

# OSHA's PRCS Requirements



**Session #2 – Entering Permit-Required Confined Spaces**

# Three (3) options to enter

- Once a space has been classified as a Permit-Required Confined Space (PRCS), there are three (3) options to enter:
  1. 1910.146(c)(5) or 1926.1203(e)
  2. 1910.146(c)(7) or 1926.1203(g)
  3. 1910.146(d)-(k) or 1926.1204 - 1926.1211

# Alternate Procedures

1910.146(c)(5) or 1926.1203(e)

An employer may use “alternate procedures” **ONLY** under the following conditions...

An employer whose employees enter a permit space need NOT comply with:

- 1910.146 (d)-(f) and (h)-(k)

or

- 1926.1204 - 1206 and 1208 – 1211

provided that **ALL** of the FIVE (5) following conditions are met:

# Alternate Procedures

1910.146(c)(5) or 1926.1203(e)

1. Employer can demonstrate that ALL PHYSICAL HAZARDS in the space are ELIMINATED or ISOLATED through engineering controls so that the ONLY hazard is an actual or potential HAZARDOUS ATMOSPHERE

# Alternate Procedures

1910.146(c)(5) or 1926.1203(e)

2. Employer can demonstrate that **CONTINUOUS FORCED AIR VENTILATION** **ALONE** is sufficient to maintain the PRCs **safe for entry**, **AND** in the event the ventilation system stops working, **entrants can exit the space safely**

# Alternate Procedures

1910.146(c)(5) or 1926.1203(e)

3. Employer develops monitoring and inspection data that supports #1 and #2
4. If an **INITIAL ENTRY** of the permit space is necessary to obtain the data required by #3 above, the entry **MUST** be a “**PERMITTED ENTRY**”

# Alternate Procedures

1910.146(c)(5) or 1926.1203(e)

5. The determinations and supporting data required by #1, #2, #3 are documented **AND** are made available to each entrant or authorized representative

# Alternate Procedures

1910.146(c)(5) or 1926.1203(e)

6. Entry is performed in accordance with:
  - a. Any conditions making it unsafe to remove an entrance cover must be **ELIMINATED BEFORE** the cover is removed
  - b. When entrance covers are removed, the opening must be immediately guarded
  - c. Before entry, the internal atmosphere must be tested
    - Any entrant or authorized representative **MUST** be provided an opportunity to observe
    - No hazardous atmosphere is permitted



# Alternate Procedures

1910.146(c)(5) or 1926.1203(e)

## 6. Entry is performed in accordance with:

- d. Continuous forced air ventilation must be used, as follows:
- NO entry until the forced air ventilation has eliminated any hazardous atmosphere;
  - forced air ventilation must be so directed as to ventilate the immediate areas where entrant is or will be present within the space and must continue until all entrants have left the space
  - air supply for the forced air ventilation must be from a clean source and must not increase the hazards in the space

# Alternate Procedures

1910.146(c)(5) or 1926.1203(e)

## 6. Entry is performed in accordance with:

- e. atmosphere must be continuously monitored unless the employer can demonstrate that equipment for continuous monitoring is not commercially available or periodic monitoring is sufficient.
  - If continuous monitoring is used, the monitor has an alarm when a specified atmospheric threshold is achieved, **OR** it will be checked with sufficient frequency for adequate time to escape
  - If continuous monitoring is not used, periodic monitoring is required
  - All monitoring must ensure that the continuous forced air ventilation is preventing the accumulation of a hazardous atmosphere.

# Alternate Procedures

1910.146(c)(5) or 1926.1203(e)

## 6. Entry is performed in accordance with:

- f. If a hazard is detected during entry:
  - i. Each employee must leave the space immediately
  - ii. space must be evaluated to determine how the hazard developed; and
  - iii. employer must implement measures to protect employees from the hazard before any subsequent entry takes place

# Alternate Procedures

1910.146(c)(5) or 1926.1203(e)

## 6. Entry is performed in accordance with:

- g. employer must ensure a safe method of entering and exiting the space. If a hoisting system is used, it must be designed and manufactured for personnel hoisting
  - a job-made hoisting system is permissible if it is approved for personnel hoisting by a registered PE, in writing, prior to use
- h. employer must verify that the space is safe for entry and that the pre-entry measures have been taken, through a **WRITTEN CERTIFICATION** that contains
  1. the date,
  2. the location of the space, and
  3. the signature of the person providing the certification
    1. certification must be made available to each entrant or authorized representative.

# Reclassification

1910.146(c)(7) or 1926.1203(g)

A PRCs may **ONLY** be reclassified as a non-permit confined space when a competent person determines that ALL of the following requirements:

1. If the PRCs poses **NO** actual or potential atmospheric hazards **AND** if all hazards within the space are **ELIMINATED** or **ISOLATED** without entry into the space, the PRCs may be reclassified as a **NON-PERMIT CONFINED SPACE** for as long as the non-atmospheric hazards remain **ELIMINATED** or **ISOLATED**

# Reclassification

1910.146(c)(7) or 1926.1203(g)

2. Employer **MUST** eliminate or isolate the hazards **WITHOUT** entering the space

– If it is necessary to enter the space to eliminate or isolate hazards, such entry must be performed as a PERMITTED ENTRY

If testing and inspection during that entry demonstrate that the PHYSICAL hazards within the permit space have been **ELIMINATED** or **ISOLATED**, the PRCs may be reclassified as a non-permit confined space for as long as the hazards remain eliminated or isolated

# Reclassification

1910.146(c)(7) or 1926.1203(g)

**WARNING!!!!!!**

Control of atmospheric hazards through forced air ventilation does **NOT** constitute elimination or isolation of the hazards!

# Reclassification

1910.146(c)(7) or 1926.1203(g)

3. Employer **MUST** document the basis for determining that **ALL** PRCs hazards have been **ELIMINATED** or **ISOLATED**, through a certification that contains:
  1. the date
  2. the location of the space, and
  3. the signature of the certifying person

The certification **MUST** be made available to each entrant or authorized representative



# Reclassification

1910.146(c)(7) or 1926.1203(g)

4. If hazards arise within the reclassified space, each entrant **MUST** exit the space
  - a. Employer must reevaluate the space and reclassify it as a PRCS as appropriate

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