

**GREATER CLEVELAND AIR
CONDITIONING CONTRACTORS
ASSOCIATION**

**CONFINED SPACE-
CONSTRUCTION INDUSTRY**





Confined Space Safety in the Construction Industry

Changes to the OSHA Standard

1926 Subpart AA



RISKCONTROL360°

The New Rule

- ✓ Previously OSHA followed the General Industry standard: 29 CFR 1910.146
- ✓ Starting August 3rd / October 2nd, 1926 Subpart AA will take effect



The New Rule

OSHA is instituting a 60-day temporary enforcement policy. Full enforcement of the new standard, which goes into effect August 3rd, is being postponed to October 2nd.



The New Rule

During this 60-day temporary enforcement period, OSHA will not issue citations to employers who make good faith efforts to comply with the new standard. Employers must be in compliance with either the training requirements of the new standard or the previous standard. Employers who fail to train their employees consistent with either of these two standards will be cited.



Temporary Enforcement Policy

Residential Construction Work- Confined Space

Extension January 8 2016

Good Faith Efforts to Comply with the Standard



Definitions

- Additional Definitions have been included with the new Rule:
 - Controlling Contractor
 - Early-warning System
 - Entry Employer
 - Entry Rescue
 - Host Employer



What is a Confined Space

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



Examples of Confined Spaces

- ❑ Boilers & Furnaces
- ❑ Crawl spaces
- ❑ Pits
- ❑ Storage Tanks
- ❑ Silos
- ❑ Sewers & Manholes



OSHA

- ✓ The new standard does not apply to:
 - ✓ Trenching and Excavations
 - ✓ Underground Construction, Caissons, Cofferdams and Compressed Air
 - ✓ Diving (subpart Y)



What is a Permit-Required Confined Space

A permit-required confined space (or a *permit space*) is a confined space that has one or more of the following characteristics:



Permit-Required Spaces

- Contains or has a potential to contain a hazardous atmosphere
 - Oxygen Deficient, Toxic, above OSHA PEL, etc.

- Contains a material that has the potential for engulfing an entrant



Permit-Required Spaces

- Has an internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls or by a floor which slopes downward and tapers to a smaller cross-section
- Contains any other recognized serious safety or health hazard



Confined Space Evaluation

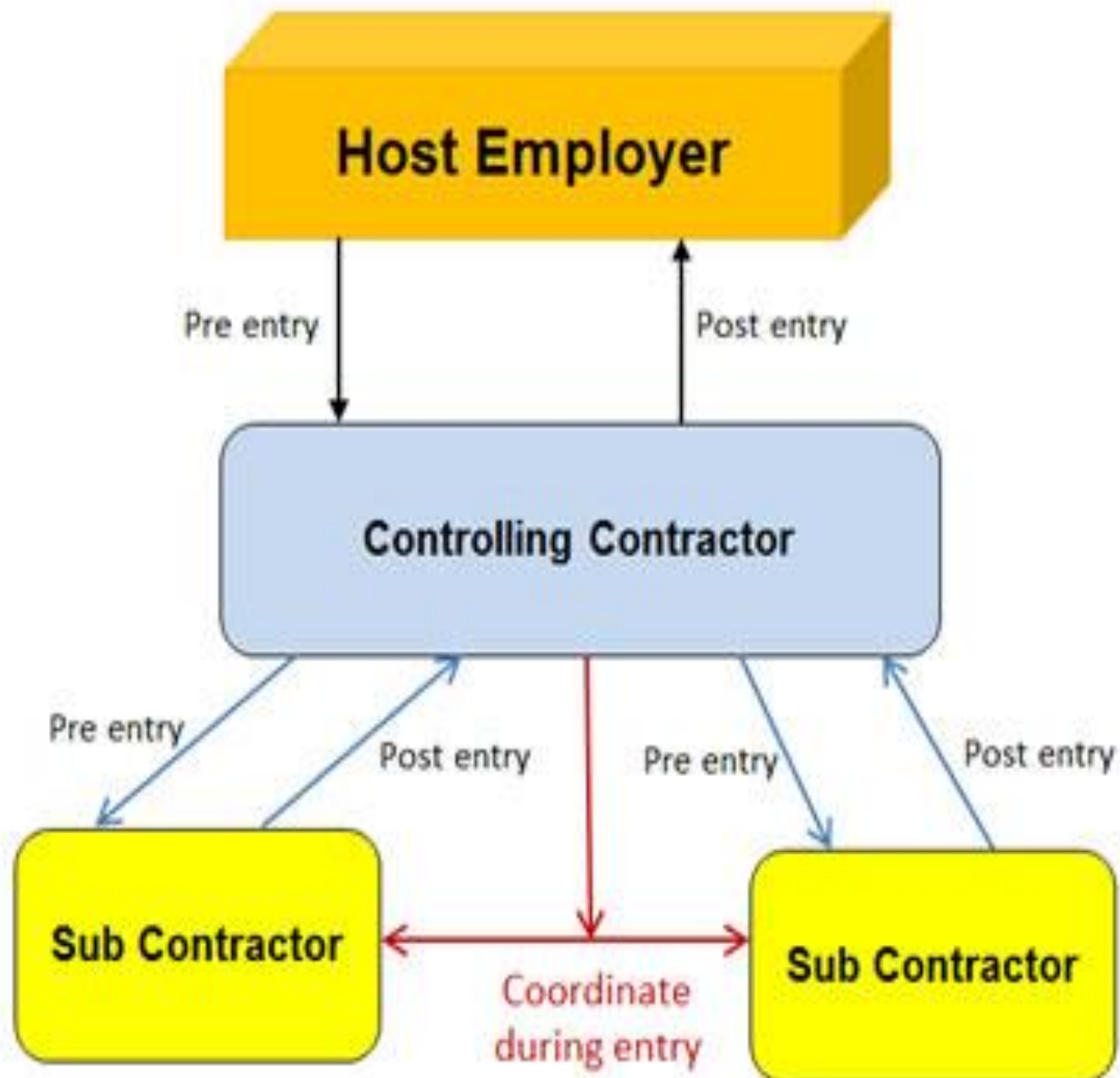
- A Competent Person must evaluate the worksite, prior to work starting, to determine if any confined spaces are present, and
- Determine if any confined spaces are considered Permit Spaces



Confined Space Evaluation

- The Evaluation can be conducted or coordinated by one employer on a multi-employer construction site





Confined Space Evaluation

If a Permit Space(s) exists, the employer must:

- Inform exposed employees, by posting danger signs or by any other equally effective means, of the existence and location of and the danger posed by the permit space.
- The following sign would meet this requirement:





DANGER

**PERMIT REQUIRED
CONFINED SPACE
DO NOT ENTER**

When Employees DO NOT ENTER

If the employer decides that their employees will not enter permit spaces:

- Employer must take effective measures to prevent their employees from entering permit spaces

Written Confined Space program is NOT required

When Employees DO enter

- If the employer chooses to have employees enter permit spaces, a complete, written confined space program must be developed that includes:



Written Confined Space Program

- ❑ Prevention of Unauthorized Entry
- ❑ Confined Space Evaluations
- ❑ Written Safe Entry Procedures
- ❑ Protective Equipment Requirements
- ❑ Evaluation of Permit-Space Conditions
 - Air Monitoring
- ❑ Employee Training Program



Written Confined Space Program

- Identify the Roles of:
 - Authorized Entrants
 - Attendants
 - Entry Supervisors
- Procedures for Rescue and Emergency Services
- Entry Permit System
- Coordination with other Employers
- Annual Review of Program



Hazards of Permit Spaces

- ❑ Atmospheric
- ❑ Engulfment
- ❑ Configuration
- ❑ Mechanical
- ❑ Electrical
- ❑ Potential
- ❑ Thermal
- ❑ Noise
- ❑ Vibration
- ❑ Physical



Controlling Permit Space Hazards

- Each Permit Space has different hazards
- Hazards can also change with time and usage
 - ▣ Post signs to warn of the dangers
 - ▣ Use barriers to prevent uncontrolled access; secure the entry
 - ▣ Develop and use a written permit space entry program and procedures



Controlling Confined Space Hazards

- ❑ Conduct air monitoring and tests to identify and evaluate hazards
- ❑ Define acceptable entry conditions
- ❑ Monitor entry conditions
- ❑ Eliminate or control the space's atmospheric hazards before entry



Controlling Confined Space Hazards

Continuous air monitoring for atmospheric hazards

Gen. Ind. standard says “periodic” monitoring

Continuous monitoring for engulfment hazards

This is a new addition to the rule



Alternate Entry Procedures

- May be used when:
 - ▣ All physical hazards are eliminated or isolated through engineering controls
 - This is a new addition to the rule
 - Solid barrier, etc.
 - ▣ Continuous forced air ventilation alone is sufficient to maintain safe conditions

(Monitoring and inspection data must support these two conditions)



Alternate Entry Procedures

- May be used when:
 - ▣ If an initial entry is required to obtain the data needed for the two items on the last slide, a standard entry must be conducted
 - ▣ The data is made available to entrants (or their authorized representative)
 - ▣ Entry into a permit space must be conducted following the conditions set forth in the standard – 1926.1203(e)(1)



Re-classifying a Permit Space

- A Permit space can be RECLASSIFIED as a non-permit space when a Competent Person determines:
 - ▣ The space poses no actual or potential atmospheric hazard
 - ▣ All hazards within the space are eliminated or isolated (without entering the space to make the determination)



Re-classifying a Permit Space

- The employer must then:
 - ▣ Complete a written certification of how the hazards have been eliminated or isolated
 - Date, Location of Space and Signature
 - Make the certification available to entrants or their authorized representatives
 - ▣ If hazards arise in the space which had been reclassified as a non-permit space, the employer must re-evaluate the space and reclassify it as a permit space



The Permit System

- A permit system is the employer's written procedure for preparing and issuing permits for entry and for returning the permit space to service following termination of entry
- The measures taken to ensure safe entry must be documented



The Permit System

- The Entry Supervisor must sign the permit to authorize entry
- The “Entry Employer” is the employer that directs workers to enter a permit space and is the one that must develop and post the entry permit.



The Permit System

- The permit must be made available to all authorized entrants
 - ▣ By posting it at the entry portal
 - ▣ Any other equally effective means

- The permit only pertains to the space identified and the time specified



The Permit System

- The Entry Supervisor must terminate entry and cancel the permit
 - ▣ When the operations specified on the permit have been completed
 - ▣ An entry condition that is not allowed arises in or near the space
- An Entry Permit may be suspended if a temporary change occurs (such as a blown fuse) provided the space is returned to permit conditions prior to entry.



The Permit System

- Any problems encountered during the entry must be noted on the permit
- Cancelled permits must be retained for a minimum of 1 year



The Permit

- The document that is provided to allow and control entry
- An entry permit must identify...
 - ▣ The permit space to be entered;
 - ▣ The purpose of the entry;
 - ▣ The date and authorized duration of entry;
 - ▣ The authorized entrants within the space;
 - ▣ The means of detecting an increase in atmospheric hazard levels;



The Permit

- An entry permit must identify...
 - ▣ The personnel serving as Attendants
 - ▣ The current Entry Supervisor and the signature or initials of the Entry Supervisor that authorized the entry;
 - ▣ The hazards of the space to be entered
 - ▣ Measures used to isolate, eliminate or control the hazards of the space prior to entry
 - ▣ Acceptable entry conditions



The Permit

- An entry permit must identify...
 - ▣ Results of initial and periodic/continuous testing with the I.D. of the tester and dates of testing
 - ▣ Description of, and means for summoning rescue and emergency services
 - ▣ Communication procedures (entrants / attendants)
 - ▣ Description of PPE, testing and communications equipment, alarms, rescue equipment, etc.
 - ▣ Any additional information to ensure safety
 - ▣ Any other required permits

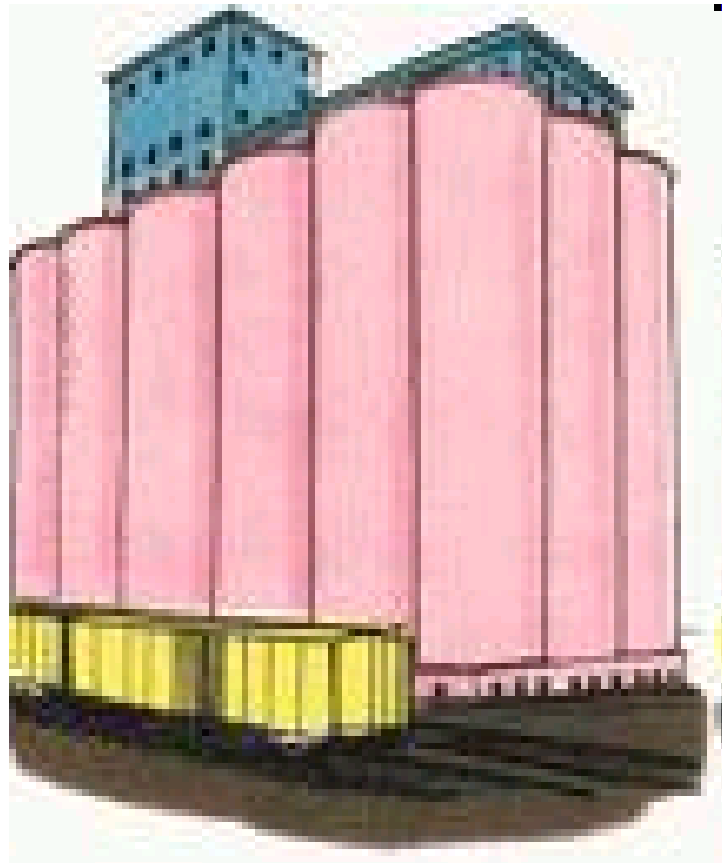


Emergency Response

- Emergency Responders must agree to notify the employer in the event that rescue services may become unavailable.



Training



Training Proficiency

- Employers must provide training so that all employees associated with confined space entry acquire the understanding, knowledge and skills necessary for the safe performance of their assigned duties.



Training Proficiency

- Training must be provided:
 - ▣ In both a language and vocabulary that the employee can understand
 - ▣ Before duties are assigned
 - ▣ Before a change in assigned duties
 - ▣ When new hazards are introduced or discovered
 - ▣ If the program is not being followed or is ineffective



Training

- Training shall establish employee proficiency in the duties required and shall introduce new or revised procedures as necessary, for compliance with this standard.
- The employer shall certify that the training required has been accomplished.
 - ▣ Employee's Name
 - ▣ Name of the Trainer(s)
 - ▣ Date(s) of Training



For More Information

OSHA's new Confined Space page -

<https://www.osha.gov/confinedspaces/index.html>

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