



**American
Fuel & Petrochemical
Manufacturers**

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November 22, 2024

Assistant Secretary Douglas L. Parker
U.S. Department of Labor
Directorate of Standards and Guidance
200 Constitution Ave. NW
Washington, DC 20210

Attention: Docket ID No OSHA–2021–0009

Submitted to the Federal eRulemaking Portal (www.regulations.gov)

Re: Request for Extension of Deadline for Comments on OSHA’s Heat Injury and Illness Prevention in Outdoor and Indoor Work Settings Proposed Rulemaking (OSHA–2021–0009) and Request for an Informal Public Hearing

Dear Assistant Secretary Parker,

On behalf of American Fuel and Petrochemical Manufacturers (“AFPM”), we respectfully ask that that Occupational Safety and Health Administration (“OSHA”) extend by sixty days the December 30, 2024, comment submission deadline for the Proposed Heat Injury and Illness Prevention in Outdoor and Indoor Work Setting rulemaking. The new deadline would be February 28, 2025. Additional time will provide AFPM and all affected stakeholders with sufficient time to organize and prepare meaningful information that will be constructive to OSHA’s rulemaking.

In addition, we also request an informal public hearing for stakeholders and experts to voice their opinions and concerns. A public hearing will enable all stakeholders to hear a broad range of perspectives that will further inform our comments.

AFPM is the national trade association representing nearly all U.S. refining and petrochemical manufacturing capacity, including the midstream transport that moves products from facilities to consumers. AFPM members support more than three million quality jobs, contribute to our nation’s economic and national security, and enable the production of thousands of vital products used by families and businesses throughout the United States. AFPM members are committed to filling these roles in a way that is responsible and sustainable for the long term. Many of AFPM’s petrochemical and midstream members are located in regions where summertime temperatures routinely exceed a heat index of 80°F. As a result, our sectors proactively developed and

successfully implemented comprehensive heat illness prevention programs to ensure the safety of their employees.

The proposed rule is lengthy, totaling 376 pages and containing numerous requests for comments. In addition, the comment period extends through Veteran's Day, Thanksgiving, Christmas, Hanukkah, Kwanzaa, and on New Year's Eve. This constricts the available time for our members and staff to finalize meaningful and constructive feedback as many of us celebrate these holidays and take time off to be with our families. Granting an extension will allow AFPM and other impacted groups time to carefully identify and understand each request for comment, review and compare our programs with the proposed rule, collect and organize our extensive, historical data, and provide detailed comments regarding our experience with heat injury and illness programs that will enhance OSHA's final rule.

AFPM appreciates the opportunity to comment and we thank you for considering our requests. Should you have questions or would like to discuss this further, please contact me by phone at (202) 844-5478 or by email at mfuller@afpm.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew Fuller". The signature is written in a cursive, flowing style.

Matthew Fuller
Policy Analyst, Regulatory Affairs