

Confined Space Stakeholder Meeting
September 24, 2008

Attendees: Barry Moreland, Brad Tullis, Damon Vickers, Dave Kaiser, Dave Parsons, Mark Hopkins, Stanton Thomas, Timothy Nelson, Tom McCullen, Pat Darby, Stephanie Snyder, Peggy Munsell
Scribe: Sarah McGovern

We shared a fact sheet that goes along with the current confined space rule. The fact sheet helps to identify when you are in a permit required space or in a confined space.

We discussed the issue of testing spaces before entering. If no atmospheric hazards have been identified as potential hazards for a space, but atmospheric testing occurs anyway, that does not automatically put you in the permit space rules.

We revisited the federal proposal for confined spaces. Under the current rules, including the WISHA rules, if you have an atmospheric hazard and a physical hazard, then you are in the permit rule no matter what. The proposed federal standard has 2 main categories of confined spaces, with subcategories for both. Under the proposal, a space is either a confined space or a permit-required confined space, but the subcategories of confined spaces include spaces where there are no hazards, all hazards can be eliminated, and spaces where the atmospheric hazards can be controlled with ventilation and any physical hazards, if present, can be eliminated. This approach is more in line with our concept of an all-hazards approach.

There was some discussion about whether OR-OSHA could pass this rule as a replacement for the current general industry rule. We believe we can, since it is based on federal OSHA's own proposal.

DEFINITIONS:

Many of the definitions will be the same. The federal proposal added a few definitions and Washington has a few that are more simplified. Dave Parsons volunteered to prepare a document that compares the current Oregon rule, WISHA rule, and proposed rule definitions.

Other major issues: developing a new rule:

- Any use of the words “could”, “potential”, “periodically” may need to be clarified.
- We may need to revisit rescue and what happens when a retrieval system is not feasible, and in situations where entry retrieval is difficult. We discussed providing information on self rescue, however the rescue provisions are specific to situations where the entrant cannot self-rescue.
- We discussed the issue of equipment that doesn’t work properly, is out of calibration, or the person using it isn’t trained. Should we add something to say that we need to follow the manufacture’s guidelines, and if you’re going to use a piece of equipment, do we have to say it needs to work?
- Training requirement for your rescue crew. Construction vs. general. It currently states that every 12 months you need to do a mock entry. This can be difficult for a highly mobile workforce.

Next meeting:

October 15, 2008

1:00 p.m.

Salem Field OSHA office

Compare WA, Federal, and OR standard side by side.