



District of Chetwynd

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WorkSafeBC
Prevention Policy & Regulation Review Department
Policy and Research Division
PO Box 5350 Station Terminal
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Via fax: 1-877-279-7599

To Whom it may concern:

RE: PROPOSED AMENDMENT TO OH&S REGULATION

The District of Chetwynd supports for the most part the proposed changes to the Occupational Health and Safety Regulations, but would like to offer comments on the following section.

Part 9, Confined Spaces

The proposed amendment to Section 9.11, Qualifications, requires those with the professional credentials of certified industrial hygienist or registered occupational hygienist have experience in confined space entry before being deemed to be "qualified" to conduct hazard assessments and written confined space entry procedures. This is a reasonable amendment, in conjunction with subsection 2(c) which provides the Board officer the leeway to recognize other education, training and experience acceptable to the Board. It is entirely possible for someone without the designated credentials to be deemed to be "qualified" to conduct hazard assessments and prepare written confined space entry procedures.

The proposed amendment to Section 9.11 is supported even though it suits larger municipalities where there are generally full time safety staff who can perform the requirements. However it is still quite onerous on smaller municipalities to try and find someone who is certified or deemed certified by the

board to carry out an assessment and then produce procedures. Perhaps WorkSafeBC should look at some sort of funding or push the Provincial Government to help small municipalities with these type of requirements. This being said, we ourselves are moving forward with these requirements to ensure the safety to our employees.

Section 9.18 is proposed to be amended by removing the distinction between pressures within a pipe, recognizing that pressures above or below 15 psig could be hazardous.

There has been insufficient change to this section from a Municipal perspective.

1. *"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.

This requires isolation of potable water lines in valve chambers if the water lines have valves or pumps in line, even though the integrity of that particular system is not being compromised. Risk Assessments support the practice of acknowledging the hazard with no probability of exposure as long as the integrity of the system is not compromised. As such, further isolation is not necessary as it is part of an engineered system.

The Regulation should acknowledge this.

2. 9.18(4) single valve isolation: In respect to isolating a substance that is hazardous only because of its pressure, temperature or quantity, in particular potable water: we must keep in mind that municipal water systems are designed and engineered. American Water and Waste Association standards appear to accept the design and use of single valve isolation, reducing pressure behind the line. There is no history of catastrophic failure of the valves.

In respect to single or multiple valve failures – they do not occur. There is no history of catastrophic failure of the valves. Isolation requirements in potable water systems should reflect the use of single valve isolation, reducing pressure to minimum acceptable operational parameters.

The proposed amendment to Section 9.22, and the corresponding Guideline, allowing alternate isolation measures other than those listed in section 9.18, provides a reasonable opportunity for employers to implement alternate isolation measures if the isolation procedures outlined in 9.18 are not practicable.

However, the requirement for applications for alternate measures is an administrative burden and does not work in emergency situations such as water

main breaks. The process is well understood; the provision of blanket alternate measures should be a consideration, and should be addressed in the guidelines. From a municipal perspective, this change is supported as there are certain situations where isolation in strict compliance with 9.18 is not possible or practicable.

We thank you for the opportunity to comment on the proposed regulation changes.

Yours truly,



Rob Crisfield
Deputy Dir. of Engineering & Public Works

Sent via(Fax)