

Myth: Confined Spaces

The OSHA standard requires you to prepare a written inventory of permit-required confined spaces. 1910.146(c)(1) The employer shall evaluate the workplace to determine if any spaces are permit-required confined spaces. 1910.146(c)(2) If the workplace contains permit spaces, the employer shall 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 spaces.

The standard requires that permit-required confined spaces be labeled or posted. 1910.146(c)(2) If the workplace contains permit spaces, the employer shall 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 spaces.

The atmosphere in a confined space can change in the blink of an eye. This is not true. For example, the oxygen content in a space won't be 20.8 percent one minute and 0 percent the next.

A confined space with an oxygen level of 19.5 percent is "safe" for entry. A confined space with an atmosphere that contains less than 19.5 percent oxygen may be immediately dangerous to life or health (IDLH).

A confined space with an atmosphere greater than 10 percent LFL cannot be entered. OSHA's directorate of compliance programs, stated that "the permit-required confined spaces standard (29 CFR 1910.146) does not prohibit working in a permit-required space where the atmosphere is above 10 percent of the LFL.

A concentration of atmospheric contaminants in excess of the OSHA PEL makes a confined space a permit-required space. For a "hazardous atmosphere" to exist, the substance of interest must be one that poses acute health effects or that might impede an entrant's ability to escape in an emergency.

The mere possibility that a "hazardous atmosphere" may exist in a confined space makes that space a permit-required space. This is not always true. The confined space supervisor must first determine the condition of the confined space as well as the piping running to or through it.

Confined space instruments should be calibrated in accordance with the manufacturer's recommendations. This is quite often abused. Without checking the instrument prior to each use, there is no way to ensure that it is responding properly.

Instrument manufacturers wouldn't sell instruments that don't do what they say they will. Be careful what you pay for. No all instruments work for confined spaces.

It's OK to remove SCBA cylinders from your back to get through small manholes. The minute a user removes the cylinder to pass it through a narrow manway, the NIOSH certification is voided, and a violation of 29 CFR 1910.134(d)(1)(ii) exists.

Slip, trip and fall hazards that may exist in a confined space make that space a permit-required space. Slips, trips and fall hazards can make a space a permit required space. This needs to be evaluated on a case by case basis.

Showing employees videotapes or letting them use interactive computer or Web-based instruction meets OSHA's requirements for confined space training. This is a very common approach out there in the workplace. Of course, the real answer is a combination of classroom training and hands-on training in the field at a real confined space. This can involve videotapes and interactive computers.

Have you ever heard this one? We didn't get cited by OSHA, so our program must be OK. Need I explain this one!!!

Questions? Contact The Redstone Group at 617-763-5034 x7007 or jwilliams@redstonegrp.com