

Mark Menicucci

Hello folks , I wanted to express my astonishment and surprise that NMOSHA and the State of New Mexico would try to adopt and enforce such a rigorous and unrealistic Rule related to Heat Illness and Heat Injury. I fully support protecting our construction workers and also providing safe work environments for them. I was a concrete finisher, years ago.

From 1971 to 1976, I worked for New Mexico Paving Company, Inc. which was a subsidiary of Kent Knowlin, as a concrete finisher. We would pave behind a CMI slip-form paver, up to a mile a day. (I am one of a few remaining members still alive of the National Mile-A-Day Club, ie, concrete paving at least 1 mile in a 24 hour day, usually took 13-14 hours in one day). There were no lunch breaks, no breaks for anything. You had the water jugs on the CMI and other machines and you could drink throughout the day. You can't stop once the concrete is being poured/laid down. I paved on I-10, I-40, I-25, also bridges/dams etc. throughout New Mexico. One summer, on I-10 we paved in Lordsburg, NM, where the average temperature for 3 weeks was 112 to 117, in the shade. We paved the concrete on top of an ATB, Asphalt Treated Base, so the actual temperature may have been in the 125-130 degree on the ATB base.

Every morning around 5:30 am, when we batched our own concrete and began to dump the concrete in front of the CMI, we had already had our safety talk about heat...we took salt tablets, and the superintendent/or foreman made sure all the water jugs had water/ice and we were told about the hazards of being all day in this severe heat. No one ever expired , a few of the workers would say during the day, that they felt faint and needed to sit in one of the Pick-ups for about 15-20 minutes.

Your rule would never have allowed us to ever pour 1 mile in a day, and with that heat, there is no time to let the concrete sit , or it would set up.

I support your thoughts and efforts for all workers who face harsh environments and difficult work situations, but I know from 1st hand experience that the proposed Rule as it stands now, will not only hurt the construction companies, but the work product itself , especially highway/road/bridges/dams etc will not meet the final specs...there will be poor quality of the final product and this is not good for New Mexico. Also, if the workers had such breaks, they would most likely hurt themselves after these breaks, trying to get caught up and trying to save their work from not meeting the finished specifications. I remember some of those days.

Please reconsider and open up more communication with all of the Construction trades like the AGC, Kelly Roepke; the ACNM, Jim Garcia; the ASA, Gia Espinoza; ABC, Carla Kugler and all other trades to work out a better Heat Illness and Heat Injury Rule, a rule that is good for the workers, the State of New Mexico and each and every Contractor.

Thank you ,