RISK SIMPLIFIED

RESOURCES

Cal/OSHA Heat Illness Prevention Guidance and Resources

Title 8 Section 3396. Heat Illness Prevention in Indoor Places of Employment

Vector Solutions: PRISM Indoor and Outdoor Heat Illness Prevention

Risk Simplified – Heat Illness Prevention Standard

QUESTIONS

Email PRISM Risk Control
or call 916.850.7300

Understanding Indoor Heat Illness Prevention Requirements

by Kristin Skorka

California is known for abundant sunshine and warm weather, unfortunately this means employees are exposed to heat in the workplace. Cal/OSHA's Indoor Heat Illness Prevention in Indoor Places of Employment (Title 8, Section 3396) standard applies to all indoor work areas where the temperature equals or exceeds 82°F when employees are present. Indoor occupational heat-related illnesses, such as heat exhaustion and heat stroke, can have severe health implications. These illnesses can lead to decreased productivity, increased absenteeism, and potentially costly workers' compensation claims. Employers must take steps to prevent such illness and create a safe and healthy workplace.

The decision tree below provides a structured approach to the relevant questions employers must ask when implementing the indoor heat illness prevention standard at each workplace:

1. Is the workplace indoor or outdoor?

Indoor

Indoor refers to a space that is under a ceiling or overhead covering that restricts airflow and is enclosed along its entire perimeter by wall, doors, windows, dividers, or other physical barriers that restrict airflow, whether opened or closed. Examples may includes:

- **Shops**
- **Kitchens**
- **Boiler rooms**
- **Water treatment facilities**
- **Fair grounds**

Outdoor

Refer to the outdoor heat illness prevention standard, Title 8, Section 3395 or PRISM's Outdoor Heat Illness Risk Simplied.

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2. Does the workplace fall under any of the exceptions?

This standard does not apply in the following circumstances:

- Employees who work remotely.
- Incidental heat exposures of less than 15 minutes in any 60-minute period when the temperature is above 82°F and below 95°F.
  - This exception does not include vehicles without air conditioning or shipping containers.
- Emergency operations directly involved in protecting life or property.

3. Is the workplace over 82°F?

The following is required when the workplace is over 82°F:

<u>Provision of water:</u>
Employers must ensure there is cool drinking water available and accessible to all employees. The water stations must be positioned as close to the work areas as possible.

<u>Access to Cool-Down Areas:</u>
Cool down areas should be accessible at all times and large enough for all employees on rest periods to sit comfortably without touching each other. Indoor cool-down areas must be less than 82°F.

<u>Emergency Response Procedures:</u>
Employers must have a plan for responding to symptoms or signs of heat illness and emergencies.

<u>Acclimatization:</u>
Supervisors must closely observe employees who are newly assigned to high heat conditions during the first 14 days.

<u>Training:</u>
Employers must conduct training sessions for all employees and supervisors on heat Illness prevention before working in high heat conditions.

<u>Heat Illness Prevention Plan (HIPP):</u>
Agencies must document specific procedures incorporating ALL of the above in addition to procedures to monitor and record temperature and selection of appropriate engineering and administrative controls. The HIPP can be included in an existing Injury and Illness Prevention Plan (IIPP), Outdoor Heat Illness Prevention Plan, or implemented individually.

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4. Is the workplace over 87°F?
or
Is the workplace over 82°F <u>and</u> employees must wear protective clothing or work in high radiant heat areas?

In addition to the above requirements triggered at 82°F, the following practices must be implemented in the workplace when any of the following conditions exist; temperature is over 87°F; temperature is over 82°F while wearing restrictive clothing, or in high radiant heat areas:

<u>Assessment:</u>

- **Employers must periodically measure the temperature and heat index, and record whichever is greater.**
- **Identify and evaluate all other environmental risk factors of heat illness such as, air movement, relative humidty, workload, protective clothing and equipment.**
- **Measurements must be taken when it is suspected to be 10 degrees or more above the latest set of measurements.**
- **Measurement records must be retained for 12 months.**

<u>Control Measures:</u>
Control measures shall be based on the identified environmental risk factors and implemented in the order below. Examples of each are listed for reference:
Engineering controls (most effective)
Cooling fans, cooling mist, isolation of hot processes, and air conditioning
Administrative controls (effective)
Rotating employees, scheduling work earlier or later in the day, reducing work hours, and using work/rest schedules
PPE (least effective)
Water-cooled garments, air-cooled garments, cooling vests, and cooling neck wraps

Following the guidelines of Heat Illness Prevention in Indoor Places of Employment will create safer indoor working environments and protect employees from the dangers of heat illness. Understanding and implementing these regulations not only ensures compliance but also fosters a culture of safety and well-being in the workplace.

Contact PRISM Risk Control if you have any questions or need assistance regarding Cal/OSHA's Indoor Heat Illness Prevention in Indoor Places of Employment.