

# NMSU- EHS&RM

After review, would like to submit the following points to consider, but no edits to suggest:

11.5.7.2 SCOPE: In the scope section, there is mention the regulations would apply to both indoor and outdoor places of employment. Utility Tunnels, vaults, enclosed unventilated spaces therefore would be covered by the regulations as is. The exemption clauses for emergency work for public utilities and communications are reality, "the show must go on".

11.5.7.9 Heat Exposure Assessment: likely the statement regarding employers need to conduct heat exposure assessment when heat index is 80 F or greater came for the attached OSHA document page-4. No need to propose higher Heat index to be threshold, likely would not be changed by NMED.

11.5.7.8 Heat Illness and Injury Prevention Plan: Attached another document that could potentially be used as starter template to meet this obligation with some editing of course.

11.5.7.10 Control Measures D. Cooling Areas: This does not translate to shade and ventilation required unconditionally. For work in enclosed spaces, EHSRM could strongly encourage use of fans for air movement.

11.5.7.13 Record Keeping -A: This requirement of record of acclimatization schedule is unrealistic, but likely will never be issue. Unlikely any employers will be able to be 100% compliant for section A.

Table 3: Work Rest Schedule: Interesting to note this table starts at heat index 90F, yet employers must assess heat exposure at heat index 80F. Also, no modification to work/rest schedule until heat index is 95 F or greater.