



**INTEROFFICE MEMORANDUM**  
**Oregon Occupational Safety & Health Division**

**Date:** April 7, 1997  
**Reviewed:** November 25, 2007  
**TO:** Carl Lukens  
**FROM:** Marilyn K. Schuster, Manager  
Standards and Technical Resources Section  
**SUBJECT:** Confined Spaces

This memo is in regard to your question about a confined space where employees are tied off to prevent them from falling into a cyclone chamber. You asked if this would allow the employer to reclassify the space as non-permit required.

OAR 437-02-1910.146, Permit-Required Confined Spaces allows for permit spaces to be reclassified only when all potential hazards are eliminated. The use of a harness and restraint line would not be a basis to reclassify the space because this would be a form of hazard control, rather than hazard elimination.

A permanent barrier to guard against falling would eliminate the falling hazard, which would remain eliminated as long as employees could not get through or around the barrier. This would allow for the reclassification of the space.

In answer to your second question, what information is required to be recorded when a permit space is reclassified, the date, location, signature of the person making the determination, and the criteria that was used to determine that the hazards and/or potential hazards had been eliminated, are required to be recorded each time a permit space is reclassified.

However, there is no set manner in which this data must be recorded, so if the hazards in a particular space and the methods of eliminating them are the same every time, a running log or a checklist to signify that the particular hazards and methods of their elimination may be used, so long as there are no additional hazards or potential hazards.