ACCESSING SAFETY KNOWLEDGE (ASK) SHEET: CONFINED SPACES – WHAT YOU SHOULD KNOW

OSHA recently issued a new standard for Confined Spaces exclusively for the construction industry. These new standards will be enforced on October 2, 2015 however employers must now be in compliance with the training requirements of the new standard or the previous General Industry standard.

As a reminder a confined space is:

- an area that has limited means of entry and/or exit
- is an area large enough for a worker to enter
- is not intended for regular/continuous occupancy.

The new Construction Confined Space standard differs with General Industry in 5 key areas:

- Prior to the start of a project a competent person must survey the project and identify any confined spaces that will be deemed a Permit Required Confined Space (PRCS). The entry point to the PRCS must be identified with the placement of a sign identify it as such.
- Controlling Contractors will be required to coordinate activities in a confined space when there are multiple employers at the worksite who may be entering a PRCS at the same time. For example one subcontractor may determine the confined space does not require a permit because the subcontractor is not introducing any hazards to the confined space, yet another is. The controlling contractor must coordinate these activities so all subcontractors are aware of all hazards prior to entry.
- The new standard also requires continuous atmospheric monitoring whenever possible. There are stimulations to the standard that does not require continues monitoring by ensuring conditions have not changed but they only apply to Non-Permit Required Confined Spaces.
- The new standard allows for the suspension of a Permit instead of cancellation in the event of changes from the entry conditions list on the permit or an unexpected event requiring evacuation of the PRCS. The space must be returned to condition stated on the permit needed for safe entry before workers are allowed entry.

The majority of confined spaces we as subcontractors encounter are not PRCS, but prior to entering any area defined as a confined space it must be surveyed by a competent person and document. Additionally, the Owner/Owner’s Representative and/or Controlling Contractor/General Contractor must be consulted to coordinate the entry and provide known hazard information. Essentially, to prove a confined space does not require a permit no atmospheric or physical hazards must be present during entry.

All employers must train their employees on the hazards of PRCS if one exists on a work site and regardless of whether the employer will be performing any work in that PRCS. Workers need to be trained never to enter a PRCS that has been identified with signage.

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