

CONFINED SPACE

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The requirements that govern confined space work can be found in different publications and differ depending on the entity performing the work and the location in which the work is going to be performed. With many different documents and requirements that regulate the program, this has proven to be somewhat confusing for the end user. You may find yourself asking:

- Can I use the ship's gas free engineer (GFE)?
- What are the requirements at a Naval Repair Facility?
- Do I use NAVSEA SAF-010 or NSTM Chapter 074?
- Do I need a GFE or a Marine chemist?

Naval Safety Command (NAVSAFECOM) created the matrix below from available governing standards to aid in determining which standards are applicable to the different processes:

Confined Space Governing Regulations

			29CFR			NAVSEA			OPNAV	
			1910	1915	1926	SAF-010	NSTM 074	STD Item	5100.23	5100.19
Ship's Force	Underway						X			X
	Non Ship Repair	Non-Shipboard (Shore)	X			X			X	
		Pier Side					X			X
	Ship Repair	Naval Shipyard				X				
		Private Shipyard				X				
		Pier Side				X				
Military Members (Non-Ship's Force) & DoN Civilian	Underway			X			X SF May provide			
	Non Ship Repair	Non-Shipboard (Shore)	X		X Construction Only				X	
		Ship Repair	Naval Shipyard		X		X			
	Private Shipyard			X		X				
	Pier Side			X		X				
Contractor	Underway			X			X SF may provide	X		
	Non Ship Repair	Non-Shipboard (Shore)	X		X Construction Only				X	
		Ship Repair	Naval Shipyard		X				X	
	Private Shipyard			X				X		
	Pier Side			X				X		

Non-Ship, Ship Repair and Underway Regulations

Shore Non-Ship Repair: (ship's force, military non-ship's force, civilians and contractors): 29 CFR 1910 and OPNAV M 5100.23 are the primary regulations for shore confined space for all entities.

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Ship Repair:

Civilians: 29 CFR1915 and NAVSEA SAF-010 are the primary regulations, including non-Naval Maintenance Facility (NMF) shore doing shipboard repair work.

Contractors: 29 CFR1915 and NAVSEA Standard Item are the primary regulations.

Ship's force: NAVSEA SAF-010 and NSTM Chapter 074, Volume 3 are the primary regulations.

Ship's force will not provide hot work certification to conduct work where DOD civilians or contractors are working in the same space or may be affected by work conducted by ship's force. The afloat GFE must coordinate hot work aboard ship with NMF GFEs or in advance of specific ship's force evolutions to ensure awareness and coordination of ship's force work. The afloat GFE must follow NMF GFE and NFPA marine chemist guidance.

Underway:

NSTM Chapter 074, Volume 3 is the primary regulation governing confined space work while underway for all entities.

Contractors: 29 CFR 1915 and NAVSEA Standard Items are the primary regulations.

NMF Personnel: 29 CFR 1915 and NAVSEA SAF-010. The afloat GFE may provide GFE services to contractor personnel when the ship is located outside U.S. territorial waters. This is solely a last resort to accomplish mission- and time-critical work and is not intended to relieve contractors of the obligation to provide their own certified marine chemist services whenever and wherever possible.

Carefully Choose the Correct Regulations

There are many potential hazards associated with entry into confined spaces, making it imperative that the correct regulations are followed while performing work in a confined space. Since confined space regulations are not housed in a single document, it is also just as important that you know where to find the applicable regulations for the work being performed. Keep the following takeaways in mind the next time you're planning, performing or overseeing work within a confined space:

1. It only takes one oversight or shortcut to undermine the extensive preparations required for safe confined space entry. Each person involved must understand their roles and responsibilities as well as which standards govern the work being performed and adhere to them. The matrix provided on page 2 is designed as a tool to aid in selecting the applicable standards that govern confined space entry based on where the work is located and who is performing the work. Again, the matrix is a tool and not a substitute for determining the correct requirements to follow.
2. Safety culture does not exist without vigilance. While selection from the many NAVSEA, NSTM's and OSHA confined spaced entry regulations can be confusing, it is imperative that the correct regulations are selected and followed for the type and location of the confined space. The phrase "The life you save may be your own" applies especially to confined space entry. It is each individual's responsibility to ensure only safe, approved practices and procedures are followed when entering confined spaces.

Additional information and guidance is located in OPNAV M-5100.23 Chapter 27.

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Key Requirements Relating to Rescue

The U.S. Navy has a written enterprise confined space program that requires an entry plan be developed before entering a confined space. Confined spaces will NOT be entered without a written confined space entry plan first being submitted, reviewed and certified by a Navy Board-certified GFE, Marine chemist afloat GFE or Competent Person, as applicable, to ensure completeness and executability of higher-level directives. A copy of the approved and certified plan will also be provided to the respective fire and emergency services (F&ES) department. This process includes troubleshooting, preventative and corrective maintenance.

Emergency and rescue procedures, to be most effective, must be consistent with the nature of the operations and the conditions within the confined or poorly ventilated enclosed space. Adequate consideration of emergency and rescue procedures must be made when evaluating confined or poorly ventilated enclosed space hazards. When personnel are entering and working in confined or poorly ventilated enclosed spaces, the GFE shall verify that emergency and rescue plans or procedures consider the following requirements:

- a. An emergency rescue control point is established at a location suitable to supply emergency rescue assistance within a reasonable period of time. The location must be clearly evaluated dependent upon the nature and conditions of the operation and the space. In some cases, such as in the case of emergency entries into the spaces which are immediately dangerous to life or health (IDLH), it may be necessary to locate the rescue control point immediately adjacent to the space. In other cases, a centrally located control point may serve a wide area involving multiple confined or poorly ventilated enclosed spaces. The appropriate dispatch center will be notified in advance of



Damage Controlman 3rd Class Rebecca Herrera, conducts gas-free testing in a confined space in the Commanding Officer's Passageway aboard USS Dwight D. Eisenhower (CVN 69). (U.S. Navy photo by Mass Communication Specialist 3rd Class Devin Alexondra Lowe)

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any confined space entry when team members are using supplied air or self-contained breathing apparatus (SCBA) and accessing Class 1 or Class 2 confined spaces. This notification will occur at least 60 minutes in advance of entry and when operations are completed. The dispatch center will notify F&ES of the Class 1 or Class 2 entry.

- b. Emergency rescue control points shall be manned with an adequate number of trained and qualified personnel to enable rescue of personnel from confined and poorly ventilated enclosed spaces. At least one person must have current certification in basic first aid and CPR. Rescue personnel must practice their skills at least annually. Practice drills shall include the use of mannequins and rescue equipment necessary for simulated rescue operations from confined and poorly ventilated enclosed spaces. If an actual rescue is performed during the 12-month period, an additional practice drill is not required.
- c. Rescue personnel entering a space to attempt rescue shall be equipped with a NIOSH- or MSHA-approved pressure-demand SCBA, harness, lifeline (where feasible) and any other personal protective equipment (PPE) applicable to the conditions.
- d. In all cases where conditions of entry and work in a confined or poorly ventilated enclosed space require the use of respiratory protective equipment, the attendants shall be equipped with a NIOSH- or MSHA-approved pressure-demand SCBA and any other PPE applicable for the conditions.
- e. Attendant personnel shall be thoroughly instructed that no rescue attempt involving entry shall be made until the rescue control point has been notified and assistance has arrived. However, rescue efforts by means of the lifeline (where used) shall be made from outside the entry point until assistance arrives to allow entry.
- f. All personnel involved in confined or poorly ventilated enclosed space entry or work shall be instructed in the proper procedures to be followed during rescue efforts, including the location of the rescue control point and the means of notifying the control point in the event of an emergency.
- g. Medical services and treatment shall be readily available for personnel overcome or injured in confined or poorly ventilated enclosed space incidents. Location of medical facilities and means of communication shall be incorporated into emergency and rescue plans.

Command and F&ES Responsibilities

Command:

- Manage Confined Space Program that describes the procedures and notifications required.
- Entrant will self-rescue if needed and/or required.
- Shore attendant will conduct non-entry assistance as specified by rescue procedure and equipment rescue at access.
- Ship Repair attendant will notify shop for non-emergent assistance or F&ES for emergency.
- There is no expectation that rescue teams or services are always available. In very few instances F&ES is not available, due to various factors, i.e., engaged in another response. Communication is required between Entry Team, Dispatch and F&ES on the installation.
- Assumption is F&ES is staffed for one emergency at a time when there is a F&ES station(s) on the installation. Plans are required to define expected actions if F&ES are dispatched to another emergency during a confined space entry.

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F&ES:

- In event of an emergency, F&ES will perform confined space rescue. Emergency includes incapacitation of or endangered or injured entrant, inability to self-rescue with an immediately dangerous to life or health (IDLH) situation or some other high hazard/emergent situation meeting definition in DoDI 6055.01. The primary responsibility for rescue rests with the entity making entrance into the confined space by either self-rescue or assisted rescue by the space attendant.
- Determine who is considered rescue service under 29 CFR 1910 and determine who is considered rescue team under 29 CFR 1915. For both, this is F&ES and only used in emergency situations unless F&ES is not available.
- Validate that rescue services and teams have appropriate training, equipment and proficiency.

Naval Safety Command Shore Directorate Contact Information:

- Safety Command Main Line/Shore Extension: (Comm) 757-444-3520 Ext. 7820, (DSN) 564-3520 Ext. 7820
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Cover: Two Commander Navy Region Japan (CNRJ) Fire & Emergency Services firefighters put a harness on a simulated casualty during confined space training onboard Commander, Fleet Activities Yokosuka(CFAY) Japan, Feb. 15, 2024. (U.S. Navy photo by Taylor Ardito)

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