

Confined Space Policy

For

Carmel Central School District

SECTION IV - PROGRAM ADMINISTRATION - WRITTEN PLAN

1.0 POLICY

Carmel Central School District is committed to provide a safe and healthful work environment for our entire staff. In pursuit of this endeavor, the following written program is in place to first identify any Permit-Required Confined Spaces (PRCS) and to eliminate or control hazards associated with PRCS operations. This program is in accordance with the Occupational Safety and Health Administration's (OSHA) Permit-Required Confined Spaces Standard, Title 29, Code of Federal Regulations 1910.146.

2.0 RESPONSIBILITIES

2.1 Overall Program Responsibility

Head Custodian is responsible for the overall implementation and maintenance of any written program or any certification concerning the requirements of the Permit-Required Confined Space Standard at our facility.

2.2 Permit-Required Confined Space Evaluation

Head Custodian is responsible for evaluating the workplace to determine if any permit spaces are present.

—Note to the Employer: If no permit-required confined spaces are determined to exist at the facility, no further action is needed (refer to subsection 3.0 for additional clarification).

Head Custodian will be responsible for determining if a PRCS program is required, or if the permit space can be reclassified as a non-permit space, or if alternative procedures can be used.

2.3 Training

Director of Facilities is responsible for ensuring that all affected personnel are properly trained and that refresher training is given. Personnel who may be included are any authorized entrants, attendants, entry supervisors, on-site rescue team members, and employees who may potentially enter the space.

2.4 Initial Contacting For Rescue Services

Head Custodian will ensure that rescue and emergency services have been informed of any permit-required confined spaces at Carmel Central School District and have been given access to the spaces for drills, training, etc.

—Note to the Employer: The completion of 2.4 is not a required entry if the permit space is reclassified as a non-permit space or if alternate procedures are used. However, if an entry is required to verify the elimination of the hazard, then a full PRCS program is needed and 2.4 must be completed.

2.5 Equipment

Director of Facilities will ensure that all equipment needed for safe entry into any permit spaces and non-permit spaces is available and in proper working order.

3.0 PERMIT SPACE IDENTIFICATION

3.1

Company Representative has evaluated the workplace and determined

(Check appropriate box)

No Permit-Required Confined Space(s) Exist at the Worksite.

Permit-Required Confined Space(s) Have Been Determined to Exist.

—Note to the Employer: Refer to Appendix C for information to assist in the determination process. As a reminder, a confined space is a space which:

- \$ Is large enough and so configured that an employee can bodily enter and perform assigned work; and
- \$ 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
- \$ Is not designed for continuous employee occupancy.

A permit space is a confined space which has one or more of the following characteristics:

- \$ Contains or has a potential to contain a hazardous atmosphere;
- \$ Contains a material that has the potential for engulfing an entrant;
- \$ 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
- \$ Contains any other recognized serious safety or health hazard. (i.e., electrical, mechanical, etc.).

If no permit spaces are identified, no further action is required.

—Note to the Employer: Develop a list of all permit-required confined spaces including their locations and identified hazard(s) which qualify it as a permit space. Though not mandated by the standard, it would be wise to develop a second list of all non-permit confined spaces in the event that these spaces are reclassified in the future.

3.2

The location(s) and hazard(s) posed by these permit spaces are listed below:

Location	Hazard

4.0 PREVENTION OF UNAUTHORIZED ENTRY

4.1

If permit spaces are identified at our worksite Head Custodian will inform exposed or potentially

exposed employees of their existence and hazards. The method(s) that will be used will be:

(check box(s) for firm's specific policy)

Posting of danger signs at each permit space reading "Danger--Permit-Required Confined Space-Do Not Enter"

—Note to the Employer: The standard allows any other equally effective means of informing employees of the presence of any permit spaces. For whatever method is chosen, OSHA will check to ensure that the method is effective.

4.2

It has been determined by Head Custodian that the permit spaces identified at our worksite:

Will not be entered by our employees.

The following measures have been taken to prevent employees from entering the spaces:

Will be entered by employees of our workplace.

— Note to the Employer: The measures used to prevent entry could include permanently closing the space; use of barriers; specialized tools, under management's control, to open the space(s); and supplementing these measures with training and signs. The steps taken by the employer must be effective in preventing employee entry into the permit space(s).

Employers who determine that their employees will enter a permit space must set up procedures to ensure safe entry. Because of the different types of permit spaces found in the work environment, the regulations allow options for employers to use to obtain this goal. Proper evaluation by the employer will determine which procedures can be used. Some permit spaces may be reclassified as non-permit spaces. Others may qualify for alternative procedures. Still others may require a full

permit-required confined space program. It is the responsibility of the employer to determine which procedure is acceptable for the particular space of concern.

Permit-Required Confined Space Entry Procedures (Options)

- a) Alternative Procedures (Subsection 6.0)
- b) Full Permit Space Entry Program (Subsection 5.0)
- c) Reclassify as Non-Permit Space (Subsection 7.0)

5.0 PERMIT-REQUIRED CONFINED SPACE (PRCS)

—Note to the Employer: A written PRCS program is not required for:

- 1) **Situations where alternative procedures are used for entry. The procedures outlined in paragraph (c)(5)(ii) are mandated and written verification is required by (c)(5)(ii)(H). Appendix D can be used to document that the alternative procedures ensure safe entry.**
- 2) **Situations where a permit space is reclassified as a non-permit space and entry is not required to verify elimination of all the hazards. Paragraph (c)(7)(iii) requires employers to document that the hazards have been eliminated. Appendix E can be used for documenting that the reclassification allows for safe entry.**

If procedures 1 or 2 cannot be used and if the employer determines that their employees will enter a permit space, then a written PRCS program (see Appendix F) is needed for each permit space and Section 5.1 must be completed. Keep in mind that a written PRCS program is different than an entry permit (see Appendix Q). A written PRCS program is a guidance document for employers and employees so they can develop and utilize the procedures required for safe entry into a permit space. An entry permit is basically a checklist to ensure all the steps for the safe entry have been taken prior to entry.

The program elements to be considered for a full PRCS are outlined in paragraph (d) of the standard and pages 9-14 of this document. This program must specify the potential hazards of the space and the procedures needed to correct them. These step-by-step procedures must include acceptable entry conditions, isolation methods needed, methods for eliminating or controlling hazardous atmospheres (i.e., purging, cleaning, ventilation), equipment needed, testing protocol, and duties of permit space team members.

5.1

Safe entry procedures have been developed for each permit space at our facility. These procedures specify the proper methods and equipment necessary to conduct the entry operation in a safe manner. A Permit Space Entry Procedure Worksheet has been completed for each permit space by Head Custodian and they are located at

—Note to the Employer: Appendix F contains a Permit-Required Confined Space (PRCS) Program Worksheet which can assist in the development of such a program. Appendix F-1 contains an example of a completed written program.

A written PRCS Program addresses the following elements for each permit space entered:

- \$ The methods used to prevent unauthorized entry.
- \$ Identify and evaluate the specific hazards before entry.
- \$ Establish measures for the safe control of identified hazards such as isolation, purging, inerting, ventilation, barricades, lockout/tagout, etc.
- \$ Procedure to test the permit space and document results.
- \$ Procedure to maintain acceptable conditions in the permit space.
- \$ Identify duties of each employee required and provide training.
- \$ Provide at least one attendant outside the permit space for the duration of the entry operations.
- \$ Implement proper procedures for rescue.
- \$ Establish a written system for preparation, issuance, use and cancellation of permits.
- \$ Coordinate entry operations during multiple employer entries.
- \$ Review entire entry program at least annually, unless previously reviewed at conclusion of a specific entry.

6.0 ALTERNATIVE PROCEDURES

6.1

The OSHA regulations allow permit spaces which have, as their *only hazard*, an actual or potential hazardous atmosphere to use alternative procedures for entry. These alternative procedures as discussed in Section I do not require the implementation of a full PRCS program. The following is a list of permit spaces at our workplace which currently qualify for alternative procedures:

—Note to the Employer: Refer to Appendix D for a Worksheet which can be used to certify that alternative procedures can be used and that the space is safe for entry. For those employers who can demonstrate that continuous forced air ventilation alone is sufficient to maintain the permit space safe for entry, only the General Requirements--paragraph (c)(5) and Training--paragraph (g) are required. Remember, continuous forced air ventilation controls the hazard--it does not eliminate it.

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- ! authorized entrant
 - ! attendant
 - ! entry supervisor
 - ! rescue personnel

8.2

Each member of the team will receive initial and annual refresher training. The training will be specific for the duties of each team member and include the procedures and practices necessary to protect them from the dangers of the permit space.

—*Note to the Employer:* Provide a training program for employees using the information contained in this document, and use any other applicable resources. Make your training program specific to the particular permit space(s) to be entered. This training must give team members the understanding, knowledge and skills necessary for them to safely perform their assigned duties.

8.3

The training program will include the duties of each team member as listed below:

Authorized Entrants

- ! Know the hazards associated with the permit space and their effects.
- ! Properly use the equipment required for entry.
- ! Maintain a continuous means of communication with the attendant.
- ! Alert the attendant in the event of an emergency.
- ! Evacuate the space if an emergency occurs.

Attendants

- ! Know the hazards associated with the permit space and their effects.
- ! Maintain an accurate account of the authorized entrants.
- ! Remain at their assigned station until relieved by another attendant or until the permit space entry is complete.
- ! Monitor conditions in and around the permit space.
- ! Summon rescue and applicable medical services in the event of an emergency.
- ! Perform non-entry rescue procedures.
- ! Perform appropriate measures to prevent unauthorized personnel from entering the permit space.

Entry Supervisors

- ! Know the hazards associated with the permit space and their effects.
- ! Verify that the safeguards required by the permit have been implemented.
- ! Verify that rescue services are available and that means for summoning them are operable.
- ! Cancel the written permit and terminate the permit space entry when required.
- ! Remove personnel who are not authorized to enter the permit space during entry operations.
- ! Periodically, determine that the entry operation is being performed in a manner consistent with the requirements of the permit space entry procedures and that acceptable entry conditions are maintained.

Rescue Personnel

- ! See Appendix P for information on rescue personnel.

8.4

Permit-Required Confined Space (PRCS) Program Training - If a full permit-required confined space program is required, training is needed on the following topics:

- ! Types of confined space hazards.
- ! Components of the written PRCS program.

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- ! Components of the entry permit system.
 - ! Components of the hot work permit.
 - ! The need for prompt guarding of the entrance opening.
 - ! Atmospheric testing equipment including its use, calibration, and maintenance.
 - ! Atmospheric testing protocol:
 - " oxygen, combustibles, toxics
 - " pre-entry, frequent or continuous testing
 - " check all levels of the space
 - ! Methods for the control or elimination of any atmospheric hazards:
 - " Inerting
 - " Draining and rinsing
 - " Purging and cleaning
 - " Continuous forced air ventilation
 - ! Procedures the employees must follow if they detect a hazard.
 - ! The evaluation process to be used for reentry if hazards are detected.
 - ! Train employees on the use of entry equipment (e.g., ladders, communication devices, etc.)
 - ! Personal protective equipment required:
 - " full body harness
 - " respiratory protection
 - " chemical protective clothing
 - " eye and face protection
 - ! Personnel and their responsibilities:
 - " authorized entrant
 - " attendant
 - " entry supervisor
 - " rescue team
 - ! On-site or Off-site rescue:
 - " Rescue Plan
 - " practice rescues
 - " basic first-aid and cardiopulmonary resuscitation certification
 - " full body harness with retrieval line attached to mechanical retrieval device
 - ! Procedures for annual review of canceled permits
 - ! Any other information necessary to ensure employee safety during a permit space entry operation.
 - ! Documentation of the training.

—Note to the Employer: Again, the training required is dependent on the specific space to be entered and the procedures which are needed to protect entrants. The information provided in this training subsection is a generalization of the topics which must be covered during employee training. Additionally, document employees' training and refresher training. This certification simply requires the employees' names, the signatures or initials of the trainers, and dates of training. Appendix R has been added if additional space is needed to record employee training.

8.4.1 The following is a list of employees who have been equipped and trained to serve as

authorized entrants at our facility:

Authorized Entrants	Trainer	Date of Training

8.4.2 The following is a list of employees who have been equipped and trained to serve as attendants:

Attendant	Trainer	Date of Training

8.4.3 The following is a list of employees who have been trained to serve as entry supervisors:

Entry Supervisor	Trainer	Date of Training

—*Note to the Employer:* Remember, training must be provided:

- ! Before employees are assigned duties involving permit space entry.
 - ! Whenever their assigned duties change.
 - ! Whenever there is a change in a permit space that creates hazards for which they have not been notified.
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9.0 HOST EMPLOYER'S RESPONSIBILITIES WITH CONTRACTORS

9.1

When contractors are involved in permit space entry work at our workplace, The Company Representative will inform them of the following information and coordinate any entry operations:

- ! The location of the permit spaces at our facility and that entry into these spaces is only allowed through a permit space program or alternative procedures or space reclassification.
 - ! Our rationale for listing the space as a permit space such as any identified hazards and our experiences with the particular space.
 - ! Precautions that we have implemented to protect employees working in or near the space.
 - ! Company Representative will debrief the contractor at the completion of the entry operation, or during if a need arises, and if any hazards were confronted or created during their work.
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— *Note to the employer:* Appendix G has been included to assist with the requirements of this subsection.

10.0 CONTRACTOR'S RESPONSIBILITIES WITH HOST EMPLOYERS

***– Note to the Employer:* Subsection 10 is required to be completed by a contractor when he/she is hired to perform work in a permit space.**

10.1

When Name of Contracting Company is hired to perform work in a PRCS, the Contractor Representative will obtain the following information from the host employer and ensure the following tasks are performed:

- ! Obtain any information on the hazards of the permit space and information from previous entry operations from the host employer.
- ! Determine if the host employer's workers will be working in or near the space.
- ! If the host employer will have employees working in or near the space during our entry operation, the Contractor Representative will coordinate entry operations with the host employer's representative.
- ! Will inform the host employer of the permit space program that will be utilized.
- ! Hold a debriefing conference at the completion of the entry operation or during the entry operation (if needed) to inform the host employer of any hazards confronted or created.

***– Note to the Employer:* For clarification, refurbishing of the existing equipment and space is considered maintenance; reconfiguration of the space or installation of new equipment (as for a process change) is usually considered construction. Additionally, Appendix H can be used to assist the contractor with the standards requirements.**

11.0 RESCUE AND EMERGENCY SERVICES

***– Note to the Employer:* This subsection is not required if the permit space has been reclassified as a non-permit space or if alternative procedures are used.**

11.1

The precautions and procedures outlined in our written PRCS program are designed to ensure that our employees are safe while working in permit spaces. Under no circumstances do we expect our employees to enter a permit space where hazards have not been eliminated or effectively controlled.

Additionally, we recognize that unexpected situations might arise that prevent entrants from self-rescue. In response, the following rescue and emergency action plan has been developed and will be strictly enforced:

The Carmel Central School District has decided to utilize:

(Check all that apply)

- On-site rescue services which include:
 - non-entry rescue procedures
 - entry rescue procedures
- Off-site entry rescue services.

—Note to the Employer: Employers who choose to use off-site rescue services need not complete subsections 11.2, 11.3, and 11.4, but must complete 11.5. Additionally, a non-mandatory letter (Appendix N) has been included to notify off-site rescuers (e.g., local fire department) of the potential hazards associated with the space. This form should be sent well in advance of any entry operation. This advanced information provides outside rescue services with the time to develop appropriate rescue strategies and practice rescue techniques.

—Note to the Employer: Each permit space must be individually evaluated to determine whether entry or non-entry rescue procedures can be used to remove incapacitated entrants. Non-entry rescue is the desired method because it is not necessary to place the rescuer at risk to remove the injured employees. Non-entry retrieval systems, such as full body harness with retrieval line, must be used whenever an authorized entrant enters into a permit space, except in situations where the retrieval system would increase the risk of entry or would not contribute to the rescue.

11.2

Director of Facilities will ensure that each member of the firm's rescue service is appropriately trained. Refer to Appendix P for rescue plan and training requirements.

11.3

Director of Facilities will ensure that each member of the rescue service will receive basic first aid and cardiopulmonary resuscitation (CPR). At least one of these members must hold current certification in first aid and CPR.

11.4

Director of Facilities will ensure that rescue team members will practice rescue techniques at least annually from the actual or similarly configured space(s).

—Note to the Employer: Simulated rescue operations must include dummies, manikins, or actual persons from the actual or from representative permit spaces. Actual rescues during the 12-month period may also substitute for a practice rescue.

11.5

Director of Facilities has made arrangements with the local Fire Dept. for off-site rescue and

emergency services and they have consented to provide this service.

Director of Facilities has informed the local Fire Dept of the hazards they may encounter if they are summoned. Director of Facilities has also provided access to the rescue service so they can evaluate the permit spaces to develop appropriate rescue plans and practice rescue operations. If rescue and emergency services are needed, the following procedures will go into effect:

—*Note to the Employer:* Describe the procedures that will be used for summoning the rescue and emergency services. Include the name, location, and telephone numbers of the rescue services in this program and also on the entry permit. Train employees on the specific procedures for summoning the rescue and emergency services.

Name of Rescue Service	
Telephone Number	
Location	
Approximate Response Time	
Name of Emergency Medical Service	
Telephone	
Location	
Approximate Response Time	

The specific procedures for summoning rescue and emergency services for our workplace is outlined as follows:

12.0 TRAINING

12.1

Training must be given to each employee who has access or potential access to a permit space. The amount and type of training needed will depend on the individual's duty assignment. For example, some employees may only be required to know the existence, location, and danger posed by a permit space. Others would need considerably more training if they are members of a PRCS team. Still

others would need training as it pertains to the type of entry procedures used (i.e., alternative procedures or reclassifying to non-permit space procedures). The overall intent of this training is to give employees the understanding, knowledge, and skills necessary for the safe performance of their assigned duties in relation to the permit spaces of concern.

12.2

Four basic categories have been set up to train employees based on duties and potential exposure.

12.2.1

Awareness Training-Awareness training for employees potentially exposed to permit spaces can be satisfied by providing them with the specific information contained in subsection 3 and 4 located on pages 72 and 73.

12.2.2

Training Required for Using Alternative Procedures-If the space qualifies for alternative procedures, training on the following topics is warranted:

- ! A major point concerning the use of alternative procedures is that these procedures can only be used when a hazardous atmosphere is the only hazard of concern.
- ! The harm associated with the atmospheric hazards of concern including their acceptable entry levels and symptoms of overexposure.
- ! Awareness training to recognize other potential hazards in or around the space.
- ! Any conditions which may make it unsafe to remove the entrance cover.
- ! The need for prompt guarding of the entrance opening.
- ! Atmospheric testing equipment including its use, method of calibration, and maintenance.
- ! Atmospheric testing protocol for oxygen, combustibles, toxics
- ! Pre-entry, frequent or continuous testing of the permit space.
- ! Check all levels of the space for atmospheric hazards.
- ! Atmospheric Controls
 - " inerting
 - " draining and rinsing
 - " purging
 - " continuous forced air ventilation including type, proper use and placement, and its limitations
- ! Procedures the employee must follow if a hazardous atmosphere is detected.
- ! The evaluation process to be used for reentry if a hazardous atmosphere is detected or the individual vacates the space and returns some time later.
- ! Train employees on the use of entry equipment used including ladders and intrinsically safe lighting.
- ! Personal protective equipment (e.g., gloves, hard hats, boots, etc.), its use, limitations, and required maintenance.
- ! A review of the completed written certification form (Appendix D) with the employee prior

to entering the space.

- ! Any process which may introduce a hazard (e.g., welding, cleaning with chemical solvents, etc.) which would prohibit use of alternative procedures.
- ! The requirements of paragraph (c)(5) must be reviewed with the employee.
- ! Any other information needed to ensure the safety of the employee.
- ! The documentation of the training.

12.2.3

Training Required for Using the Reclassifying Permit Space Procedures-If the permit space can be reclassified as a non-permit space, the following items must be discussed:

- ! Documentation of the elimination of the hazards. If the elimination of the hazards or verification of elimination requires employees to enter the space, then a full PRCS program is needed.
- ! Train employee on the hazards associated with the space (i.e., mechanical, chemical, atmospheric) and the methods needed to eliminate the hazards such as:
 - " Isolation techniques
 - " Lockout/Tagout
 - " Disconnection and misalignment of pipes
 - " Double block and bleed
 - " Blanking and blinding
 - " Removal of engulfment hazards
 - " Elimination of hazardous atmosphere by draining, inerting, purging, cleaning, venting
- ! Train employees on the use of entry equipment used including ladders, ground fault circuit interrupters for electrical equipment, etc.
- ! Personal protective equipment (e.g., gloves, hard hat, boots, etc.) including its use, limitations, and required maintenance.
- ! A review of the completed written certification form (Appendix E) with the employee entering the space.
- ! The requirements of paragraph (c)(7) must be reviewed with the employee(s).
- ! Inform employees that any procedures such as welding, cleaning with a chemical, etc. would negate the reclassification and convert the space back to a permit space.
- ! Any conditions which may make it unsafe to remove entrance cover.
- ! The need for prompt guarding of the entrance opening.
- ! Atmospheric testing equipment including its use, method of calibration, and maintenance.
- ! Atmospheric testing protocol
 - " oxygen, combustibles, toxics
 - " pre-entry, frequent or continuous testing
 - " check all levels of the space
- ! Procedures the employee will follow if a hazard is detected
- ! The evaluation process to be used for reentry if a hazard is detected or the individual vacates the space and returns some time later.
- ! Awareness training to recognize other potential hazards in or around the space.

! The documentation of the training.

12.2.4

Training Required for using full Permit-Required Confined Space Procedures (see subsection 8.4)

—Note to Employer: The training required depends on the specific permit space to be entered and the procedures which are needed to protect entrants. The information provided in this training subsection is a generalization of the topics which must be covered during employee training.

13.0 PERMIT-REQUIRED CONFINED SPACE PROGRAM REVIEW

—Note to the Employer: This subsection is not required if the permit space has been reclassified as a non-permit space or if alternative procedures are used.

13.1

Within one year of any entry operation, Head Custodians will conduct a review of the program using the canceled entry permits to identify any deficiencies in our program. A review will be conducted sooner if there is reason to believe that the program does not adequately protect our employees. Any corrective measures will be documented by a revision of the program. Employees will be trained on any changes. Additionally, employees who note any inadequacies with the program can contact Director of Facilities .

If no permit space entry operations are conducted during the year, no review is needed.