



HEALTHIER WORKPLACES | A HEALTHIER WORLD

June 4, 2021

Jay Withrow
Director
Division of Legal Support, ORA, OPPPI, and OWP
Virginia Department of Labor and Industry

AIHA Support for Heat Illness Prevention Standard, 16 VAC 25-210

Dear Mr. Withrow:

AIHA, headquartered in Virginia and representing more than 200 occupational and environmental health and safety professionals in the Commonwealth strongly supports Virginia's intent to develop and adopt a standard "to reduce/eliminate employee injuries, illnesses, and fatalities due to exposure to excessive heat at indoor and outdoor places of work."¹ Each year, hundreds of workers die and thousands more suffer injuries from occupational exposure to heat illness.^{2,3} Despite this, neither the U.S. Occupational Safety and Health Administration (OSHA) nor the Virginia Occupational Safety and Health (VOSH) program have a standard that specifically addresses heat stress. Action is urgently needed to help prevent more fatalities and injuries.

AIHA recommends the following components be detailed in the standard:

- Reference to established and recognized alert/exposure limits
- Provisions for personal protective equipment, rest, water, and shade
- Reference to surveillance and medical testing
- Administrative controls such as training and the posting of heat stress warning notices
- Provisions for whistleblower protections

¹ https://townhall.virginia.gov/L/GetFile.cfm?File=92\5501\8926\AgencyStatement_DOLI_8926_v1.pdf

² <https://www.cdc.gov/mmwr/preview/mmwrhtml/mm6136a6.htm>

³ <https://www.citizen.org/wp-content/uploads/2439.pdf>, page 5

Conclusion and Next Steps

AIHA looks forward to working with VOSH on this rulemaking and other actions to help protect all workers from occupational hazards. If you have any questions on these comments or other matters, please contact Mark Ames at mames@aiha.org or (703) 846-0730.

Sincerely,



John Mulhausen, Ph.D., CIH, CSP, FAIHA
President
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.