

Master Brewers Safety Toolbox Talk



OSHA's National Emphasis Program on Heat-Related Illness and Injuries

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Background

On September 20, 2021, in an [OSHA National News Release](#), OSHA published a [memorandum](#) establishing an enforcement initiative that is designed to prevent and protect employees from heat-related illnesses and death. This initiative, which develops a National Emphasis Program (NEP) on heat inspections, is an expansion of an already existing [Regional Emphasis Program](#) (REP) in OSHA's Region VI, which covers Arkansas, Louisiana, New Mexico, Oklahoma, and Texas.

Between 2015 and 2020 OSHA reported it conducted approximately 200 heat-related inspections each year and about 15 heat-related fatality inspections annually. The U.S. Department of Labor's Bureau of Labor Statistics (BLS) reports that from 2011 to 2019 there was an average of 38 fatalities per year and an average of 2,700 cases of heat-related illnesses that resulted in days away from work.

Further, OSHA is launching a rulemaking process to develop a workplace heat standard and is forming a National Advisory Committee on Occupation Safety and Health Heat Injury and Illness Prevention Work Group that will help to better understand the challenges, as well as identify and share best practices. The new enforcement initiative will rely on OSHA's General Duty Clause of the Occupational Safety and Health Act of 1970, Section 5(a)(1). For any proposed citations for heat-related hazards where the employer fails to have procedures in place to protect workers adequately, the Compliance Safety Health Officer (CSHO) would use the General Duty Clause.

What Will the NEP Do?

This initiative will apply to both indoor and outdoor environments in general industry, construction, agriculture, and maritime where potential heat-related hazards exist, whereas the REP focused primarily on employees working outdoors. It prioritizes heat-related interventions and inspections of work activities on days when the heat index exceeds 80°F ("heat priority days"). Employers are being encouraged to implement methods to protect employees on heat priority days, including activities such as regularly taking breaks for water and rest and providing shade. They are also asked to provide training for workers on how to identify common symptoms of heat-related illness and what to do

when an employee suspects a heat-related illness is occurring. Employers should also establish methods for taking periodic measurements to determine workers' heat exposure.

As part of the program, it appears that the OSHA area offices will look at the potential for heat-related illness and deaths at both indoor and outdoor worksites on heat priority days on which the heat index exceeds 80°F. A heat index at this level indicates a need for increased enforcement to identify potential hazards associated with heat that could be present in the working conditions and which could lead to illness or death. The area offices will also look at complaints and referrals to schedule site visits. A OSHA Compliance Safety Health Officer (CSHO) would use the [OSHA-NIOSH Heat Safety App](#) as a resource for making baseline determinations on the site being inspected. CSHOs would be tasked with reviewing OSHA 300 Logs, interviewing employees regarding potential heat-related issues, reviewing an employer's plan to address heat-related illnesses, and identifying potential heat-related conditions and activities.

What Should Employers Do?

Employers should begin conducting hazard analyses of their working conditions and tasks to be performed to determine whether there are potential heat-related risks. It is recommended that a heat-related program be developed to address items such as working conditions, scheduling breaks, providing resources for hydration, and a training plan. The training plan needs to encompass how to recognize the early signs and symptoms of heat-related illness. The plan should also include a heat-acclimatization process for new workers, as well as those who have been out for extended periods. Employers should look at how shift work may be modified and how there can be a workload reduction using machinery or additional workers. Cool water stations should be provided, as well as opportunities for consumption of electrolyte-replenishing drinks or ice-pops. Drinking water every 15–20 minutes should be encouraged when moderate work activities are being performed.

OSHA does provide more information and resources on their website regarding [heat exposure](#) and [heat illness prevention](#).

If you have any questions or comments regarding this Toolbox Talk, please contact a member of the Brewery Safety Committee.