



ASSOCIATION OF CALIFORNIA WATER AGENCIES
JOINT POWERS
INSURANCE AUTHORITY

Cal/OSHA Announces Confined Space Emphasis Program

The attached news release from Cal/OSHA announces the initiation of a “**Confined Space Emphasis Program**” to focus attention on preventing worker deaths and injuries in confined spaces in worksites across the state.

Cal/OSHA begins its yearlong campaign on confined space hazards by stressing the importance of the requirement that businesses have plans in place to:

- ◆ Identify confined spaces at their workplaces
- ◆ Notify and train employees
- ◆ Ensure that onsite rescue plans are in place



These requirements include:

- ◆ **Having a written confined space plan**
- ◆ **Procedures to test the air quality inside the space**
- ◆ **Proper employee and supervisor training prior to entering confined spaces**
- ◆ **Having effective rescue procedures in place which must be immediately be available onsite**

The JPIA has developed a **Confined Space Audit Exercise** for members use. This exercise identified, in detail, Cal/OSHA’s focus. If your organization can successfully accomplish the audit, you may have a Confined Safety Program that stands up to a Cal/OSHA inquiry. If your audit is lacking any element listed in the exercise, you need to start upgrading your Confined Space Program **NOW!**

For more help on working safely in confined spaces, you may wish to contact Cal/OSHA’s Consultation Service toll-free at (800) 963-9424. You can also visit https://www.dir.ca.gov/dosh/dosh_publications/consultationbrochure.html for more information.

If you have any questions regarding this alert, please contact your JPIA Risk Management Consultant. If you do not have the Consultant’s number, please contact the JPIA main office at (800) 231-5742.



CONFINED SPACE AUDIT EXERCISE

(Recommended to be conducted at least annually)

- 1) Has Water Agency identified all **confined spaces** within its facilities? (see definition below)

Confined Space means a space that:

- (a) Is large enough and so configured that an employee can bodily enter and perform assigned work; and
- (b) Has limited or restricted means for entry or exit (for example, tanks, vessels, silos, storage bins, hoppers, vaults, and pits are spaces that may have limited means of entry.); and
- (c) Is not designed for continuous occupancy.

- 2) Have any spaces have been identified as **Permit-Required Confined Spaces (PRCS)**?

Permit-Required Confined Space (permit space) means a confined space that has one or more of the following characteristics:

- (a) Contains or has a potential to contain a hazardous atmosphere;
- (b) Contains a material that has the potential for engulfing an entrant;
- (c) 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
- (d) Contains any other recognized serious safety or health hazard.

- 3) Are all confined spaces labeled or otherwise identified properly?

- 4) Who is authorized to enter confined spaces to do construction, maintenance or service work?

- 5) Is a list maintained of authorized CSE supervisors, attendants, and entrants?

- 6) Is this list reviewed and updated annually?

- 7) Can employees who make entries to explain their training, knowledge about the employer's confined space program, and permit requirements?

- 8) When was the last review of the Water Agency's written confined space program or "operation procedures" for confined space entry conducted? (Date: _____)

Evaluation should include the written program's procedures for:

- Issuing and cancelling entry permits (for PRCS);
- Testing procedures before employee entries into confined spaces;
- Monitoring employees while they are in the confined spaces;
- Training of entrants, attendants, rescuers, and supervisors in CSE procedures and CSE rescue operations

- 9) When was the last training on the Water Agency's written confined space program or "operation procedures" for confined space entry conducted? (Date: _____)

- 10) How often is training conducted for CS entry and rescue operations?

- 11) Are written training records maintained?

CONFINED SPACE AUDIT EXERCISE*(Recommended to be conducted at least annually)*

- 12) Did the training include hands-on demonstration of CSE procedures?
- 13) Did the training include a review of rescue procedures and simulated drill?
- 14) Can CSE supervisors, attendants and entrants explain specific rescue procedures? (Calling 911 **does not** meet the Cal/OSHA requirements).
- 15) Is there a written arrangement/agreement with an emergency response agency (fire department) to conduct CSE rescues?
- 16) Has the emergency response agency been invited or conducted a drill in the Water Agency's confined spaces?
- 17) Date of last CSE rescue drill conducted _____.
- 18) Upon completion of confined space entries is there a review conducted of the entry permit, CSE procedures and space classification procedures? (Audits should be conducted regularly and at least every 6 – 12 months by an assigned individual. Entry records should be maintained for at least 3 years.)
- 19) How does the Water Agency, as a Host Employer, brief outside contractors as to CSE permit requirements, space hazards and entry procedures? Whose confined space program is used for those entries?

Action Items:

Completion Date:

_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

Water Agency: _____

CSE Audit Completed by: _____ Date: _____
(Name / Title)

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Cal/OSHA Issues Hazard Alert and Launches Confined Spaces Emphasis Program

Oakland - The California Department of Industrial Relations' Division of Occupational Safety and Health (Cal/OSHA) today launched a statewide Confined Space Special Emphasis Initiative to focus attention on preventing worker deaths and injuries in confined spaces in worksites across the state. As part of this initiative, Cal/OSHA issued a [Confined Space Hazard Alert](#) to help employers and employees identify confined space situations and take immediate steps to protect workers.

"Employers in California are responsible for identifying and mitigating risks in the workplace," said Department of Industrial Relations Director Christine Baker. "This initiative and the Confined Space Hazard Alert provide specific information so that employers can identify when confined space hazards exist and special precautions must be taken."

Since confined spaces may be encountered in virtually any industry, their identification is the first step in preventing fatalities and injuries. The goals of the Confined Space Emphasis Initiative are to:

- Increase awareness of employees and employers of these hazards.
- Provide resources, online materials, training, and consultation to prevent injuries and deaths
- Increase enforcement efforts to ensure all employers have adequate confined space programs and training at their workplaces.

The initiative follows investigations of confined space deaths and injuries in California—in different industries and different situations. In 2011, seven workers were killed in confined space incidents in California, including two young brothers in Kern County overcome by toxic gases in a recycling drainage tunnel.

"Confined spaces can be deceptively dangerous. It is even more tragic that over 60% of confined space worker deaths occur to would-be rescuers who attempt to save a worker who initially succumbs," said Cal/OSHA Chief Ellen Widess. "These confined space fatalities are preventable with proper programs in place. We are taking a comprehensive approach to reducing these deaths and injuries in California—through widespread education, enforcement, consultation, as well as partnerships to help increase awareness and compliance."

Cal/OSHA begins its yearlong campaign on confined space hazards in collaboration with partners in labor, industry, public safety agencies and other safety and health

groups. The campaign stresses the importance of the requirement that businesses have plans in place to identify confined space at their workplaces, notify and train employees, and ensure that on-site rescue plans are in place. These requirements include having a written confined space plan, procedures to test the air quality inside the space, proper employee and supervisor training prior to entering confined spaces, and having effective rescue procedures in place which must be immediately available on site.

Common types of confined spaces include tanks, silos, pipelines, sewers, storage bins, drain tunnels, and vaults. These are widespread in many industries, and also in non-industrial workplaces such as health care, education, retail, and services.

Cal/OSHA has posted confined space hazard materials on its website at www.dir.ca.gov/dosh. Online webinars and other outreach programs will also be held throughout the year to help educate employers become aware of the risks inherent of working in confined spaces and necessary steps to prevent injuries and deaths.

For more help on working safely in confined spaces, contact the Cal/OSHA Consultation Service toll-free at 1-800-963-9424. Also visit www.dir.ca.gov/dosh/consultation.html for more information.

Employees with work-related questions or complaints can call the California Workers' Information Hotline at 1-866-924-9757.

Sample CSE Rescue Availability Confirmation Letter

(Type on Agency Letterhead)

Date

Name/Title

Address of Fire Agency

City, State, Zip

Re: Confined Space Rescue Services

Dear: (Name/Title) Chief Smith:

I appreciate your time and the discussion we had on (Insert Date). The purpose was to review the availability of (Name of Fire Agency) to provide confined space rescue operations.

As mentioned, (Name of Water Agency) has confined spaces throughout its operations. Safe working procedures used by (Name of Water Agency) staff prior to, and throughout confined space entries include completing an entry permit, monitoring atmospheric conditions, and space ventilation.

I would like to extend an open invitation for you to visit and review any of the confined spaces at our facilities. These spaces can be used by (Name of Fire Agency) to conduct training and rescue drills. Upon your request, (Name of Water Agency) staff and equipment could be made available for training, or during an emergency.

It is understood the (Name of Fire Agency) has trained staff available to conduct confined space rescue operations. In event of an emergency, (Name of Water Agency) staff should (describe specific emergency procedures. This should not be "Call 911").

Thank you for your time and professionalism. I look forward to the opportunity to work with you in the future. Should you wish to discuss confined space rescue operations in more detail, or schedule a training drill, please contact me at (Insert Name, phone email contact information)

Respectfully,

Name

Title

Agency