Implementing a Heat Stress Program

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Guidance for Implementing a Heat Stress Program

• A team is working on a white paper with guidance on the implementation of a heat stress and heat strain program utilizing the 2016 TLV

• Plan to address items such as:
  – Heat Stress TLV
  – Identification of Risk Activities
  – Heat Stress Information for Workers
  – Detailed Analysis for Heat Stress
  – Environmental Monitoring
  – Physiological Monitoring
Special Questions When Conducting Monitoring - Security

• Cybersecurity

  – Blue Tooth enabled devices

  – Data storage (Cloud, device itself, etc.)

  – Interference with other equipment

  – Security approval in certain areas (Limited Area, etc.).
Special Questions When Conducting Physiological Monitoring – Records

OSHA Definitions

- **1910.1020(c)(5)** "Employee exposure record" means a record containing any of the following kinds of information:

- **1910.1020(c)(5)(i)** Environmental (workplace) monitoring or measuring of a toxic substance or harmful physical agent, including personal, area, grab, wipe, or other form of sampling, as well as related collection and analytical methodologies, calculations, and other background data relevant to interpretation of the results obtained;

- **1910.1020(c)(5)(ii)** Biological monitoring results which directly assess the absorption of a toxic substance or harmful physical agent by body systems (e.g., the level of a chemical in the blood, urine, breath, hair, fingernails, etc.) but not including results which assess the biological effect of a substance or agent or which assess an employee's use of alcohol or drugs;
1910.1020(c)(6)(i) "Employee medical record" means a record concerning the health status of an employee which is made or maintained by a physician, nurse, or other health care personnel, or technician, including:

1910.1020(c)(8) "Exposure" or "exposed" means that an employee is subjected to a toxic substance or harmful physical agent in the course of employment through any route of entry (inhalation, ingestion, skin contact or absorption, etc.), and includes past exposure and potential (e.g., accidental or possible) exposure, but does not include situations where the employer can demonstrate that the toxic substance or harmful physical agent is not used, handled, stored, generated, or present in the workplace in any manner different from typical non-occupational situations.

1910.1020(c)(9) "Health Professional" means a physician, occupational health nurse, industrial hygienist, toxicologist, or epidemiologist, providing medical or other occupational health services to exposed employees.
Special Questions When Conducting Monitoring - Physiological Monitoring Records

- What result should be recorded?

- Should physiological monitoring data be considered an exposure record?

- Should physiological monitoring data be considered a medical record?
In the 2019 ACGIH® TLV® there is notice of intent to establish the following in the physical agents section:

“Appendix B: Personal Physiologic Monitoring In the Workplace”

The appendix ends with this statement:

“Personal physiological measurement technologies make it possible to move from generalized workplace assessments to personalized health status assessments of the individual worker. However, the measurements must benefit the health and safety of the individual, and personal health data must be firewalled from occupationally related data.”