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## Confined Spaces – A Primer

Confined spaces exist at many, if not most, of the facilities we occupy, and their management encompasses multiple OSHA standards. There are two OSHA regulations that specifically govern confined spaces along with superseding requirements in other OSHA standards. Consequently, reaching out for guidance in specific situations may be needed. Here we are going to cover just the basics:

**Q: What is a confined space?**

A: A confined space is a physical space that has the following characteristics:

- Limited or restricted means for entry or exit (e.g. small door or hatch or small opening, low ceiling height, etc.)
- Large enough for a person to enter and do work (whole body entry not just an arm or head)
- Not designed for continuous human occupancy (space conditioned?)

**Q: Where are confined spaces found?**

A: Typical confined spaces at our sites include but are not limited to HVAC system fan, filter and return units; HVAC ducts; interstitial ceiling spaces; utility chases; raised floors; vaults; manholes; tanks, crawl spaces and attics.

**Q: How are confined spaces regulated?**

A: OSHA confined space regulations apply if a confined space also has one or more of the following characteristics:

- Contains or has the potential to contain a hazardous atmosphere (toxic or flammable)
- Has the potential for engulfment or entrapment (flowable solids such as wood dust or sloping walls/floors found in dust collector cyclones)
- Contains a mechanical hazard (e.g. fan blades)
- Contains any other recognized safety or health hazard (e.g. fall hazard, configuration that impedes self-rescue, work on an energized circuit, fire from welding or soldering, encounter with wild animals, etc.)

OSHA-regulated confined spaces are called Permit Required Confined Spaces (PRCS). Completion of a WRITTEN PERMIT prior to entry is required by the regulations. Outside contractors are often engaged to perform entry into such spaces. Don't assume that the regulatory obligations fall only upon the contractor.- Most times, the location has the regulatory burden as well.

Basic OSHA compliance entails the following:

- Identify and inventory the confined spaces at your site
- Determine the status of each confined space: PRCS or non-PRCS (just a confined space without a hazard)
- Label the confined spaces with their status
- Prepare a written safe entry procedure that includes rescue for each PRCS
- Complete a PRCS Permit for each entry documenting adherence to the entry procedure

For help with your confined space program, please contact David Templeman @ [david.templeman@cbs.com](mailto:david.templeman@cbs.com).

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If you would like more details, please contact David Templeman at [david.templeman@cbs.com](mailto:david.templeman@cbs.com).