

Permit Required Confined Space: You Can't Just Call 911!

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Last May, OSHA released it's long awaited Permit Required Confined Space Standard specifically for construction. 29 CFR 1926 Subpart AA specifically applies to construction work however, it excludes excavations (Subpart P), underground construction (Subpart S) and Diving (Subpart Y).

The General Industry Standard, 29 CFR 1910.146 did not address construction work, leaving contractors without any real guidance. The new standard is geared specifically towards construction work and includes mechanisms for contractors to safely perform the work.

Included in both standards are requirements for a rescue team for work that involves entry into a Permit Required Confined Space:

19.26.1204(i)

Develop and implement procedures for summoning rescue and emergency services (including procedures for summoning emergency assistance in the event of a failed nonentry rescue), for rescuing entrants from permit spaces, for providing necessary emergency services to rescued employees, and for preventing unauthorized personnel from attempting a rescue;

This part of the standard has been misunderstood and a point of confusion for those performing permit entries outside of a controlled facility. Many contractors unwittingly believe that they can rely on a local fire department to act as a rescue team and simply write "Call 911" for rescue procedures on their Entry Permit. This mistake could prove to be deadly.

The fact is, most fire departments and first aid squads are not equipped or trained to perform confined space rescue. In addition, their response time would not be sufficient for work performed within a permit space where the conditions are Immediately Dangerous to Life and Health (IDLH).

To fully understand the requirements, you will need to review all parts of Subpart AA, specifically section 1926.1211, Rescue and Emergency Services. This section provides details about what is required for the rescue team. It is important to remember that each situation may require something different.

First and foremost you must evaluate the hazards that may be contained within the space to ensure that the rescue team/service...Has the capability to reach the victim(s) within a time frame that is appropriate for the permit space hazard(s) identified...This will determine if you must have a rescue team/service on site. Again, for IDLH conditions such as oxygen deficiency, the rescue team will need to be onsite AND standing by ready to enter the space. Most local fire departments will not provide this service, or will give other emergencies (such as a fire) that occur at the same time, preference. For these situations, you will probably need to retain the services of a qualified rescue contractor or train your own employees.



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Once you have evaluated and fully understand the hazards, then you can begin to evaluate, and choose your rescue team/service. In addition to being able to respond in a timely manner, you will need to make sure that the Rescue Service/Team...Is equipped for, and proficient in, performing the needed rescue services.

In other words, they will need to be trained and provided with the proper equipment. The training must be the same that was provide to Authorized Entrants and will include, at a minimum, information about the hazards to be faced during entry. The team must also perform simulated rescue drills on the actual space or a similar representative space at least once every 12 months. IN addition, you must ensure that at least one member of the rescue team who holds a certification in first aid and CPR is available.

Non-entry rescue, using a tripod or similar retrieval device, is preferred (and required)... unless the retrieval equipment would increase the overall risk or entry or would not contribute to the rescue of an entrant. Remember, a retrieval device can only be relied upon for rescue for vertical entry where there are not obstructions. Where non-entry rescue is used, you must ensure that rescue services are available to respond in the event that non-entry efforts fail.

Where non-entry rescue is used, all entrants must wear a full body harness attached to a retrieval line. The retrieval line must be attached to a mechanical device or fixed point outside the permit space. A mechanical devices, such as a tripod with a hand operated winch, is required for vertical entry of 5 feet or deeper

In many cases you will likely use a retrieval device to aid in rescue operation and it should be set prior to any entry. In summary, you will need to do the following:

1. Determine if the spaces to be entered are "Permit Spaces." Note that you may want to establish rescue procedures for Non-Permit Entry as well. This may be as simple as establishing communication with local emergency medical services (EMS) and ensuring that they can be effectively contacted and reach your site.
2. Once you have determined that you are going to perform a Permit Entry, evaluate the hazards to be faced by the entrants.
3. Determine if non-entry rescue will be sufficient. If it is, ensure that rescue services and EMS will be available in the event that non-entry rescue fails.
4. Evaluate the resources that are available to you. You may find that your internal staff will have the skills and experience to perform rescue work. Call the local fire department to determine what, if any role, they might play in rescue efforts. This may be limited to providing you with support. You may also look into using a contractor that specializes in permit space rescue.
5. Provide the necessary training and equipment that is required to perform rescue operations. The training must include a simulated drill and a review of all the hazards that will be faced by entrants. The equipment that you will need shall depend on the hazards associated with the entry. This may include self contained breaking apparatus, ventilation equipment, additional lifelines, a back board and other first aid equipment.
6. Develop a written plan for entry work that includes rescue procedures. The plan should be reviewed by all members of the entry and rescue teams and approved by the Entry Supervisor.

No matter what type of work you are performing, it's important to be prepared for an emergency. For more information about this topic, go to www.osha.gov/confinedspaces/, or call your insurance broker's risk control department.

About the Author

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