# Section 9.22: Alternative measures of control or isolation of adjacent piping

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#### Prevention Practices and Quality (PPQ)

- Senior Prevention Advisors provide advice and support to prevention officers and senior management on various aspects of the Act and Regulations
  - Legal and technical interpretations of the Act and Regulations
- PPQ also has senior engineers that also provide advice to officers
- Other roles of PPQ
  - Variances and acceptance reviews
  - Assist officers with orders reviews
  - Assist external stakeholders with application of the Act/Regulation (Guidelines)
  - Develop various materials and documents to assist in the implementation of new policies and regulations (training for officers, FAQs, Primers, website and other communication material)

## Some definitions to know first Alternative measures of control or isolation of adjacent piping

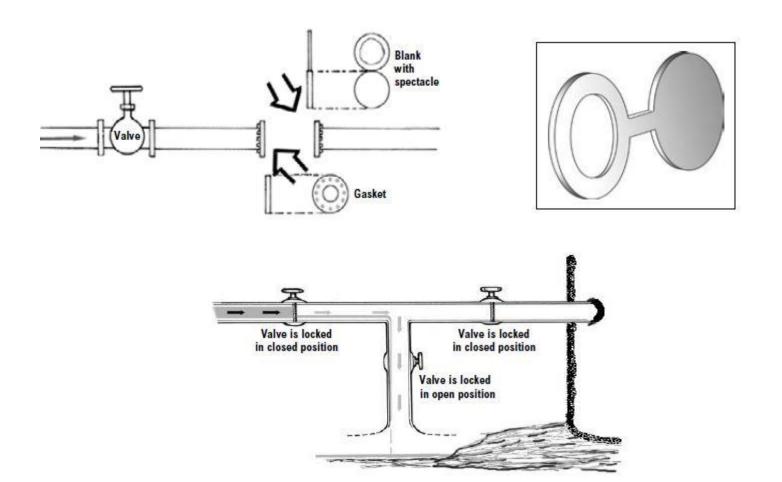
"Adjacent piping" means a device such as a pipe, line, duct or conduit which is connected to a confined space or is so located as to allow a substance from within the device to enter the confined space

"**Harmful substance**" means a WHMIS hazardous product, a substance referred to under section 5.48, or a substance which may have a harmful effect on a worker in a confined space

Also definitions for

- Disconnecting
- o Blank
- Blanking or blinding
- o Blind

#### Some common isolation methods



#### What does section 9.18 say?

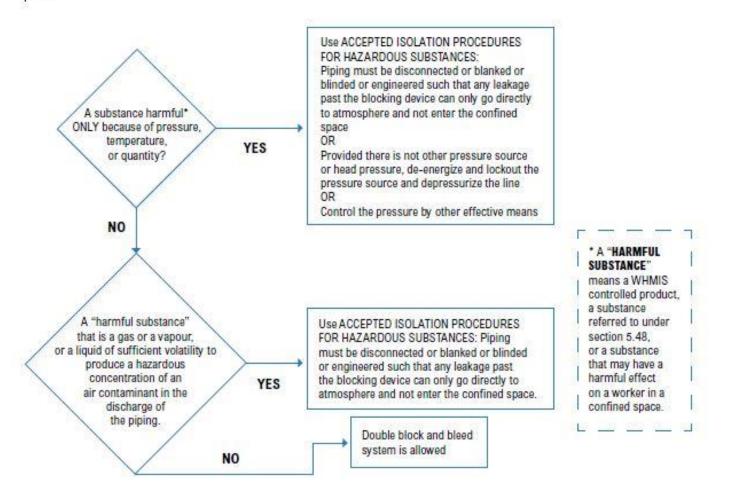
Control of harmful substance in adjacent piping

- 1. For a **volatile liquid, gas or vapour**, control by disconnecting or isolating using blanks or blinds
- For a harmful substance that is not a volatile liquid, gas or vapour, control by disconnecting, or isolating by blanks, blinds, or use a double block and bleed system
- 3. For a harmful substance that is harmful only because of the temperature, pressure or quantity of the substance, control by disconnecting, isolate by blanks, blinds, double block and bleed, isolating in a manner that's certified by a P. Engineer, or if no head pressure, by de-energizing and locking out the pressure sources and depressurizing the adjacent piping

#### Confined space entry program: manual

Adjacent piping with a HARMFUL\* substance?

Start:



### What does section 9.22 say?

## Alternative measures of control or isolation of adjacent piping

(1) Section 9.18 does not apply if

- a) a measure specified in section 9.18 to control or isolate harmful substances contained in adjacent piping from a confined space is **not practicable**, and
- b) The employer implements alternative measures of control or isolation that are **acceptable to the Board**.
- (2) All workers affected by measures implemented under subsection (1) must be informed of the measures taken and instructed in any applicable work procedures.

#### Acceptable to the Board What's the process under section 9.22?



#### Acceptances

#### Guidelines and other resources

#### Who submits the acceptance request

• Owner of the confined space or the contractor doing the work in the confined space may apply for the acceptance for alternative measures

#### What to include in the submission

- WorkSafeBC has developed two guidelines:
  - $_{\odot}\,$  G9.22-1 Alternate measures Making submissions; and
  - $\circ$  G9.22-2 Alternate measures for confined spaces municipal sewage systems
- Online form: Cover letter (worksafebc.com type variances and acceptances)

#### **Other resources**

- Confined Space Entry Program: A Reference Manual
- Coming soon: revision of the two guidelines for alternative measures will include examples of the common alternative measures we've accepted

#### Main Elements of a Submission

- 1. Scope of application
- 2. Why isolation using the measures in s.9.18 are not practicable.
- Contact information of the CS administrator and the qualified persons involved.
- 4. Description of the hazards
- 5. Detailed description of the alternative measures to be implemented
- 6. How workers will be informed and instructed of the measures
- 7. How the use of the alternative measures will be supervised and by whom
- 8. Time period for which the alternative measures will be needed.
- 9. How the JHSC or worker health and safety representative was consulted on the alternative measures

#### Common alternative measures of control

Some examples of controls are:

- Use of other means of isolation valves, gates, inflatable bladders, freezing sections of piping, redirecting flow
- Leakage monitoring and pumping
- Air monitoring and ventilation
- PPE
- Communication plan
- Evacuation plan
- Instruction and training
- Control of other hazards e.g. electrical, falls

## Questions?