OSHSB
PUBLIC ~~HEARING~~ Meeting
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December 10, 2018

Executive Officer
Occupational Safety and Health Standards Board
2520 Venture Oaks Way, Suite 350
Sacramento, CA 95833

RE: **Petition for Emergency Standard to protect outdoor workers in areas impacted by unhealthy levels of wildfire smoke**

This is a petition requesting development of an emergency standard to put in place protections for outdoor workers who are working in areas impacted by wildfire smoke.

The catastrophic wildfires across California in 2018 and other recent years demonstrate the urgent need for protection for workers who must labor outdoors in areas where the air quality meets or exceeds unhealthy levels due to wildfire smoke. Wildfire smoke contains high levels of fine particulate matter (PM2.5). Exposure to fine particulate matter can reduce lung function, worsen heart and lung conditions, and cause coughing, wheezing, and difficulty breathing. An emergency standard needs to be put in place as soon as possible, since wildfires are now occurring during many months of the year. The emergency standard should apply to outdoor occupations such as agriculture, construction, landscaping, maintenance, commercial delivery, and other activities not considered to be "first response". These other activities to be covered by the standard would for example include work of nurses, caregivers and school staff evacuating patients, residents, and students.

The emergency standard should follow the model of Cal/OSHA, Air Resources Board, and public health advisories and be based on requiring protections when Air Quality Index measurements reach unhealthful readings due to wildfire smoke. The standard should require the implementation of feasible engineering controls such as enclosed structures or vehicle cabs with filtered air for rest and meal breaks. Because public health advisories recommend limiting the time and exertion spent in outdoor activities[i], the standard should address, where feasible, administrative controls such as changes in work location and schedules, reduction in work intensity, and additional rest periods. The emergency standard should also address provision of appropriately selected and maintained respiratory protection.

Sincerely,

Mitch Steiger
California Labor Federation
MS: sm
OPEIU 29 AFL CIO

Douglas L. Parker
Worksafe

Anne Katten
California Rural Legal
Assistance Foundation

[i] See, for example, https://ww2.arb.ca.gov/protecting-yourself-wildfire-smoke