



## Managing Confined Spaces

Many companies spend a great deal of time discussing what is a confined space. To be frank, many of those “discussions” are because the worker feels at risk because of isolation and management is attempting to control expenses. Both issues are valid and must be addressed. No sense spending too much on worker safety if it puts you out of business, nor does it make sense to spend a fortune on legal bills and fines because we took short cuts.

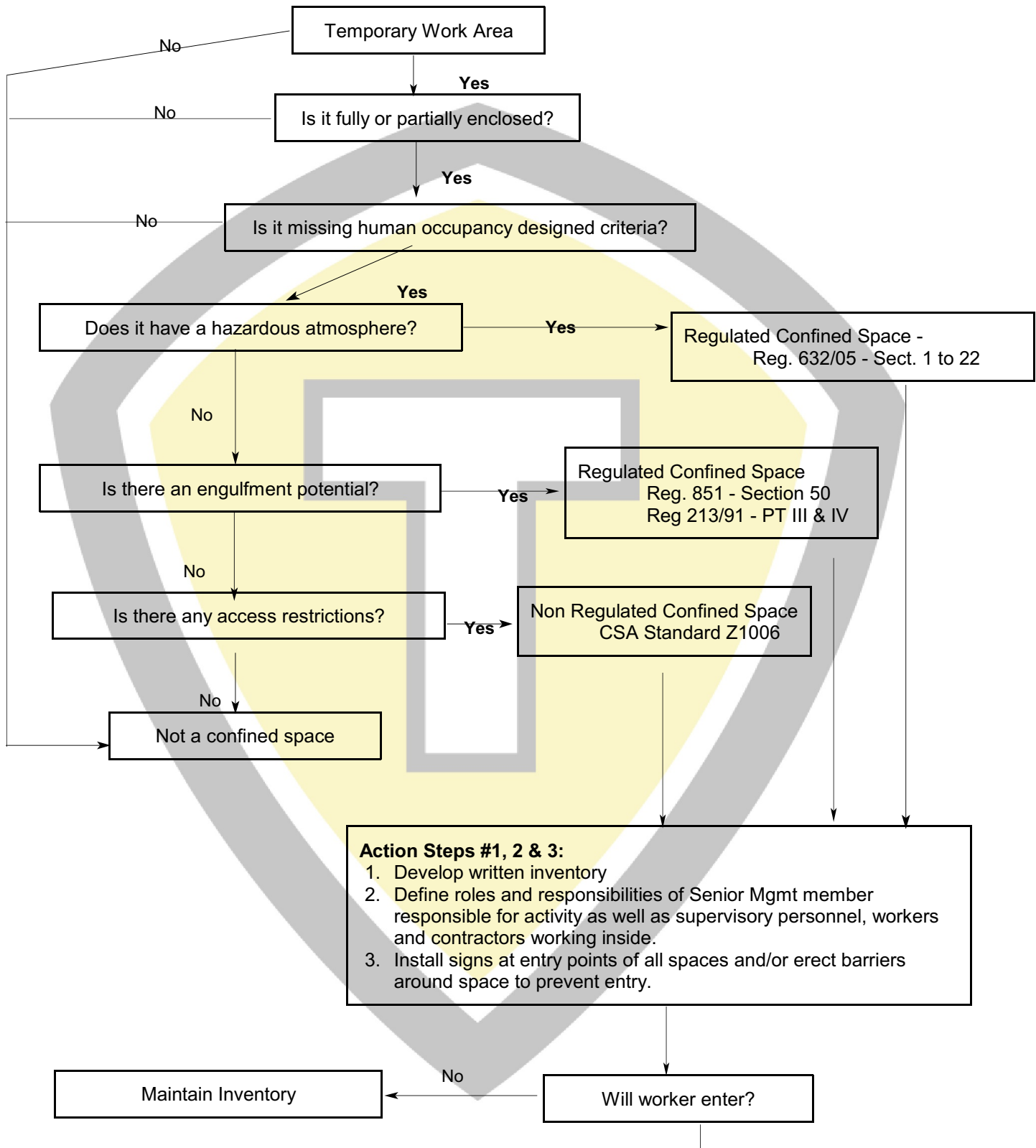
The Ontario Confined Space Regulations as well as the Canadian Standards Association (CSA) Z1006 Standard - *Managing Work in Confined Spaces* provide direction and guidance on how to enter a confined space safely. The problem is that it is not always clear how each document will work with the other. Especially when on page 4 of the Confined Spaces Guideline published by the Ministry of Labour that compliance with CSA Z1006 is **not required**, but “it is up to the workplace to decide if (best practices in) the standard would assist with compliance ....” Ironic, considering page #14 of the Guideline states “Note that even if a space might not be a confined space under the Confined Space Regulations, the employer must take every precaution reasonable in the circumstances to protect workers entering the space as required under clause 25(2)(h) of the OHSA”.

So, ensuring that all “reasonable precautions are taken” is not always an easy decision. A court case involving Metron Construction in 2012 showed that the company had taken hap-hazard steps in creating a safety program, but the actions were not complete nor consistently applied. To help you avoid a similar situation, this Info Sheet contains a flowchart that outline 16 actions that each document in it’s own way ask of management. We have ordered and grouped the various actions sequentially to help make compliance easier. We have broken down Action Steps 4, 5, & 6 into points to again provide clarity. Many of the Action Steps in the flowchart refer you to another Info Sheet to provide more answers. We have tried to include as many tips and ideas in this and the other documents as possible. Our website’s FAQ page and Blog may provide additional information.

Now back to the Metron Construction prosecution. We have provided the information and some checklists. The ball is now in your court to IMPLEMENT (the tough part). Implementation fails because we can’t afford to buy gear, get training or find the time. You will have to prioritize. I understand that not always will the priorities chosen today make sense in a court of law tomorrow. No matter, start working on your program. To help, here is more information. Your budget (for a simple system) will run about \$15,000 to \$20,000 to purchase gear with a further \$5,000.00 to \$15,000 for 3<sup>rd</sup> party training. Developing the written documentation (including meetings) will take about 400 to 600 hours. Ongoing costs will run about \$5,000 for maintenance and at least 100 to 200 man hours in review meetings. In short, this may be the most expensive and time consuming safety program you ever undertake. However, this low frequency task is extremely high risk and your efforts could save a life. Your call.

The fine print. Please understand, this document and all our information does have it’s limitations. It doesn’t provide every answer, and some ideas exceed what the legislation requires. Above all, ensure that if the legislation dictates a certain responsibility or requirement, you complete that action.

# Management of Confined Spaces



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Yes

**Action Step #4:**

- a. Competent Person to identify hazards (Info Sheet #5)
- b. Define allowable exposure levels (eg. regulatory, standards or best practices)
- c. Measure hazard exposure levels to determine type of confined space

Confined Space with hazards associated with limited access or egress

Confined space with hazards that present a risk that requires controls other than for atmospheric hazards

Confined Space with atmospheric hazards alone or in combination with other hazards

Hazards could only cause Non Critical Injures (Info Sheet #9)

Hazards could cause Critical Injures (Info Sheet #9)

**Action Step #5a:**

- a. Establish written work procedures including but not limited to:
  - i) safe entry and exit
  - ii) two way communication
  - iii) person check with log (Info Sheet #8)
  - iv) rescue/retrieval plan
- b. Develop appropriate forms and documents as required
- c. Identify & acquire the protective equipment needed to carry out work procedures

**Action Step #5d:**

- a. Establish written work procedures including but not limited to:
  - i) safe entry and exit
  - ii) two way communication
  - iii) Attendant at the entry point with permit (Info Sheet #8)
  - iv) controls to mitigate hazards identified
  - v) atmospheric monitoring
  - vi) rescue/retrieval plan
- b. Develop appropriate forms and documents as required
- c. Identify & acquire the protective equipment needed to carry out work procedures

**Action Step #5b:**

- a. Establish written work procedures including but not limited to:
  - i) safe entry and exit
  - ii) two way communication
  - iii) person check with log (Info Sheet #8)
  - iv) controls to mitigate hazards identified
  - v) rescue/retrieval plan
- b. Develop appropriate forms and documents as required
- c. Identify & acquire the protective equipment needed to carry out work procedures

**Action Step #5c:**

- a. Establish written work procedures including but not limited to:
  - i) safe entry and exit
  - ii) two way communication
  - iii) Attendant at the entry point with permit (Info Sheet #8)
  - iv) controls to mitigate hazards identified
  - v) rescue/retrieval plan
- b. Develop appropriate forms and documents as required
- c. Identify & acquire the protective equipment needed to carry out work procedures

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**Action Step #6:**

- a. Determine what Entry and Rescue Personnel skills, Fitness to Work criteria and other developmental issues are needed.
- b. Develop training program(s) to cover (Info Sheet #11):
  - i) what is a confined space
  - ii) roles and responsibilities (who does what when)
  - iii) the work procedures developed
  - iv) how to use or operate the protective equipment/gear needed
  - v) how to complete the documentation needed for the job
  - vi) how to remove an injured person properly from the space
- c. Deliver training program

Prior to entry are there any changes in the environment or the work to be performed inside of or in proximity to the confined space from the original hazard identification?

No

Proceed with work as per the procedures developed.

Yes

**Action Step #7 & 8:**

7. Competent Person to identify hazards due to changes in environment or work activities that are planned to be performed **and** develop and implement any additional controls to mitigate any new hazards found in or around the space.
8. Set up required protective and rescue equipment at the entry point.

Complete the task in the space.

**Action Step #9 to 16:**

9. Audit task/paperwork to ensure work procedures are being followed as well as that the protective and emergency response equipment are there as required (Info Sheet #12).
10. Conduct periodic assessment of peoples' skills and conduct semi annually rescue practices.
11. After task ensure protective and emergency response equipment are clean, work as required and stored properly.
12. Maintain equipment (eg. monitors, fall arrest devices and respirators) as required and keep a log of all activities.(Info Sheet #14)
13. Maintain file for all completed documents (time duration is usually determined by the AHJ).
14. Review inventory, assessments, procedures, work fitness records and training as changes occur, enhancement opportunities are found or at regular intervals of no more than 3 years.
15. Conduct retraining sessions at least every 3 years.
16. Improve your system as required.