

OSHA Confined Space G.I. vs. Construction

EEI Occupational Safety & Health Committee
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Confined Spaces in Construction

- 1926.1200-Proposed Rule
 - ✓ November 28, 2007
 - ✓ Comments due February 28, 2008
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Construction Definition

Work for construction, alteration and or repair, including painting and decorating

OSHA ASSUMPTIONS

- "Unlike most general industry worksites, construction worksites are continually evolving, with the number and characteristics of confined spaces changing as work progresses."
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OSHA Assumptions

"...the general industry standard does not apply to construction employers, and, as such, does not specify the appropriate level of employee protection based on the hazards created by construction activities performed in confined spaces."

OSHA Assumptions

"...the general industry standard did not meet the needs of the construction industry because it did not provide adequate information to contractors for distinguishing among the different types of confined spaces, or to determine the appropriate level of employee protection based on the hazards resulting from construction activities performed in confined spaces."

Construction vs. General Industry

Work for construction, alteration and or repair, including painting and decorating

- Exceptions
 - ✓ Subpart Y
 - ✓ Subpart P
 - ✓ Subpart S
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1926.1200-Proposed

One space, same outage, same maintenance crew.....

Two different entry programs

1910.146-Permit Confined Space

- Permit confined space
 - Non-Permit confined space
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1926.1200-Proposed

- **Continuous System-Permit-Required Confined Space**
- **Permit-Required Confined Space**
- **Controlled-Atmosphere Confined Space**
- **Isolated-Hazard Confined Space**

Each confined space must be classified if hazards present in or near the space

1926.1200-Proposed

- Terms Defined Different Than 1910.146
 - ✓ Emergency
 - ✓ Engulfment
 - ✓ Hazardous atmosphere
 - ✓ IDLH
 - ✓ Isolate or isolation
 - ✓ Permit-Required confined space
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1926.1200-Proposed

IDLH-A condition that occurs when an employee is exposed to a **physical** or atmospheric hazard that could result in any one of the following effects:

- An immediate threat to life
 - Irreversible adverse health effects
 - Serious physical harm
 - Impaired ability to escape unaided
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1910.146 Confined Space

IDLH-Any condition that poses an immediate or delayed threat to life or that would cause irreversible adverse health effects or that would interfere with an individual's ability to escape unaided from a permit space

1910.120-HAZWOPER

IDLH-An atmospheric concentration of any toxic, corrosive or asphyxiant substance that poses an immediate threat to life or would cause irreversible or delayed adverse health effects or would interfere with an individual's ability to escape from a dangerous atmosphere.

NIOSH-Pocket Guide to Chemical Hazards

NIOSH Respirator Selection Guide defines IDLH as conditions that pose an immediate threat to life or health, or conditions that pose an immediate threat of severe exposure to contaminants, such as radioactive materials, which are likely to have adverse cumulative or delayed effects on health.

1926.1200-Proposed New Definitions

Barrier	Physical Hazard
CS-PRCS	Planned Conditions
Contractor	Protect/Protection
C-ACS	Rescue
Controlling Contractor	Rescue Service
Early Warning System	Safe Level
Entry	Serious Physical Harm
Entry Rescue	SP-RCS
Host Employer	Standard
Limited/Restricted	Test/Testing
Monitor/Monitoring	Unplanned Condition
OSHA Requirement	Ventilate/Ventilation

1926.1200

- Not necessary for entry in G.I. facilities
 - Too prescriptive
 - Confusing and overly burdensome if applied to G.I. employers doing construction work
 - Increases owner liability
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Participate in the Process!

- Owe it to your employer
 - Bad regulations do not add job security
 - Educate OSHA-they do not understand our industry
 - Comment on good and bad
 - Final rule....too late to start
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Participate-continued

- Participation enhances your knowledge of industry practice
 - EEI cannot represent us without our support
 - Agency contacts
 - Maintain institutional knowledge of the inner workings of OSHA within the EEI membership
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