

DEPARTMENT OF LABOR
OCCUPATIONAL HEALTH AND SAFETY ADMINISTRATION

DOCKET NO. OSHA–2021-0009:
HEAT INJURY AND ILLNESS PREVENTION IN OUTDOOR AND INDOOR
WORK SETTINGS

COMMENTS OF
THE AMERICAN SHORT LINE AND REGIONAL RAILROAD ASSOCIATION

The American Short Line and Regional Railroad Association (“ASLRRA”), on behalf of itself and its member railroads, requests that the Occupational Safety and Health Administration (“OSHA”) extend the deadline for comments on the Heat Injury and Illness Prevention in Outdoor and Indoor Work Settings proposed rule until March 31, 2025, in order to provide the regulated community with sufficient time to analyze the proposed rule and provide public comments.¹ The proposed rule would apply to all employers conducting outdoor and indoor work in all general industry, construction, maritime, and agricultural sectors where OSHA has jurisdiction. It would be a programmatic standard that would require employers to create a plan to evaluate and control heat hazards in their workplaces, setting forth employer obligations and the measures necessary to effectively protect employees from hazardous heat.²

ASLRRA is a small non-profit trade association representing the interests of about 600 short line and regional railroads. Short lines operate nearly 50,000 route miles in the United States, or approximately 30% of the national freight network, touching in origin or destination one out of every five cars moving on the national railroad system, serving customers who

¹ 89 Fed. Reg. 70,698 (Aug. 30, 2024).

² *Id.*

otherwise would be cut off from the national railroad network. Both in legislative matters before Congress and in regulatory matters before state and federal agencies, ASLRRA advocates for enlightened public policies which promote a strong regional and short line rail component for the national transportation infrastructure. Most short line railroads are considered small businesses.³

Given the length of the NPRM, the voluminous studies cited, and the comprehensive nature of the proposed new standard, ASLRRA requests that OSHA extend the comment period to March 31, 2025.

Respectfully submitted,



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³ See 13 C.F.R. § 121.201 and North American Industry Classification System code 482112, “Short Line Railroad.”