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

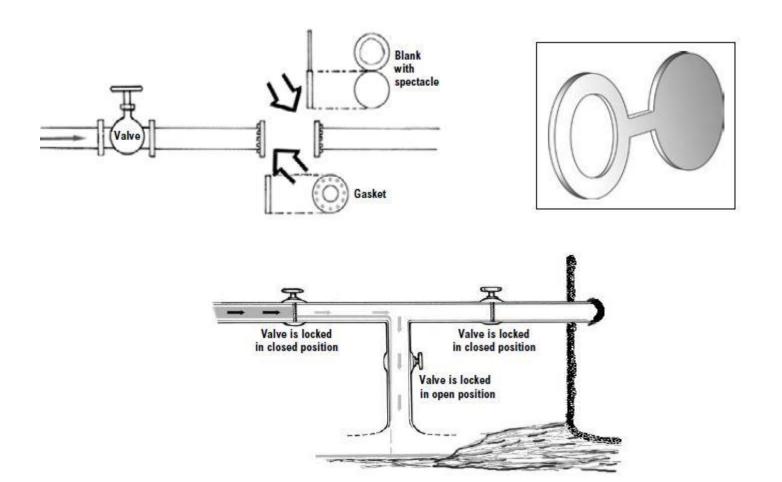
"Adjacent piping" means a device such as a pipe, line, duct or conduit which is connected to a confined space or is so located as to allow a substance from within the device to enter the confined space

"**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?

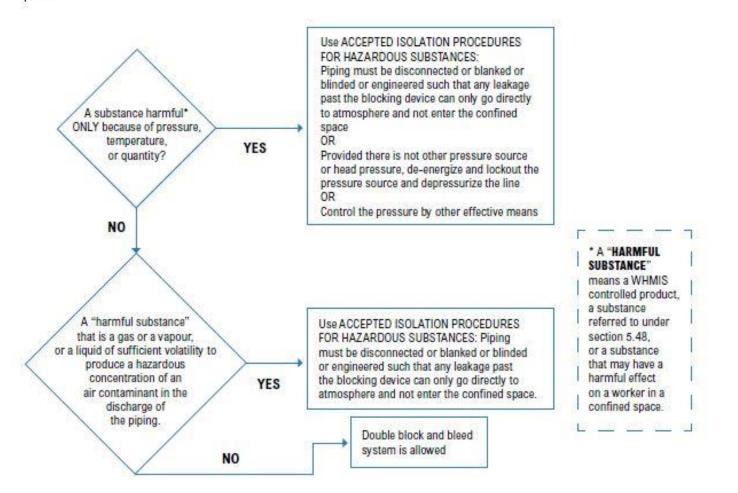
Control of harmful substance in adjacent piping

- 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:



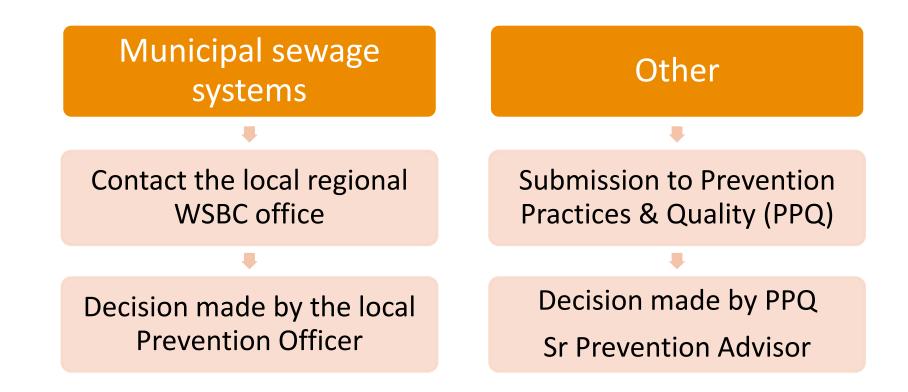
What does section 9.22 say?

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?