HOST EMPLOYER RESPONSIBILITIES UNDER OSHA’S PRCS STANDARD

Don’t make the mistake of thinking that certain responsibilities under the Permit-Required Confined Space standard doesn’t apply to you because you choose not to have your employees enter those spaces. Employers (host employers) who choose to hire another employer (contractor) to enter PRCS have the obligation to ensure the safety those contract employees. Many contractor deaths in permit spaces are due to the fact that employers failed to exercise their authority over contractors or ignored situations where contractors exhibited dangerous behavior.

Under the Permit-Required Confined Space standard the host employer has 6 key obligations to ensure contractor safety:

1. The assessment and identification of permit spaces of the workplace must have been conducted. The host employer must advise the contractor of any permit spaces on their premises that the contractor may have a reason to enter.

2. The permit space must only be entered by the contractor in compliance with a PRCS program. The host and contractor must agree as to exactly what program will be followed.

3. The host employer must communicate the hazards in the space and the reasoning behind designating the space as a permit-required.

4. Hosts must also inform contractors of any entry precautions that have been implemented.

5. Hosts must coordinate operations with the contractor when host and contractor employees will be working in or near permit spaces.

6. At the end of the entry operations, the contractor must debrief the host regarding the permit program and any hazards confronted in the space during entry operations.

Entry precautions can include draining, flushing and rinsing a space; isolating the space by disconnecting lines, blanking or providing a double block-and-bleed system; locking out mechanical equipment; flagging or barricading the work area; de-energizing electrical equipment; providing temporary lighting; purging and ventilating the space; and performing initial atmospheric testing.