

## Ronald Sutton

The intent of protecting workers from high heat issues is very good, however there are likely to be several issues with the implementation.

For smaller businesses the record keeping and retention requirement will add significant costs. Other than keeping lawyers happy and employed I can see no reason to record the heat index at every project and retain that record for 5 years. Six months is more than enough unless the personnel are always exposed to high heat index and it is not a seasonal issue.

We have always provided our employees with available free hydration, however it is their responsibility to estimate how much they may need on an hourly or daily basis. We hire adults who are self responsible and as long as they have water available they should be able to manage their intake without management acting like a nanny. In the 8 years that I have run the company we have not had a single heat incident since the employees have hydration available and they manage their own level of fluid intake.

Forcing management to make a heat exposure assessment at the beginning of a project does not add value for workers on construction projects (outdoor or indoor before the site is fully enclosed and has HVAC active) as exposure levels change with the weather. This needs to be a daily employee responsibility not an employer responsibility (FYI this is another reason record keeping is not particularly worthwhile except to lawyers). Employees know what they are wearing and how heat affects them individually. They need to be responsible for themselves. The employer needs to make hydration available and let them take rest as needed, but the employee needs to be able to decide if they drink or rest.

The only time that the above comments are not applicable are in places like steel mills where there is always PPE and High heat, on high voltage electrical work where there is always PPE.