As I sit down to write this, an intense band of lake-effect snow continues to pummel areas near and south of Buffalo, New York. In fact, many parts of the country are starting to feel the sting of cold winter air and the unique challenges that come along with it.

Some contractors, especially those in the southern most areas of the country will carry on with their work, business as usual. Temperatures may be cooler but not many changes are required in the way they plan their work or outfit their crews. For the rest of us, however, winter temps mean making sure workers are protected from the cold. We spent a lot of time this year talking about heat illness, especially with OSHA's Heat Illness and Injury Prevention rulemaking underway. Although the effects heat and cold stress differ, many of the strategies are similar. Like heat stress, OSHA does not currently have a cold stress regulation on the books. That doesn't mean protecting workers from cold stress is optional. In fact, the General Duty Clause requires employers to protect workers from all recognized hazards, including exposure to cold.

1. **Written Program** – Contractors whose workers will be exposed to cold should develop and maintain a written cold stress program. Many employers will combine heat and cold stress in one overarching program, sometimes including provisions for lone workers. Combining environmental hazards into one program is beneficial because it allows for a consistent approach for each and will help employers develop a strategy for seasonal readiness. Programs should include provisions for training, PPE selection, monitoring of exposed workers, communication, warm-up breaks, and emergency response procedures.

2. **Training** – Workers should be trained on the elements of the program including recognizing the effects of cold stress, selecting proper PPE/clothing, frequency and duration of warm-up breaks, communication methods, and how to respond in an emergency. Training should address new workers before exposure and existing workers seasonally.

3. **Protective Equipment and Clothing** – Keeping workers warm without becoming overheated is a challenge for line workers. The ability to layer is the best option as it allows the worker to add or remove layers based on exertion levels and comfort. Wearing a full body coverall or bulky hooded sweatshirt will keep you warm but can become an issue with overheating or with properly fitting harnesses and rubber sleeves when working aloft. OSHA requires any outer layer item, even an accessory like a neck gaiter to be flame resistant. This includes the occasional hooded sweatshirt or beanie hat that may slip through the cracks. Garments designed to break the wind are affective at keeping the bulk down while maintaining warmth. It's a best practice to get your winter weather gear ordered early in the fall to prevent long lead times affecting your ability to outfit your crews in time.

4. **Recognizing Cold Stress and Emergency Response** - Supervisors and workers must understand the signs of cold stress and how to react to them. Hypothermia, Frostbite, Chilblains, and Trench Foot can result in serious health effects and sometimes death. Train your workers on how to recognize the symptoms and the first aid procedures related to each. Supervisors must monitor temperature and worker condition at the worksite, where they will be working. Some companies require a "buddy system" to take this monitoring to the next level. Click HERE to review the NIOSH/CDC resource page for additional information about cold stress and cold related illnesses.

   Thank you and Have a Safe and Healthy Holiday Season!

Mike Starner
Executive Director, Outside Line Safety
mike.starner@necanet.org