

Shelby Jones

Thank you for putting this together and providing additional guidance to the contents of OSHA's NEP. Some small considerations:

1. NM is prone to relative humidity values less than 40%, can a different chart be selected for Table 2.
2. Table 3 is wonderful, very clear and concise. My only concern is I didn't see any language or examples defining what light/moderate/heavy work might constitute. Please consider writing a brief description of those definitions.
3. What is the role of the employer to provide appropriate clothing for the work environment or at least a credit to support the purchase of appropriate clothing? High quality outdoor clothing can be very expensive and the economic bracket of many NM employees exposed to heat in their jobs can be quite impoverished.
4. In 11.5.7.10 D. h It describes how an employer can get out providing shade given certain circumstances, if the employer can demonstrate that their substitute methods of cooling are effective. There is currently no guidance or example or appendix that clarifies that process. My fear (because I have seen this happen multiple times already) is that without clarification this provision could be used as a loop hole for employers.
5. Can clarification be added to 11.5.7.9 E regarding personal/individualized risks. There is language in OSHA's NEP regarding examples of personal/individualized risks, my personal opinion is that this should either be cited or written into the text of 11.5.7.9 E to ensure that the individuals partaking in heat exposed work are considered in the Heat Exposure Assessment.