

To: Environmental Health and Safety (EHS) Coordinator

From: Sam Celly

Sub: ***Heat Illness Prevention Program Training***

Date: May 15, 2016

Background: Cal/OSHA heat illness prevention regulation (T8CCR3395) became effective on May 1, 2015. This standard applies to outdoor areas of employment. When porters are parking cars and salespersons are showing automobiles on display to customers or taking them on test drives, they are considered to be working outdoors. Fed-OSHA also requires that employees be trained in heat illness prevention under a general injury prevention standard. Cal/OSHA enforcement details are at <http://www.dir.ca.gov/dosh/heatillnessqa.html>.

Law on Heat Stress: The heat illness prevention standard requires employers to undertake steps as follows:

Shade Requirements: Employees who are working outdoors, such as car rinsing crews or salespersons should have access to shade. Employees should be encouraged to take a preventative cool-down rest in shaded areas when they feel the need to do so to protect themselves. An employee who is taking a preventative cool-down rest shall be monitored to see if they are exhibiting symptoms of heat illness and is encouraged to remain in the shade till symptoms of heat illness have abated.

Available Cool Water: Almost all dealerships have water coolers available to employees and customers alike and as such are in compliance. Water served cooler than the ambient temperature suffices. Bottled water is not necessary. If you have a parts truck driver going around town, then a water cooler in the truck would be sufficient.

Emergency Response Procedures: Employers will maintain emergency response procedures as follows:

- Ensuring that there is effective communication through voice or electronic means with employees
- Responding to signs and symptoms of heat illness, including providing first-aid and calling 911
- If there is severe heat illness (staggering or disorientation), then emergency response procedures must be implemented such as calling 911.

Other States: In other states where a specific heat illness standard may not exist, the employers' responsibility for addressing heat related illnesses do not cease. General duty clause of OSHA requires that an employer provide a safe workplace by abating hazardous conditions and provide safety training (on heat stress).

Monthly Mailer: In the monthly mailer to your dealership, a training memo on heat stress is enclosed. Please review it with all employees and seek acknowledgement. As always, your comments are welcome and may be sent via email to sam@cellyservices.com.

Written Heat Illness Prevention Program (HIPP): Each dealership has been provided a copy of HIPP pursuant to Title 8 CCR 3395. A copy must be maintained on site and every manager must be aware of the requirements. Employers should note, however, that 8 CCR §3203 requires an employer to establish, implement, and maintain an effective IIPP. All IIPPs must include effective procedures for hazard identification, evaluation and control, hazard correction, investigation of employee injuries and illnesses, and communication with employees regarding health and safety matters. All of these requirements apply to the hazards posed by exposure to outdoor heat as well as other hazards.

HEAT STRESS TRAINING REQUIREMENTS IN CALIFORNIA

Employee Training is required as follows:

1. The environmental and personal risk factors for heat illness.
2. The employer's procedures for complying with the requirements of this standard.
3. The importance of frequent consumption of small quantities of water, up to 4 cups per hour under extreme conditions of work and heat.
4. The importance of acclimatization.
5. The different types of heat illness and the common signs and symptoms of heat illness.
6. The importance of immediately reporting to the employer, directly or through the employee's supervisor, symptoms or signs of heat illness in themselves or coworkers.
7. The employer's procedures for responding to symptoms of possible heat illness, including how emergency medical services will be provided should they become necessary.
8. Procedures for contacting emergency medical services, and if necessary, for transporting employees to a point where they can be reached by an emergency medical service provider.
9. How to provide clear and precise directions to the work site.

Supervisor Training is as follows:

1. The information on employee training as listed in section above.
2. The procedures the supervisor is to follow to implement the applicable provisions in this section.
3. The procedures the supervisor is to follow when an employee exhibits symptoms consistent with possible heat illness, including emergency response procedures.
4. How to monitor weather reports and how to respond to hot weather advisories.

Poster: STOPPING FOR WATER KEEPS YOU GOING poster from the OSHA website can be downloaded and posted on your employee notice board. http://www.osha.gov/SLTC/heatillness/osha_heat_poster_en.pdf

Disclaimer: Information from www.osha.gov and Cal/OSHA <https://www.dir.ca.gov/dosh/> was used to prepare this Newsletter. Employers must consult their lawyer for legal matters and safety consultants for matters related to safety. The article was authored by Sam Celly of Celly Services, Inc. who has been helping automobile dealers comply with EPA & OSHA regulations since 1987. Sam received his BE (1984) and MS (1986) in Chemical Engineering followed by a J.D. from Southwestern University School of Law (1997). Our newsletters can be accessed at www.epaoshablog.com. Your comments/questions are always welcome. Please send them to sam@cellyservices.com.