

## How to Select Confined Space Emergency Rescue Teams

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A question was brought up recently about whether Public Works employees are required to provide first aid as part of their work in permit entry confined spaces. In general, first aid training and administration falls under standards 29 CFR 1910.151 and 1926.50(c) which are generally applied throughout the industries that they cover. However, there are other OSHA standards in which certain specific hazards or industries make employee first aid training mandatory, and reliance on outside emergency responders is not an allowable alternative. OSHA mandates first aid training for logging employees, but the confined space standard allows employers to make the determination of which techniques in response to its specific hazards will ensure the safest work environment possible.

OSHA's Confined Space Standard (29 CFR 1910.146) states that an employer is expected to draft as part of its permit entry confined space program an employer-specific rescue procedure in the event of an emergency while work is performed in that space. That employer-specific rescue procedure should include non-entry rescue protocols and outline expectations of response by assigned employees.

When employees are designated to provide permit space rescue and emergency services, the employer must provide the necessary rescue personal protective equipment and training in its use as well as training in their assigned rescue duties. The employer is also obligated to train affected employees in basic first-aid and cardiopulmonary resuscitation (CPR) and "Ensure that at least one member of the rescue team or service holding a current certification in first aid and CPR is available [1910.146\(k\)\(2\)\(iii\)](#)."

While professional rescue services are available and EMS providers may seem like a better option to rely on in an emergency, it is considered an industry best practice to have a non-entry rescue plan in place that includes an in-house rescue team that is assigned, trained, and available to provide aid. While there are potentially more qualified response personnel minutes away from an emergency, critical moments can be lost due to delays in emergency services arrival to a scene, need to assess their own risks of entry, and setting up rescue equipment before entry and rescue can begin.

The standard does offer help in this decision making by including the Non-Mandatory Appendix F - Rescue Team or Rescue Service Evaluation Criteria. This serves as a guide for helping employers evaluate whether their emergency rescue options are adequate.

Finally, cross coordinate information in the confined space policy to the bloodborne pathogens policy. Any employees expected to provide first aid (as part of an OSHA standard requirement or otherwise), are then considered to have reasonable anticipation of exposure and should be included in the employer's Exposure Control Plan.

Resources:

- [Non-Mandatory Appendix F - Rescue Team or Rescue Service Evaluation Criteria](#)
- [Letter of Interpretation \(OSHA requirements for providing First Aid\)](#)
- [Letter of Interpretation \(Clarification of "proximity"\)](#)
- [Article: Confined-Space-Rescue-The-Good-the-Bad-and-the-Ugly.aspx](#)
- [Pooled Pricing: StartGroup Confined Space Inventory](#)
- [IRMA's Bloodborne Pathogens Model Policy](#)