

Confined Spaces: Construction Requirements

The requirements that apply to a confined space task depend on whether the task meets the criteria to be labeled as construction or general industry. It's important that you understand this distinction and how it affects the requirements that are in place to protect workers.

Construction Tasks in Confined Spaces

A confined space is large enough and designed/configured so that people may enter, has limited or restricted entries or exits, and is NOT designed for continuous occupancy. A confined space that contains ANY hazard requires a permit.

Construction tasks create or change a confined space. They include construction, alteration and repair tasks, including painting and decorating. General industry tasks are maintenance activities that do not change the space or its conditions. Construction activities in confined spaces require more safety measures than general industry activities.

NOTE: The requirements you must use depend on your location and the work you perform in the confined space. For example, in the United States, 29 CFR 1926.1201 contains confined space requirements for construction and 29 CFR 1910.146 contains confined space requirements for general industry.

Employers are responsible for determining if activities in confined spaces must follow the requirements for construction or general industry. When an employer has workers who perform both construction and general tasks work in confined spaces, they must follow the more stringent construction requirements. If you have concerns, stop work and report them to your supervisor immediately. Failure to follow appropriate requirements puts people at risk and can result in serious fines and legal actions.

Key Requirements for Construction Tasks in Permit-Required Confined Spaces

The key requirements for construction tasks in permit-required confined spaces are:

- Evaluating the confined space
- Assigning a qualified person
- Continuously monitoring permit-required confined spaces for atmospheric and engulfment hazards
- Suspending permits
- Working with multiple employers at the worksite
- Monitoring the availability of emergency services

NOTE: These are general requirements. The exact requirements may vary based on your location and activities. Please ask your supervisor or safety professional if you have questions.

Evaluating the Confined Space

Construction activities require a competent person to evaluate the worksite and identify confined spaces. The competent person has the skill and authority to identify existing and potential hazards in confined spaces. The competent person is often the entry supervisor who

should be involved in entry planning. If the space has hazards that require isolation, it must have physical barriers that separate people from hazards.

Qualified Person

For construction activities, the entry supervisor of a permit-required confined space must be a qualified person who is trained and equipped per relevant standards to fulfill the role. A qualified person (or entry supervisor) must also reevaluate and reclassify confined spaces that contain construction activities, as needed.

Continuous Monitoring

Construction activities in permit-required confined spaces require that a qualified attendant continuously monitor the space for atmospheric conditions and engulfment hazards.

Engulfment hazards are those that can submerge, drown or bury a person. As an example of continuous monitoring, construction work in a storm sewer requires a qualified attendant to test the atmosphere before, during and after entry. Observers or devices may monitor conditions outside the space, such as a connected stormwater drain that could cause a flash flooding engulfment hazard.

Suspension of Permits

For construction activities in permit-required confined spaces, we can suspend the permit if we return the space to the entry conditions listed on the permit before re-entry. If that is not possible, we must cancel the permit. If there is any doubt, it is best to cancel the permit instead of suspending it for added safety and to ensure compliance.

Multiple Employers on the Worksite

Construction projects frequently have specialized professionals on the site who are there as contractors or subcontractors. People working outside the confined space must not introduce new hazards into the space. For example, don't run a generator or gas-powered equipment near the entrance of a confined space because it can cause carbon monoxide to enter the space.

The **host employer** must communicate with other employers at the worksite about:

- Confined space locations
- Actual and potential risks and hazards
- Any new or changing hazards
- Precautions and controls required to enter the space

The **host employer**, **controlling contractor** and **entry employer** must coordinate with each other when multiple parties enter the same confined space and when the permit will be suspended or canceled.

Availability of Emergency Services

For construction activities in permit-required confined spaces, employers who are relying on local emergency services for emergency response must arrange for responders to give them advance notice if they will be unable to respond. Do NOT plan to call local emergency services for confined space emergencies without discussing it with them first.