

OSHA's PRCS Requirements



Session #1 – Application and Evaluating Spaces

Application of OSHA Standards

- 1910.146 - General Industry PRCs
- 1926.1201 - .1213 – Construction PRCs as well as General Industry Spaces when “construction work” is taking place

NOTE: Neither standard applies to Confined Spaces; they only apply to spaces that have been deemed Permit-Required Confined Spaces.

What makes a space a “Confined Space”?

A Confined Space is a space that has ALL three (3) of the following characteristics:

1. Is large enough and so configured that an employee can bodily enter it;
2. Has limited or restricted means for entry and exit; and
3. Is not designed for continuous employee occupancy.

large enough and so configured that an employee can bodily enter...

- it must be large enough and so configured that an employee can **FULLY ENTER and PERFORM WORK**
- a space that is just large enough that an employee could just barely squeeze into, but cannot perform any work does not meet this definition
- a space that is large enough that an employee can only get part of their body into, but can't fully enter, does not meet this definition

While there may be hazards associated with these types of spaces,
they are not addressed with this particular rule!!!!



Has limited or restricted means for entry and exit...

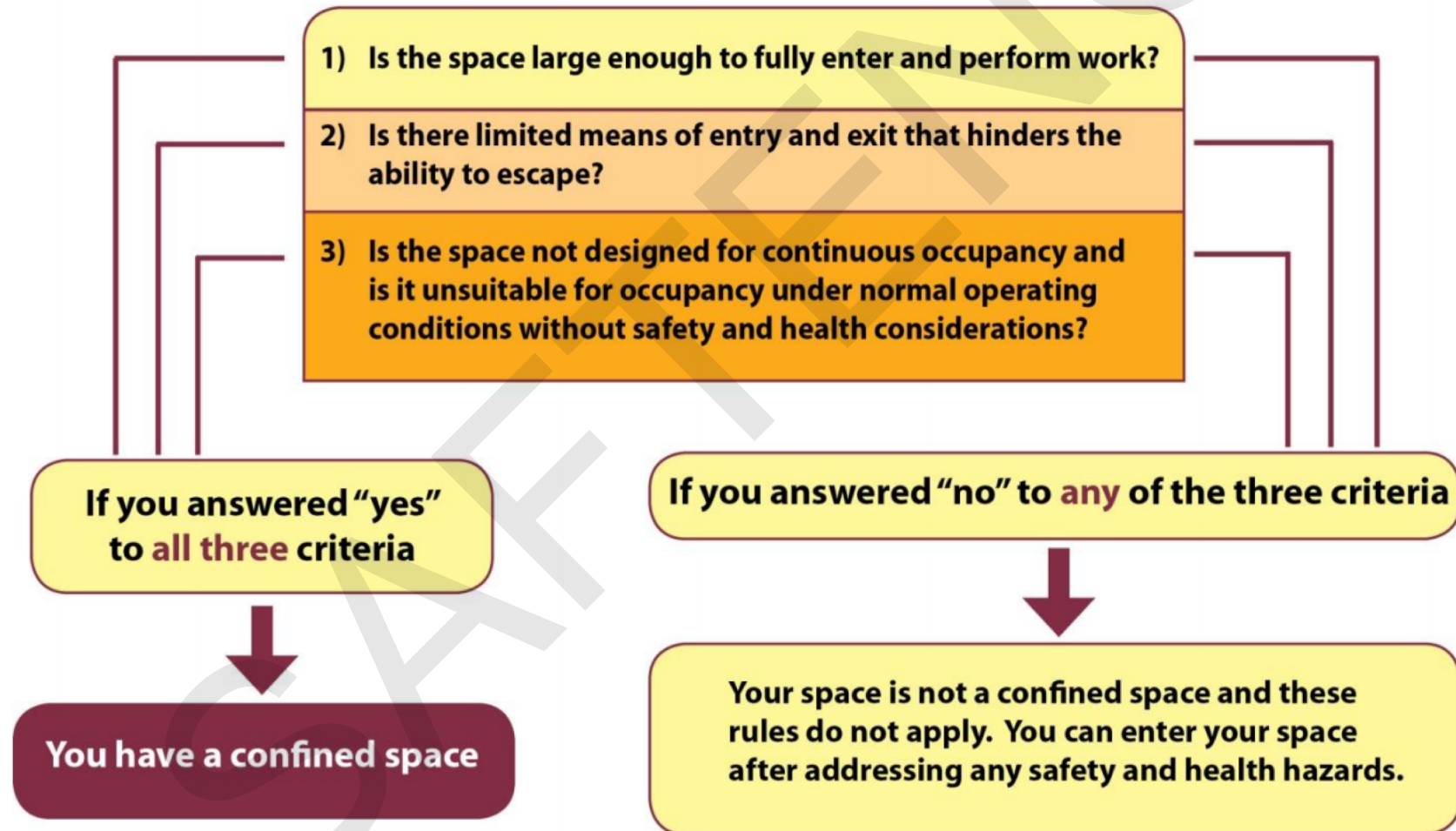
- If you must contort your body to enter a space it may be limited means of entry and exit
 - Examples of this include having to climb through a man/porthole, climb up a ladder, or crawling through a tunnel in order to exit

It is important to recognize that each space should be evaluated on a case by case basis and a limitation in one set of circumstances may not be a limitation elsewhere

not designed for continuous employee occupancy...

- A space that is designed for periodic occupancy is **NOT** the same thing as a space that is designed for continuous occupancy
 - The presence of a fixed ladder, lighting, or ventilation does **NOT** automatically mean the space is designed for CONTINUOUS occupancy
- We **MUST** look at the PRIMARY FUNCTION AND PURPOSE of the space
 - Was the space designed for an employee to be permanently assigned to perform work there or was the space designed to house and protect operating equipment that needs to be monitored or occasionally maintained?
- A space may have lighting to facilitate periodic occupancy. This lighting may be needed to safely enter and exit, read gauges or perform maintenance or repairs to equipment in the space. Similarly, ventilation may be necessary to keep equipment from overheating or provide fresh air for temporary job assignments or tasks. In both cases the work required to be performed in these spaces is intermittent or temporary in nature.

Evaluate the space to determine if you have a confined space



What makes a “Confined Space” a “Permit-Required Confined Space”?

A Permit-required confined space (PRCS) is a “confined space” that has one (1) or more of the following characteristics:

1. Contains or has a **potential** to contain a **HAZARDOUS ATM**;
2. Contains an **ENGULFMENT** hazard;
3. Has an internal **CONFIGURATION** such that an entrant could be trapped or asphyxiated by inwardly converging walls or by a floor which slopes downward and tapers to a smaller cross section; or
4. Contains any other **RECOGNIZED SERIOUS** safety or health hazard

Hazardous Atmosphere (HAZ ATM)

An atmosphere that may expose employees to the risk of **DEATH**, **INCAPACITATION**, **IMPAIRMENT** of ability to self-rescue (that is, escape unaided from a permit space), **INJURY**, or **ACUTE ILLNESS** from one (1) or more of the following causes:

1. >10% of its lower flammable limit (LFL)
2. Airborne combustible dust at a concentration > LFL
Note: This concentration may be approximated as a condition in which the combustible dust obscures vision at a distance of 5 feet (1.52 meters) or less.
3. Atmospheric oxygen concentration <19.5% or >23.5%
4. Atmospheric concentration of any substance for which a dose or a PEL could result in employee exposure in excess of its dose or PEL
Note: An atmospheric concentration of any substance that is **NOT** capable of causing death, incapacitation, impairment of ability to self-rescue, injury, or acute illness due to its health effects is **NOT** covered by this definition.
5. Any other atmospheric condition that IS IMMEDIATELY DANGEROUS TO LIFE or HEALTH (IDLH)

Engulfment Hazard

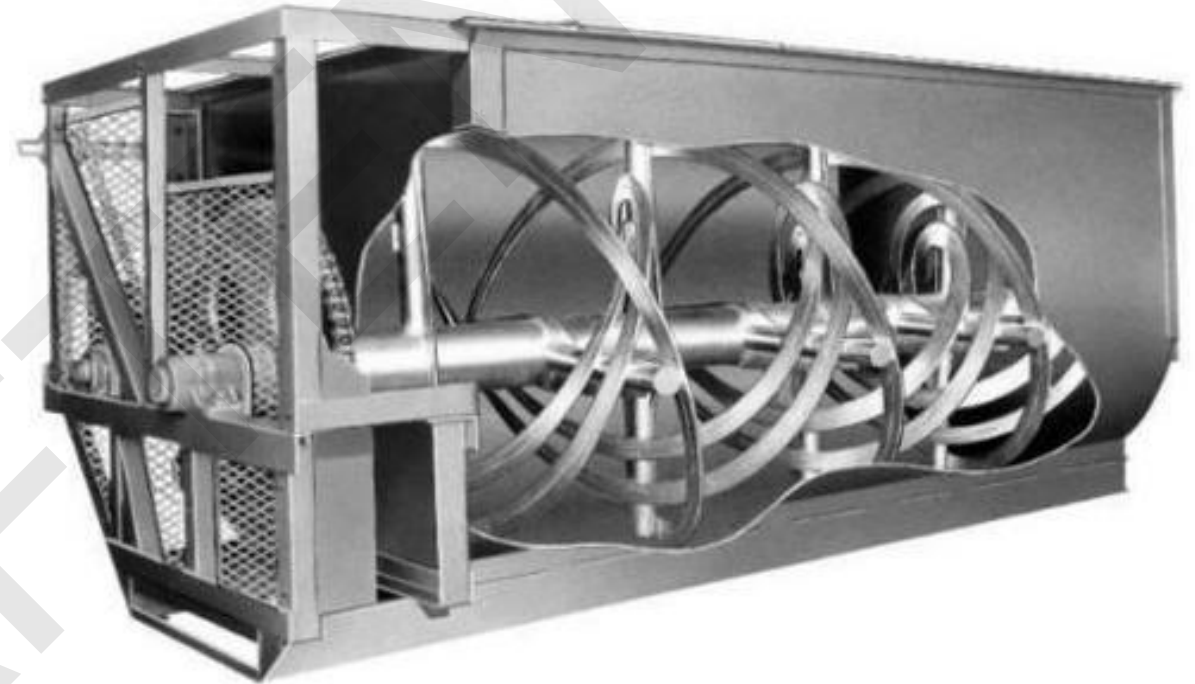
Engulfment means

*the surrounding and effective capture of a person by a **LIQUID** or **FINELY DIVIDED (FLOWABLE) SOLID SUBSTANCE** that can be aspirated to cause death by filling or plugging the respiratory system OR that can exert enough force on the body to cause death by strangulation, constriction, crushing, or suffocation.*

inwardly converging walls or by a floor which slopes downward and tapers to a smaller cross section



any other recognized serious safety or health hazard



Evaluate the CS to determine if you have a PRCs

You determined that you have a confined space.

