



## Confined Space Procedures

Have you ever thought about how much time it takes to get something done in a confined space? There is a lot to do. You must organize equipment, supplies and personnel. Setting up safeguards and completing the paperwork. It all takes time, and as they say, “time is money”. Good procedures and systems are there to reduce time and therefore save money. In other words, procedures and systems, if done properly, create a competitive advantage. However more often than not, Confined Space Procedures lie forgotten on some shelf, or they are abbreviated to suit our memory or time constraints.

Confined spaces need a variety of procedures. For instance:

- Roles and Responsibilities - outlines the duties of senior management, supervisory staff, workers and contractors when working in a confined space;
- Space Requirements - summarizes the space specific hazard controls and rescue equipment that are necessary for the task(s);
- Operating Instructions - details the steps the reader must complete to set up, turn on/off or operate the piece of equipment or system that they are using; and
- Forms & Form Completion - Instructions directing what data goes in what blank in each form (eg. Permits) used for confined spaces.

For many companies, they rely on one Procedure that contains much of the above information. Unfortunately, often it is generic in scope and does not help the personnel when working in the space. In addition these documents usually do not have all the information needed. In the book, “What’s the Secret to Providing World Class Customer Service”, John DiJulius provides guidance on developing procedures. He argues the need for procedures to contain a clear outcome along with 4 performance categories. These categories he calls Non-negotiable Standards - those items that have to be done every time NO MATTER WHAT. The 2<sup>nd</sup> would outline the employee’s Expected Level of Performance. The 3<sup>rd</sup> category would describe Potential Deficiencies that might occur while performing the task. This section would then also provide guidance on how to rectify the issue. The 4<sup>th</sup> category would describe what would be recognized as the employee going Above and Beyond.

### Roles and Responsibilities

This document outlines the duties of senior management, supervisory staff, workers and contractors when working in a confined space. It creates job tasks and names positions to carry out these duties with regard to the organization’s Confined Space Program. You will have duties outlined for each of the roles of the Entry Team, Rescue personnel, Senior Management person assigned the overall responsibility of confined spaces, the supervisors involved, contractors as well as the Joint Health and Safety Committee/Health and Safety Coordinator. Properly defined, each of these functions contribute to an efficient Confined Space Program. The roles and responsibilities document could also include the correct sequence of steps to follow when preparing for and working in a confined space.

## Space Requirements

Each space needs a document that summarizes the hazard controls and/or rescue equipment and systems available to the worker. This document at best, is a generic checklist (form) of items or systems (eg. specific monitors, ventilators, lockout systems) available and used on site. Once the hazard identification process is complete for a space, the form would be adjusted and completed to indicate what is needed based on the task. This enables you to make the protective controls even more specific to the hazards found. A task specific document can improve decisions by reducing improvisation or freelancing the control selection process that can occur with generic procedures. This type of document also standardizes expertise levels which can eliminate mistakes caused by inexperience.

## Operating Instructions

Operating instructions fall into two categories - equipment instructions and systems instructions. Many confined space protective controls involve both types. For instance gas monitors have documents from the manufacturer telling you how to operate the device (eg. turning it off/on, bump test, etc.). In addition, there is the sampling methodology or testing instructions you follow to find the substance you are looking for. Both are necessary and must be available to the user. We recommend a binder containing documents that merge both tool and system instructions together. The set of combination instructions would then become not only a handy field reference but also your training manual.

## Forms and Form Completion Instructions

The fourth set of procedures needed are the Completion Instructions for the forms used in your confined space program (eg. Permit or Space Requirements Form). How often is there a blank on a form but you have no guidance as to what goes in the blanks. Yes, your confined space course may include form completion instruction but, how often does the user complete the form after training? Forgetfulness causes many form completion deficiencies. Another issue is that the training may be incomplete. For instance, on a Permit, do you enter the worst of two numbers from the atmospheric pre-entry testing done or do you enter the average of all the readings taken for the substance? Written completion instructions provide a handy reminder for personnel on how to complete your forms.

In summary, there are significant documentation efforts required by this low frequency, high risk work. Because there are few opportunities to utilize these skills, it is necessary to invest time writing out the details that provides floor/field people critical information when they need it. To ensure your personnel use the documents, they must be "reader friendly". In other words, they must be well written, properly sequential and complete. So, with your documentation outlining the most safe and efficient way of doing things, you will minimize waste and injuries which in turn reduces costs. By all accounts, a win-win situation.