SafetySmart COMPLIANCE OSHA
The Leading Guide for OSHA Compliance and Management

TOOL TYPE	MODEL POLICY	LAST REVIEWED	012/18/12
GEOGRAPHY	US	SOURCE:	

MODEL COLD STRESS PREVENTION POLICY

PROBLEM: OSHA doesn't have a specific standard for cold (or heat) stress. But OSHA doesn't need one to hold you liable for failing to protect workers from extreme cold. That's because the OSHA General Duty Clause, Sec. 5(a)(1) of the *Occupational Safety and Health Act*, says that every employer must safeguard workers against "recognized hazards" that can cause great bodily harm or death. OSHA has long taken the position that cold stress may be a "recognized hazard" covered by the GDC. As a result, it expects employers to take steps to protect their workers against cold stress.

HOW TOOL HELPS SOLVE THE PROBLEM: Here's a cold exposure control policy that you can use to protect your workers against cold stress injuries.

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COLD STRESS EXPOSURE POLICY
ABC COMPANY

PURPOSE:

ABC Company ("Company") is adopting this Cold Exposure Control Policy to ensure that workers are protected from exposure to cold stress injuries such as:

- Frostbite: destruction of body tissue (usually on the face, ears, fingers and toes) that can result in permanent damage and destruction, including amputation.
- Hypothermia: a life-threatening condition where the body's core temperature falls below normal 98.6°F (37°C) due to a sudden or prolonged exposure to cold such as falling into cold water or working outdoors for an extended period.
- Chillblains: mild cold injury due to prolonged and repeated exposure to cold temperatures that results in swollen, red, and itchy or painful skin.
- Trench Foot: cold, swollen, or numb feet that have been subjected to cool water (often, at above freezing temperatures) for prolonged periods, resulting in nerve and muscle damage.

POLICY:

- Supervisors must exercise due diligence for worker safety when assigning work in cold environments by monitoring and taking the following into account:
- Air temperature;
- Wind chill factor;
- Level of work effort (light, moderate, or heavy); and
- Work conditions (dry or wet).
- Each supervisor shall ensure that workers are equipped with the following work controls when necessary to protect against cold stress hazards:
- Appropriate clothing (including insulated footwear, layered garments, head coverings, and gloves or mittens) that protects against cold and water and provides traction to prevent slips and falls;

- Appropriate protective equipment such as insulated sleeping bags and survival equipment that will allow a worker to endure natural elements until rescued;
- Barricades or other structures to block air or reduce air velocity at the work location;
- Machine controls and tools that workers may operate without removing protective clothing such as mittens or gloves;
- Postponement of non-urgent tasks and rescheduling of work activities to allow for work during the warmest part of the day or when the wind is the most calm;
- Heated shelters and warm liquids; and
- Increased time to acclimatize to cold temperatures.
- Workers at risk of exposure to the cold shall be permitted to take work/warm-up breaks in accordance with the guidelines recommended by the American Conference of Governmental Industrial Hygienists (ACGIH). In the event they are extremely uncomfortable, they shall be allowed to interrupt their work for an extended time period.
- All workers subject to cold exposure shall work in groups of at least two workers each so that they may be observed by at least one other designated person in the workgroup. Workers who observe symptoms of cold stress must take the employee to a heated first aid room, contact his or her supervisor, and (if appropriate) call immediately for medical assistance.
- All workers with the potential for exposure to conditions that could cause cold stress shall receive initial and annual refresher training on:
- Recognizing signs and symptoms of cold stress illnesses and injuries;
- Cold stress prevention, including proper clothing habits and safe work practices;
- Factors that could increase the risk of cold stress injuries and illnesses, such as caffeine or alcohol consumption and direct contact with metal surfaces;
- Increased risks associated with handling materials and equipment in extreme temperatures; and
- Proper first aid response and emergency procedures for responding to cold injuries and illnesses.