

Proposed Indoor Heat Illness Standard





THE PROPOSAL



How Did
We Get
Here?

Where it All Started

- Two Serious Citations in 2012
 - GISO §3203 violations for employee heat-related injuries related to working indoors.
 - Upheld by the Appeals Board
 - *National Distribution Center, Cal/OSHA App. 12-R6D2-0391, 12-R6D2-0378, Decision After Reconsideration (Oct. 5, 2015).*
 - It was appropriate for the Division to issue citations to employers for indoor heat illness under the Injury Illness Prevention regulation.





Where it All Started

February 28, 2017

- Initial, proposed, draft Indoor Heat Illness standard submitted by The Division.
- 1st Advisory Committee Meeting

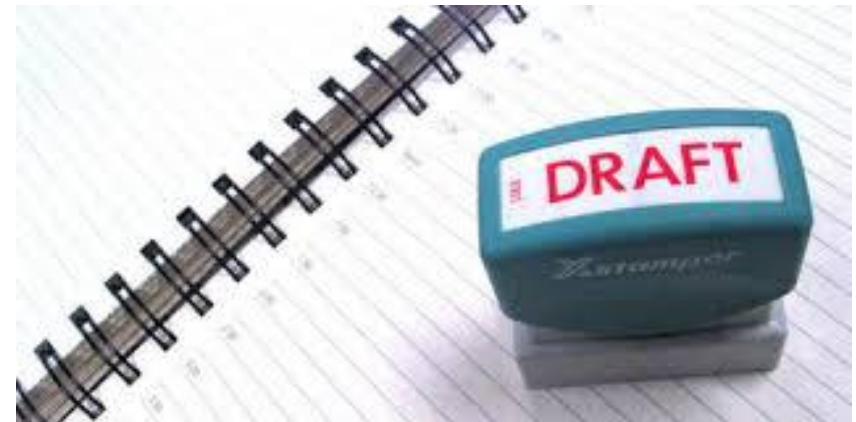
The Process

- Three Advisory Committee Meetings

- February 28, 2017
- May 25, 2017
- February 8, 2018

- Four Draft Revisions

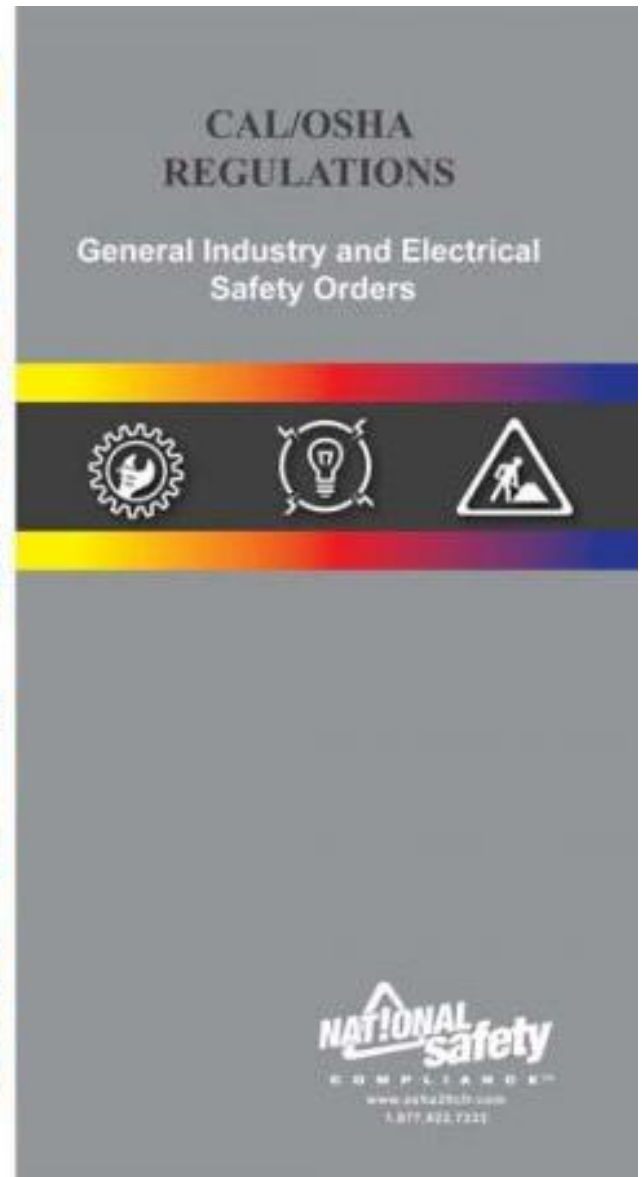
- February 16, 2018
- May 16, 2018
- October 24, 2018
- January 29, 2019



But....

- Last Advisory Committee Meeting generated A TON on comments.
 - 20 different stakeholders

CAL/OSHA



**WHERE ARE WE
NOW?**



What is “Indoor?”

- Space that is under a ceiling or overhead covering and is enclosed along its perimeter by walls, doors, windows, dividers or other physical barriers whether open or closed.

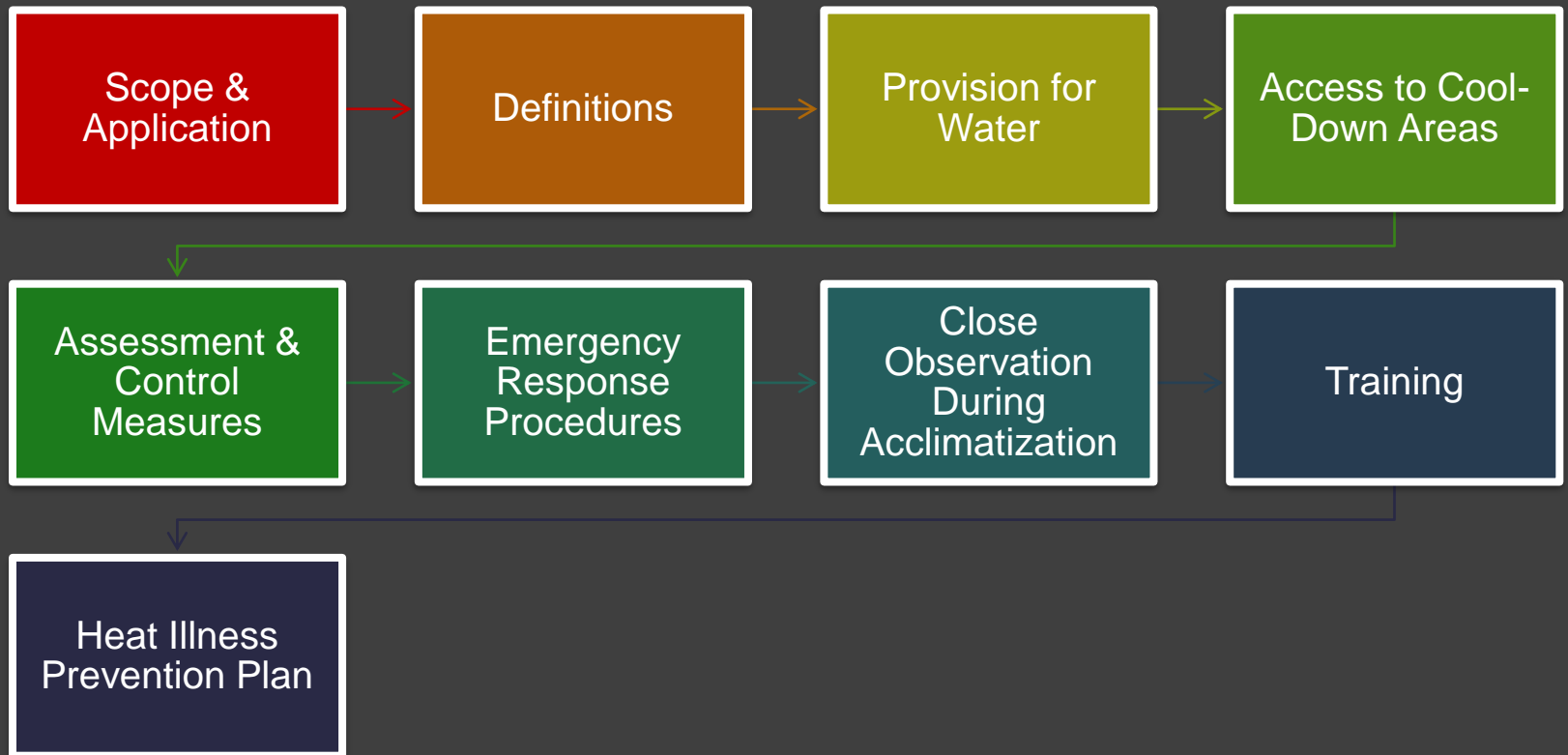


What is “Indoor?”

- One “Indoor Location” Exception;
 - Does not refer to shaded area that meet the requirements of §3395 AND use exclusively for employees covered under §3395.
- All work areas that are not indoor are considered outdoor and covered by §3395.



Break it Down



Scope & Application

- **All indoor work areas** when the temperature equals or exceeds 82-degrees.
 - When employees are present
 - Any other setting identified in writing by The Division.
 - Does not exclude employer requirements for Hazard Assessment in §3203.



Scope & Application

- **Note 1**

- Program integration into existing IIPP, Outdoor Heat Illness Program
- DO NOT DO THIS!!!!
 - Stand-Alone Document

- **Note 2**

- No fear of retaliation clause





**Will be defined
within
sections of the
presentation,
as pertinent.**



Provision For Water

- Identical to the §3395 Provision
- As close as practicable to where employees are working.
- In Cool Down Areas.
- One quart of water per employee, per hour.
- Replenishment procedures



Provision For Water

- Potable Drinking Water
 - §3363 - GISO
 - §1524 - CSO
 - §3457 – Ag
- Potable water in adequate supply shall be provided in all places of employment for drinking and washing.



Access to Cool-Down Areas (Provision for Shade)

- Maintain one or more cool-down areas at all times.
 - Designated Area(s);
 - Monitored;
- Large enough to accommodate the number of employees on Preventative Cool-Down Rests.
 - Be available, under the same conditions, during break and meal periods.



Access to Cool-Down Areas (Provision for Shade)

- Sit in a normal posture without physical contact with each other.
- Located as close as practicable to where employees are working.



Access to Cool-Down Areas (Provision for Shade)

The temperature in the Cool-Down areas shall be maintained at less than 82 degrees Fahrenheit, unless the employer demonstrates it is infeasible.

- No exemption for infeasibility.
 - Devise other solutions.



Access to Cool-Down Areas (Provision for Shade)

- Cannot be areas where;
 - Environmental Risk Factors for Heat Exist;
 - Employees are exposed to unsafe or unhealthful conditions;
 - Employees are deterred or discouraged from accessing the area.



Preventative Cool-Down Rests

- A protected break period.
 - Allowed at any time employee feels it is needed.
- SB435 – Recovery Periods
- Expands meal and rest break prohibitions to “Cool-Down” periods take to prevent heat illness.
 - Employers cannot require an employee to work during a recovery period.
 - Employers can be responsible for a one-hour wage premium for missed/denied “Cool Down” periods.



Preventative Cool-Down Rests



Employees in a Cool-Down Area must;

- Be monitored and asked about symptoms of heat illness.
- Be encouraged to remain in the Cool-Down Area.
- Not be ordered back to work until symptoms are abated.
 - No less than 5-minutes



Environmental Risk Factors Assessment



Condition	Trigger
Temperature	87-Degrees
Heat Index	87-Degrees
OR	
When the temperature reached 82-Degrees F. AND,	
<u>Heat Restrictive Clothing*</u>	
<u>High Radiant-Heat Areas**</u>	

*Heat-Restrictive Clothing

- Full-Body clothing covering the arms, leg and torso.
 - Waterproof
 - Chemical, Biological, Radiological or fire protection
 - Protect the process from contamination



*Heat-Restrictive Clothing

- Exception
 - Flame (FR) or Arc-Flash resistant properties that are;
 - Constructed only of knit or woven fibers, AND;
 - Worn in lieu of the employees street clothing, AND;
 - Worn without a full-body thermal or moisture barrier.



**High Radiant-Heat Areas

An area where the globe temperature is at least 5-degrees greater than the “temperature.”

Temperature: Dry bulb temperature, in degrees F, obtainable by using a thermometer without considering humidity or radiant heat.





Environmental Risk Factors Assessment to include;

- Be In Writing;
- Temperature or Heat Index Measurement at the time of Assessment;
- Description of all Environmental Risk Factors Present
- Date
- Time
- Location

Representative of where the temperature or Heat Index is expected to be the highest.

- Worst-Case Scenario



Re-Assessment Procedure

- Updated temperature measurements when the temperature or heat index rises 10-degrees;

Requires active involvement of employees in performing;

- Designing and conducting the Assessments.
- Identifying and evaluating the risk factors

Assessment records maintained for 12 months.

- Made available upon request.

Control Measures

- Maintain both the temperature and heat index to below 87 degrees Fahrenheit or the temperature to below 82 degrees Fahrenheit where employees wear clothing that restricts heat removal or work in high radiant heat work areas, except to the extent that the employer demonstrates such controls are infeasible.

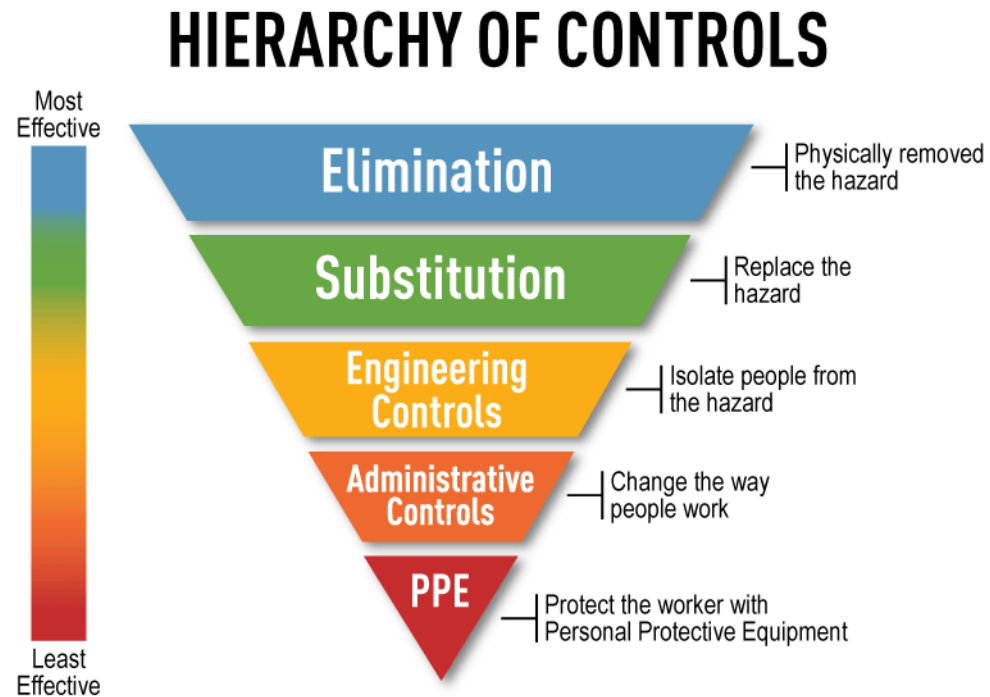


Control Measures

Details a Heat-Illness Hierarchy of Controls”

- Engineering Controls
- Administrative Controls
- PPE

Controls implemented in order, as feasible.



Control Measures

Engineering Controls

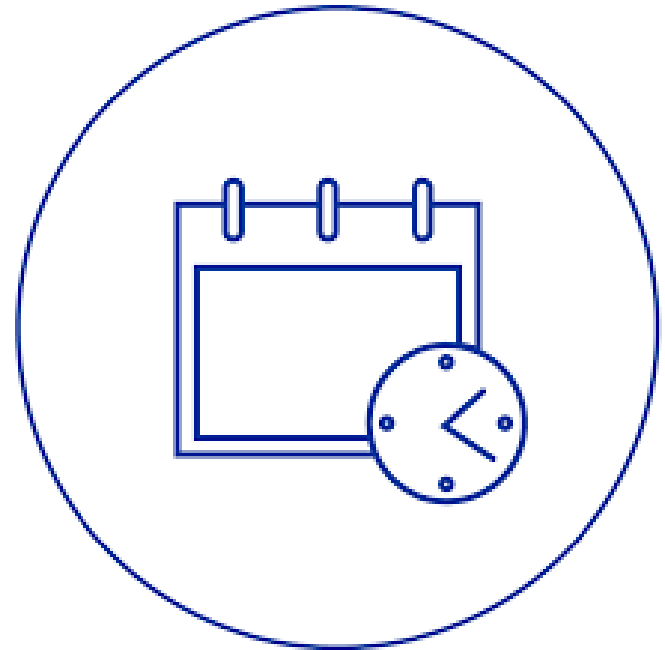
- First Line of Defense.
- Reduce the temperature, or Heat Index, to the lowest temperature possible, as feasible.



Control Measures

Administrative Controls

- Second Line of Defense.
- When engineering controls cannot reduce the temperature, or Heat Index
 - Below 90-degrees
 - Below 82-degrees (Heat-Restrictive Clothing or High Radiant-Heat)



Control Measures

- Personal Heat-Protective Equipment

- Last Line of Defense
 - Does nothing to reduce the hazard itself
- When Engineering and Administrative controls cannot reduce the temperature, or Heat Index;
 - Below 90-degrees
 - Below 82-degrees (Heat-Restrictive Clothing or High Radiant-Heat)



Emergency Response Procedures

- Effective Communication Ability

Employee \rightleftarrows Supervisor



Emergency Response Procedures

- Appropriate Level of Response
 - Acute Heat Illness = First Aid
 - Severe Heat Illness = EMS
- Affected Employees must be monitored
 - Not Left Alone
 - Not Sent Home
 - Self-taken to Clinic or Hospital



Acclimatization

- Observation of all employees when the temperature in the work area is at least 10-degrees higher than the average daily temperature in the work area the proceeding 5 days.
 - By a Supervisor or Designee



Acclimatization

- First 14 Days of being assigned to a work area if;

Condition	Trigger
Temperature	87-Degrees
Heat Restrictive Clothing	82-Degrees
High Radiant-Heat Areas	82-Degrees

- Closely observed by a Supervisor or Designee



Training

- Each employee prior to working in areas anticipated to have Heat Illness risk.
 - Environmental Risk Factors for Heat Illness
 - Personal Risk factors for Heat Illness
 - Employer Heat Illness Prevention Procedures
 - Employee Right to Cool-Down Rest Periods
 - The importance of Water Consumption
 - The concept of acclimatization



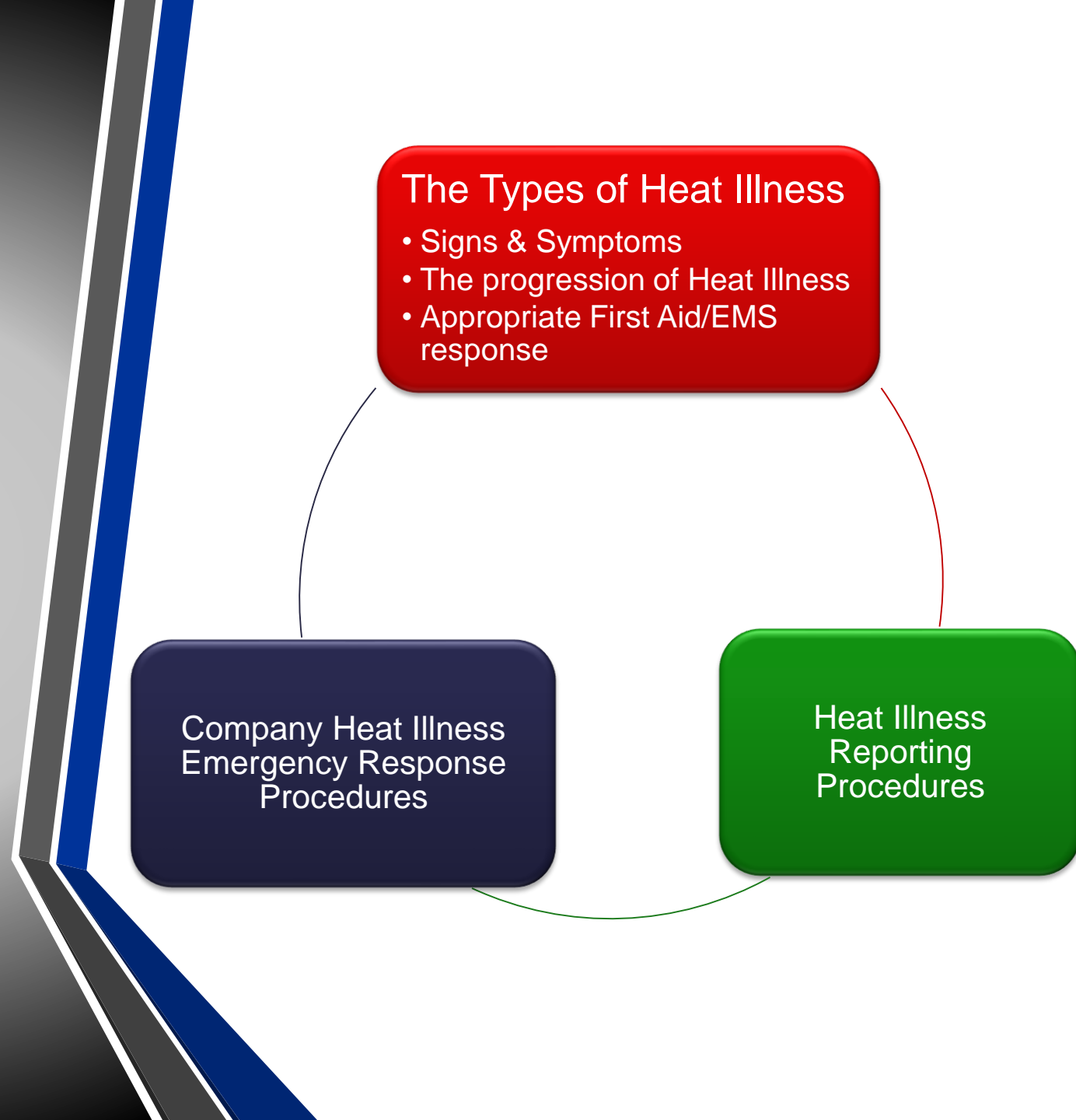
Training

The Types of Heat Illness

- Signs & Symptoms
- The progression of Heat Illness
- Appropriate First Aid/EMS response

Company Heat Illness
Emergency Response
Procedures

Heat Illness
Reporting
Procedures



Training

Supervisor Training

Everything above,
AND;

- Management Heat Illness procedures
- Emergency Response Procedures
- How to monitor the Temperature and Heat Index.

Written Program

- Employer shall establish, implement and maintain an effective Heat Illness Prevention Plan.
 - Available in English and the language understood by the majority of employees
 - Available on-site to employees and The Division, upon request.



Written Program

- Minimum Requirements
 - Procedures for the Provision of Water;
 - Procedures for the Provision for Cool-Down Areas;
 - Procedures to measure and record the temperature;
 - Procedures for Training;
 - Procedures for observation during Acclimatization;
 - Heat Illness Emergency Response Procedures



Questions



Contact

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Thank You!

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