

Confined Spaces vs. Permit-Required Confined Spaces

OSHA FAQ site:

A permit space is a confined space that may have a hazardous atmosphere, engulfment hazard, or other serious hazard, such as exposed wiring, that can interfere with a worker's ability to leave the space without assistance.

Other Interpretations from OSHA:

Contains or has a potential to contain a hazardous atmosphere, it contains a material that has the potential for engulfing an entrant, it has an internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls or by a floor that slopes downward and tapers to a smaller cross-section, or it contains any other recognized serious safety or health hazard.

Pre-Entry Planning for All Confined Spaces

- Having a competent person evaluate the work site for the presence of confined spaces, including permit-required confined spaces;
- Identifying the means of entry and exit, proper ventilation methods, and elimination or control of all potential hazards in the space once the space is classified as a permit-required confined space;
- Ensuring that the air in a confined space is tested before workers enter for oxygen levels, flammable and toxic substances, and stratified atmospheres;
- Removing or controlling hazards in the space and determining rescue procedures and necessary equipment if a permit is required for the space; and
- Ventilating or using whatever controls or protections are necessary so employees can safely work in the space.

OSHA 'Letter of Interpretation' posted on the OSHA website regarding Attics and Crawlspace

(This is an older letter, though OSHA has not changed the definition of Confined/Permit-Required Confined Spaces in the time since it was written)

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Are attics considered confined spaces?

Answer

If an attic space in your building fits the definition of a confined space, then attics are confined spaces. However, attic spaces that are determined to be confined spaces should generally fall into the category of non-permit confined spaces because they have either natural or mechanical ventilation which would prevent accumulation of hazardous atmosphere and because other hazards would not normally be present.

Question

Are crawl spaces with or without trap door entry considered confined spaces?

Answer

How easily a worker can enter and exit a space is affected by both the size and type of ingress/egress point to the space (if there is a full doorway or only a small portal) **and** the actual transition (stairs, ladder, or nothing) into the space. To determine if a trap door were to render a space a confined space, you would look at considerations such as weight and swing of the trap door to see if they inhibit an employee from exiting the space. Even if the trap door itself does not impede entry/exit, if it is difficult to reach the trap door due to physical constraints such as piping, duct work, and conduits, then the crawl space would be a confined space.