

California Industrial Hygiene Council
3 Waters Park Drive, #226
San Mateo, CA 94403

February 15, 2019

Ms. Amalia Neidhardt
Senior Industrial Engineer
Division of Occupational Safety and Health
California Department of Industrial Relations
1515 Clay Street
Oakland, CA 94612

RE: Proposed Indoor Heat Illness Standard

Dear Ms. Neidhardt,

The California Industrial Hygiene Council (CIHC) appreciates the opportunity to again comment on the proposed Indoor Heat Illness Standard. We have a few comments on this current draft (amended Jan 29, 2019), and offer the following suggested changes.

Section (a)1 identifies a temperature at which the standard would apply to “all indoor work areas” except with certain exceptions. We believe that another exception not identified should be duration of exposure to the threshold temperature, such as an exposure of 1 hour. Not identifying duration of exposure leads one to conclude that an employer would be subject to the standard if their employees experience an instantaneous exposure in excess of the 82 degrees F threshold. This may occur simply if there is ventilation equipment failure, an issue particularly important for office environments. This should not be the case and therefore we encourage the addition of duration of exposure as a condition under which the standard applies.

CIHC also suggests that Cal/OSHA exempt office environments from this standard. Clearly the standard was not intended for office environments and there is no scientific basis to include offices and therefore we suggest making an exception for office workplaces.

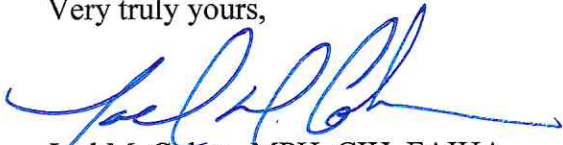
Section (e)(B)(3) requires the employer to retain temperature measurements for 1 year. CIHC understands the need to retain temperature readings for a reasonable period of time, particularly when the employer is attempting to resolve a heat problem, but as a general requirement for the standard, CIHC does not understand the need to retain readings for this period of time, and suggests deleting this requirement.

Lastly, it is our understanding that Appendix A will be the NOAA Heat Stress Chart. There are several heat charts available under the National Weather Service and it is unclear specifically which chart Cal/OSHA intends to use as Appendix A. CIHC believes Cal/OSHA will use the color-coded chart that can be found at <https://www.weather.gov/safety/heat-index>. Assuming that is correct, the chart offers likelihood of heat disorders “with prolonged exposure or strenuous activities”.

Based on the temperature and relative humidity, a “caution” to “extreme danger” condition is shown. As such, it is unclear how this chart will be used as a measure of Heat Index for assessment and control measures. CIHC believes that NIOSH and the ACGIH charts on heat stress offer a far clearer indicator of heat stress conditions and should be used rather than the NOAA Heat Index chart.

CIHC appreciates the ability to be involved in the development of this standard. Please let us know if you have any questions concerning the above-stated points.

Very truly yours,



Joel M. Cohen, MPH, CIH, FAIHA
Board Member
California Industrial Hygiene Council