

## **WEEKLY SAFETY TOPICS**

# STEAM TUNNEL SAFETY CONFINED SPACE



#### STEAM TUNNELS ARE CONFINED SPACES

Recent OSHA interpretation has moved to consider tunnels with limited exits as confined spaces. Limited access can mean things like by way of a ladder, through a small opening, or a distance over 150 feet. It is difficult to define the entire system as a confined space, and it is equally difficult to identify specific areas or passages as confined spaces. Furthermore, and more importantly, normal confined space entry procedures are both impractical and do little to protect the health and safety of employees entering the steam tunnel system.

Reclassifying the tunnel system with alternate entry procedures provides a structure and procedural safeguards to protect the UCR employees working in these areas.

### **Tunnels are not necessarily Permit-Required Confined Spaces**

#### Protocols for maintaining the steam tunnel system as a non-permit entry space.

- 1. The tunnels are a controlled access work area. Only trained and authorized persons may enter.
- 2. Communication is required. All entrants must check-in and out every time (even for breaks) with the Central Plant control room on radio channel "Central Plant A" or by telephone at (951) 827-4678. If you are not going to exit when planned, call again to update.
- 3. The tunnels shall not be used for general passage as a short-cut. Tunnel entry is only for inspection, maintenance, and repair of tunnel systems and equipment only.
- 4. All tasks to be performed in the tunnels must follow an existing standard procedure or a job hazard analysis (JHA) must be completed before the work is scheduled. EH&S can assist supervisors with JHA and procedure development.
- 5. There must be an exit plan. If working near a vault set up a ladder and open the vault to provide a quick exit route. Make sure to barricade the opening on the topside.
- 6. Check out a 4-gas meter from Central Plant . This will provide a warning if the oxygen level dips or another contaminant is present. If the meter alarms exit immediately.
- 7. If hazards arise during an entry (a steam leak occurs, disturbed asbestos, excessive water pools on the floor, gas leaks, etc.):
  - All employees must immediately leave the tunnel
  - Contact a supervisor to review and evaluate what the hazardous situation is and how it developed, and
  - <u>Implement controls necessary</u> to protect employees from the hazardous atmosphere before any subsequent entry takes place. IF hazard can not be controlled a permit-entry will need to take place.
  - Contact EH&S for assistance in determining the hazards and developing appropriate controls.