

CONFINED SPACE ENTRY POLICY for NON-PERMIT REQUIRED & “ALTERNATIVE PROCEDURES” SPACES

Clancy & Theys employees are not permitted to enter a Permit Required Confined Space (PRCS). However, if the PRCS is deemed by a C&T Competent Person to be a Non-PRCS or “Alternative Procedures” are utilized then employees may enter the space as long as the intent of OSHA standards 29 CFR 1926.1203(g) are met.

Definitions

1. *"Confined space" means a space that:*
 - a. *Is large enough and so configured that an employee can bodily enter and perform assigned work; and*
 - b. *Has limited or restricted means for entry or exit (for example, tanks, vessels, silos, storage bins, hoppers, vaults, and pits are spaces that may have limited means of entry.); and*
 - c. *Is not designed for continuous employee occupancy.*
2. *"Permit-required confined space (permit space)" means a confined space that has one or more of the following characteristics:*
 - a. *Contains or has a potential to contain a hazardous atmosphere;*
 - b. *Contains a material that has the potential for engulfing an entrant;*
 - c. *Has an internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls or by a floor which slopes downward and tapers to a smaller cross-section; or*
 - d. *Contains any other recognized serious safety or health hazard.*

Identification of Confined Spaces

Signage will be posted to identify all confined spaces on the project.

Non-Permit Required Confined Space Entry

In order for a PRCS to be reclassified to a Non-PRCS **ALL OF THE FOLLOWING MUST BE MET.**

1. If the permit space poses no actual or potential atmospheric hazards and if all hazards within the space are eliminated or isolated without entry into the space (unless the employer can demonstrate that doing so without entry is infeasible), the permit space may be reclassified as a non-permit confined space for as long as the non-atmospheric hazards remain eliminated or isolated;
2. The entry employer must eliminate or isolate the hazards without entering the space, unless it can demonstrate that this is infeasible. If it is necessary to enter the permit space to eliminate or isolate hazards, such entry must be performed under OSHA 29 CFR 1926.1204 through 1926.1211. If testing and inspection during that entry demonstrate that the hazards within the permit space have been eliminated or isolated, the permit space may be reclassified as a non-permit confined space for as long as the hazards remain eliminated or isolated;
 - a. Control of atmospheric hazards through forced air ventilation does not constitute elimination or isolation of the hazards. OSHA 29 CFR 1926.1203(e) covers permit space entry where the employer can demonstrate that forced air ventilation alone will control all hazards in the space.
3. The entry employer must document the basis for determining that all hazards in a permit space have been eliminated or isolated, through a certification that contains the date, the location of the space, and the signature of the person making the determination. The certification must be made available to each employee entering the space or to that employee's authorized representative; and
4. If hazards arise within a permit space that has been reclassified as a non-permit space, each employee in the space must exit the space. The entry employer must then reevaluate the space and reclassify it as a permit space as appropriate in accordance with all other applicable provisions of this standard.

Entry into a Permit Required Confined Space Utilizing “Alternative Procedures”

Entry into a PRCS by C&T Employees is only allowed when the “alternate procedures” specified within this policy.

1. An employer whose employees enter a permit space need not comply with OSHA 29 CFR 1926.1204 through 1206 and 1926.1208 through 1211, provided that all of the following conditions are met:
 - a. Demonstration that all physical hazards in the space are eliminated or isolated through engineering controls so that the only hazard posed by the permit space is an actual or potential hazardous atmosphere;
 - b. Demonstration that continuous forced air ventilation alone is sufficient to maintain that permit space safe for entry, and that, in the event the ventilation system stops working, entrants can exit the space safely;
 - c. Develop and document monitoring and inspection data that supports the demonstrations.
 - i. The determinations and supporting data required will be made available to each employee who enters the permit space; and
 - d. Entry into the permit space under the terms of this section is performed in accordance with the requirements of paragraph (2) of this section.
 - i. **Note:** See section on (Non-Permit Required Confined Space Entry) for reclassification of a permit space after all hazards within the space have been eliminated.
2. The following requirements apply to entry into permit spaces that meet the conditions set forth in paragraph (1) of this section:
 - a. Any conditions making it unsafe to remove an entrance cover must be eliminated before the cover is removed.
 - b. When entrance covers are removed, the opening must be immediately guarded by a railing, temporary cover, or other temporary barrier that will prevent an accidental fall through the opening and that will protect each employee working in the space from foreign objects entering the space.
 - c. Before an employee enters the space, the internal atmosphere must be tested, with a calibrated direct-reading instrument, for oxygen content, for flammable gases and vapors, and for potential toxic air contaminants, in that order. Any employee who enters the space, or that employee's authorized representative, must be provided an opportunity to observe the pre-entry testing required by this paragraph.
 - d. No hazardous atmosphere is permitted within the space whenever any employee is inside the space.
 - e. Continuous forced air ventilation must be used, as follows:
 - i. An employee must not enter the space until the forced air ventilation has eliminated any hazardous atmosphere;
 - ii. The forced air ventilation must be so directed as to ventilate the immediate areas where an employee is or will be present within the space and must continue until all employees have left the space;
 - iii. The air supply for the forced air ventilation must be from a clean source and must not increase the hazards in the space
 - f. The atmosphere within the space must be continuously monitored unless the entry employer can demonstrate that equipment for continuous monitoring is not commercially available or periodic monitoring is sufficient. If continuous monitoring is used, the employer must ensure that the monitoring equipment has an alarm that will notify all entrants if a specified atmospheric threshold is achieved, or that an employee will check the monitor with sufficient frequency to ensure that entrants have adequate time to escape. If continuous monitoring is not used, periodic monitoring is required. All monitoring must ensure that the continuous forced air ventilation is preventing the

accumulation of a hazardous atmosphere. Any employee who enters the space must be provided with an opportunity to observe the testing required by this paragraph.

- g. If a hazard is detected during entry:
 - i. Each employee must leave the space immediately;
 - 1. The space must be evaluated to determine how the hazard developed; and
 - 2. The employer must implement measures to protect employees from the hazard before any subsequent entry takes place.
 - ii. The employer must ensure a safe method of entering and exiting the space.
 - 1. If a hoisting system is used, it must be designed and manufactured for personnel hoisting; however, a job-made hoisting system is permissible if it is approved for personnel hoisting by a registered professional engineer, in writing, prior to use.
 - iii. The employer must verify that the space is safe for entry and that the pre-entry measures required by paragraph (2)(a-f) of this section have been taken, through a written certification that contains the date, the location of the space, and the signature of the person providing the certification.
 - 1. The certification must be made before entry and must be made available to each employee entering the space.

Certification of Safe Entry into a Non-Permit Required Confined Space

Project Name: _____

Competent Person: _____

Description of Space Location: _____

Description of Task(s): _____

Date Issued _____

Date Expired _____

Time Issued _____

Time Expired _____

Hazard Evaluation

- | | | |
|---|----|-----|
| 1. Is there a potential for atmospheric hazards within the confined space? | No | Yes |
| a. Was atmospheric testing required? | No | Yes |
| 2. Is there a potential for workers within the confined space to encounter any other hazards? | No | Yes |
| 3. If potential hazards were present were they eliminated or isolated? | No | Yes |
| a. If hazards were present but were eliminated or isolated, describe methods used. | | |

Entrants

The following entrants have been trained to enter a Non-PRCS and have been notified to immediately exit the space upon recognition of any potential or suspected hazard.

Entrant Name (Printed)

Entrant (Signature)

Entrant Name (Printed)

Entrant (Signature)

Entrant Name (Printed)

Entrant (Signature)

Entrant Name (Printed)

Entrant (Signature)

_____ As Competent Person I certify that the space is safe for entry.
Signature of Competent Person

Certification of Safe Entry into a Permit Required Confined Space Using Alternative Procedures

Project Name: _____ Date Issued: _____

Competent Person: _____ Date Expired: _____

Description of Space Location: _____

Description of Task(s): _____

Hazard Evaluation

- | | | |
|--|----|-----|
| 1. Is there a potential for atmospheric hazards within the confined space? | No | Yes |
| 2. Have all physical hazards in the space are eliminated or isolated through engineering controls so that the only hazard posed by the permit space is an actual or potential hazardous atmosphere? | No | Yes |
| 3. Is continuous forced air ventilation alone is sufficient to maintain that permit space safe for entry, and that, in the event the ventilation system stops working, entrants can exit the space safely? | No | Yes |

Atmospheric Testing Data

Initial Test Prior To Entry

Time	Oxygen >19.5% - <23.5%	Flammable <10% LFL	Hydrogen Sulfide </= 10ppm	Carbon Monoxide </= 50ppm

Periodic Testing

Time	Oxygen >19.5% - <23.5%	Flammable <10% LFL	Hydrogen Sulfide </= 10ppm	Carbon Monoxide </= 50ppm

Entrants

The following entrants have been trained to enter a PRCS utilizing *Alternative Procedures* and have been notified to immediately exit the space upon recognition of any potential or suspected hazard.

Entrant Name (Printed)

Entrant (Signature)

Entrant Name (Printed)

Entrant (Signature)

Entrant Name (Printed)

Entrant (Signature)

Entrant Name (Printed)

Entrant (Signature)

Signature of Competent Person As Competent Person I certify that the space is safe for entry.