

III. Interpretive Guidance

Inspectors and consultants must cite code violations of Chapter 296-45 WAC and Chapter 296-809 WAC, in reference to all confined space hazards, applying the standard appropriate to the hazard being cited.

A. What are the requirements for underground and underground residential distribution electrical work?

WAC 296-45-205(6) makes it clear that all provisions of WAC 296-809, apply whenever employees enter an enclosed space while it contains a hazardous atmosphere. For such spaces, any violations must be cited using the specific provisions in WAC 296-809. For other spaces where a hazard may exist, WAC 296-45-205(7) requires that for underground and underground residential distribution electrical work an attendant ("watchman") shall be kept at the surface. For such spaces, DOSH staff must cite violations for the lack of an attendant or for a failure to ensure that the attendant performs properly using WAC 296-45-205(7). Violations related to attendant duties can be supplemented by reference to the attendant duties in Chapter 296-809, but the requirements of Chapter 296-45 must provide the basis for the citation.

B. What are the requirements while work is performed on energized wires, cables, or appliances?

WAC 296-45-65037(10) and WAC 296-45-65038(4)(a) require two or more competent or qualified persons to be in the same manhole or subway while performing work on any energized wire, electrical cable or electrical appliance carrying more than 300 volts of electricity for underground and underground residential distribution.

C. How should confined space requirements be applied to electrical workers where electrical hazards are present?

Employers should be encouraged to eliminate all safety and health hazards for their confined space work. However, at times the electrical systems will be energized in the confined space due to the requirements of the electrical work in question.

- a. DOSH staff must not issue violations of Chapter 296-809 WAC, for the failure of electrical lockout-tagout during electrical work by the electrical contractor or utility. However, the appropriate violation under Chapter 296-809 WAC, must be issued for any other safety and health hazards not eliminated or otherwise controlled so as to not pose a hazard to the electrical workers.
- b. Such confined space situations are permit-required confined space entries and alternative entry provisions of WAC 296-809-60002 cannot be used.

D. Are employers subject to Chapter 296-45 WAC required to use forced ventilation and atmospheric testing when working underground?

Chapter 296-45-205(9) WAC allows forced ventilation *or* oxygen deficient testing prior to entry into underground manholes or unvented vaults and during entry work. Therefore, DOSH staff must not cite violations of Chapter 296-809 WAC, for a failure to perform both tasks.

Approved: _____
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