

## IMPORTANT POINTS

As much as it's important for time cards to be handed in on time, it's as important that they are properly filled-in and signed by your supervisor at work. You have in your employment kit a copy of a time card as it should be filled-in. Please refer to this example. If you need further information, please do not hesitate to ask either Jean Beauchamp or Natalie Ferguson.

Some of you are handing in timecards late and some extreme cases almost a month old. This is causing problems for our payroll / accounting department. Our clients also expect to have their invoices in a timely fashion and in order for this to occur, you must hand in your timecards regularly. Furthermore, handing in your timecards on weekly basis means you will receive your pay every week.

All incidents or accidents that happen while at work and because of the work that you are doing have to be reported to LaborTek Immediately **WITHOUT EXCEPTIONS**

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## Confined space requirements demystified: Understanding the regulations and importance of preparation

Workers entering confined spaces as defined by provincial and federal health and safety regulations (*O. Reg. 632/05: CONFINED SPACES and the Canada Occupational Health and Safety Regulations (SOR/86-304)*) must be protected from risks.

The provincial regulation describes a "confined space" as a "fully or partially enclosed space, (a) that is not both designed and constructed for continuous human occupancy, and (b) in which atmospheric hazards may occur because of its construction, location or contents or because of work that is done in it."

Meanwhile the federal definition says that "confined space means an enclosed or partially enclosed space that; (a) is not designed or intended for human occupancy except for the purpose of performing work, (b) has restricted means of access and egress, and (c) may become hazardous to any person entering it owing to (i) its design, construction, location or atmosphere, (ii) the materials or substances in it, or (iii) any other conditions relating to it."

The regulations identify what both public and private sector employers must do to protect workers. There are stipulations that the employer must protect workers entering the confined space, but the regulations do not say how. These unknowns and unidentified gaps can stall companies and departments seeking to protect their employees.

When I get involved with confined space requirements, I start out by providing a Confined Space Roadmap as a fast-track tool so interested parties can learn for themselves what is required.

My top 11 roadmap items are:  
You need to become familiar with

the relevant regulations;  
Provide workers with confined space safety awareness;  
Develop a Confined Space Program and Policy; this includes specific confined space assessments;  
Develop an entry plan for each space (they can be grouped by type if they are similar);  
Acquire appropriate atmospheric testing equipment;  
Rent or purchase a rescue tripod/ rescue reel or mechanical advantage system;  
Provide PPE (personal protective equipment) - harness, footwear, coveralls, head protection, eye protection, gloves as required, and train workers on the care and use of the equipment;  
Review the program/policy and plan with workers;  
Train personnel on the responsibilities of entrant, attendant, and rescuers;  
Perform rescue rehearsals for the space to be entered; and  
Maintain documentation for the entry and training provided.

These 11 points are the basic steps to train and protect workers in a non IDLH (Immediately Dangerous to Life or Health) environment. This list does not include all of the training required if the environment is an IDLH confined space, which requires an exponential increase in training and rescue support.

One misconception is that a person can be trained as an "entrant", "attendant" and "rescuer" for any location or any type of confined space. This is false and a very dangerous misconception. Each space poses its own risks and challenges depending on the access point, interior and, exterior risks, or even the weather. Each risk needs to be identified and mitigated.

So in essence, each space requires training by type. This can be a daunting task and often times the conversations leads to, "you just have to come over and see it for yourself."

This is the best thing for me

and I enjoy the new spaces and reflect on solutions from past experience to support the best solutions. A collective analysis can lead to better risk mitigation that provides solutions for aspects of entry and egress, working in the space, atmospheric monitoring, communications and rescue challenges and solutions.

I always train to include a Plan B but in actual fact some locations may need multiple back-up plans in case of a main system failure or unforeseen circumstances. In the event of a real emergency, it is risky to try and figure out what you are going to do when you may only have minutes to spare. No one plans for an emergency to happen but if you don't plan for the potential for an emergency you have little hope of a successful rescue.

This is why point 10 states you perform rescue rehearsals that prove you have a viable rescue plan. I have been lucky enough to train workers that had rescue training plans that failed. The reason I say lucky is that this posed the question, "how can we make this work?" So we sharpen our pencils, white board the problem, and enlist everyone to create a rescue solution and try the new plan. At this point with every company and department, I see the turning point when workers know and understand the vital importance of the reentry and rescue plans and the importance of risk mitigation procedures.

Simply put, everyone entering the space needs to be able to get out safely – and this needs careful planning and training.