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Construction Confined Spaces

Subpart AA – 1926.1200

Presented by Bryan Thais, INSafe Safety Consultant

Friday, March 04, 2016

Objectives

- What are confined spaces and permit required confined spaces
- General requirements
- Understand the exchange of information required between multiple contractors
- Differences between construction and general industry standard

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Important Dates

- 2007 --- Proposed Rule
- May, 2015 --- Final Rule published
- Effective --- August 2015
- Indiana --- February 4, 2016

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Confined Space

- Large enough for an employee to enter
- Has limited means of entry and exit
- Is not intended or designed for continuous human occupancy

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Permit Required Confined Space

- Contains or has the potential to contain a hazardous atmosphere
- Potential for engulfing an entrant
- Internal configuration with inward converging walls or floors sloping downward and tapers
- Contains any serious safety or health hazard

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Examples of Confined Spaces

- Manholes
- Sewers
- Lift stations



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Examples of Confined Spaces

- Tanks
- Vaults
- Ducts



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Examples of Confined Spaces

- Silos
- Pits
- HVAC units/ducts



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Examples of Confined Spaces

- Attics



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Examples of Confined Spaces

- Crawl spaces



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Standard covers both permit and non-permit spaces

- Exceptions:
 - 1926 subpart P – Excavations
 - 1926 subpart S – Underground
 - 1926 subpart Y – Diving



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General Requirements

- Competent person identifies all confined spaces on the job
- Inform employees of identified permit spaces by posting danger signs



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General Requirements

- Inform employee representatives and controlling contractor
- Take effective measures to prevent employees from unauthorized entry
- If entry is necessary – develop and implement a written permit space program

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Confined Space Program

- Identification and evaluation of hazards in a space
- Measures to prevent unauthorized entry
- Means, procedures, or practices needed for safe entry

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Confined Space Program

- Acceptable entry conditions
- How physical hazards will be isolated
- How control of atmospheric hazards will be accomplished
- Verification procedures

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Confined Space Program

- Equipment to be used
- Permits and the permitting process
- Duties of entrants, attendees, and supervisors
- Rescue plans and procedures

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Important

- Failure to decide is an implicit decision to allow employees to enter the space if they are working in proximity
- Only the presence of a hazard in a confined space will trigger the majority of procedures required by the final rule.

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Conditions for Alternate Procedures

- Physical hazards eliminated or isolated
- Atmospheric hazards controlled by forced air ventilation and safe exit provided



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Conditions for Alternate Procedures

- Employer develops monitoring data to support requirements
- If entry has to be made to obtain data – it is compliance with entire standard
- Data is documented and available to employees

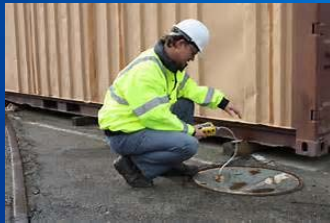
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Safe Alternate Entry criteria

- Conditions made safe prior to removing entrance cover and entrance openings guarded
- Atmosphere tested with direct reading instrument prior to entry



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Safe Alternate Entry criteria

- Monitoring equipment must have an alarm
- Atmosphere continuously monitored or periodic monitoring sufficient



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Safe Alternate Entry criteria

- Continuous forced air ventilation is used
- No hazardous atmosphere permitted



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Safe Alternate Entry criteria

- If hazard detected – leave space, evaluate space, eliminate hazard prior to entry
- Safe means for entry and exit of space
- Written certification that space is safe and pre-entry measures or criteria been done



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Meeting alternative safe entry conditions eliminates the following

- Written program requirements
- Permitting process
- Entry permit
- Duties of authorized entrants, attendants, and supervisors
- Rescue and emergency services

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Reclassification

Permit space to non-permit space:

- Poses no atmospheric hazard
- All hazards within space are eliminated
- Documentation/Certification that all hazards eliminated
- If hazard arises – exit and reclassify

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Training

- Provided to all employees who enter permit spaces
- In a language they understand and at no cost
- Before assigned duties and when there is a change in duties

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Training

- Deviation from permit process or inadequacies in an employees knowledge
- Changes in operations not previously trained
- Training must establish proficiency
- Training records must be kept

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Communication and coordination

Host employer – employer who owns or manages the property

Controlling contractor – employer who has overall responsibility for construction at the worksite

Entry employer – employer whose employees enter a permit space

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Host employer

Must provide to controlling contractor prior to entry:

- Location of each known permit space
- Hazards of the permit space
- Precautions previously implemented by any employer to protect from hazards

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Controlling employer

Prior to entry:

- Obtain information and previous entry operations from host employer
- Provide to other employers
 - a) information obtained from host employer
 - b) any information it has about the space
 - c) previous precautions implemented prior to entry

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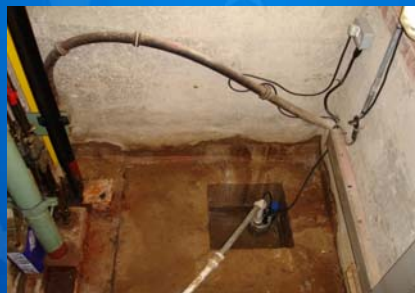
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Controlling employer

After entry:

- Debrief each entry employer on hazards confronted or created during entry
- Apprise host employer of the information exchanged



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Entry employer

Prior to entry:

- Obtain information about space and entry operations from controlling employers
- Inform controlling employer of permit space program and of the hazards likely to be encountered or created while in the space

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Entry employer

After entry:

- Inform controlling employer of the permit space program followed and of any hazards confronted or created while in the space



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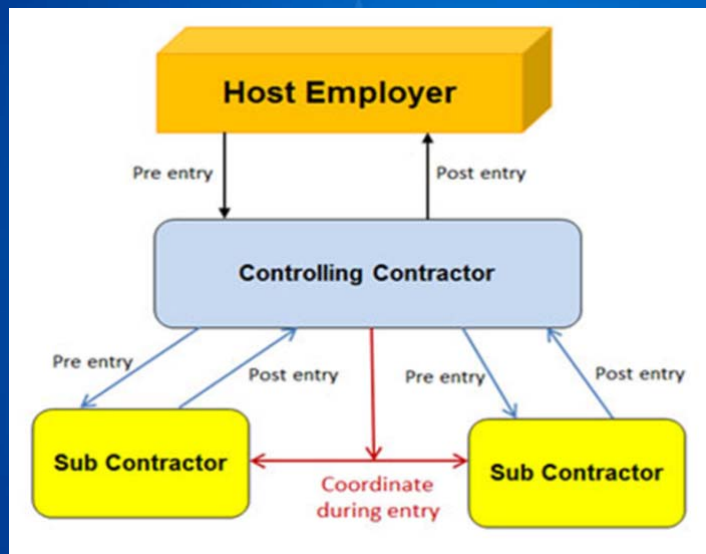
Controlling and Entry Employer(s)

Must coordinate entry operations:

- More than one entity will be entering space at the same time
- Entry performed at same time as other activities which could result in a hazard within space

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Differences

- Communication/coordination activities with multiple employers
- Competent person to evaluate site
- Continuous monitoring of atmospheric hazards and of engulfment hazards
- Suspension of a permit instead of cancellation

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Differences

- Advanced notice to employer by rescue services when not available
- Training in a language employees understand
- Isolation / elimination of hazard

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Summary

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- General requirements
- Understand the exchange of information required between multiple contractors
- Differences between construction and general industry standard

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Helpful Links and Resources

- www.osha.gov/confinedspaces/
- www.osha.gov/Publications/OSHA3825.pdf
- www.osha.gov/FedReg_osha_pdf/FED20150504.pdf
- www.osha.gov/confinedspaces/1926_subpart_aa.pdf

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Questions ?

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Indiana Department of Labor – INSafe

Phone: 317-232-2688

Fax: 317-233-3790

Website: www.in.gov/dol/insafe.htm

E-mail: insafe@dol.in.gov

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INSafe Safety Consultant
Phone: 812-888-4054
Website: www.in.gov/dol/insafe.htm
E-mail: bthais@dol.in.gov

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