



SAFETY SERVICES
COMPANY

WHITEPAPER

New OSHA Training Requirements for Confined Spaces



Many workplaces contain spaces considered “confined” because their configurations hinder the activities of employees who must enter, work in and exit them.

A confined space by definition has limited or restricted means for entry or exit, and it is not designed for continuous employee occupancy. Examples of confined spaces include underground vaults, tanks, storage bins, manholes, pits, silos, process vessels, and pipelines.

In addition to standard confined spaces, OSHA uses the term “permit-required confined space” to describe a confined space that has one or more of the following characteristics: contains or has the potential to contain a hazardous atmosphere; contains a material that has the potential to engulf an entrant; has walls that converge inward or floors that slope downward and taper into a smaller area, which could trap or asphyxiate an entrant; or contains any other recognized safety or health hazard such as unguarded machinery, exposed live wires, or heat stress.

Emergency Training Procedures

Nationwide there are a combined 6 million workplaces with confined spaces. To limit incidents of injury and death OSHA has instituted a strict policy dealing with confined spaces. Through this policy, OSHA requires implementing standard emergency procedure training for entrants, attendants, and supervisors.

Plant management is required to have fully trained rescue teams ready to respond to any situation. Other requirements include identifying hazards in confined spaces, defining your workplace-confined spaces and setting up a permit policy. In addition to the increase of workplace injury by not having a policy in place, a citation for non-compliance carries penalties of \$70,000 per occurrence, and it is expected that numerous fines will be imposed on businesses committing serious violations.



Your Specific Confined Spaces Requirement

The Final Rule for Permit-Required Confined Spaces was published in the Federal Register on January 14, 1993, and became effective on April 15, 1993. This standard (29 CFR1910.146) was based on years of gathering information on confined space fatalities and testimony about the hazards of confined spaces from all sectors of industry and labor. Because it applies to all of general industry, a performance-oriented standard was developed rather than a specification standard.

OSHA notes, by their very nature and configuration, many permit spaces contain atmospheres that, “unless adequate precautions are taken, are immediately dangerous to life and health (IDLH)”. For example, many confined spaces are poorly ventilated – a condition that creates an oxygen-deficient atmosphere and allows the accumulation of toxic gases.

It is your obligation as an employer to evaluate your workplace to determine if any spaces are permit-required confined spaces.

Permit Required Confined Spaces

You must first determine whether a space is a confined space. If it is a confined space, then you must determine if it is a permit-required confined space. Next, if it is a permit-required confined space, then you must determine whether full permit entry rules apply or less restrictive alternative entry rules apply.

If you determine your employees will enter permit-required confined spaces, then you must develop a written confined space entry program and training plan. This program/plan needs to be available for inspection by employees and their authorized union representatives.

How to Plan

The following are some aspects the program/plan must include:

- Measures to prevent unauthorized entry
- Identification and evaluation of the hazards of permit spaces
- Equipment needed to perform a safe entry operation
- Procedures for atmospheric testing of the space
- Provision of at least one attendant outside the space
- Provision for responding to emergencies
- Designation of all persons with active roles and provision of required training
- Procedures for summoning rescue and emergency services
- System for the preparation, issuance, use and cancellation of entry permits
- Procedures to coordinate operation where more than one employer is involved
- Procedure for evaluation and correction of entry operations when the employer has reason to believe that the program is not sufficiently protective
- The mechanism by which the confined space permit entry program is reviewed

Prevent Injuries and Increase Productivity

While the blow of a workplace injury cripples many companies, safety training programs are proven to drastically reduce the risk of injury and increase workplace productivity.

Through independent studies, OSHA has confirmed employers who have in place a safety and health training program experience a 52% lower rate of "injury with days away" than employers without a program. [2]

A second study of private industry employers by OSHA found even more benefits to a safety training program.

Here are a few highlights of those programs:

Company Benefits: [3]

- Average sales rose 7.5%
- Manufacturing defects and waste dropped from \$2.7 million in 2001 to \$435,000 in 2005
- Improved decision-making
- EMR dropped by 45%



NIOSH Findings

The value of training is further emphasized by a study of 41 workers hospitalized for hand injuries. Through the survey of these employees conducted by members of National Institute for Occupational Safety and Health (NIOSH), it was discovered more than half had no on-the-job training for the equipment that caused their injury.

Workplaces that establish safety and health management systems can reduce their injury and illness costs by 20 to 40%, according to OSHA.

Studies not only show the impact safety training has in increasing productivity and preventing injury. It shows the value training has to prevent casualties. [4]

A NIOSH study of 55 confined workplace fatalities found that only three of those losing their lives ever received training on the proper workplace safety procedures.

A study of the California insurance industry also revealed that every dollar invested in safety training resulted in \$3 or more dollars in savings.

Safety training is not a cost, it is an investment.

There is a Better Solution

Meeting these regulations is a tedious process requiring you to either to develop a training program yourself or to outsource with expensive safety consultants.

There is a better solution.

Here at Safety Services we have developed a “Do-It-Yourself” training program that is both simple to administer and fulfills all your OSHA requirements.

This innovative kit features an Interactive Training Program, Student’s Handbook, Instructor’s Handbook, OSHA Regulations, Student Tests, Training Logs, Fall Protection Checklist, Certificates, Wallet Cards and More.

Topics addressed:

- OSHA requirements
- Safety manuals
- Safety decals and information
- Personal Protective Equipment (PPE)
- Inspections
- Start-up requirements
- Operation guidelines
- Common hazards and how to avoid them
- Maneuvering requirements
- Maintenance requirements
- And much more



Three Simple Steps to Certification

Our kit is a simple three (3) step solution that brings all your employees into compliance.

1. Classroom/online training – The first step of our program is an intuitive electronic training session. Furthermore, through the program, employees navigate an electronic training program at a computer and then take an test that is graded automatically in real-time.
2. Field training – The second part of training is in the field. During this portion of the session, your appointed trainer shows the trainee the infield applications of the materials they learned in the classroom session.
3. Evaluation – The third step to the training session is evaluation. Through this step, the trainer evaluates the trainee and either signs off on certification or retouches on topics that need more work. Above all, certification through the program meets or exceeds OSHA requirements.

In addition to meeting training requirements, the kit provides instruction on how to craft your confined spaces written policy. If you are not comfortable writing your own policy we can provide the service for an additional fee.

To learn how we can solve your company's confined space safety training and compliance needs, check out our products and services here or call us at (866) 329-5407 today.



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This publication does not itself alter or determine compliance responsibilities, in other words, OSHA sets standards themselves and the Occupational Safety and Health Act. Moreover, because interpretations and enforcement policy may change over time, for additional guidance on OSHA compliance requirements, the reader should consult current and administrative interpretations and decisions by the Occupational Safety and Health Review Commission and the Courts.

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