

Manager/Supervisor Risk Management

#141– 4/9/13

A twice weekly e-mail training for YCPARMIA members

TOPIC: SAFETY – CONFINED SPACE – ENTRY PERMITS

As indicated in the last topic, when an employer has a confined space that has aggravating characteristics that makes it potentially more dangerous, then the State requires additional protections. The written program must develop a “permit” process where the employer restricts access to the confined space to specified individuals under specific circumstances and safeguards. Occasionally there are internal disputes over whether a particular confined space should be characterized as a confined space, or a permit required confined space with higher safety standards. As a practical matter, for the safety of the employees, there are seldom reasons not to treat every confined space as permit-required.

The required permit process is, in effect, formalized procedures and records that are designed to make entry much safer. A designated entry supervisor must authorize the entry (by an employee or contractor) by signing the written permit, and then cancel the entry permit when the process is completed – records of the permit and entry must then be retained for a full year. At a minimum, the process is designed to make sure that people know that the person is in the space, that there is help present if needed, and that nothing is done to endanger the person while inside. It is important to note that the required attendants are prohibited from entering the space to conduct a rescue.

Cal/OSHA requires that the employer program have:

- A written confined space plan that identifies and marks all confined spaces;
- Procedures to test and monitor the air inside confined spaces before and during entry;
- Procedures to prevent unauthorized entry, and have an attendant present during entry;
- Controls of all hazards inside the confined space;
- Training for all involved in the procedures, hazards, and rescue procedures; and
- Effective rescue procedures immediately available at the site.

The State requires, among other things, that the written permit:

- Identifies the space, and the purpose of the entry;
- The date and duration of the entry, and a list of the individuals authorized to enter;
- Names of the entry supervisor and required attendants that are not entering the confined space;
- A list of the hazards and the measures to control them, along with any required equipment; and
- The emergency/rescue services available and the means to contact them.

Hands-on training at the particular space with the required equipment, and designated rescue services is essential -- an emergency situation is not a good time to work out the bugs. The rescue services can be provided by staff, but they must have the proper ongoing entry training, equipment, and practice simulated rescues at least once a year. Outside rescue services must be given a list of the hazards (as should local emergency medical providers), and access to the site to plan and practice.

Next Topic: Safety – Ergonomics