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To: [Shute, Carmyn L \(LNI\)](#)
Cc: [Jeremy Beck](#); [Travis Walling](#); [Diana Carlen \(dcarlen@gth-gov.com\)](#); [Sophie Doumit](#)
Subject: Cowlitz PUD Comments on Outdoor Heat Exposure Rulemaking
Date: Monday, August 15, 2022 12:25:00 PM

External Email

Greetings Ms. Shute,

Please see Cowlitz Public Utility District's comments below regarding the development of the permanent rule surrounding Ambient Heat Exposure (Chapter 296-62 WAC).

Definitions:

We appreciate the inclusion of the definition for "Buddy System."

Trigger Temperature:

We understand that combining double layer woven clothes and "all other clothing" into one trigger temperature threshold (80 degrees F) streamlines the current rule language, but we are not convinced that dropping the trigger temperature to 80 degrees F is necessary to maintain worker safety.

We believe better communication of Heat Related Illness factors has been incorporated into employee safety manuals and procedures, and has improved overall employer/employee education on heat hazards since 2017. It would be helpful for stakeholders to see the breakdown in statistics presented by the Department that tie a sizable percentage of HRI claims to temperatures below 89 degrees F. Does the Department's conclusions take into consideration the industry, workload, clothing, or personal factors that contributed to the HRI claim?

Establishing a lower trigger temperature at 80 degrees F will be harder for employers to manage, and the communication/accommodative provisions will toggle back and forth with much greater frequency resulting in significant workflow disruptions unnecessarily. With increased emphasis on employer communication, provision of adequate shade, access to cool drinking water, and encouragement for more frequent rest periods, employees can confidently monitor and evaluate their work environment and safely maintain their workflow in the presence of temperatures both above and below 89 degrees F.

Cowlitz PUD recommends the Department maintain the existing rule's three tiers of trigger temperatures.

High Heat Procedures

Incorporating prescribed work/rest cycles within the permanent rule are unnecessary, as a one-size-fits-all approach cannot appropriately factor in the competing variables of workload, industry, personal fitness, and education. It is important to have a baseline level of education and training, coupled with general and flexible procedures that ensure workers have access to water, shade, and reasonable preventative and mandatory breaks based upon their individual

needs.

Cowlitz PUD appreciates the Department's emphasis on worker safety in high ambient temperature environments. We are committed to ensuring a healthy, safe, and productive work environment for our employees, and believe that the permanent rule language should enshrine flexibility and reasonableness in the procedures to promote success all around.

Thank you again for the opportunity to comment. We look forward to continuing our participation in the process.



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