



# Oregon

Theodore R. Kulongoski, Governor

**Department of Consumer and Business Services**  
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July 11, 1996

Reviewed: November 25, 2007

Chris Scully, Safety Engineer  
Intel Corporation  
AL4-91  
5200 NE Elam Young Parkway  
Hillsboro, OR 97124-6497

Dear Mr. Scully,

This is in response to your letter requesting clarifications on 1910.146, "Permit Required Confined Spaces." This is also a follow-up to the telephone conversation you had with David McLaughlin on July 9, 1996, regarding this issue.

1910.146(c)(7) allows permit required confined spaces to be reclassified as non-permit spaces when there are no actual or potential physical or atmospheric hazards. This reclassification may remain until there are actual or potential physical or atmospheric hazards.

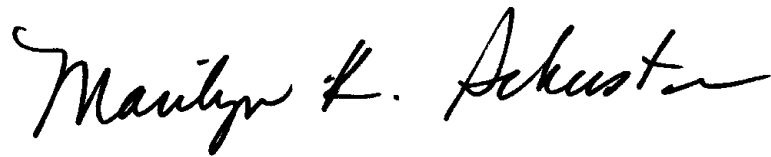
When a permit space is reclassified as a non-permit space, the basis for determining that all of the hazards have been eliminated must be documented through written certification that includes the date of the reclassification, the space that has been reclassified, and the signature of the person making the determination.

During entry into a reclassified space, if any hazards arise, all employees must immediately exit the space and the space must be reevaluated to determine if it is a permit required confined space.

In the 2 class system that you have proposed, a Class 1 Confined Space may be reclassified as a non-permit required confined space if there are no actual or potential physical hazards, there are no potential atmospheric hazards, and air monitoring shows that there are no actual atmospheric hazards before and during the entry.

We hope this answers your question regarding confined spaces. If you have any questions or if we can be of further assistance, please contact David McLaughlin at (503) 378-3272.

Sincerely,

A handwritten signature in black ink that reads "Marilyn K. Schuster". The signature is written in a cursive style with a long, sweeping underline.

Marilyn K. Schuster, Manager  
Standards and Technical Resources Section  
Oregon Occupational Safety and Health Division