



Ensuring Compliance: Building an Effective Confined Space Program

M-H2

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27th California Unified Program
Annual Training Conference
March 24-27, 2025

Outline

- What is a confined space?
- What are the hazards of confined space?
- Where do we fail as companies?
- Where do we fail as instructors?
- What can we do to improve?

What is Confined Space?

- **Confined space means a space that a space is:**
 - Large enough and so configured that an employee can bodily enter and perform assigned work; and
 - Has limited or restricted means for entry or exit (for example, tanks, vessels, silos, storage bins, hoppers, vaults, and pits are spaces that may have limited means of entry.); and
 - Is not designed for continuous employee occupancy.



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Permit Required Confined Space

- Permit-required confined space (permit space) means a confined space that has one or more of the following characteristics:



Contains or has the potential to contain a hazardous atmosphere;
Contains a material that has the potential to engulf an entrant;
Has an internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls or by a floor that slopes downward and tapers to a smaller cross-section; or
Contains any other recognized serious safety or health hazard.

Common hazards of confined spaces?

- Hazardous Atmospheres
- Flammable Atmospheres
- Physical Hazards
- Improper LOTO
- Hot-Work



Where do we fail as companies?

- Improper/Inadequate training for employees
- Not identifying confined spaces properly (or at all)
- Not enough supplies or equipment (or none at all)
- No follow-up after training

Where do we fail as instructors?

- Improper training
- Inadequate training
- Classroom-only presentation
- Lack of hands-on specific training

What can we do to improve?

- As a company
 - Improve the company's confined space program
 - General and Site Specific
 - Ensure adequate and quality training
 - Perform hands-on evaluations, and additional training specific to the current confined spaced on-site.
 - Correctly identify and classify confined space inventory

Common Mistakes

- Companies tend not to classify their confined spaces correctly or try to reclassify their spaces without proper information.
- Misclassification of a confined space can establish false pretenses to the workers and potentially expose them to unknown hazards



How to Become More Interactive!

- One of the most hazardous aspects of a confined space is the atmosphere. Most individuals do not understand how an air monitor works or how to interpret the data.
- Training
 - Include hands-on exercises
 - Air monitoring



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How to Become More Interactive!

- Fall protection/Retrieval systems:
 - Set up and tear down the tripod, davit arm, winch/pulley, and/or rescue ropes
 - Demonstrate how to properly fit the harness to the user
 - Proper harness inspections and failure criteria



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Rescue & Emergency Procedures

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Rescue Services

- One of the most overlooked aspects, and a major contributor of loss of life is working within a PRCS without rescue services.
- Many companies have an inadequate rescue plan or no plan at all.
- Companies are in the mindset that they can rely on the fire department for rescue. We will cover more later.

Rescue Services

- The employer shall ensure that at least one standby person is at the site and is trained and immediately available to perform rescue and emergency services
- This person needs to hold a current certification in First Aid / CPR
- Non-entry rescue is the preferred method of rescue

Rescue Services

- A rescue plan must be in place and everyone needs to understand what to do in the event of an emergency
- All work STOPS in the event of an emergency
- We cannot solely rely on 911 for rescue services
 - Q: Why not?

Why we cannot rely on 911

- Not all fire departments are confined space rescue certified
 - If you use a fire department as part of your rescue program, you need to have the direct number to that fire department and you must check in with them prior to entry into the confined space
- Response time
- By the time the fire department is ready to make entry into the space, it will most likely be a body retrieval rather than an emergency rescue

Rescue

- Have a competent rescue plan in place.
- Practice rescue simulations.
- Ensure roles and responsibilities are established and employees are competent in their roles.

Confined Space Programs and Inventory

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Confined Space Programs and Inventory

Does your company have a confined space program

- Is it specific to the confined spaces on site
- Are hazards identified
- Has historical air monitoring been tracked

Is the program general in nature or specific to the site

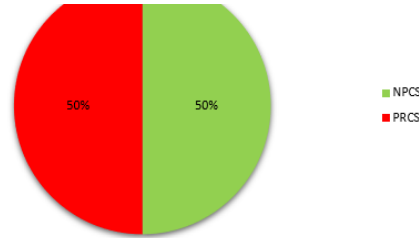
- Companies will produce a general confined space program; however, certain locations will require site-specific confined space programs.

Appropriate Inventory

Companies should maintain a confined space inventory to ensure both employees and others who may be working in the area of identified confined spaces are made aware of their presence and hazards.

Confined Space Inventory

Prior to performing work activities in a location known or suspected to be a Confined Space, employees should refer to this inventory for additional information pertaining to specific locations. The inventory will be updated as new Confined Spaces are identified, or if conditions change at an existing location.



| # | Confined Space | | Site | Results | | GPS Coordinates | |
|---|---------------------|-------------------|--------------------------|---------|-----------|-----------------|------------|
| | CS # | Type | Location | Result | Date | Latitude | Longitude |
| 1 | CS1 | Water tank | Basement | PRCS | 4/10/2024 | 38.66161 | -121.18292 |
| 2 | CS2 | Electrical Vault | North Side of Building | NPCS | 4/10/2024 | 0 | 0 |
| 3 | CS3 | Diesel Tank | 3rd Floor East Side Room | | 4/10/2024 | 0 | 0 |
| 4 | CS4 | Maintenance Cover | 123 Folsom Blvd | | 4/10/2024 | 0 | 0 |
| 5 | CS5 | | 0 | | 4/10/2024 | 0 | 0 |
| 6 | CS6 | | 0 | | 4/10/2024 | 0 | 0 |

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Confined Space Mapping

For large locations, maps can identify space locations.



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Any Questions?

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