ACCESSING SAFETY KNOWLEDGE (ASK) SHEET:  
CONFINED SPACE ENTRY IN CONSTRUCTION

OSHA recently issued a new regulatory standard on Confined Space Entry exclusively for the construction industry. These new standards will be enforced starting October 2, 2015. In addition, employers must be in compliance with the training requirements of this new standard or the previous General Industry standard, if applicable to your operations.

As a reminder a confined space is:

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

The new Construction Confined Space Entry Standard differs with original General Industry standard in five 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 forced air ventilation and atmospheric monitoring while the entrant is inside the space. There are some rare instances within the new standard that does not require continuous forced air and air monitoring. This condition can exist by ensuring the only potential hazard is atmospheric, no hazard is present, conditions have not changed and the space has been de-classified to Non-Permit Required Confined Space. In typical constructions settings, most confined spaces will be permit required.

- The new standard allows an issued Confined Space Permit to be SUSPENDED instead of being CANCELLED in the event there are changes in the entry conditions listed on the permit or if there is an unexpected event that requires temporary evacuation of the PRCS. When returning to the space, the conditions inside the space must be the same as or return to the safe conditions originally stated on the permit in order for safe entry to continue and before workers are allowed to re-enter.

Prior to entering any area defined as a confined space, it must be properly surveyed and atmospherically tested by a “Competent Person” knowledgeable about confined space entry, inherent hazards, and the requirements of this new standard to determine how the space will be classified as either a non-permit or permit required confined space. All hazards must be removed and all atmospheric testing, hazard controls including continuous air monitoring and forced air ventilation must be documented.

Additionally, the Facility Owner/Owner’s Representative and/or Controlling/General Contractor must be consulted to coordinate the entry and disclose all information concerning known or newly discovered hazards. An "Alternate Entry" which is a non-permit space, may be used by the employer providing the confined space does not contain any physical hazards that could harm or prevent an Entrant from self-rescue and the only potential hazard is a hazardous atmosphere that is present or can reasonably be expected to develop at any time before or during entry and the air can be controlled by continuous forced air ventilation and continuous atmospheric monitoring while the Entrant is inside the space.

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.