

Manager/Supervisor Risk Management

#140– 4/4/13

A twice weekly e-mail training for YCPARMIA members

TOPIC: SAFETY – CONFINED SPACE

In February of 2012 Cal/OSHA launched a statewide special emphasis initiative that focused attention on death and injuries in confined spaces. The initiative included increase enforcement efforts to ensure all employers have adequate confined space programs and training. If any of your entity's workplaces have confined spaces you must have a program, and related training. Again, this program would be supplemental to the entity's IIPP.

Cal/OSHA defines a confined space as:

- Large enough and configured for a person to enter to perform assigned work.
- Limited or restricted in the way of entry or exit, and
- Not designed for continuous occupancy.

All three elements must be present for it to be a confined space.

A permit-required confined space is one that a worker cannot enter without a written permit from the appropriate supervisor. Examples might include, but are not limited to, water and sewer pipes, an excavation, silos, vaults, tunnels, fuel tanks, and pits. In addition to the three elements above, a permit-required" confined space has one or more of these additional characteristics:

- Contains or has a potential to contain a hazardous atmosphere;
- Contains a material that has the potential for engulfing an entrant;
- A cross section configuration that could trap or asphyxiate a worker; or
- (The subjective catch all) contains any other recognized serious safety or health hazard.

Cal/OSHA requires that the employer find and identify all of their spaces that are permit-required confined spaces. For confined spaces all employers must have:

- A written confined space plan, including identifying and marking all confined spaces;
- Procedures to test and monitor the air inside confined spaces before and during entry;
- Procedures to prevent unauthorized entries with an attendant monitor during entry;
- Effective controls of all existing atmospheric or safety hazards inside the confined space;
- Employees and supervisor training on safe work, hazard controls, and rescue procedures; and
- Effective rescue procedures that are immediately available on site.

YCPARMIA, thankfully, has had very few confined space injuries, and they have been minor. As a practical matter not all employees are comfortable entering confined spaces, and in the past some have shared their concerns regarding the adequacy of their entity's protocols and training. If not addressed, it is only another short step for them to go anonymously to Cal/OSHA; with the "special emphasis program" for enforcing confined space regulations, a State inspection will all most certainly follow.

Next Topic: Safety – Confined Space – Entry Permits