

Barry White Associates

Safety, Health & Environmental Solutions

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Mr. David Lamensdorf
President
Safe Environment Engineering
26135 Bella Santa Drive
Valencia, CA 91355

Dear David:

Following are the answers to the two questions you asked regarding the OSHA Permit Entry Confined Space standard.

1. How quickly must a rescue operation be initiated?

OSHA provides no guidelines in the language of the standard. Obviously, "as soon as possible" should be the guide. Over the years OSHA has adopted the policy that rescue should be initiated within five minutes, based on the fact that oxygen deprivation beyond that amount of time can result in irreversible brain damage. Any time rescue is too late to save a life, and an earlier response would have saved the life, there *prima facie* evidence that the rescue was not timely. The rescue training and practice required by the standard would provide the employer with sufficient information concerning how fast his/her response team could act. The use of the **Life.line** system is useful for extremely dangerous spaces where a stand-by is also used, since that stand-by individual can enter the space (when properly protected) and can effect immediate rescue efforts, since he/she is not the attendant. The attendant is the individual operating the **Life.line** system at the monitor. The attendant at the monitor can also contact the rescue personnel faster than can a human attendant stationed outside the space, who may not as quickly realize there is a problem.

2. When an entrant enters a confined space from the top, must an attendant be stationed at the top at all times?

The OSHA standard requires that "... a mechanical device shall be available to retrieve personnel from vertical type permit spaces more than 5 feet deep." In addition, the standard requires that rescue begin "... as soon as the rescuer becomes aware that rescue is necessary." As one can see, the language is not very specific.

OSHA inspectors seem to agree that a tripod should be positioned over the opening of a vertical type permit space to assist the entrant to enter the space, and should remain there during the entry. The entrant should be attached to the tripod by a line attached to a harness he/she is wearing. There is no need for the attendant to be at the top full-time, as long as rescue can begin as soon as possible. The need to remove someone from a vertical entry space is not greater than the need to remove an entrant from a side-opening space. It is only more difficult to remove an entrant from a space where he/she must be lifted out, rather than pulled along a horizontal path. The 5 minute rule is still in effect. Again, an attendant at the **Life.line** monitor can contact rescue personnel immediately if there is a problem, and direct them to the top of the confined space where they can use the lifting device to remove the entrant.

I hope this information is helpful

Sincerely yours,


Barry White