



OSHA

DIRECTORATE OF CONSTRUCTION

Confined Space Standards Side-by-Side Comparison Chart



General Industry vs. Construction Industry

This table examines what regulations your company would be required to follow if:

(1) OSHA adopted the current 1910 Confined Space standard as is and applied it to Construction

OR

(2) OSHA adopted the draft Confined Spaces in Construction standard.

Scenario

Scenario: *A Host employer hires a General Contractor to supervise construction work in one section of a sewer system. Some subcontractors will be doing manhole and box work while at the same time your company will be responsible for the installation of taps.*

Hazard Assessment

General Industry Standard

- *No “how to” guides for hazard assessment or information on what to look for in the space*
- Evaluate the workplace to determine if spaces are permit-required using:
 - Hazard assessment
 - Knowledge from the host
 - Treating all spaces as a PRCS
- Result → a sewer meets the definition of a confined space & testing must be done to decide if a permit is required

Construction Industry (Draft)

- *Explicit procedures to follow in deciding whether confined spaces are present & what hazards exist*
- Result → Sewer is classified as a confined space & the atmospheric and engulfment hazards in the sewer are identified

Classify the Space & Develop a Plan

General Industry Standard

- *Space is assumed to be a permit required space*
- Develop and implement a written permit space program
- Result → Space is permit-required; create a written program

Construction Industry - Draft

- *No assumptions about space classification*
- Based on hazards, information from personal evaluation & Controlling employer, evaluate the space & classify it
- Result → Space is a Continuous System – PRCS

Information Exchange & Coordination

General Industry Standard

- Host must inform contractor of:
 1. permit spaces on the worksite
 2. Host's precautions/procedures
 3. Debrief contractor at end of entry ops.
- Contractor must:
 1. Obtain available information from host
 2. Inform host of contractor's confined space program & hazards confronted /created
- *Host must coordinate entry operations ONLY between their employees and sub's*
- Result → Potential confined space operations by Host; information shared only between Host and contractor

Construction Industry (Draft)

- Controlling employer provides ONLY information they possession, including:
 1. Known hazards
 2. Known classifications
 3. Previous precautions & procedures taken by Controlling employer
- Contractor briefs Controlling employer at conclusion of entry ops
- *GC coordinates confined space activity between ALL subs*
- *No requirement for GC to enter a space or evaluate it*
- Result → Information shared between Controlling & Subs; no req. for controlling to enter space

Types of Confined Spaces

General Industry Standard

Permit Spaces

1. Permit Space
2. "Special" Permit Space
3. Continuous System Space

Non-Permit Spaces

1. Non-Permit Space

Construction Industry (Draft)

Permit Spaces

1. Permit Required Confined Space
2. Continuous System – Permit Required CS

Non-Permit Spaces

1. Controlled Atmosphere CS
2. Isolated Hazard CS

Reclassifying the Space

General Industry Standard

- *Decide whether space can be reclassified through hazardous atmosphere controls*

1. If yes, classify as a “special” permit space
2. If no, continue applying permit requirements unless you can isolate all hazards

- Result → The sewer exposes employees to potential engulfment hazards from water/waste. Cannot classify space as “special” permit

Construction Industry (Draft)

- *Space is classified after initial hazard assessment*

- *Result → No need; space was previously classified*

Permit Space Requirements

General Industry Standard

- Post danger signs & prevent unauthorized entrants
- Identify/evaluate hazards before entry
- *Continuous monitoring of section of a continuous system in which employees work*
- Result → Continuously monitor that portion of the sewer where your employees operate

Construction Industry (Draft)

- Post danger signs, prevent unauthorized entry
- Identify/evaluate hazards before entry
- *Continuous monitoring of section of a continuous system in which employees work*
- *Continuous monitoring for non-isolated engulfment hazards using early warning device*
- Result → protect employees from atmospheric & engulfment hazards

Employee ID & Training

General Industry Standard

- Identify and train attendants, entrants, and supervisors
- Result → train those employees who will hold these positions

Construction Industry (Draft)

- Identify, train and coordinate attendants, entrants and supervisors
- Result → train those employees who will hold these positions

Rescue Provisions

General Industry Standard

- Task specific standard
- Evaluate rescue services for:
 1. Ability to respond to summons in a timely manner and;
 2. Ability, in terms of proficiency w/rescue related tasks & equipment, to function appropriately
- Provide rescue service w/access to all permit spaces where rescue service may be necessary
- Result → Need for extensive evaluations (potentially on-site) to ensure services are properly equipped & trained

Construction Industry (Draft)

- Performance oriented standard
- Ensure that rescue services:
 1. Can respond to summons in a timely manner and;
 2. Have access to PRCS work is in (simulated sites will also be allowed)
- Result → No requirement for providing 3rd party rescue service with equipment and no req. to evaluate them for "appropriate functions"

Annual Review

General Industry Standard

- Review entry program once a year

Construction Industry (Draft)

- Review entry program once a year

Documentation

General Industry Standard

- Ensure proper entry permit documentation
- *No specific time period for document retention in standard*
- *Employer must maintain a written program*
- *Result → Maintain entry permits for 1 year & written program*

Construction Industry (Draft)

- Ensure proper entry permit documentation
- Verification documents are kept only as confined space work is ongoing
- *Employer may maintain a copy of this standard OR a written program*
- *Result → Maintain entry permits for 1 year and copy of standard for length of confined space work*

Employee Participation

General Industry Standard

- *Affected employees must be consulted on ALL aspects of development & implementation of permit program*
- *No specific requirement to post entry permits*
- Result → Every employee or rep must be consulted before program will be OSHA compliant

Construction Industry (Draft)

- Employees who enter a confined space must be given opportunity to observe inspections & atmospheric testing / monitoring
- *Must post entry permit at worksite*
- *Focus employee participation on hazards that directly affect them*
- Result → no duty to consult employee on all matters