HEAT: OSHA UPDATE AUGUST 2024

OSHA has issued a Notice of Proposed Rulemaking for Heat Injury and Illness Prevention in Outdoor and Indoor Work Settings.

OSHA has determined that the health effects associated with exposure to occupational heat are generally acute. The proposed standard aims to address the many numerous acute health effects of occupational exposure to hazardous heat. These include, among other things, heat stroke, heat exhaustion, heat syncope, and physical injuries (e.g., falls) due to fatigue or other heat-related impairments. These harms occur after relatively short-term exposures to hazardous heat and are typically apparent at the time of the exposure or shortly thereafter. Heat is the leading cause of death among all weather-related phenomena in the United States.

The proposed standard would require employers to create a plan to evaluate and control heat hazards in their workplace both indoors and outdoors.

Proposed elements of a heat standard:

- Scope and application
- Definitions
- Heat Injury and Illness Prevention Plan (HIIPP)
- Identifying heat hazards
- Requirements at or above initial heat trigger
- Requirements at or above high heat trigger
- Heat illness and emergency response and planning
- Training
- Recordkeeping

Key Items for outdoor work include:

1. Monitoring heat conditions by:
    - Tracking local heat index
    - Measuring heat index (i.e., temperature and humidity) forecasts, or wet bulb globe temperature (WBGT)
2. Proposed Heat Triggers
    - Initial heat trigger – a heat index Limit (RAL) of 80°F or a WBGT equal to the NIOSH Recommended Alert Limit (RAL)
    - High heat trigger – a heat index of 90°F or a WBGT equal to the NIOSH Recommended Exposure Limit (REL)

PROPOSED REQUIREMENTS AT OR ABOVE INITIAL HEAT TRIGGER

- Drinking water that is suitably cool, with at least one (1) quart per employee per hour
- Outdoor break areas with shade OR air-conditioning if an enclosed space
- Indoor break areas with air-conditioning OR increased air movement, and, if appropriate, de-humidification
- Indoor work area controls such as fans or comparable natural ventilation, and, if appropriate, de-humidification OR air-conditioning OR controls for radiant heat sources
- Acclimatization plan for the first week of work for new and returning employees
- Rest breaks if needed (paid)
- Regular effective, two-way communication between employer and employees

PROPOSED ADDITIONAL REQUIREMENTS AT OR ABOVE THE HIGH HEAT TRIGGER

- Rest breaks (minimum 15 minutes every two (2) hours, paid) – unpaid meal break may also serve as a rest break
- Observation for signs/symptoms of heat-related illnesses – buddy system, or each supervisor/heat safety coordinator can observe up to 20 employees
- Effective, two-way communication with employees who are alone at a work site at least every two (2) hours
- Hazard alert with information on drinking water, rest breaks, and emergency response procedures

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OTHER REQUIREMENTS

- Procedures for responding to an employee experiencing signs and symptoms of a heat-related illness
- Procedures for responding to an employee experiencing a heat emergency, including immediate actions that employer must take
- Initial and annual refresher training for supervisors, heat safety coordinators, and employees
- Supplemental training after:
  - Changes in exposure to heat hazards
  - Policy and procedure changes
  - Occurrence of heat injury or illness at the work site
- Recordkeeping for on-site measurements at indoor work areas, with retention of written or electronic records for six (6) months

The Standard was unofficially published on July 2, 2024. Comments will be accepted for 120 days after it is published.

Note heat standards are also in place in California, Oregon, Washington, Colorado, and Minnesota. It is hot out there, folks, and getting hotter. Start implementing your plans today.

Your QC ambient measurements inside and outside of the containment could be used to track temperature and wet bulb global temperatures to trigger responses to initial and high heat triggers.

OSHA has a Heat - Heat Stress Calculator | Occupational Safety and Health Administration (osha.gov)

Provision	All Covered Employers (See Scope)	At or Above Initial Heat Trigger	At or Above High Heat Trigger
Identifying heat hazards	●	●	●
Heat illness and emergency response procedures	●	●	●
Training for employees and supervisors	●	●	●
Heat injury and illness prevention plan(HIIPP)	●	●	●
Recordkeeping	●	●	●
Drinking water		●	●
Break area		●	●
Indoor work area controls		●	●
Acclimatization plan for new or returning workers		●	●
Rest breaks (if needed)		●	●
Effective communication means with employees		●	●
Rest breaks (minimum 15 min every 2 hours)			●
Supervisor or buddy system to observe for signs and symptoms			●
Hazard alert			●