

November 21, 2024

The Honorable Douglas Parker  
Assistant Secretary of Labor  
Occupational Safety and Health Administration  
U.S. Department of Labor  
200 Constitution Avenue, N.W.  
Washington, D.C. 20210

**RE: Docket No. OSHA-2021-0009, Extension Request Related to Comment Period on Notice of Proposed Rulemaking (NPRM) for Heat Injury and Illness Prevention in Outdoor and Indoor Work Settings (RIN 1218-AD39)**

Dear Assistant Secretary Parker:

On behalf of TRSA – The Linen, Uniform and Facility Services Association, I respectfully request that the Occupational Safety and Health Administration (OSHA) extend the deadline for comments on its Heat Injury and Illness Prevention in Outdoor and Indoor Work Settings proposed rule until March 31, 2025. An extended comment period will provide the linen, uniform and facility services community with adequate time to analyze the proposal and prepare comments that will help the agency in its development of a final rule.

TRSA represents the \$50 billion linen, uniform and facility services industry, which employs 200,000 people at over 2,500 facilities across North America. TRSA's membership consists of 330 commercial laundry processors and supplier partner companies. The commercial laundry industry enables healthcare facilities, hotels, restaurants, retailers, government entities (e.g., first responders, public utilities, infrastructure maintenance operations), and other organizations to enhance their image and provide clean, safe environments for employees and customers.

TRSA members take the issue of heat-related illness very seriously and are committed to working with OSHA to develop a rule that is both effective and practical. TRSA is eager to provide data and information that will assist OSHA in the development of a final rule. However, TRSA believes that additional time is necessary to respond to this NPRM for the following reasons:

- **Complexity of the NPRM:** The 376-page proposed rule is highly complex and technical. Providing OSHA with accurate, meaningful feedback requires substantial time and thoughtful analysis on wide-ranging topics. An extension would allow TRSA needed time to fully review this complex rule, collect data, consult with members and industry experts, and provide OSHA with more informed and meaningful comments.
- **Impact on State Plans:** As outlined in the NPRM, there are numerous ways in which State OSH Plans will be affected by this proposed rulemaking. TRSA is gathering information on OSH plans on a state-by-state basis. As the Maryland OSH heat stress standard just went into effect on September 30, 2024, gathering this data, as well as information on other state plans, will take additional time.

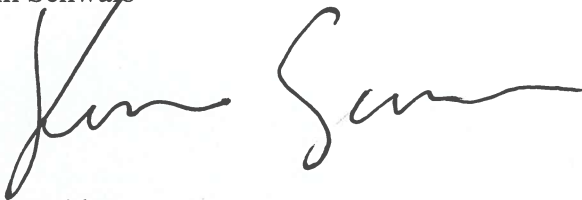
- **Holiday Considerations:** As the current comment period deadline falls between two major federal government holidays – Christmas and New Year’s Day – it will be more difficult to obtain important feedback from members. The winter holiday season is one of the busiest times of year for the industry, and operators must primarily focus on running their businesses and supporting the essential operations that they serve.

In light of these circumstances, TRSA urges OSHA to extend the comment period to March 31, 2025. If you have any questions or need further information, please contact me at [kschwalb@trsa.org](mailto:kschwalb@trsa.org).

Thank you for your consideration of this request.

Sincerely,

Kevin Schwalb



Vice President  
Textile Rental Services Association