Proactive Management

Proactive Mangement
1822 Cabernet Drive
Chula Vista CA 91913

David Dorame
(619) 407-0443

August 17, 2018

Dear Mr Berg,

In an effort to effectively comply with Cal/OSHA Regulation T8 GISO CCR 3395 (d) 1, and exception to subsection (d) 1 & 2, we would like to clarify if the following arrangement would be compliant.. In the referenced regulation, shade is required anytime the ambient temperature outside exceeds 80 degrees Fahrenheit. Several factors relating to position of the sun and wind speed are constantly working against us to provide cool shade that is out of any direct sunlight while the employee is outside.

We would like to utilize the inside of a Farm Labor Bus equipped with air circulation via dual 12" fans and blackout curtains which would help to eliminate the challenges of wind and non-ideal sun positioning. **We have developed the following components in hopes of receiving a letter of affirmation that our shade design is acceptable and satisfies all requirements of T8CCR 3395.**

There is a bus with all of these components listed below installed that is available for your inspection at anytime.

1. Retractable, Solid, Blackout Curtains mounted along the entire length of both sides of bus. The curtains will be extended when the bus arrives to the field to

begin work and will be retracted when work is completed for the day to prevent any direct sunlight from entering the bus through the day via the side windows.

2. QTY 2 - 12 volt, 12 Inch fans that will be operating at the rear of the bus whenever someone is present inside the bus and using it for rest and recovery. The fans will circulate air from inside the bus to outside of the bus, and thus expelling stagnant air and some potential odors. The fans have full exterior guards to prevent any intrusion into the blades.

3. Rear Emergency Exit Door Kept Open To Allow Airflow From Fans To Escape Bus.

4. Driver Area Fan System Operating At Front of Bus Side Door of Bus Kept Open To Allow Ease of Access of Employees And Air To Travel Outside of Bus.

Please see attached photos of proposed components that will make up “Bus Shade System.” Below you will find temperature data that clearly shows that the inside of a bus maintains a cooler ambient temperature at a given time than outside in direct sunlight or under an external shade. Temperatures were taken using three identical digital Kestrel 3000 Thermometers mounted on the external body of bus, under the retractable awning that is on the bus, and inside the middle area of the bus with shades closed

Observation Time and Date	Outside Ambient - Direct Sunlight (Degrees Fahrenheit)	Outside Ambient - Under External Shade (Degrees Fahrenheit)	Inside Bus Shade With Blackout Curtains Extended and Fans Running (Degrees Fahrenheit)
7/26/2018 - 2:30 PM	86.4°F	79.5°F	74.8°F
7/27/2018 - 10:15 AM	84.9°F	81.0°F	71.6°F
7/28/2018 - 10:39 AM	77.7°F	76.6°F	74.3°F
7/31/2018 - 11:05 AM	75.9°F	70.5°F	69.6°F

5. There is a minimum of 18 seats in each bus, which is enough space for 36 people (Adequate space for an entire crew).

   Each seating area is 38.5” Wide x 23.5” Long = 6.25 Square feet per seat and 3.14 Square feet per person which is ample space for an employee to rest and recover in a relaxed position without touching another employee. We have determined that 1.5 Square foot per person is adequate to ensure they are not touchin each other during breaks.

   Attached is my Kestrel weather meter certificate.

Sincerely, David Dorame


Short
DOT 1119213
CA 252057
FLC 000187467


SALIDA DE EMERGENCIA
EMERGENCY DOOR
DO NOT BLOCK


SALIDA DE EMERGENCIA
LEVANTE PALANCA ROJA Y EMPUJE
EMERGENCY EXIT


WARNING LAMP GUIDE
2900 Product Families Operating Tips
OIL MOTOR
1-15-18
NEXT
MIN 62788
C.T.
Panasonic
ELP!


LO/HI
LEFT
FAN
OFF
LO/HI
DEFOG
FAN
OFF