



Safety Notice

Confined Space

PURPOSE

This Safety Notice has been issued to prevent accidents and injuries surrounding confined space entry in the Canada-Newfoundland and Labrador Offshore Area.

BACKGROUND

A confined space incident recently occurred in our jurisdiction which prompted us to review confined space entry practices, policies and procedures on installations operating in the Canada-Newfoundland and Labrador Offshore Area. The review showed that improvements may be required in the following areas, depending on installation-specific procedures:

Use of Lifelines

Section 161(2) of the *Canada-Newfoundland and Labrador Offshore Marine Installations and Structures Occupational Health and Safety Transitional Regulations* and the *Transitional Regulations* enacted by the Province of Newfoundland and Labrador adopting same, requires the use of a harness, lifeline and anchor point if hazardous conditions exist in a confined space (unsafe atmospheric conditions or the presence/free flow of liquids, solids or hazardous substances). The use of a lifeline is required when a gas tester must enter a space to perform atmospheric testing because it is unknown at this point, whether the atmosphere is safe. The gas tester must use a lifeline until it is confirmed that hazardous conditions *do not* exist. For certain spaces, where the configuration makes the use of a lifeline impractical or unsafe, the Operator must seek regulatory approval from the C-NLOPB (in the form of a Regulatory Query) to not use lifelines.

Fall Protection in Confined Spaces

It is important to provide fall protection equipment and adhere to procedures during any confined space entry. Section 10 of the *Canada-Newfoundland and Labrador Offshore Marine Installations and Structures Occupational Health and Safety Transitional Regulations* and the *Transitional Regulations* enacted by the Province of Newfoundland and Labrador adopting same, requires fixed ladders greater than 6 meters to be designed and installed with protective cages or platforms, or be used with a fall protection system. Proper fall protection equipment must be selected to protect individuals entering/egressing the space and to ensure efficient and safe rescue.

Entry and Egress

Confined space entry requires specialized, often bulky personal protective equipment (PPE) which may create an entanglement hazard or fall hazard during entry or egress

from a confined space. The risk assessment for each confined space should include an assessment of PPE (type and arrangement for the individual) to ensure PPE selection will enable individuals to safely enter, occupy and egress a confined space. The size of the individual compared to the size of the entrance must also be risk assessed to ensure entry/egress is not impeded, especially for rescue purposes.

Rescue Plans

Detailed rescue plans must be developed for each space entered, taking into account the specific hazards and conditions that may be encountered and the types of events that may occur depending on the work being completed. Rescue plans must also be in place for any event that may occur while gas-testing is taking place. Generic rescue plans do not suffice.

Gas testing and Re-entry

The pre-entry gas test determines whether the atmosphere is safe before the confined space is entered. The time between the pre-entry gas test and entry into the space should be minimized. Confined spaces must also be verified for changes in the atmosphere and monitored for other hazards as often as necessary, to ensure a safe atmosphere is maintained (e.g. period of unoccupancy, upon change of shifts, after a work interruption, or when conditions change).

RECOMMENDED ACTION

Based on the preceding, it is recommended that Operators/Employers, in consultation and engagement with the workforce:

- Review their confined space procedures and include criteria for the appropriate use of lifelines.
- Conduct a review of all fixed ladders and/or fall protection arrangements in all confined spaces to ensure the risk of a fall is as low as reasonable practicable.
- Conduct a risk assessment of the types and use of PPE to determine the most appropriate PPE arrangement that will enable workers to safely enter, occupy and egress the confined space.
- Review confined space emergency response procedures and ensure that appropriate and effective procedures are in place and are exercised for the specific hazards that may be encountered. Refer to section 6.4 of *CSA Z1006-16 Management of Work in Confined Space* for further guidance on developing a rescue plan.
- Review confined space monitoring and gas testing practices to ensure that a safe atmosphere and workplace is maintained at all times.

LEGISLATION

- *Canada – Newfoundland and Labrador Offshore Marine Installations and Structures Occupational Health and Safety Transitional Regulations* (Sections 10,

159, 160, 161, 176) and the *Transitional Regulations* enacted by the Province of Newfoundland and Labrador adopting same.

- *Canada- Newfoundland and Labrador Atlantic Accord Implementation Act* (paragraphs 205.013(f)(h)(i) and 205.019 (f)(h)(i)) and *the Canada-Newfoundland and Labrador Atlantic Accord Implementation Newfoundland and Labrador Act* (paragraphs 201.10(f)(h)(i) and 201.16(f)(h)(i)).

OTHER REFERENCES

- *Canadian Standards Association (CSA) Z1006-16 Management of work in confined space*
- *Canadian Standards Association (CSA) Z259.2.5-17 Fall arresters and vertical lifelines*

This Safety Notice shall be posted onboard installations which are operating under an authorization issued by the C-NLOPB, in a prominent place, accessible to every employee at the workplace.

Questions regarding this Safety Notice may be directed to a C-NLOPB Safety Officer at the address shown below.

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