

Confined Space Entry

Frequently asked Questions and Answers

Q1 What is a confined space?

Answer: *A confined space means an enclosed or partially enclosed space that*

- (a) is not designed or intended for human occupancy except for the purpose of performing work;*
- (b) has restricted means of access and egress; **and***
- (c) may become hazardous to a person entering it as a result of*
 - (i) its design, construction, location or atmosphere,*
 - (ii) the materials or substances in it, or*
 - (iii) any other condition relating to it.*

Therefore, based upon this definition, if a space does not satisfy **all three** criteria then it is not considered a confined space and these regulations do not apply.

Q2 Are there any prerequisites for the Confined Space Entry Certification Training Program referred to in s.511(3) ? For example, is fall protection training needed?

Answer: No, there are no prerequisites for confined space entry certification training, however, other training may be required by the Occupational Health and Safety (OHS) legislation, such as for a CSE vertical entry and in hazardous atmospheres, retrieval equipment is required (section 513 (1)(a)).

Q3 Who conducts the assessment referred to in s.511 (1) ? One example has been an elevator maintenance person – is it the elevator company or the building owner? If always the “employer”, how can it be done practically?

Answer: The employer of the individual performing the work (entering the space) shall conduct the assessments to ensure the hazards are identified. In instances where the work is not being performed at the employer’s place of work, the building owners/occupants shall be consulted to ensure all applicable hazards are identified. The employer shall ensure the assessment is completed and covers the hazards of the specific space.

Q4 Is there a minimum number of persons (i.e. confined space entrants) that require training with a given employer?

Answer: No, each entrant shall complete confined space entry training with an approved CSE training provider prescribed by the Workplace Health, Safety and Compensation Commission (WHSCC).

Q5 What training do confined space attendants need?

Answer: At a minimum, CSE certification training is required for attendants as prescribed by WHSCC, keeping in mind that attendants are not permitted to enter a confined space according to OHS legislation. Knowledge and skills are required to fulfill the responsibilities of the work of an attendant as described in OHS Regulation s.513(3) and s.513(4).

Q6 What training do emergency response teams require?

Answer: As a minimum, CSE certification training as prescribed by the WHSCC in addition to a recognized emergency response training course. Fire Departments do not have to complete the prescribed CSE training but shall complete relevant NFPA (National Fire Protection Association) training.

Q7 What should be included on a confined space entry permit (OHS Reas s.512 (2)(e))?

Answer: All information required to perform work safely. This will depend upon the risk. See OHS Regulations s.512 (2)(c) and (e).

Q8 OHS Regs s.512(11) – What is appropriate testing for harmful vapours. etc? Intervals?

Answer: Appropriate testing will be based upon potential atmospheric hazards associated with the space and the type of work being performed as identified in the risk assessment. The intervals will be determined based upon risk but as a minimum, where a hazard exists, testing should be performed prior to initial entry, after an interruption in work or any time conditions change.

Q9 Is there an expiry date for training?

Answer: Training expires three years after date of issue. Upon expiry, workers

Q10 Where do you find the list of training providers?

must recertify with a WHSCC approved CSE training provider. Recertification training is 16 hours, eight hours of theory and eight hours of practical learning activities.

Answer: The list of approved CSE training providers can be found on the WHSCC web site. See

http://www.whscc.nf.ca/prevention/prevention_confinedspaceentry.whscc

Q11 Is there a transition period with respect to the January 1, 2013 deadline?

Answer: No.

Q12 Is “grandfathering” permitted, whereby confined space training from elsewhere may be substituted for the WHSCC certified training?

Answer: No.

Q13 Can I train my own workers?

Answer: Yes, as long as your confined space entry training program and trainers have been approved by the WHSCC.

Q14 Are there “classes” of confined spaces as referenced in some other jurisdictions?

Answer: No. This Province’s OHS Regulations do not define classes of confined space nor do these regulations reference “restricted” spaces. While it is recognized the use of restricted spaces may be an effective tool, it shall not be incorporated into a confined space entry program.

Q15 When does a person actually “enter” a confined space?

Answer: A worker is considered entering a confined space when the breathing zone of the worker breaks the plane of the opening to the confined space. Breathing zone is defined as the area within a 10 inch radius of the worker's nose and mouth.

Q16 Tests must be carried out to check for the presence of which materials?

Answer: Any materials identified in the risk assessment.

Q17 Does a municipality's manholes have to be systematically numbered?

Answer: No, but workers must be made aware of the existence of, and the hazards posed by, the confined spaces that may be present at a workplace.

Q18 Can the municipal fire department be relied upon for rescue?

Answer: The fire department may be consulted as to its availability, but the onus is on the employer to ensure that emergency rescue procedures are in place, and that workers responding to emergencies are trained in the use of those procedures. If the fire department is used they have to be trained in accordance to NFPA (National Fire Protection Association) training.