12.55 ELEVATOR PITS AS CONFINED SPACES
DATE: September 2, 2002

I. Background
After the current confined space standard took effect in March of 1995, the Department of Labor and Industries received several inquiries regarding elevator pits and vaults in light of WAC 296-62-141 et seq (Part M of Chapter 296-62 WAC).

Previous department correspondence (dated May 19, 1994) addressed elevator pits in relation to the old Part M. However, the current Part M changed the definition of confined spaces and their associated requirements. This policy directive, based on a memo originally issued in September of 1996, reflects those changes.

II. Scope
This WISHA Regional Directive (WRD), which will remain in effect indefinitely, provides guidance to WISHA consultation and enforcement staff regarding elevator pits. It replaces, but does not substantively change, the previous WRD 12.55.

III. Application Guidance
A. Is an elevator pit a "confined space" under the standard?
Most elevator pits fall under the current definition of confined space. But this does not necessarily mean that they fall within the definition of a permit-required confined space. In determining whether employers have met their obligations under WAC 296-62-141, the inspector or consultant must evaluate each elevator pit on a case-by-case basis to determine whether it meets the definition of a permit-required confined space under the standard.

B. What options does an employer have if an elevator pit meets the definition of a permit-required confined space?
In the event that an elevator pit (or other space) is identified as a permit-required confined space, the employer may take actions to convert it from a permit space to a non-permit space (eliminating all hazards) or may use alternative entry procedures in accordance with WAC 296-62-141.

Approved:
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For further information about this or other WISHA Regional Directives, you may contact WISHA Policy & Technical Services at P.O. Box 44648, Olympia, WA 98504-4648 or by telephone at (360)902-5503. You also may review policy information on the WISHA Website (http://www.wa.gov/lni/wisha).