



What You Need to Know About OSHA's Confined Space Standards

The confined space standards for both general industry and the construction industry place great emphasis on safety training.

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The Occupational Safety and Health Administration has published a general industry standard and a construction industry standard for engaging in confined space work. You must know the differences between these standards, the defined roles for confined space workers, and requirements for confined space training.

OSHA's confined space standard for general industry workers (29 CFR 1910.146) and its more recent confined space standard for the construction industry¹ (26 CFR 1926 Subpart AA) aim to protect workers who enter confined spaces. Confined spaces are some of the most dangerous areas for an employee to be working in due to limited or restricted entry and exit points. As such, it is critical you follow OSHA's confined space standards to keep your workers safe.

We've put together this helpful resource to help you comply with these regulations and mitigate or eliminate the risks of an incident when your employees are working in or around a confined space. You'll learn the differences between OSHA's two standards, the circumstances in which each are applicable, and software tools for confined space training.²

What Are the Differences Between OSHA's Confined Spaces General Industry and Construction Standards?

OSHA's construction standard contains many of the same requirements outlined in the general industry standard, which has protected workers for nearly two decades. However, there are a few key differences between these two standards that you should be aware of.

Requirements for Multi-Employer Work Sites

In the construction industry, it's extremely unlikely that only a single employer will be

operating at a building site, especially throughout more complex projects. As a result, OSHA's confined space standard for the construction industry includes detailed provisions for when there are multiple employers, contractors, and subcontractors at a work site that will need to enter the same confined space.

The burden of ensuring compliance with the construction standard falls on the site's host employer, which must ensure all parties are following OSHA regulations. Ultimately, though, it's in everyone's best interest to comply, as both contractors and the host employer can be cited for confined space violations under OSHA's multi-employer citation policy (CPL 2-0.124), which states the following:

"On multi-employer worksites, more than one employer may be citable for a hazardous condition that violates an OSHA standard."

Four Defined Roles for Confined Space Workers

You also should be aware that OSHA's construction standard defines four roles for employees involved in working in permit-required confined spaces.

These roles are:

- Authorized entrants to the space. These are any employees who are authorized by the employer to enter a permit space and perform the work. Entrants will be trained in all the safe procedures for working in confined spaces, including the proper use of personal protective equipment (PPE) and how to monitor the air quality while inside a confined space. Because communication is so important between entry team members, entrants also will be trained to use communication equipment such as walkie-talkies to stay in touch with attendants.
- Attendants. These are employees that are designated to continuously maintain an accurate count of all authorized entrants in the permit space. An attendant's job is to stay by the entrance and monitor what goes on both inside and outside the space. Attendants must make quick, informed decisions about whether it's safe for the entry to continue or whether the work should be stopped and the entrants should be evacuated.
- The entry supervisor. Before any worker enters a permit space, the entry supervisor must certify that all of the required safety tests have been made and that all needed required procedures and equipment are in place. The supervisor also will make certain rescue services are standing by and that the systems used to contact them are working, too. When satisfied, the supervisor will sign off on the confined space's entry permit, and the work can proceed. Entry supervisors also will monitor the progress of the work in the space to ensure that it proceeds within the guidelines established by the permit.
- Emergency and rescue personnel. These personnel are responsible to assist in evacuating the confined space in the event of an emergency. Employees who conduct

rescues must be provided with proper PPE and rescue equipment while also being trained in the proficient use of that equipment. Employers must inform each rescue team of the hazards they may confront when called to perform a rescue. You also must provide the rescue team access to all permit spaces in which rescue may be necessary so that the team can develop appropriate rescue plans and practice rescue operations.

It's critical that you designate which employees are assigned these roles. If no employee is clearly designated as an authorized entrant, OSHA will consider this an implicit decision to allow *any* employees to enter the confined space if they are working near it. Regardless of whether any unauthorized employees actually enter the confined space, a failure to designate authorized entrants is a violation of the construction standard and will result in hefty OSHA fines and citations.

Which Confined Space Standard Should You Follow?

Whether you need to follow OSHA's confined space standard for general industry or construction depends on whether the work that needs to be done in the confined space could be classified as maintenance or a construction activity.

If maintenance is being performed, you need to follow OSHA's general industry standard. If any construction activity needs to be conducted in the space, you need to follow OSHA's construction standard. It might seem simple, but keep in mind that you may actually need to comply with *both* standards, depending on the tasks at hand.

If you're not sure what standard to follow, OSHA has released several letters of interpretation³ (LOI) that should help. In these letters, the agency defines maintenance as:

"Keeping equipment or a structure in proper condition through routine, scheduled or anticipated measures without having to significantly alter the structure or equipment in the process. For equipment, this generally means keeping the equipment working properly by taking steps to prevent its failure or degradation."

Construction activities, on the other hand, should be defined as "work for construction, alteration, and/or repair, including painting and decorating." The agency also clarifies that construction work is not limited to new construction, but can include the repair of existing facilities or the replacement of structures and their components.

For example, the replacement of one utility pole with a new, identical pole would be maintenance; however, if it were replaced with an improved pole or equipment, it would be considered construction.

It's important to evaluate your work carefully so that you understand what standards and requirements you'll need to follow for a project.

What are OSHA's Confined Space Training Requirements?

Confined space standards for both general industry and the construction industry place great emphasis on safety training.

Involved employees performing each entry role described above have specific safety training requirements based on potential hazards in the confined space and the tasks they'll be carrying out. These requirements also determine when individuals assigned to a certain role must receive training.

For example, employees who are designated as part of the search and rescue team have to be trained as authorized entrants as well as performing rescue duties. This means that each employee in the emergency and rescue team must be trained in basic first aid and cardiopulmonary resuscitation (CPR). At least one member of the rescue team needs to have an active certification in basic first aid and CPR.

The standard also requires the rescue team to practice performing confined space rescues before attempting an actual rescue. This type of training needs to reoccur on an annual basis (once every 12 months) by performing simulated rescue operations in a replicated confined space.

It's important for the rescue team to perform practice rescues and for all employees to maintain training compliance. In a study⁴ conducted in 2017 by the National Institute for Occupational Safety and Health, rescuers were shown to account for approximately 60 percent of confined space fatalities. The study also found that only 15 percent of *all* employees involved in a confined space incident had received confined space training.

How Can You Provide Proper Confined Space Training?

Though training is critically important for worker safety, it's no secret that scheduling and coordinating it can be difficult, time-consuming, and can even delay work.

You can streamline the safety training process by using online training management systems to schedule and track their employee training. The latter is particularly important, as both OSHA's general industry and construction standards require organizations to maintain detailed training records. You'll need to be able to easily provide an OSHA compliance officer with training records in the event that your business is subject to an OSHA inspection.

It may be beneficial to also consider online training content for easy training delivery. Full-length online courses have been found to be effective for safety training while minimizing overhead costs.

Online safety training courses also can contain mid-point quizzes and learning checks to improve employee engagement and verify that learners have the knowledge they need

to work safely in confined spaces.

In the event of a lack of oxygen, workers only have four minutes to escape a confined space. When workers know the safety training basics, the time it takes to return to a safe area is dramatically reduced, which could potentially save lives.

References

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