



VOSH PROGRAM DIRECTIVE: 12-120

ISSUED: October 7, 1987

SUBJECT: Virginia Confined Space Standard for the Telecommunications Industry, 1910.268(t)

- A. Purpose. This directive transmits to field personnel the Virginia Confined Space Standard for the Telecommunications Industry, 1910.268(t).
- B. Scope. This directive applies to all VOSH personnel.
- C. Action. The Assistant Commissioner, Enforcement Directors and Regional Supervisors shall assure that Telecommunications employers comply with the Virginia Confined Space Standard for the Telecommunications Industry, 1910.268(t). The effective date is November 15, 1987 for mechanical ventilation requirements and July 1, 1988 for remaining requirements fo the standard.
- D. Background.

On October 28, 1985, the Department of Labor and Industry and the Safety and Health Codes Board published in the Virginia Register a Notice of Intent to adopt a confined Space Standard for General Industry and the Construction Industry (the Telecommunications Industry is included under the broader context of "General Industry"). A proposed standard was published on November 24, 1986 in the Virginia Register; a sixty-day comment period followed and public hearings were held during the week of February 2-6, 1987. In response to the written and oral comments received, the Safety and Health Codes Board decided on March 23, 1987 to split the proposed standard into two standards - one for the Telecommunications Industry and one for the rest of General Industry and the Construction Industry. The two standards are essentially identical except for provisions in the Telecommunications Standard dealing with mechanical ventilation, atmospheric testing, requirements for use of traffic control devices when work is being done on streets and highways, and the effective dates.

At the March 23, 1987 meeting, the Board adopted the final standard for General Industry and Construction and the standard for Telecommunications, except for sections 4.A., 4.C. and 10.B. The Board requested additional comments on those three sections and the notice was published on May 25, 1987 in the Virginia Register. On June 29, 1987, the Board adopted the three remaining sections in response to comments and recommendations of the Commissioner of Labor and Industry.

The final standard will apply to all employers with employees working in the Telecommunications Industry.

The estimated number of affected employers in Virginia is 20, representing an estimated 1, 414 confined space entrants and 16,500 confined spaces that would be covered by the standard.

The estimated cost of compliance with the proposed standard is approximately \$494 total additional cost per employee for all affected employers. The comparable value of benefits per worker, based upon injuries and deaths avoided by compliance with this standard, is estimated to be \$694 per affected employee.

E. Summary of the Standard.

The final Confined Space Standard defines a “confined space” as “any space not intended for continuous employee occupancy, having a limited means of egress, and which is also subject to the accumulation of an actual or potentially hazardous atmosphere...or a potential for engulfment.”

With some limited exceptions, the final standard provides the following general practices and procedures for entry into and work inside a confined space: (1) the employer must implement a written entry permit system; (2) the employer must train each employee on the hazards of working in a confined space before the employee is authorized to enter a confined space (the employer must maintain the records of the most recent training program conducted); (3) atmospheric testing must be conducted for flammability and toxic materials expected to be present; (4) all confined spaces must be mechanically ventilated in accordance with Bell System Practices for Testing and Ventilating Manholes; (5) electrical and mechanical hazards must be removed or prevented from causing a hazardous situation; (6) when necessary, an attendant shall be stationed immediately outside every confined space (a non-attendant entry is permitted in many cases); (7) the employee entering a confined space with a hazardous atmosphere must be provided with an appropriate retrieval device with a retrieval line and an appropriate respirator; and (8) confined space entry work that occurs on a public thoroughfare must be done in accordance with requirements in the Manual on Uniform Traffic Control Devices for Streets and Highways.

An important aspect of the final standard is its reliance on the concept of the “qualified person”. A “qualified person” is defined as “a person who is trained to recognize the hazard(s) of the confined space and how to evaluate those anticipated hazards” The final standard provides that the employer may designate an employee as a “qualified person” for the purpose of assuring safe confined space entry procedures and practices at a specific site.

Appendix A is a list of concentrations at which certain substances exhibit Immediately Dangerous to Life or Health effects. Appendix B is a list of amendments and deletions for 1910 Telecommunications Industry standards which will become effective concurrent with the Confined Space Standard for Telecommunications.

E-ATTACHMENT: Virginia Confined Space Standard for the Telecommunications Industry, 1910.268(t).

http://www.doli.virginia.gov/vosh_enforcement/pdfs/16vac25-70.pdf

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**VIRGINIA CONFINED SPACE STANDARD
FOR THE TELECOMMUNICATIONS INDUSTRY**

AS ADOPTED BY
VIRGINIA OCCUPATIONAL SAFETY AND HEALTH CODES BOARD

Date: March 23 and June 29, 1987



VIRGINIA OCCUPATIONAL SAFETY AND HEALTH PROGRAM
VIRGINIA DEPARTMENT OF LABOR AND INDUSTRY

Effective Date

November 15, 1987 (form mechanical ventilation portions)
July 1, 1988 (for remaining portions of standard)

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