



# DPC Confined Space Entry Policy

## Exhibit 2

### Evaluate the hazards of any entry into a permit space

*Knowing when a permit is necessary can save a life*

*Posted November 6, 2010 from J.J. Keller & Assoc.*

OSHA's standard on permit-required confined spaces (PRCS) says entry occurs as soon as any part of the entrant's body breaks the plane of the opening into the permit space. As clarified in an OSHA letter of interpretation dated Oct. 18, 1995, "When any part of the body of an entrant breaks the plane of the opening of a PRCS large enough to allow full entry, entry is considered to have occurred and a permit is required, regardless of whether there is an intent to fully enter the space."

This definition of "entry" might seem to be too strict, but OSHA's letter clarifies that there are situations where a partial entry would be hazardous: "Examples of situations where entry by only part of the body into a PRCS can expose an entrant to the possibility of injury or illness are as follows:

1. An entrant can possibly suffer a burn while reaching into a PRCS, which is so classified because it contains a thermal hazard.
2. An entrant can possibly fall into a below grade PRCS while standing on a vertical ladder in the opening of the space, which is so classified because it contains an oxygen deficient atmosphere.
3. An entrant can possibly become unconscious as result of his head accidentally entering a PRCS while they are reaching into a PRCS, which is so classified because it contains an oxygen deficient atmosphere.

As another example, if the space contains a flammable or oxygen enriched atmosphere, and if the activities during a partial entry could produce a spark or other ignition source, then a fire in the space could flash out of the opening and cause serious injuries to the employee.

This doesn't necessarily mean that you'd be fined if a permit wasn't followed when someone reached into a tank. OSHA's guidance continues: "However, if entry by only part of the body does not expose the entrant to the possibility of injury or illness, then the violation may be considered a 'de minimis' violation. (A de minimis violation is one in which a standard is violated, but the violation has no direct or immediate relationship to employee safety or health. These violations are documented but no citations are issued.) "Examples of situations where entry by only part of the body into a PRCS would not expose an entrant to the possibility of injury or illness are as follows:

1. An entrant reaches through the opening of a horizontal PRCS, which is so classified only because it contains exposed live electrical parts ten feet from the opening.
2. An entrant put his head through the opening of an overhead PRCS, which is so classified only because it contains unguarded rotating parts ten feet from the opening.

Also consider a situation such as a worker reaching through a small grate to take a sample from a permit space. OSHA's letter states, "If a part of the body were placed in an opening through which the worker could not pass into the permit-required confined space, no PRCS entry will have occurred." Keep in mind, however, that the employee would still need protection from any hazards involved in the task, but a permit would not be needed.