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Cc: [Brian Bailey](#)
Subject: Ambient Heat Exposure Permanent Rulemaking - Comments
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Hello Ms. Shute,

Thank you for the opportunity to comment on the Ambient Heat Exposure Permanent Rulemaking. Please see my comments in regards to the questions posed during the stakeholder meeting.

1. What is important to consider when establishing work/rest cycles for high heat procedures?

Mandatory break times need to be simple to ensure good compliance. A complex table for deciding this will set up supervisors for mistakes and also lead to confusion among workers. In addition to this, how will the rules apply if an employee is required to perform 5-min of moderate work, but otherwise light work during an hour? Do breaks need to follow the highest level of work activity in that hour or will rules follow the majority of the work?

2. What methods have you used to reduce exposure to heat stress that you have found successful, and when (e.g. scheduling work at cooler times of day, lower work intensity, use of swamp coolers)?

Starting work early is the most effective way to reduce exposure.

3. What concerns do you have regarding worker protection from heat?

3. Employees receive training on heat stress, and Management supports overall safety, including breaking up jobs to alternate between outdoor work in high heat and lighter duty tasks. I am concerned with the change to emphasize that employees should take as many breaks as they feel they need. Some employees will take advantage of this, leaving the others working harder and putting them at greater risk for heat related illness. The rule needs to be something that can be applied fairly to all workers.

If an employee has personal factors that prevent working in these environments or would require more break time, the accommodation process should be followed so that workers are not assigned to jobs they cannot reasonably perform. This will ensure teams have the right resources to complete jobs and that work is divided to prevent injury/illness of the remaining workers.

Thank you,

Sally Hurst

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