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November 25, 2024

The Honorable Douglas Parker
Assistant Secretary of Labor
Occupational Safety & Health Administration
U.S. Department of Labor
200 Constitution Avenue, NW
Washington, DC 20210

Re: Request for Extension of the Comment Period on Heat Injury and Illness Prevention in Outdoor and Indoor Work Settings Docket ID No. OSHA-2021-0009

Dear Mr. Parker:

The Alliance for Chemical Distribution (ACD) formally requests that the Occupational Safety & Health Administration (OSHA) grant a minimum 60-day extension on the deadline for comment submissions on the agency's Heat Injury and Illness Prevention in Outdoor and Indoor Work Settings proposed rule (89 Fed. Reg. 70698, August 30, 2024). This will give ACD and other stakeholders the time needed to assess nuances in the proposal and provide thoughtful and well-defined comments.

The proposed rule is extensive, spanning 376 pages in its *Federal Register* publication. These pages are full of technical findings related to heat-related health effects and economic impacts in addition to the requirements of the rule itself. Reading through the entirety of this regulation and scrutinizing the dense information provided takes substantial time and effort.

Also, this rule covers a broad spectrum of employers, potentially covering varying businesses such as summer camps, landscapers, warehouses, restaurants, and many more. Considering the broad range of those covered by this rule, it is important to garner as much input as possible from the prospective regulated population.

Lastly, it is necessary to recognize the novelty of this proposal, as it establishes an entirely new standard. While OSHA has been ensuring employers protect their workers from heat under the General Duty Clause, shifting to a standard sets forth new requirements and creates long-term implications. If this new standard is not finalized correctly, any issues will require lengthy future rulemaking processes to remedy.

ACD requests that OSHA grant at least 60 additional days to give stakeholders adequate time to formulate and submit comprehensive responses. Allowing more time to respond will ensure comments received are thoughtful and abundant, providing OSHA with better input as the agency moves towards drafting a final rule.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer C. Gibson". The signature is fluid and cursive, with a long horizontal stroke at the end.

Jennifer Gibson
Senior Vice President, Regulatory Affairs
Alliance for Chemical Distribution