



HEALTHIER WORKPLACES | A HEALTHIER WORLD

May 19, 2022

Douglas L. Parker
Assistant Secretary of Labor for Occupational Safety and Health
U.S. Department of Labor

AIHA Comments on OSHA's Proposal to Revoke its Affirmative Determination Granting Final Approval to Arizona's Occupational Safety and Health Plan

Docket No. OSHA-2021-0012
RIN: 1218-AD43

Dear Assistant Secretary Parker:

AIHA, the association for scientists and professionals committed to preserving and ensuring occupational and environmental health and safety, appreciates the opportunity to provide feedback on OSHA's proposal to revoke its affirmative determination granting final approval to Arizona's occupational safety and health plan (State Plan). Below are our comments, which we hope you find useful.

The Arizona Division of Occupational Safety and Health (ADOSH) has worked to engage the community in occupational safety and health through their consultative service, Voluntary Protection Program (VPP), and outreach programs. They have sponsored Safety Summits throughout the State to allow employees to attend various health and safety-related classes and presentations at no cost to the employee. Presenters have included a mix of ADOSH employees and safety advocates from the community. These Safety Summits have been held in Flagstaff, the Phoenix metro area, Tucson, and Yuma.

ADOSH has mounted an aggressive heat stress outreach program for the last few years with billboards, public service announcements on radio and TV, interviews with local news media, and meetings with impacted employees in agriculture and construction where employees were given wallet cards and employers were given quick guides and posters to remind employees to drink water, stay out of the heat when possible, rest in the shade, and identify the symptoms of heat stress. These activities were already in place prior to the recent Federal emphasis on heat stress.

There are currently more than 50 VPP sites in Arizona, with over 36,000 employees, and the number keeps growing. ADOSH has advertised the value of the VPP program and has developed a program that companies can navigate and complete. ADOSH has set up

Special Government Employee teams composed of employees from VPP companies that aid in evaluating new or renewal applications, including the site visits. ADOSH boasts the first trade contractor to be named a VPP site (Wilson Electric), several municipalities, and the first government facility (the Industrial Commission of Arizona). Other VPP sites include construction companies, industrial manufacturing sites, and service providers such as Central Arizona Project and Cintas.

ADOSH has reached out to the public sector by attending related meetings and establishing the Public Entities Program. This program works with public groups such as towns, cities, counties, and State government departments to increase their safety culture, decrease their injuries, and help them achieve VPP status. This program has been well received by many of the participating entities.

In light of the above considerations, AIHA believes that ADOSH should continue to serve the State of Arizona as a State Plan.

Conclusion

AIHA thanks you for the opportunity to provide feedback on OSHA's proposal to revoke its affirmative determination granting final approval to Arizona's State Plan. We look forward to our continued work together, helping protect the health and safety of all workers and their communities. If you have any questions on these comments or other matters, please contact me at mames@aiha.org or (703) 846-0730.

Sincerely,



Mark Ames
Director, Government Relations
AIHA

About AIHA

AIHA is the association for scientists and professionals committed to preserving and ensuring occupational and environmental health and safety in the workplace and community. Founded in 1939, we support our members with our expertise, networks, comprehensive education programs, and other products and services that help them maintain the highest professional and competency standards. More than half of AIHA's nearly 8,500 members are Certified Industrial Hygienists and many hold other professional designations. AIHA serves as a resource for those employed across the public and private sectors as well as to the communities in which they work. For more information, please visit www.aiha.org.