The general industry confined space standard has five key differences from the construction rule. These five new requirements include:

1. More detailed provisions requiring coordinated activities when there are multiple employers at the worksite. This will ensure hazards are not introduced into a confined space by workers performing tasks outside the space. (An example would be a generator running near the entrance of a confined space causing a buildup of carbon monoxide within the space.)

2. Requiring a competent person to evaluate the worksite and identify confined spaces, including permit spaces.

3. Requiring continuous atmospheric monitoring whenever possible.

4. Requiring continuous monitoring of engulfment hazards. (An example would be when employees are performing work in a storm sewer. A storm upstream from the workers could cause flash flooding. An electronic sensor or observer posted upstream from the worksite could alert workers in the space at the first sign of the hazard, giving the workers time to evacuate the space safely.)

5. Allowing for the suspension of a permit, instead of cancellation, in the event of changes from the entry conditions list on the permit or an unexpected event requiring evacuation of the space. The space must be returned to the entry conditions listed on the permit before re-entry.

In addition, OSHA has added provisions to the new rule that clarifies existing requirements in the general industry standard. These include:

• Requiring that employers who direct workers to enter a space without using a complete permit system prevent workers’ exposure to physical hazards. This can be done through elimination of the hazard or isolation methods such as lockout/tagout.

• Requiring that employers who are relying on local emergency services arrange for responders to give the employer advanced notice if they will be unable to respond for a period of time (e.g., because they are responding to another emergency, attending department-wide training).

• Requiring employers to provide training in a language and vocabulary that the worker understands.

It should also be noted that several terms have been added to the definitions for the construction rule. For example, “entry employer” was added to describe the employer who directs workers to enter a space, and “entry rescue” was added to clarify the different types of rescue employers can use.

For additional information, please see the following OSHA standards:

• General industry - 29 CFR 1910.146
• Construction - 29 CFR 1926.1200

IMPORTANT NOTICE - The information and suggestions presented by Western National Insurance Company in this Technical Bulletin are for your consideration in your loss prevention efforts. They are not intended to be complete or definitive in identifying all hazards associated with your business, preventing workplace accidents, or complying with any safety related, or other, laws or regulations. You are encouraged to alter them to fit the specific hazards of your business and to have your legal counsel review all of your plans and company policies.