



# ***Don H. Mahaffey Drilling Co.***

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**INDOOR HEAT ILLNESS**

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YOUR OSHA COMPLIANCE SOLUTION

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## **1 OBJECTIVE**

In accordance with California Code Regulations, Title 8, Section 3396, Don H. Mahaffey Drilling Co. has implemented this Heat Illness Prevention Program to reduce the risk of work-related heat illnesses among employees. Don H. Mahaffey Drilling Co. is committed to encouraging preventive measures, such as drinking adequate amounts of water and taking cool-down breaks, and teaching employees how to identify the signs and symptoms of heat illness in themselves and others.

## **2 PROGRAM ADMINISTRATOR**

Don H. Mahaffey Drilling Co. has designated Ashley Mahaffey Tullius for the administration of this plan. Ashley Mahaffey Tullius will be responsible for:

- a. Identifying work areas that could potentially expose employees to heat illness hazards;
- b. Ensuring that all employees are properly trained in the identification and prevention of heat illness as well as the importance of drinking adequate amounts of water to prevent heat illness;
- c. Completion of Appendix 2 (Site-Specific Procedures) when applicable; and
- d. Maintaining, reviewing and updating the Heat Illness Prevention Program at least annually.

## **3 PROVISION OF WATER**

Employees will have access to potable drinking water meeting the requirements of California Code of Regulations, Title 8, sections 1524, 3363, and 3457, as applicable, including, but not limited to the requirements that it be fresh, pure suitably cool, and provided to employees free of charge. The water will be located as close as practicable to the areas where employees are working and in indoor cool-down areas required by section 4. Where drinking water is not plumbed or otherwise continuously supplied, it will be provided in sufficient quantity at the beginning of the work shift to provide one quart per employee per hour of drinking for the entire shift. Smaller quantities of water may be provided at the beginning of the shift if there are effective procedures for replenishment during the shift as needed to allow employees to drink one quart or more per hour. The frequent consumption of water, as described in section 8, will be encouraged.

## **4 ACCESS TO COOL-DOWN AREAS**

- 4.1 One or more cool-down areas will be provided and maintained at all times while employees are present. The cool-down area will be at least large enough to accommodate the number of employees on recovery or rest periods, so that they can sit in a normal posture fully in the cool-down areas without having to be in physical contact with each other. The cool-down area will be located as close as practicable to the areas where employees are working. Subject to the same specifications, the size of the cool-down area during meal periods will be at least large enough to accommodate the number of employees on the meal period who remain onsite. The temperature in indoor cool-down areas will be maintained at less than 82 degrees Fahrenheit, unless it can be demonstrated that it is infeasible.

- 4.2 Employees will be allowed and encouraged to take a preventative cool-down rest in a cool-down area when employees feel the need to do so to protect themselves from overheating. Such access to cool-down area will be permitted at all times. An individual employee who takes a preventative cool-down rest:
- a. Will be monitored and asked if they are experiencing symptoms of heat illness;
  - b. Will be encouraged to remain in the cool-down area; and
  - c. Will not be ordered back to work until any signs or symptoms of heat illness have abated, and in no event less than five minutes in addition to the time needed to access the cool-down area.
- 4.3 If an employee exhibits signs or reports symptoms of heat illness while taking a preventative cool-down rest or during a preventative cool-down rest period, appropriate first aid or emergency response will be provided according to section 6. For the purposes of this section, preventative cool-down rest period has the same meaning as “recovery periods” in Labor Code subsection 226.7(a).

## 5 ASSESSMENT AND CONTROL MEASURES

*This section only applies to work areas subject to one or more of the conditions listed below:*

- a. *The temperature equals or exceeds 87 degrees Fahrenheit when employees are present; or*
  - b. *The heat index equals or exceeds 87 degrees Fahrenheit when employees are present; or*
  - c. *Employees wear clothing that restricts heat removal and the temperature equals or exceeds 82 degrees Fahrenheit; or*
  - d. *Employees work in a high radiant heat area and the temperature equals or exceeds 82 degrees Fahrenheit.*
- 5.1 As specified in subsections 5.1(a) through 5.1(d), The temperature and heat index will be measured, and whichever is greater will be recorded. All other environmental risk factors for heat illness will be identified and evaluated.
- a. Accurate records will be established and maintained for either the temperature or heat index measurements, whichever value is greater, as required by section 5.1. The records will include the date, time, and specific location of all measurements.
  - b. Temperature and heat index measurements, as required by subsection 5.1, will be taken as follows:
    1. Initial measurements will be taken when it is reasonable to suspect that section 5 applies where employees work and at times during the work shift when employee exposures are expected to be the greatest.
    2. Measurements will be taken again when they are reasonably expected to be 10 degrees or more above the previous measurements where employees work and at times during the work shift when employee exposures are expected to be the greatest.
    3. Records, as required by subsection 5.1(a), will be retained for 12 months or until the next measurements are taken, whichever is later. The records will be made available to employees, designated representatives as defined in California Code of Regulations, Title 8, 3204, and representatives of the Division at the worksite and upon request.

- c. Instruments used to measure the temperature or heat index will be used and maintained according to the manufacturers' recommendations. Instruments used to measure the heat index will provide the same results as those in the NWS heat index chart in Appendix 3.
- d. Effective procedures to obtain the active involvement of employees and their union representatives in the following will be created:
  - 1. Planning, conducting, and recording the measurements of temperature or heat index, whichever is greater, as required by subsection 5.1.
  - 2. Identifying and evaluating all other environmental risk factors for heat illness.

*Exceptions to subsection 5.1:*

- a. *In lieu of complying with subsection 5.1, Don H. Mahaffey Drilling Co. may assume a work area is subject to one or more of the conditions listed under section 5. When such occurs, Don H. Mahaffey Drilling Co. will comply with subsection 5.2.*
- b. *Vehicles with effective and functioning air conditioning.*

- 5.2 Control measures as specified in 5.2(a) through (c) will be used to minimize the risk of heat illness. The selection of control measures will be based on the environmental risk factors for heat illness present in the work area.
- a. Engineering controls will be used to reduce and maintain both the temperature and heat index to below 87 degrees Fahrenheit when employees are present, or to reduce the temperature to below 82 degrees Fahrenheit where employees wear clothing that restricts heat removal or work in high radiant heat areas, except to the extent that where it can be demonstrated such controls are infeasible. When such controls are infeasible to meet the temperature and heat index thresholds, Don H. Mahaffey Drilling Co. will:
    - 1. Use engineering controls to reduce the temperature, heat index, or both, whichever applies, to the lowest feasible level, except to the extent that it can be demonstrated such controls are infeasible; and
    - 2. Use engineering controls to otherwise minimize the risk of heat illness, except to the extent that it can be demonstrated that such controls are infeasible.
  - b. Where feasible engineering controls are not sufficient to reduce and maintain the temperature and heat index to below 87 degrees Fahrenheit when employees are present or the temperature to below 82 degrees Fahrenheit where employees wear clothing that restricts heat removal or work in high radiant heat areas, administrative controls will be used to minimize the risk of heat illness, except to the extent that it can be demonstrated such controls are infeasible.
  - c. Where feasible engineering controls are not sufficient to reduce and maintain the temperature and heat index to below 87 degrees Fahrenheit when employees are present or the temperature to below 82 degrees Fahrenheit where employees wear clothing that restricts heat removal or work in high radiant heat areas and feasible administrative controls do not minimize the risk of heat illness, personal heat-protective equipment will be used to minimize the risk of heat illness, except to the extent that it can be demonstrated that use of such equipment is infeasible.

## 6 EMERGENCY RESPONSE PROCEDURES

Effective emergency response procedures, including the following, will be implemented:

- a. Ensuring that effective communication by voice, observation, or electronic means is maintained so that employees at the worksite can contact a supervisor or emergency medical services when necessary. An electronic device, such as a cell phone or text messaging device, may be used for this purpose only if reception in the area is reliable. If an electronic device will not furnish reliable communication in the work area, Don H. Mahaffey Drilling Co. will ensure that there is a means of summoning emergency medical services.
- b. Responding to signs and symptoms of possible heat illness, including but not limited to first aid measures and how emergency medical services will be provided.
  1. If a supervisor observes, or any employee reports, any signs or symptoms of heat illness in any employee, the supervisor will take immediate action commensurate with the severity of the illness.
  2. If the signs or symptoms are indicators of severe heat illness (such as, but not limited to, decreased level of consciousness, staggering, vomiting, disorientation, irrational behavior, or convulsions), emergency response procedures will be implemented.
  3. An employee exhibiting signs or symptoms of heat illness will be monitored and will not be left alone or sent home without being offered onsite first aid and/or being provided with emergency medical services in accordance with Don H. Mahaffey Drilling Co.'s emergency response procedures including contacting emergency medical services.
- c. Contacting emergency medical services and, if necessary, transporting employees to a place where they can be reached by an emergency responder.
- d. Ensuring that, in the event of an emergency, clear and precise directions to the worksite can and will be provided as needed to emergency responders.

## 7 ACCLIMATIZATION

- 7.1 Where no effective engineering controls are in use to control the effect of outdoor heat on indoor temperature, all employees will be closely observed by a supervisor or designee during a heat wave.
- 7.2 An employee who has been newly assigned to any of the following will be closely observed by a supervisor or designee for the first 14 days of employment:
  - a. In a work area where the temperature or heat index, whichever is greater, equals or exceeds 87 degrees Fahrenheit; or
  - b. In a work area where the temperature equals or exceeds 82 degrees Fahrenheit for employees who wear clothing that restricts heat removal; or
  - c. In a high radiant heat area where the temperature equals or exceeds 82 degrees Fahrenheit.

## 8 TRAINING

### 8.1 Employee Training

Effective training in the following topics will be provided to each supervisory and non-supervisory employee before the employee begins work that should reasonably be anticipated to result in exposure to the risk of heat illness:

- a. The environmental and personal risk factors for heat illness, as well as the added burden of heat load on the body caused by exertion, clothing, and personal protective equipment.
- b. Don H. Mahaffey Drilling Co.'s procedures for complying with the requirements of this program, including, but not limited to, Don H. Mahaffey Drilling Co.'s responsibility to provide water, cool-down areas, cool-down rests, control measures, and access to first aid as well as the employees' right to exercise their rights under this program without retaliation.
- c. The importance of frequent consumption of small quantities of water, up to four cups per hour, when the work environment is hot and employees are likely to be sweating more than usual in the performance of their duties.
- d. The concept, importance, and the methods of acclimatization pursuant to Don H. Mahaffey Drilling Co.'s procedures under this program.
- e. The different types of heat illness, the common signs and symptoms of heat illness, and appropriate first aid/or emergency responses to the different types of heat illness, and in addition, that the heat illness may progress quickly from mild symptoms and signs to serious and life-threatening illness.
- f. The importance of employees immediately reporting to Don H. Mahaffey Drilling Co., directly or through the employee's supervisor, symptoms or signs of heat illness in themselves, or in co-workers.
- g. Don H. Mahaffey Drilling Co.'s procedures for responding to signs or symptoms of possible heat illness, including how emergency medical services will be provided should they become necessary.
- h. Don H. Mahaffey Drilling Co.'s procedures for contacting emergency medical services, and if necessary, for transporting employees to a point where they can be reached by an emergency responder.
- i. Don H. Mahaffey Drilling Co.'s procedures for ensuring that, in the event of an emergency, clear and precise directions to the worksite can and will be provided as needed to emergency responders. These procedures will include designating a person to be available to ensure that emergency procedures are invoked when appropriate.

### 8.2 Supervisor Training

Prior to supervising employee performing work that should reasonably be anticipated to result in exposure to the risk of heat illness, effective training on the following topics will be provided to the supervisor:

- a. The information required to be provided in subsection 8.1.
- b. The procedures the supervisor is to follow to implement the applicable provisions in this program.
- c. The procedures the supervisor is to follow when an employee exhibits signs or report symptoms consistent with possible heat illness, including emergency response procedures.

- d. Where the work area is affected by outdoor temperatures, how to monitor weather reports and how to respond to hot weather advisories.

*Note: Where employees are covered by California Code of Regulations, Title 8, section 3395 and California Code of Regulations, Title 8, section 3396, the training program for this program can be integrated into section 3395 training.*

## APPENDIX 1 – DEFINITIONS

**Acclimatization** – Temporary adaptation of the body to work in the heat that occurs gradually when a person is exposed to it. Acclimatization peaks in most people within four to fourteen days of regular work for at least two hours per day in the heat.

**Administrative Control** – A method to limit exposure to a hazard by adjustment of work procedures, practices, or schedules. Examples of administrative controls that may be effective at minimizing the risk of heat illness in a particular work area include, but are not limited to: acclimatizing employees, rotating employees, scheduling work earlier or later in the day, using work/rest schedules, reducing work intensity or speed, reducing work hours, changing required work clothing, and using relief workers.

**Clothing that Restricts Heat Removal** – Full-body clothing covering the arms, legs, and torso that is any of the following:

- a. Waterproof; or
- b. Designed to protect the wearer from a chemical, biological, physical, radiological, or fire hazard; or
- c. Designed to protect the wearer or the work process from contamination.

*Exception to the above definition: “Clothing that Restricts Heat Removal” does not including clothing demonstrated by Don H. Mahaffey Drilling Co. to be all of the following:*

- a. *Constructed only of knit or woven fibers, or otherwise an air and water vapor permeable material; and*
- b. *Worn in lieu of the employee’s street clothing; and*
- c. *Worn without a full-body thermal, vapor, or moisture barrier.*

**Cool-down Area** – An indoor or outdoor area that is blocked from direct sunlight and shielded from other high radiant heat sources to the extent feasible and is either open to the air or provided with ventilation or cooling. One indicator that blockage is sufficient is when objects do not cast a shadow in the area of blocked sunlight. A cool-down area does not include a location where:

- a. Environmental risk factors defeat the purpose of allowing the body to cool; or
- b. Employees are exposed to unsafe or unhealthy conditions; or
- c. Employees are deterred or discouraged from accessing or using the cool-down area.

**Engineering Control** – A method of control or device that removes or reduces hazardous conditions or creates a barrier between the employee and the hazard. Examples of engineering controls that may be effective at minimizing the risk of heat illness in a particular work area include, but are not limited to: isolation of hot processes, isolation of employees from sources of heat, air conditioning, cooling fans, cooling mists fans, evaporative coolers (also called swap coolers), natural ventilation where the outdoor temperature or heat index is lower than the indoor temperature or heat index, local exhaust ventilation, shielding from a radiant heat source, and insulation of hot surfaces.

**Environmental Risk Factors for Heat Illness** – Working conditions that create the possibility that heat illness could occur, including: air temperature, air movement, relative humidity, radiant heat from the sun and other sources; conductive heat sources such as the ground, workload severity and duration, protective clothing, and personal protective equipment worn by employees.

**Globe Temperature** – The temperature measured by a globe thermometer, which consists of a thermometer sensor in the center of a six-inch diameter hollow copper sphere painted on the outside with a matte black finish, or equivalent. The globe thermometer may not be shielded from direct exposure to radiant heat while the globe temperature is being measured.

**Heat Illness** – A serious medical condition resulting from the body’s inability to cope with a particular heat load, and includes: heat cramps, heat exhaustion, heat syncope, and heat stroke.

**Heat Index** – A measure of heat stress developed by the National Weather Service (NWS) for outdoor environments that takes into account the dry bulb temperature and the relative humidity. For the purposes of this program, heat index refers to conditions in indoor work areas. Radiant heat is not included in the heat index. The required NWS heat index chart (2019) is in Appendix 3 of this program.

**Heat Wave** – Any day in which the predicted high outdoor temperature for the day will be at least 80 degrees Fahrenheit and at least ten degrees Fahrenheit greater than the average high daily outdoor temperature for the preceding five days, for this purposes of this program only.

**High Radiant Heat Area** – A work area where the globe temperature is at least five degrees Fahrenheit greater than the temperature, as defined in “Temperature.”

**High Radiant Heat Source** – Any object, surface, or other source of radiant heat that, if not shielded, would raise the globe temperature of the cool-down area five degrees Fahrenheit or greater than the dry bulb temperature of the cool-down area.

**Indoor** – A space that is under a ceiling or overhead covering that restricts airflow and is enclosed along its entire perimeter by walls, doors, windows, dividers, or other physical barriers that restrict airflow, whether open or closed. All work areas that are not indoor areas are considered outdoor and covered by California Code of Regulations, Title 8, Section 3395.

*Exception: Indoor does not refer to a shaded area that meets the requirements of section 4 and is used exclusively as a source of shade for employees covered by this program.*

**Personal Heat-Protective Equipment** – Equipment worn to protect the user against heat illness. Examples of personal heat-protective equipment that may be effective at minimizing the risk of heat illness in a particular work area include, but are not limited to: water-cooled garments, air-cooled garments, cooling vests, wetted over-garments, heat-reflective clothing, and supplied-air cooling systems.

**Personal Risk Factors for Heat Illness** – Factors such as an individual’s age, degree of acclimatization, health, water consumption, alcohol consumption, caffeine consumption, and use of medications that affect the body’s retention or other physiological responses to heat.

**Preventative Cool-down Rest** – A rest taken in a cool-down area to prevent overheating.

**Radiant Heat** – Heat transmitted by electromagnetic waves and not transmitted by conduction or convection. Sources of radiant heat include the sun, hot objects, hot liquids, hot surfaces, and fire.

**Relative Humidity** – The amount of moisture in the air relative to the amount that would be present if the air were saturated.

**Shielding** – A physical barrier between radiant heat sources and employees that reduces the transmission of radiant heat.

**Temperature** – The dry bulb temperature in degrees Fahrenheit obtainable by using a thermometer freely exposed to the air without considering humidity or radiant heat, to measure the temperature in the immediate area where employees are located.

**Union Representative** – A recognized or certified collective bargaining agent representing the employees.

## APPENDIX 2 – SITE-SPECIFIC PROCEDURES

Location \_\_\_\_\_

Responsible Person \_\_\_\_\_

### Provision of Cool-down Areas

*Where are cool-down areas located, who is responsible for monitoring employees in cool-down areas for signs or symptoms of heat illness, etc.*

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### Provision of Water

*How water is provided to employees.*

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### Water Replenishment

*Who is responsible for the replenishment of water if there is not a plumbed water source, how is the water refilled, from where, etc.*

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### Temperature and Heat Index Measurement and Assessment of Environmental Risk Factors

*How are temperature and heat index measured and how are environmental risk factors assessed, etc.*

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### Acclimatization Procedures

*How employees are acclimatized to areas where the temperature equals or exceeds 87 degrees Fahrenheit or 82 degrees Fahrenheit when employees wear clothing that restricts heat removal or work in high radiant heat areas.*

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**Emergency Response Procedures**

*Who is responsible for monitoring employees for signs and symptoms of heat illness, how can employees report signs and symptoms, how will first aid and/or emergency medical services be provided, etc.*

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**Additional Site Information**

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### APPENDIX 3 – NATIONAL WEATHER SERVICE HEAT INDEX CHART (2019)

Temperature °F	Relative Humidity %																			
	5	10	15	20	25	30	35	40	45	50	55	60	65	70	75	80	85	90	95	100
80	77	78	78	79	79	79	80	80	80	81	81	82	82	83	84	84	85	86	86	87
81	78	79	79	79	79	80	80	81	81	82	82	83	84	85	86	86	87	88	90	91
82	79	79	80	80	80	80	81	81	82	83	84	84	85	86	88	89	90	91	93	95
83	79	80	80	81	81	81	82	82	83	84	85	86	87	88	90	91	93	95	97	99
84	80	81	81	81	82	82	83	83	84	85	86	88	89	90	92	94	96	98	100	103
85	81	81	82	82	82	83	84	84	85	86	88	89	91	93	95	97	99	102	104	107
86	81	82	83	83	83	84	85	85	87	88	89	91	93	95	97	100	102	105	108	112
87	82	83	83	84	84	85	86	87	88	89	91	93	95	98	100	103	106	109	113	116
88	83	84	84	85	85	86	87	88	89	91	93	95	98	100	103	106	110	113	117	121
89	84	84	85	85	86	87	88	89	91	93	95	97	100	103	106	110	113	117	122	
90	84	85	86	86	87	88	89	91	92	95	97	100	103	106	109	113	117	122	127	
91	85	86	87	87	88	89	90	92	94	97	99	102	105	109	113	117	122	126	132	
92	86	87	88	88	89	90	92	94	96	99	101	105	108	112	116	121	126	131		
93	87	88	89	89	90	92	93	95	98	101	104	107	111	116	120	125	130	136		
94	87	89	90	90	91	93	95	97	100	103	106	110	114	119	124	129	135	141		
95	88	89	91	91	93	94	96	99	102	105	109	113	118	123	128	134	140			
96	89	90	92	93	94	96	98	101	104	108	112	116	121	126	132	138	145			
97	90	91	93	94	95	97	100	103	106	110	114	119	125	130	136	143	150			
98	91	92	94	95	97	99	102	105	109	113	117	123	128	134	141	148				
99	92	93	95	96	98	101	104	107	111	115	120	126	132	138	145	153				
100	93	94	96	97	100	102	106	109	114	118	124	129	136	143	150	158				
101	93	95	97	99	101	104	108	112	116	121	127	133	140	147	155					
102	94	96	98	100	103	106	110	114	119	124	130	137	144	152	160					
103	95	97	99	101	104	108	112	116	122	127	134	141	148	157	165					
104	96	98	100	103	106	110	114	119	124	131	137	145	153	161						
105	97	99	102	104	108	112	116	121	127	134	141	149	157	166						
106	98	100	103	106	109	114	119	124	130	137	145	153	162	172						
107	99	101	104	107	111	116	121	127	134	141	149	157	167							
108	100	102	105	109	113	118	123	130	137	144	153	162	172							
109	100	103	107	110	115	120	126	133	140	148	157	167	177							
110	101	104	108	112	117	122	129	136	143	152	161	171								
111	102	106	109	114	119	125	131	139	147	156	166	176								
112	104	107	111	115	121	127	134	142	150	160	170	181								
113	104	108	112	117	123	129	137	145	154	164	175									
114	105	109	113	119	125	132	140	148	158	168	179									
115	106	110	115	121	127	134	143	152	162	173	184									
116	107	111	116	122	129	137	146	155	166	177										
117	108	112	118	124	132	140	149	159	170	181										
118	108	113	119	126	134	142	152	162	174	186										
119	109	114	121	128	136	145	155	166	178											
120	110	116	122	130	138	148	158	170	182											
121	111	117	124	132	141	151	162	174	187											
123	111	118	125	134	143	154	165	178												
123	112	119	127	136	146	157	169	182												
124	113	120	129	138	148	160	172													
125	114	121	130	140	151	163	176													





<sup>(1)</sup>The dry bulb temperature in degrees Fahrenheit obtainable by using a thermometer freely exposed to the air without considering humidity or radiant heat, to measure the temperature in the immediate area where employees are located.

<sup>(2)</sup>A measurement of heat stress developed by the National Weather Service for outdoor environments that takes into account the dry bulb temperature and the relative humidity. For the purposes of this appendix, heat index refers to conditions in indoor work areas. Radiant heat A copy of the 2019 National Weather Service Heat Index Chart can be found in Appendix 3.

**When this appendix should be used:**

This appendix should be used to measure the indoor temperature or heat index (whichever is greater) when one or more of the following conditions apply.

- a. The temperature equals or exceeds 87 degrees Fahrenheit when employees are present; or
- b. The heat index equals or exceeds 87 degrees Fahrenheit when employees are present; or
- c. Employees are wearing clothing that restricts heat removal and the temperature equals or exceeds 82 degrees Fahrenheit; or
- d. Employees work in a high radiant heat area and the temperature equals or exceeds 82 degrees Fahrenheit.

**Instructions:**

- 1. Take an initial measurement when it is reasonably suspected that the temperature will reach or exceed the designated temperatures where employees are working. The initial measurement should be taken at times during the work shift when employee exposures are expected to be the greatest.
- 2. Take another measurement when it is reasonably expected to be 10 degrees or more above the previous measurements where employees are working. Another measurement should be taken at times during the work shift when employee exposures are expected to be the greatest.