



Oregon
Theodore R. Kulongoski, Governor

Department of Consumer and Business Services
Oregon Occupational Safety & Health Division (OR-OSHA)
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January 3, 1996

Reviewed: November 25, 2007

Bruce Hulberg
Safety and Compliance Coordinator
Seneca Sawmill Company
P.O. Box 851
Eugene, OR 97440-0851

Dear Mr. Hulberg:

This is in response to your December 15, 1995 letter requesting a rule interpretation concerning entry into the mill planer baghouse. You asked if the permit required confined space entry into the baghouse could be performed under 1910.146(c)(7).

This provision of the regulation applies to permit required confined spaces which pose no actual or potential atmospheric hazards. If the space poses a potential atmospheric hazard (for explosion), then the space cannot be reclassified as a non-permit space under 1910.146(c)(7).

There is insufficient information in your letter to determine whether or not the possibility of an explosive atmosphere may exist in this space. Also, the entry procedures which you provided for our review indicate that atmospheric testing will be conducted for all entries into the planer baghouse. Apparently your hazard evaluation indicated the possibility of oxygen deficient or toxic atmospheres in the baghouse. Because of the possibility of actual or potential atmospheric hazards, this space could not be reclassified as a non-permit space under 1910.146(c)(7).

If you have further questions, please contact OR-OSHA's Technical Section at (503) 378-3272.

Sincerely,

Marilyn Schuster, Manager
Standards and Technical Resources Section