

HEAT ILLNESS

What OSHA's National Emphasis Program Means for Employers

By Tom Sumner and Warren Guillot Jr.

The dangers associated with heat-related illness are well understood. However, deaths and serious illnesses continue to occur, and their prevalence may grow over time because of increased frequency of extreme temperatures.

To emphasize its concern and take necessary action, OSHA is implementing an enforcement initiative on heat-related hazards, developing a national emphasis program on heat inspections (OSHA, 2022) and launching a rulemaking process to develop a workplace heat standard. In addition, the agency is forming a National Advisory Committee on Occupational Safety and Health Heat Injury and Illness Prevention Work Group to provide better understanding of the challenges and to identify and share best practices to protect workers.

What Does This Mean for Employers?

OSHA area directors across the nation will institute the following:

- Prioritize inspections of heat-related complaints, referrals, and employer-reported illnesses and initiate an on-site investigation where possible.
- Instruct compliance safety and health officers during their travels to jobsites to conduct an intervention (providing the agency's heat poster or wallet card, which discusses the importance of easy access to cool water, cooling areas and acclimatization) or open an inspection when they observe employees performing strenuous work in hot conditions.

- Expand the scope of other inspections to address heat-related hazards where work site conditions or other evidence indicates these hazards may be present.

This means that OSHA will increase enforcement activities under the General Duty Clause until a federal heat standard is promulgated, especially focusing on high-risk industries such as construction and other strenuous activities indoors and outdoors.

Employers should evaluate their current programs on heat illness prevention and increase focus on training and recognition of the potential dangers. The program should make it clear as to when supervisors must implement enhanced high-heat procedures that include:

- observing individual employees for alertness,
- a mandatory buddy system within teams of workers,
- effective communication with lone workers,
- cool down rest periods every 2 hours, and

- performing the most strenuous tasks during the cooler hours of the shift.

Key Components of an Effective Heat Illness Prevention Program

The following components are critical for effectively protecting employees from the harmful effects of exposure to high heat and should be incorporated into an employer's heat illness prevention program:

1. communication of risk factors
2. information detailing the signs, symptoms, prevention and treatment of heat-related illnesses
3. engineering and administrative control methods such as inclusion of effective heat illness prevention procedures (e.g., acclimatization, emergency response, high-heat and weather monitoring)
4. training for all affected employees and supervisors, which should include:
 - environmental and personal risk factors to heat illness,
 - acclimatization protocol (ACGIH, 2017),
 - the importance of regular hydration throughout the workday,
 - the effects of protective clothing such as Tyvek suits,
 - work or rest regimen,
 - shaded break areas such as canopies with tables, chairs and fans,
 - skin and head coverings for direct sunlight exposure,
 - importance of employees reporting heat-related symptoms,
 - effects of alcohol and other lifestyle factors,
 - self-monitoring techniques such as monitoring pulse rate (ACGIH, 2017), and
 - taking immediate action when a worker appears to be disoriented or confused.

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Resources

Consider the OSHA-NIOSH Heat Index App (NIOSH, n.d.) as a tool for helping supervisors to recognize when additional preventive precautions should be implemented. This can be downloaded by Apple and Android users. The National Weather Service (n.d.) heat index chart can also be useful as a visual aid.

Conclusion

It is important for employers to understand that heat-related illnesses are currently vastly underreported, and that often in reported incidents of heat illness, the individuals were unaware of the signs and symptoms of heat stress. Employers should take advantage of this national emphasis program and use the appropriate resources to revisit and update or improve the organization's existing heat illness prevention plan where applicable. **PSJ**

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