

## ANSI/ASSE Z117: Confined Spaces



Tim Healey

### **PS: Why should OSH professionals know about ANSI/ASSE Z117, Safety Requirements for Entering Confined Spaces?**

**Tim:** As a consensus standard, it represents best practices. It is a consensus from a wide body of people in organizations that have a vested interest in conducting confined space entry work in a safe manner. It gives improved meaning to the black-and-white regulations from OSHA and various state OSHA agencies. It blends the hard-and-fast of the prescriptive regulations with a measure of practicality of pragmatism in areas where standards are more broad and general.

### **PS: How do OSH professionals get their companies to utilize the standard after they have already met OSHA compliance?**

**Tim:** In many ways, there is a cultural reluctance in some organizations to look beyond regulations. An OSH professional can influence an organization to understand that with regulations you are always playing defense, as opposed to looking ahead and using the insights of best practices to prevent a mishap that might cause injury. OSH professionals can show that from a business perspective the pragmatism or the best practices found in standards such as Z117 will actually save money, maybe in the short run, certainly in the medium run and absolutely in the long run, by being preventive.

### **PS: Why are confined spaces so challenging? How does the standard help users meet those challenges?**

**Tim:** Some organizations simply may not recognize something can be a confined space, whether it is a form of denial or a lack of understanding about potential hazards or some combination.

One pivotal point that we use at Hartford Steam Boiler Inspection and Insurance Co. (HSB) is making sure we have a clear understanding of the three elements used to define a confined space. Usually when a conversation begins, "There is no hazard," and someone is looking at the object or situation and adds, "It is not easy to get in or out of there, it is big enough for me to get in, and it is certainly not intended for me or anyone to be in there full time. Oh wait a minute, that is a confined space!"

Taking a step back and looking at that definition helps to open some eyes. At HSB, we perform about 10,000 confined space entries every year in boilers, pressure vessels and similar spaces. When you

are looking at the furnace of a big boiler or a steam drum it is pretty simple to realize that it is a confined space, but they do not always leap out like that.

### **PS: Why did the committee improve the section on confined space entry team training?**

**Tim:** One advantage of the ANSI process is that we must periodically review standards to make sure they remain relevant and accurate. It is likely we have learned something in the past 4 to 6 years that will improve the standard. That is one positive aspect of the ANSI process and ASSE's involvement in it—continuous improvement based on lessons learned from organizations, consultants and people with enforcement backgrounds.

With respect to team training, it was clear these provisions needed refinement to better identify what type of training team members need so they are better able to complete an entry project. The committee felt there was enough information available to be able to add credibility and utility to the revision.

### **PS: What kind of impact do you expect from the updated standard?**

**Tim:** Organizations that already have a positive sense of value for the standard will view it in a positive way, since the additional details clarify some areas that were fuzzy. For organizations struggling with confined spaces, the enhancements may prompt them to say it is time to take a look.

Of course, there might be some naysayers. Again, this is a consensus process, not based on a unanimous vote by every potentially interested party. But that is why the consensus process exists, to provide a forum for those conversations. The result is a better standard that is more valuable to users.

### **PS: Any final thoughts?**

**Tim:** Confined space has a lot of history with regulations dating back to 1975. There have been some minor changes along the way in terms of the regulatory process. The intent of Z117 has always been good. The OSHA regulations provide the skeleton, but we have to put some meat on the bones. I think the regular periodic review produced by the ANSI process reflects that industries are changing, that confined space interest continues to climb, and that more organizations are recognizing the hazards related to confined space entry. Nothing is static. Many lessons have been learned over the years.

That is why the ANSI process is so accommodating for practicing OSH professionals. The process is better able to keep up with changing practices, changing workplaces and technology, and is able to more quickly incorporate the lessons learned in industry, unlike the laborious time-consuming regulatory process.

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