

Power Hour Q&A: Confined Space in Breweries – Best Practice

Q: Can anyone recommend a cost effective multi-gas meter?

(JF) I have used portable units from www.analox.net that are dependable and easy to use. I paid \$998 for my portable CO₂/O₂ monitor. They also manufacture and sell area CO₂ monitors which are essential for cellars and cold boxes.

Honeywell also carries portable multi-gas units. I recently purchased a 5 gas unit which measures CO₂, O₂, LEL, CO and H₂S and paid just under \$2000 for the unit. http://www.brandtinst.com/Honeywell/Honeywell_GasAlert_Micro5/Honeywell_GasAlert_Micro5_5-Gas-Detector.html Having a multi-gas unit when you have boilers (natural gas), waste water treatment (H₂S) and the other brewery hazards is also considered an essential safety tool.

A colleague of mine has used this company as well - <http://www.co2meter.com/>. However, the units only measure CO₂ – not O₂+CO₂.

Please remember that you will also need to purchase a calibration/bump testing kit with the meter so that you can ensure it is working correctly before testing a confined space.

Q: Can the Entry Attendant and the Entry Supervisor be the same person?

(JF) Yes, as long this person is able to remain dedicated to the task at hand (observing and monitoring the entrants). However, I recommend having a separate entry attendant and entry supervisor for a check and balance of the entry process.

Q: Would you be willing to share your written policies?

(JF) Once the Confined Space Entry BMP's are published, I would recommend basing your written policies off that document. In addition, your workers compensation insurance carrier is likely to have boiler plate templates or written programs that you can tailor to your own facility. As with most written safety programs, they really should be your own and specific to your operation. There are numerous examples on the internet that you can find to create your own written program with.

Q: Could you talk a little bit more about the equipment that you will be using for extraction?

(JF) The following link can provide a fairly detailed overview of the equipment necessary for extraction - <http://www.capitalsafety.com/en-us/pages/product-category-overview-page.aspx?prodCatId=11>. Essentially, the entrants will wear fall protection or rescue harnesses who are tethered to an extraction device which has a winch that can be used to extract them from the confined space.

Q: Ken spoke about breaking the plane of a PRCS. Would even operating the manway (that swings inward) require a re-classification or permit?

(KA) – Technically yes, OSHA considers entry to have occurred when any part of the body breaks the plane of the opening into the permit required confined space. If there are hazards present such as mechanical equipment, pressure, heat, chemicals etc. it is recommended that you eliminate these hazards prior to opening the manway. Testing at the opening of the manway is also recommended for spaces that contain CO2 or other contaminants because these materials can be released into the employees' faces when opening the manway.

Q: What was the driver to re-classify some spaces as not "confined space" but still follow all procedures and permitting? Insurance? Other?

(JF) – Primarily the driver was a reduction regulatory burden on our operations. If one has designated their spaces as permit required confined spaces, then all the regulations apply. By reclassifying, then the bulk of the regulations no longer apply – especially around onsite rescue services. However, we still follow the procedures and permitting as an extra layer of oversight to ensure our operations run as safe as possible.