



# CONFINED SPACE AWARENESS

## TOOLBOX TALK: Confined Space Awareness

RATTLIR Safety Series – "Strike Before It Bites"

### Purpose

Confined spaces present unique hazards including limited entry/exit, hazardous atmospheres, entrapment, and engulfment risks. OSHA 29 CFR 1910.146 provides requirements for identifying and safely working in confined spaces. This toolbox talk explains the difference between Permit-Required Confined Spaces (PRCS), the process for reclassification to Non-Permit Required Confined Spaces (NPRCS), and safe entry practices common in the power industry.

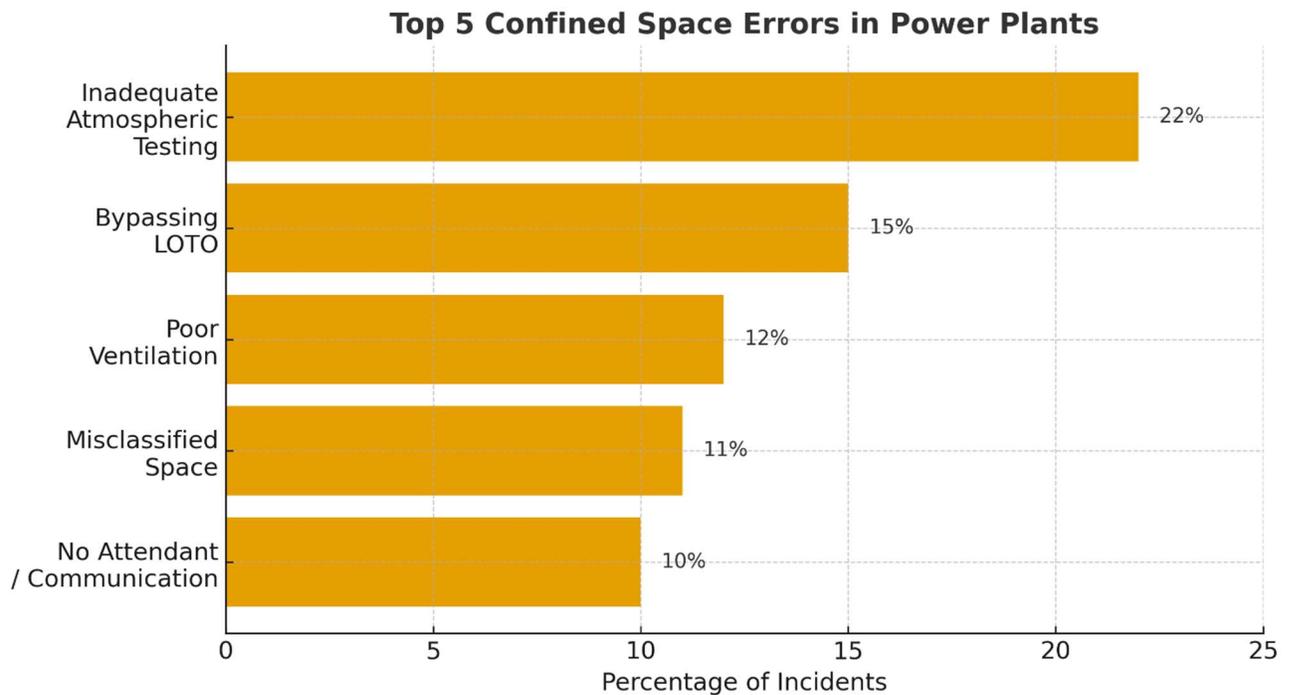


Figure 1 – Top 5 Confined Space Errors in Power Plants



# CONFINED SPACE AWARENESS

## OSHA Definitions (29 CFR 1910.146)

- A confined space must meet ALL THREE criteria:
  1. large enough to enter,
  2. limited means of entry/exit,
  3. not designed for continuous occupancy.
- A Permit-Required Confined Space (PRCS) contains or has the potential to contain serious hazards such as hazardous atmosphere, engulfment, inwardly converging walls, or any recognized serious safety/health hazard.
- A Non-Permit Required Confined Space (NPRCS) is a confined space that does NOT contain actual or potential hazards capable of causing death or serious physical harm.

## Reclassification of PRCS to NPRCS (Allowed by OSHA 1910.146(c)(7))

- OSHA allows a PRCS to be reclassified as an NPRCS if all hazards are eliminated without entry.
- Isolation, lockout/tagout, ventilation, or removal of atmospheric hazards must be completed and verified.
- The person performing reclassification must document that all hazards have been removed.
- If new hazards arise or conditions change, the space reverts back to PRCS immediately.
- Reclassification is common in power plants for spaces like pits, turbine enclosures, condenser waterboxes, or valve galleries once hazards are fully controlled.

## Safe Confined Space Entry Practices

- Review the confined space evaluation form or permit before entering.
- Test the atmosphere for oxygen content, flammable gases/vapors, and toxic gases.
- Ventilate the space as needed to maintain safe atmospheric conditions.
- Ensure all hazardous energy sources are controlled using lockout/tagout.
- Maintain continuous communication with attendants or control center personnel.
- Never enter a space unless you are trained, authorized, and conditions meet the required classification.
- Stop work if conditions change – reassess whether the space must be reclassified as PRCS.



# CONFINED SPACE AWARENESS

## Discussion Questions

- Do you understand the difference between PRCS and NPRCS under OSHA 1910.146?
- Are you aware of the reclassification process and who is authorized to perform it?
- Do you have the proper gas testing tools and entry documentation today?

## RATTLIR Takeaway

Confined spaces are only safe when hazards are clearly identified, removed, or controlled. Understanding OSHA requirements and proper reclassification procedures ensures workers enter only when conditions are truly safe. RATTLIR strikes before it bites by promoting disciplined evaluation, testing, and verification before any confined space entry.