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RESOURCES

Cal/OSHA Confined Space Regulations
Cal/OSHA Confined Space Guide for General Industry
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Confined Space: Identification

by Sarah Bruno, ARM

Entering a confined space can be a dangerous task, but often cannot be avoided to perform necessary work. Confined spaces may be encountered in virtually any facility. An important first step is to identify each confined space within an agency to ensure the proper safety precautions are taken when an employee must enter. Despite the name, a confined space is not necessarily small.

A confined space is a space that has all three of the following characteristics:

1. Is large enough that an employee can enter and perform assigned work; and
2. Has limited or restricted means for entry or exit (either the opening itself is small or hard to access — for example, requires a ladder); and
3. Is not designed for continuous employee occupancy. This means the design of the space did not take into consideration that humans would be entering and did not provide for human occupancy (such as inadequate ventilation, lighting, and space).

Some common examples of a confined space include crawl spaces, tanks, water or sewer pipes, and those spaces entered via a manhole (underground utility vault).

Once all the confined spaces have been identified, the next step is to determine which have hazards that make them permit-required confined spaces (PRCS). A PRCS fits the definition of a confined space discussed above and has one or more of the following characteristics:

- Contains or has a potential to contain a hazardous atmosphere, examples include oxygen-deficient environments or the presence of toxic or flammable gasses.
- Contains a material that has the potential for engulfing or burying an entrant, such as water or loose granular materials such as sand.
- Has inwardly converging walls or a floor that slopes downward and tapers to a smaller area (similar to a funnel – see photo below) which could trap or asphyxiate (suffocate) an entrant.
- Contains any other recognized serious safety or health hazard (e.g., unguarded machinery, exposed live wires, or high temperature).

It is important to distinguish between the two types of confined spaces because they have different requirements for safe entry. More information on the regulatory requirements for confined spaces can be found in CCR Title 8, Article 108.

Before beginning confined space work, employers should consider if it is possible to complete the task from outside the confined space and avoid entering. Consider devices or equipment that might allow the work to be done from the outside. After this consideration, occasional worker entry may be deemed necessary for maintenance, inspection, repairs, or similar tasks that cannot be accomplished from the outside.

In order to prevent potential worker injuries and death, training is essential. It should include the recognition of what constitutes a confined space and the hazards that may be encountered in them.

Agencies are encouraged to take inventory of agency facilities for any confined spaces that may exist. Maintain a list of confined space locations and their specific hazards on file, including the determination if they are a PRCS or not. Identifying them as such and taking the necessary precautions is an important first step in employee safety.

For questions or additional information regarding confined spaces, please contact the PRISM Risk Control Department.