OSHA’s Confined Space Regulation 2015

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Agenda

1. What is a confined space?
2. Permit vs. Non-Permit
3. Key People (traditional)
4. History of the Construction Confined Space Standard
5. What’s the Same (or Similar)
6. What’s different
Confined Space

A space that:

- Is large enough and so configured that an employee can bodily enter and perform assigned work
- Has limited or restricted entry/exit means
- Is not designed for continuous Employee occupancy
Permit-required confined space

A confined space with either:
- a hazardous atmosphere;
- an engulfment hazard;
- sloping surfaces; or
- a serious safety or health hazard.
Attendant

- Individual stationed outside the permit space who **monitors** entrants
- Must have communication
- Can alert rescue
- Does not enter
- Knows hazards
Entrant

- Authorized entrant means an employee who is authorized by the entry supervisor to enter a permit space.
- Knows the hazards
- Knows how to do the job.
Entry Supervisor

The qualified person (such as the employer, foreman, or crew chief) responsible for determining if

- acceptable entry conditions are present at a permit space where entry is planned;
- for authorizing entry and;
- overseeing entry operations.
Background

- General Industry Standard published 1993
- 29CFR1926.21(B)(6)(i) – Safety Training and Education only reference to confined space previously.
- Construction Confined Spaces viewed as dynamic.
Background

- Final Rule issued May 4, 2015
- Effective August 3, 2015 for federal plan states. (60 day grace period to get equipment)
- State plan states have 6 months to implement.
Similarities GI vs. Const.

The construction standard follows the General Industry (GI) standard in many areas. The following are similarities between the two.

- Reclassification of a Permit required to Non-Permit required confined space
- An attendant may be responsible for multiple PRCS’s
- Anklets or wristlets may be used.
- Cross training of Supervisor as Attendant/Entrant is permitted.
- Duties of the Entrant & Attendant are similar.
Differences GI vs. Const.

- The GI standard bases its practices on the assumption that confined space entry is in a fairly stable work environment with minimal changes occurring at the same time.
- The Construction standard assumes that there may be multiple trades/groups working in the same area and that hazards change much more quickly than in GI.

The following slides will highlight some key differences.
Communication

General Industry

- Inform contractor that the workplace contains PRCS’s and a PRCS program is required to enter.
- Host employer coordinates entry from multiple employers.

Construction

- Host Employer
- Controlling Contractor
- Entry Employer
Information Exchange
Host Employer

The employer who owns or manages the property.

Before entry operations begin, the host employer must provide the following information, if it has it, to the controlling contractor:

- The location of each known permit space;
- The hazards or potential hazards in each space or the reason it is a permit space; and
- Any precautions that the host employer or any previous controlling contractor or entry employer implemented for the protection of employees in the permit space.

Note: If the owner of the property on which the construction activity occurs has contracted with an entity for the general management of that property, and has transferred to that entity the information specified in §1926.1203(h)(1), OSHA will treat the contracted management entity as the host employer for as long as that entity manages the property.
Controlling Contractor

Employer that has overall responsibility for construction at the worksite.

- Note to the definition of “Controlling Contractor”. If the controlling contractor owns or manages the property, then it is both a controlling employer and a host employer.
Controlling Contractor

Before entry operations begin, the controlling contractor must:

- Obtain the host employer’s information about the permit space hazards and previous entry operations;
- and
- Provide the following information to each entity entering a permit space and any other entity at the worksite whose activities could foreseeably result in a hazard in the permit space.
Controlling Contractor

After entry operations:

- The controlling contractor must debrief each entity that entered a permit space regarding the permit space program followed and any hazards confronted or created in the permit space(s) during entry operations;
- The controlling contractor must apprise the host employer of the information exchanged with the entry entities pursuant to this subparagraph.
Entry Employer

Employer who decides that an employee it directs will enter a PRCS.

- Before entry operations begin, each entry employer must:
  - Obtain all of the controlling contractor’s information regarding permit space hazards and entry operations; and
  - Inform the controlling contractor of the permit space program that the entry employer will follow, including any hazards likely to be confronted or created in each permit space.
Entry Employer

For Permit Spaces

- Implement the measures necessary to prevent unauthorized entry;
- Identify and evaluate the hazards of permit spaces before employees enter them;
- Specifying acceptable entry conditions;
- Providing each authorized entrant or that employee’s authorized representative with the opportunity to observe any monitoring or testing;
- Isolating the permit space and physical hazard(s) within the space;
Entry Employer

For Permit Spaces

- Purging, inerting, flushing, or ventilating the permit space as necessary to eliminate or control atmospheric hazards of permit spaces;
- Determining that, in the event the ventilation system stops working, the monitoring procedures will detect an increase in atmospheric hazard levels in sufficient time for the entrants to safely exit the permit space;
- Providing pedestrian, vehicle, or other barriers as necessary to protect entrants from external hazards;
- Eliminating any conditions (for example, high pressure) that could make it unsafe to remove an entrance cover.
Entry Employer

For Permit Spaces

- Develop and implement procedures for summoning rescue and emergency services (including procedures for summoning emergency assistance in the event of a failed non-entry rescue);

- Review the permit space program, using the canceled permits retained, within 1 year after each entry and revise the program as necessary.

- Note to paragraph (n). Employers may perform a single annual review covering all entries performed during a 12-month period.

- If no entry is performed during a 12-month period, no review is necessary.
Entry Employer

For Permit Spaces that cannot be isolated (sewers or similar) and entry is authorized

- Continuously monitor entry conditions in the areas where authorized entrants are working
- Provide an early-warning system that continuously monitors for non-isolated engulfment hazards. The system must allow sufficient time for the authorized entrants to safely exit the space.
- Test the internal atmosphere of the permit space with a calibrated, direct-reading instrument before any employee enters the space.
Whose responsible for?

Host Employer
- Identifying all confined spaces on a work site.

Controlling Employer
- All aspects of safe entry into the PRCS
  - Communicating results of entry
  - Doing a 12 month audit

Entry Employer

Sub Contractor
- Communicate

Draw lines to what each is responsible for.

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Information Exchange
Early Warning System

General Industry
- Not required.
- (Must be trained to recognize warning signs of danger.)

Construction
- Provide an early–warning system that continuously monitors for non–isolated engulfment hazards.
- The system must alert entrants early enough to safely exit.
- Can be used where isolation can not be done (e.g. sewer)
Engulfment Monitoring

**General Industry**
- Not specifically called out.

**Construction**
- Monitoring required to notify entrant with enough time to exit the space.
Rescue Teams – In House

**General Industry**
- Can use in-house team and need hands-on training every 12 months.

**Construction**
- Can use in-house team and need hands-on training every 12 months.
- Must prevent unauthorized entry for untrained rescuers.