

# EVERYTHING YOU NEED TO Know About Osha's heat stress National Emphasis program

### OSHA's Heat Stress National Emphasis Program





# THE STANDARD

OSHA is currently developing a Heat Stress Standard that will likely impact your business. Comments are currently under review and the Standard release date is to be determined. In the meantime, OSHA released a National Emphasis Program on Heat Stress in April to ensure workers are protected from heat.

## PLAN NOW

Employers should start planning for the Standard and be aware of potential OSHA inspections especially on days with heat advisories. OSHA has stated they will prioritize heat-related inspections on days where the heat index is expected to be 80F or higher or when the National Weather Service has announced a heat advisory or warning for the local area.





## **NEP FACTS**

#### What will the National Emphasis Program cover?

• The program will apply to 70 high-risk industries, based on Bureau of Labor Statistics data on incidence rates of heat-related illnesses and employee days away from work (DART), unusual numbers of fatalities or hospitalizations reported to OSHA, and heat-related General Duty Clause violations and Hazard Alert Letters. OSHA has the full list of industries they will be focusing on in Appendix A of the Heat Stress National Emphasis Program.

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## PROGRAM ESSENTIALS

The NEP will address the following elements of a heat injury and illness program:

- $\circ~$  Written program
- Monitoring workplace temperature and employee exertion
- Availability of water and adequate breaks for hydration and rest
- $\circ~$  Access to shade or cooler areas
- Acclimatization program for new and returning workers
  "Buddy system" for monitoring signs of heat strain
  Administrative controls to limit heat exposures, such as earlier start times or employee/job rotation
  Training on signs of heat illness, first aid, heat emergency plans, and the importance of hydration
- Monitoring Employee Heat Stress: Will you monitor employee vital signs (such as temperature and heart rate) and symptoms, or will you use specific screening criteria, such as the ACGIH Heat Stress TLV guidelines?
- **Medical Surveillance:** Consider including a heat stress evaluation in your existing medical surveillance program. This evaluation should take into account any existing health conditions that could be impacted by heat.
- **Controls:** Will you use engineering controls (e.g., cooling systems) and/or have administrative controls (e.g., precooling workers, working at night, water immersion for extremities, water breaks, etc.)? Will your control plan change based on short-term and longterm weather forecasts? • Heat Acclimatization Program: Have a plan in place to gradually increase new and returning workers' workload to build up a tolerance to working in the heat. • First Aid and emergency procedures: Develop emergency and first aid procedures to respond to heat illness and injuries. Include first aid kits, water and electrolyte replacement, and emergency contact lists. • Heat stress training program: Train workers and management about the causes of heat stress, how to recognize the signs and symptoms of heat illness and injury, and first aid and emergency procedures. This training should be presented annually to workers who are exposed to high heat. • Incorporate heat safety into the safety culture: Encourage workers to take breaks to rehydrate and cool off, and to encourage reporting heat-related illnesses. • Follow heat stress standards adopted by other states: Some OSHA State Plans have already adopted heat stress standards for indoor or outdoor workplaces. These states include California, Minnesota, Oregon and Virginia. **Read the comments in the Federal Register:** Some of the comments OSHA received on a proposed heat stress standard are from H&S professionals, physicians, or professional bodies. These comments address how OSHA could implement a heat stress standard and OSHA is required to address every comment. Even if their recommendation is not implemented, their advice could help your program. You can find these comments here.

### What should I do to prepare for the National Emphasis Program?

The best way to prepare for this new standard is to create a written Heat Injury and Illness Prevention program and enforce it across your workplace.

Ideally, your plan should contain each of the following:

- **Risk Assessment:** What factors of the job may contribute to an individual's susceptibility to heat related illnesses? For example, is there any PPE a worker might have to wear that exasperates heat stress? What are the most physically demanding tasks? Will they be working close to heat sources, such as ovens or heavy equipment?
- **Exposure Guidelines:** Decide what conditions you'll use for setting your Heat Injury and Illness Prevention Program in place – National Weather Service's Heat Advisory or Warnings, a specific heat index, wet-bulb globe temperature, or another method, and at what temperature plan elements go into effect.

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Although it is hard to predict what will be in the new standard, taking these steps can prepare you if OSHA comes to inspect your workplace under the National Emphasis Program, or when a new Heat Stress standard is released.

Safex can help make the process of creating a heat stress protection program that works for you, easier. While you work toward complete compliance, the easiest things to start doing right away are:

- Providing access to water, rest and shade,
- Complete heat stress safety training and
- Start an acclimatization program. <u>Download a template here.</u>

