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Cal-OSHA releases final regulations designed to prevent heat illness of employees working outdoors. The regulations require that employers provide sufficient drinking water, access to shade and training.

California Edition

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Heat Illness Prevention Regulation for California Employers Made Permanent

By William F. Terheyden and Nicole LeBlanc

The California Occupational Safety and Health Standards Board has approved permanent Heat Illness Prevention regulations, replacing temporary emergency regulations adopted in 2005. The regulations were prompted by a significant increase in the number of heat-related incidents reported to the Division of Occupational Safety and Health.

The final regulations, codified in Title 8 of the California Code of Regulations at Section 3395, are substantially similar to the emergency standard they supersede. Like their temporary predecessor, the permanent regulations apply to all outdoor places of employment, particularly at times when environmental risk factors for heat illness are present. The full text of the regulations can be found at California Code of Regulations, Title 8, section 3395 Heat Illness Prevention.

These regulations delineate control and training measures to reduce the risk of heat-related illness. Specifically, the regulations require provisions for water, access to shade and training in heat illness prevention. The regulations additionally provide notice to employers of other existing requirements under Title 8, relevant to the prevention of heat illness, with which employers need to comply as applicable. Such existing Title 8 standards include the development of an injury and illness prevention program and emergency first aid and medical response preparedness.

Environmental risk factors for heat illness are those working conditions that create the possibility that heat illness could occur. Such factors include air temperature, relative humidity, radiant heat from the sun, conductive heat sources such as the ground, air

movement, workload severity and duration, protective clothing and personal protective equipment worn by employees. Personal risk factors for heat illness include an individual's age, health, ability to acclimate to heat exposure, consumption of water, alcohol, caffeine, and use of prescription medications that affect the body's water retention or other physiological responses to heat.

The regulations consist of three separate requirements:

1. **Provision of Water.** An employer is required to provide sufficient quantities of water at the beginning of the work shift -- one quart per employee per hour for drinking for the entire shift (two gallons per employee for an 8-hour shift). The frequent drinking of water shall be encouraged.
2. **Access to Shade.** Employees suffering from heat illness, or believing a preventative recovery period is needed, shall be provided access to an area with shade that is either open to the air or provided with ventilation or cooling for a period of no less than five minutes. Access to shade shall be permitted at all times.

Shade can be provided by buildings, lean-tos or other partial and/or temporary structures that are ventilated or open to air movement.
3. **Training.** All employees are to be trained on the following topics:
 - Environmental and personal risk factors for heat illness.
 - The employer's procedures for identifying, evaluating and control-

ling exposures to the environmental and personal risk factors for heat illness.

- The importance of frequent consumption of small quantities of water, up to 4 cups per hour under extreme conditions of work and heat.
- The importance of acclimatization, which is the temporary adaptation of the body to work in the heat.
- Different types of heat illness and the common signs and symptoms of heat illness.
- The importance of immediately reporting to the employer symptoms or signs of heat illness in themselves or in coworkers.
- The employer's procedures for responding to symptoms of possible heat illness.
- Procedures for contacting emergency medical services.
- How to provide clear and precise directions to the worksite.

at cooler times of the day, by scheduling additional breaks during the hot times of the day, and by rotating particularly hot job assignments among employees;

- b. Provide misters and cooling vests as needed;
 - c. Encourage employees not to wait until actual symptoms appear before seeking shade.
3. Ensure that employee training includes both a focus on prevention techniques and recognizing early onset of symptoms of heat illness.

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Practical Steps Towards Heat Illness Prevention:

The extraordinary heat which California endured during the summer of 2006 exposed employees to high risk of heat illness. The new regulation will undoubtedly be vigorously enforced by the Division of Occupational Safety and Health, especially when another heat wave strikes.

Employers should take the following steps to prevent heat illness in all outdoor places of employment:

1. Make water readily accessible, near employee work areas, so that employees can drink water as needed. Encourage sufficient drinking of water and adequate hydration.
2. Ensure that employees are given access to the shade at all times.
 - a. Minimize risk factors for heat illness by providing shade in work areas, by scheduling outdoor vigorous work