# OregonOSHA

## Confined spaces – crawlspaces and attics

Oregon OSHA's rule on confined spaces applies to architectural spaces, such as crawlspaces and attics. This fact sheet clarifies some of the specifics regarding these spaces.

There are three characteristics that must be present in order for a space to be a confined space.

These characteristics are:

- Large enough to bodily enter and perform work. The space must be large enough to fit your entire body. If there are no openings large enough to get your body inside, then it does not meet this characteristic and the space is not a confined space.
- Has a limited means of getting in and out. If you need to contort your body or use your hands to get in or out or navigate inside the space, you've met one of the characteristic of a confined space. Another consideration is determining how difficult it would be to remove a person who isn't able to exit by themselves.
- Not designed for continuous occupancy. A space that has a fixed ladder to help with getting in and out does not automatically mean that the space is designed for continuous occupancy. It may be designed only for periodic occupancy.

A confined space with a hazard is a permit-required confined space.

#### **Crawlspaces and attics**

Crawlspaces and attics typically fit the definition of confined spaces rather than permit spaces because they usually do not have hazards. However, conditions can change, so it is important to understand the normal conditions so you know when something changes.

For example, a crawlspace may normally be dry, but if an employee opens the hatch and finds that the sewer line has broken and is leaking raw sewage, then it is a permit space until the problem is fixed and the sewage is removed. The nature of the work can also change the nature of the space. For example, if work within the crawlspace includes opening up the sewer line, the space is a permit



space for the duration of the work. Once the pipe is closed and the space returns to its normal state, it can be re-evaluated as a confined space.

Attics are typically confined spaces, but environmental conditions, such as heat during the summer, can change it to a permit space. The nature of the work can also change the nature of the space. For example, if the guards for electrical components need to be removed, exposing workers to live parts, it becomes a permit space. When the guards are replaced, the space can be re-evaluated as a confined space.



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#### Drop ceilings and soffit spaces

Drop ceilings typically fit the definition of a confined space but don't normally have a hazardous atmosphere or contain other serious safety or health hazards. When you evaluate your workplace, drop ceilings that may contain hazards must be identified. When the ceiling void is a component of the building ventilation system (serving as plenum), atmospheric hazards of the work spaces below the ceiling must be considered. The confined space determination for a soffit follows the same logic for drop ceilings.

#### Ventilation/fan chambers and air shafts

HVAC equipment with access other than through a standard door typically is considered a confined space. The most likely hazards in HVAC equipment components are mechanical (fan blades, chain and belt drives) and can be eliminated either through guarding or energy source isolation (lockout/tagout). When all hazards can be eliminated through permanent guarding, the space can be re-evaluated as a confined space. If the physical hazards of a permit space cannot be eliminated through permanent guarding, it can only be entered with a permit, or under the provisions of alternate entry, where applicable.

#### Construction

In new construction, employers may be able to organize work practices to avoid placing workers in areas that meet the definition of a confined space. For example, completing work in what will eventually become a crawl space before constructing the overhead portion of the crawl space, applying insulation to an attic floor before the underlying ceiling below it is installed, and completing basement work before the overhead structure is installed or after stairways are in place could keep those spaces from meeting the definition of a confined space.









#### **References:**

- 437-002-0146: Confined spaces
- Fact Sheet: Confined spaces
- Not designed to be occupied Oregon OSHA's guide to confined space safety for general industry and construction work
- Confined space A-Z topic page

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