure from activities such as moving from a building to a car when both the building and the car are mechanically ventilated.

Thank you for your consideration.

Kip Fout, CIH
Healthy Buildings Program Manager
Stanford Environmental Health & Safety
650-723-0486