

# Memorandum

DATE: August 31, 2015

WAP Memorandum 013

REPLY TO

ATTN OF: AnnaMaria Garcia, Director *JRG FOR AMG 8-31-15*  
Weatherization and Intergovernmental Program Office

SUBJECT: Updated OSHA requirements for Confined Space Entry, including Attics and Crawl Spaces

TO: Weatherization Assistance Program (WAP) Grantees

In May 2015, OSHA developed a new construction standard for protections to employees working in confined spaces. Confined spaces is defined by OSHA in 29 CFR 1926.1202 as a space that:

- Is large enough and so configured that an employee can bodily enter it;
- Has limited or restricted means for entry and exit; and,
- Is not designed for continuous employee occupancy.

These criteria may affect DOE's weatherization work, most notably for the attics and crawl spaces often accessed and worked in during the course of weatherizing a home. This standard (29 CFR 1926 Subpart AA) took effect August 3, 2015. OSHA has issued a 60 day extension to the enforcement of this rule via a memorandum titled "[Temporary Enforcement Policy for Construction Work in Confined Spaces](#)", which moves the effective enforcement date to October 2, 2015.

As with all OSHA standards, interpretation and enforcement of 29 CFR 1926 is the purview of OSHA and Grantees are encouraged to contact their state OSHA representative. OSHA offices can be located through the following link: <https://www.osha.gov/html/RAmap.html>

DOE encourages Grantees to be proactive in ensuring their WAP network is operating in compliance with the new standard. Depending on current practices and training regimens, additional training, air monitoring, and crawl space and attic safety protocols may be necessary. DOE will update the next version of our Health and Safety Weatherization Program Notice to reflect this standard.

Please note that any health and safety training required to perform WAP work, including OSHA training, can be paid for with WAP training and technical assistance funds.

**Additional Resources related to this issue can be found through the following:**

[Fact Sheet on Confined Spaces in Construction: Crawl Spaces and Attics](#)

<https://www.osha.gov/Publications/OSHA3787.pdf>

[Confined Spaces FAQs](#)

<https://www.osha.gov/confinedspaces/faq.html>

[Final Rule 29 CFR 1926 Subpart AA](#)

[https://www.osha.gov/confinedspaces/1926\\_subpart\\_aa.pdf](https://www.osha.gov/confinedspaces/1926_subpart_aa.pdf)

[Temporary Enforcement Policy for Construction Work in Confined Spaces](#)

[https://www.osha.gov/confinedspaces/tempenforcementpolicy\\_0715.html](https://www.osha.gov/confinedspaces/tempenforcementpolicy_0715.html)