

Presentation to the Cal/OSHA Standards Board

Impacts of Proposed Indoor Heat Illness Regulation



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Industry Efforts

- We work to protect our workers
- Major track record of delivering safety to our workforce
 - Annual “train-the-trainers”
 - Topics from lockout/tagout to confined spaces
 - Special grant to create Yard Truck Safety program and training



Concerns

- Temperature thresholds are too low
- Fixes are too expensive
- This is different from outdoor heat illness – we don't have an issue indoors
- Takes our eye off the ball



Concerns

- Concern is section 3396 (e)(2)
- Issue w/ Ag buildings are very large
- Too expensive to incorporate A/C
- Will cause issues with some operations due to large volume air flow requirements
- What is “infeasible”?





Confidential

NO SMOKING

LOCKOUT

Confidential



Costs

- Cost estimates from cotton gins and almond hullers ranged from \$1 M to \$1.5 M for each building roughly at 36K sq. ft.
- Total cost ranged from \$3.5 M to \$9 M for multiple building operations.



What do we do today?

- Start earlier in the day during off-season
- Work high areas in the morning and low areas in the afternoon
- Utilize fans and portable coolers
- Provide water throughout
- Break room or office is cooling center







DANGER
FELONY

DANGER
FELONY

BELT
7-3

SAMUEL JACKSON

SAMUEL JACKSON



JGB

PORT-A-COOL®

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Dehydrator

- Needs heat
- Only one person – 50% inside/50% outside
- Can't install A/C
- Never had issue





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ROW 3

Summary

- Too costly for very little benefit
- Current practices seem to address any concerns
- We actually use these buildings for shade for outdoor heat illness cases



