

International Union of Elevator Constructors

Local 131

I worked in the field for 43 years in the Aviation Industry and Elevator Construction Trade. I have worked inside the Arctic Circle and in Saudi Arabia and many other places. Heat Safety is paramount to production. I have never experienced rampant heat related injury or death because of the safety programs implemented in all industries and companies I was associated with. The 80 degree threshold is low and should be increased to 84-85 degrees.

Providing shade is unrealistic for prolonged periods in some situations.

A review of most company safety programs and apprenticeship programs would find 99% of this idea is already in practice.

Lastly, because this rule wants to limit exposure and duration, the rule should include additional qualified workers to implement the changes suggestion.