

Confined Space Entry Program

I. INTRODUCTION

The Goucher College campus has confined spaces that, due to various chemical and physical properties, may cause death or serious injury to employees who may enter them. This Confined Space Entry Program is developed and established to identify, evaluate, and control such spaces, and to detail procedures and responsibilities for entering and working within confined spaces.

Adherence to the policies and directives contained in this program is mandatory for all supervisors, employees and contractors of the college. Supervisors and employees failing to follow this program are subject to disciplinary action and/or dismissal.

II. DEFINITIONS

Acceptable Entry Conditions - The conditions that must exist in a permit space to allow entry and to ensure employees can safely enter into and safely work within a permit required confined space.

Attendant – An individual stationed outside one or more permit required spaces who monitors the authorized entrants and who performs all attendant duties assigned in the this Confined Space program.

Authorized Entrant – An employee who is authorized by the employer to enter a confined space.

Confined Space - A space that:

- 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; and
- Is not designed for continuous employee occupancy.

Entry - The action by which a person passes through an opening into a permit required confined space. Entry is considered to occur as soon as any part of the entrant's body breaks the plane of an opening into the space. **NOTE:** For entry to occur, there must be an intent to bodily enter the confined space. An employee may reach into a space, and not bodily enter (say to adjust a valve), and do so without an entry permit being required.

Entry Permit - The written or printed document provided by the college to allow and control entry into a permit space.

Entry Supervisor - The person responsible for determining if acceptable entry conditions are present at a permit space where entry is planned, for authorizing entry and overseeing entry operations, and for terminating entry.

Hazardous Atmosphere - An atmosphere that may expose employees to the risk of death, incapacitation, impairment of ability to self-rescue, injury, or acute illness from one or more of the following conditions:

- Flammable gas, vapor, or mist in excess of 10 percent of its lower flammable limit (LFL);
- Airborne combustible dust at a concentration that meets or exceeds its LFL (this may be approximated as a condition in which the dust obscures vision at a distance of 5 feet or less);
- Atmospheric oxygen concentration below 19.5 percent or above 23.5 percent;
- Atmospheric concentration of any substance for which a dose of permissible limit is published (in Subpart G Occupational Health and Environmental Control; or Subpart Z Hazardous and Toxic Substances); or
- Any other atmospheric condition that is immediately dangerous to life or health.

Immediately Dangerous to Life or Health Condition— Any condition that poses an immediate threat of loss of life or physical injury or that may result in irreversible or immediate, severe health effects or other conditions that could impair escape from the confined space. If entry into an IDLH condition is required, rescue personnel and equipment shall be standing by the site.

Non-Permit Confined Space - A confined space that does not contain, or with the respect to atmospheric hazards, does not have the potential to contain any hazard capable of causing death or serious physical harm.

Permit Required Confined Space - A confined space that:

- Contains or has a potential to contain a hazardous atmosphere; or
- Contains a material that has the potential for engulfing an entrant; or
- 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.

Prohibited Condition - Any condition in a permit space that is not allowed by the permit during the time when entry is authorized.

Safety Officer – The College Safety Officer is responsible for administering this plan. In the absence of a safety officer, the college will retain an outside consultant to assist in

administering this plan.

Testing - The process by which the hazards are identified and evaluated. Testing includes specifying the tests that are to be performed in the permit space.

III. RESPONSIBILITIES

- A. In consultation with the Director of FMS or his/her designee, the college Safety Officer, or outside consultant will:
1. Evaluate the work place and identify permit required confined spaces.
 2. Inform exposed employees of the existence, location of, and the danger posed by the permit space by posting danger signs or by any other equally effective means.
 3. Determine if employees will or will not enter permit required space. If not, will take effective measures to prevent employees from entering the permit spaces.
 4. Provide and document training for entrants, attendants, entry supervisors, and (if used) in-house rescue personnel.
 5. Designate the appropriate supervisor(s) as entry supervisor(s).
 6. Provide all specified equipment required for entry in a permit required confined space as outlined in this program at no cost to the employees, maintain that equipment properly, and ensure that employees use that equipment properly.
 7. When acting as host employer for a contractor performing permit space entry work, shall,
 - a. Inform contractor of permit space entry program;
 - b. Apprise contractor of hazards of particular permit spaces and precautions and procedures implemented for protection of employees in or near permit spaces;
 - c. Coordinate entry operations with the contractor when both will be working in or near permit spaces and debrief contractor after entries;
 - d. Obtain information from contractor about its permit program to be followed and coordinate multiple entry operation;
 - e. Debrief contractors of the hazards encountered or created.
 8. If necessary, reclassify a non-permit confined space as a permit space when there are changes in use or configuration.

B. Employees

1. Will not enter any permit required confined space unless specifically authorized by an entry supervisor and only in full accordance with this program and the OSHA standard.
2. Will attend and complete any scheduled training required by his/her supervisor and this program.
3. When selected as an entrant, attendant, or entry supervisor, will perform those duties as outlined in this program.

C. Entrants

1. Will know the hazards that may be faced, including the mode, signs or symptoms, and consequences of the exposure;
2. Will properly use equipment as required;
3. Will communicate with the attendant as necessary to enable the attendant to monitor entrant status and to alert entrants of the need to evacuate the space.
4. Will alert the attendant whenever the entrant recognizes any warning sign or symptom of exposure to a dangerous situation, or detects a prohibited condition.
5. Will exit from the permit space as quickly as possible whenever:
 - a. An order to evacuate is given by the attendant or the entry supervisor, or an evacuation alarm is activated.
 - b. The entrant recognizes any warning sign or symptom of exposure to a dangerous situation, or detects a prohibited condition.

D. Attendants

1. Will know the hazards that may be faced during entry, including the mode, signs or symptoms, and consequences of the exposure.
2. Will be aware of possible behavioral affects of hazard exposure.
3. Will continuously maintain an accurate count and identity of authorized entrants.
4. Will remain outside the permit space during entry operations until relieved by another attendant.
5. Will communicate with entrants as necessary to monitor entrant status and to alert entrants of the need to evacuate.
6. Will monitor activities inside and outside the confined space to determine if safe for entrants to remain in space and will order evacuation when necessary.
7. Will summon rescue and emergency services when assistance for emergency exit from permit space is necessary.
8. Will take the following actions when unauthorized persons approach or enter a permit space while entry is underway:
 - a. Warn them to stay away, or exit immediately if they have entered.
 - b. Inform the entrants and entry supervisor if unauthorized persons enter the permit space.
9. Will perform non-entry rescues as specified by college procedure.
10. Will perform no duties that might interfere with the primary duty to monitor and protect authorized entrants.

E. Entry Supervisors

1. Will know the hazards that may be faced during entry, including the mode, signs or symptoms, and consequences of the exposure.
2. Will verify that acceptable conditions for entry exist before endorsing the permit and allowing entry to begin.
3. Will terminate the entry and cancel the permit when entry operations are complete or a prohibited condition arises.

4. Will verify that rescue services are available and the means for summoning them are operable.
5. Will remove unauthorized individuals who enter or who attempt to enter the permit space.
6. Will determine, whenever responsible and at appropriate intervals, that acceptable entry conditions are maintained.

IV. PERMIT REQUIRED CONFINED SPACE ENTRY PROGRAM PROCEDURES

A. Identification of Confined Spaces.

All permit required confined spaces will be identified by the college Safety Officer, or designee, in consultation with the Director of FMS or his/he designee. Exposed employees will be informed of such spaces through posting with warning signs or other equally effective means, such as facility maps and training.

B. Entry permit procedures are as outlined below:

1. Entrants will obtain an entry permit from an Entry Supervisor prior to entry of the space.
2. The entrant or authorized attendant will accomplish all pre-permit actions required for entering the space, such as atmospheric testing (described below) and hazard control/elimination actions, have all required equipment on hand, provide for attendant and rescue services, etc.
3. The entrant will complete all items on the permit.
4. The entry will be authorized and the permit will be signed by an authorized entry supervisor. If any item on the permit is checked as "NO" (meaning not yet completed or available), the permit will not be signed.
5. Entry may proceed. A copy of the entry permit will be placed outside the confined space until the permit has been cancelled by appropriate personnel.
6. Permits will be cancelled by the entry supervisor upon completion of the work, or when any prohibited condition arises. Permits cannot be let to expire. Cancelled permits must be kept for the annual review.

C. Testing and Monitoring.

An authorized attendant shall:

1. Test the space as necessary to determine if acceptable entry conditions exist before beginning entry operations. Initial testing of the atmosphere must be done from outside the confined space prior to any entry. If isolation of the space is infeasible because the space is large or part of a continuous system (such as a sewer), entry conditions will be continuously monitored where entrants are working.
2. Test or monitor the permit space as necessary to determine if acceptable entry conditions are being maintained during the course of entry operations.

3. When testing for atmospheric hazards, test first for oxygen, then for combustible gases and vapors, and then for toxic gases and vapors. Parameters for non-hazardous atmospheres are:

- a. Oxygen between 19.5 and 23.5 percent;
- b. Flammability less than ten percent of the lower flammability limit (LFL);
- c. Toxicity less than the permissible exposure limit (PEL).

An authorized attendant must be present and monitoring the entry at all times. The attendant will not be assigned any other duties that may interfere with his attendant duties.

Equipment required for permit required confined space entry includes equipment required for testing and monitoring; ventilating; communications between the entrant and attendant, and for summoning rescue; personal protection; lighting; barriers/shields for openings; means of ingress and egress; and any other equipment necessary for safe entry and rescue.

D. Rescue and emergency services

1. Non-entry rescue is the preferred method for rescue of personnel from a permit required space. **Employees will not enter a permit space for rescue unless they have been specifically trained and equipped for such rescue.**
2. To facilitate non-entry rescue, retrieval systems or methods shall be used whenever an authorized entrant enters a permit space, unless the retrieval equipment would increase overall risk of entry or would not be of value to any rescue. Retrieval system requirements are:
 - a. Each entrant shall use a chest or full body harness, with a retrieval line attached at the center of the back near shoulder level, or other appropriate point.
 - b. The other end of the retrieval line shall be attached to a mechanical device or fixed point outside of permit space enabling immediate use. A mechanical device will be used to retrieve personnel from vertical type permit spaces more than five feet deep.
 - c. If the injured entrant is exposed to any substance with a required SDS or similar document, that SDS or document will be made available to the medical facility treating entrant.
3. If rescue should become necessary, the attendant will:
 - a. Call 911 and then Goucher's Office of Public Safety at x6112 (so that Public Safety officer can direct emergency personnel to the direct location);
 - b. Attempt **non-entry** rescue procedures to the extent possible by the circumstances.
 - c. Monitor the situation and be ready to give rescuers information on how many victims and their status, what hazards, chemical types, concentrations, etc. are present.
4. Only designated personnel will enter permit spaces for rescue purposes. **(Currently no Goucher employees are designated as rescue personnel and they may not**

enter a confined space for rescue purposes.) If in the future, a Goucher employee is designated to enter a confined space for rescue purposes, each designated rescue team member will be trained on:

- a. Use of personal protective and rescue equipment necessary for making the rescue from the permit space;
- b. Performance of assigned rescue duties and also that training required of authorized entrants;
- c. Basic first-aid and cardiopulmonary resuscitation (CPR). At least one member of the rescue team will hold current certification in first aid and CPR.

If a rescue team is established in the future, each rescue team member will practice making permit space rescues at least once every 12 months, by means of simulated rescue operations and in spaces representative of the types of permit spaces from which rescue is to be performed. This training will be scheduled and monitored by the college Safety Officer.

E. Program Review

Cancelled permits shall be retained by FMS for one year. The Permit Space Program will be reviewed within one year of each entry using these cancelled permits to revise the program as necessary to ensure employees are protected from permit space hazards. A single review covering all entries in the preceding year may be conducted.

V. TRAINING

Only trained and qualified employees may be authorized as entrant, attendant, entry supervisor, or in-house rescue team members. The training will establish proficiency in the duties required by this program so that the employee acquires the understanding, knowledge, and skill necessary for the safe performance of his/her duties.

Training must be completed before employee is assigned duties under this program, before there is a change in assigned duties and, whenever a supervisor has reason to believe either that there are deviations from permit space entry procedures or inadequacies in the employee's knowledge or use of this program.

The college Safety Officer, or designee, will certify that this training has been accomplished. The certification will contain the employee's name, signatures or initials of the trainers, and dates of training. The certification will be maintained in the personnel file of the employee and a record of training will be maintained in the office of the general counsel.

VI. ALTERNATE ENTRY PROCEDURES

Alternate entry procedures may only be used when the only hazard is an actual or potential hazardous atmosphere. If alternate entry procedures are used, no permits are needed, no attendant or supervisor is required, and rescue provisions need not be used. Training and a

written certification are required.

Conditions To Be Met To Qualify For Alternate Procedures:

- a. The only hazard posed by permit space is an actual or potential hazardous atmosphere. (See Note after the Permit Space Reclassification section.)
- b. Continuous forced air ventilation alone is sufficient to maintain safe permit space.
- c. Monitoring and inspection data that supports above demonstrations have been developed and documented.
- d. If initial entry is necessary to obtain above data, it shall be performed in accordance with this program.
- e. Documented determinations and supporting data will be made available to entrants.

Entry must be in accordance with the following requirements:

- a. Any condition making it unsafe to remove an entrance cover shall be eliminated before removing the cover. When entrance covers are removed, the opening shall be promptly and effectively guarded.
- b. Before entry, the internal atmosphere shall be tested with a calibrated direct-reading instrument, for the following conditions in the order given:
 - 1. Oxygen content: 19.5 - 23.5%
 - 2. Flammable gases and vapors: $\leq 10\%$ of LEL
 - 3. Potential toxic air contaminants: $< \text{PEL}$
- c. There may be no hazardous atmosphere within the space whenever any employee is inside the space.
- d. Continuous forced air ventilation shall be used as follows:
 - 1. Entry not permitted until hazardous atmosphere is eliminated.
 - 2. Ventilation shall be directed to immediate areas where employees are or will be present and will continue until all employees have left the space;
 - 3. Air supply shall be from a clean source and may not increase hazards in space.
- e. Atmosphere within space shall be continuously tested as necessary to ensure that ventilation is adequate. If hazardous atmosphere is detected during entry:
 - 1. Each employee shall leave space immediately;
 - 2. Space shall be evaluated to determine how hazardous atmosphere developed; and
 - 3. Measures must be taken to protect employees from hazardous atmosphere before any subsequent entry.
- f. The entry supervisor will verify that the space is safe for entry and that all of the above requirements have been met. Such verification will be in writing to include the date, location of the space, and the signature of the person providing the certification, and shall be made available to each employee before entry.

VII. PERMIT SPACE RECLASSIFICATION

A permit space may be reclassified as a non-permit space:

- a. If there are no actual or potential atmospheric hazards and if all hazards within the permit space are eliminated without entry, the space may be reclassified for as long as the non-atmospheric hazards remain eliminated.
- b. Hazards may be eliminated by such actions as purging or inerting tank/vessels of contaminants, emptying material from hoppers/bins, or use of company lockout/tag procedures for electrical/ mechanical hazards. The control of atmospheric hazards through forced air ventilation does not constitute elimination of that hazard (it only controls the hazard: the preceding Alternate Entry Procedures must be used in such cases).
- c. If entry is required to eliminate hazards, it shall be according to this program and the space may be reclassified for as long as the hazards remain eliminated.
- d. Entry supervisors will certify in writing that all hazards in permit space have been eliminated and make this document available to each entrant.
- e. If hazards arise in declassified permit space, employee(s) shall exit and the employer shall determine whether to reclassify the space.

NOTE: A combination of reclassification procedures and alternate entry procedures (e.g. using lockout/tagout to eliminate a physical hazard, then continuous forced air to control an atmospheric hazard) may not be used together. Situations as such must be entered under the permit program.

VIII. WRITTEN PERMIT

The following information must be included in the written permit. The permit must be a standardized format for each entry.

- a. The permit space to be entered.
- b. The purpose of the entry.
- c. The date and the authorized duration of the entry permit.
- d. The authorized entrants within the permit space, by name or by such other means.
- e. The personnel, by name, currently serving as attendants.
- f. The individual, by name currently serving as entry supervisor, with space for signature or initials.
- g. The hazards of the permit space to be entered.
- h. The measure used to isolate the permit space and to eliminate or control permit space hazards before entry.
- i. The acceptable entry conditions.
- j. The results of initial and periodic tests, with the names or initials of the testers and when the tests were done.
- k. The rescue and emergency services that can be summoned and the means for summoning them.
- l. The communications procedures used by authorized entrants and attendants to maintain contact during the entry.
- m. Equipment (such as personal protective equipment, testing, communications, alarm system, and rescue equipment) to be provided for compliance with this section.

- n. Any other information whose inclusion is necessary in order to ensure employee safety.

(Attached to permit) Any additional permits, such as for hot work, that have been issued for work in the permit space.

REVIEWED AND UPDATED, DECEMBER 2018.

APPENDIX A

ENTRY PERMIT

Date & Time Issued ___ - ___ - ___ / _____
 Date & Time Expires ___ - ___ - ___ / _____
 Permit Space ID: _____ Purpose Of Entry _____
 Entrants' Names/Team ID: _____
 Attendant(s): _____
 Entry Supervisor _____

All Entrants, Attendant(s), & Entry Supervisor Verified Trained For Duties _____
 Hazard(s) of Space: Atmospheric _____ Engulfment _____ Electrical _____
 Mechanical _____ Other _____

	DATE	TIME	N/A
Method to Eliminate / Ventilation	_____	_____	_____
Control Hazard(s) Lockout/Tagout	_____	_____	_____
Completed: Line(s) Broken-Capped-Blanked	_____	_____	_____
Purge-Flush-Vent	_____	_____	_____
Other _____	_____	_____	_____

Equipment Available:

	N/A	YES	NO		N/A	YES	NO
Calibrated Gas Monitor	()	()	()	Protective Clothing	()	()	()
Safety Harnesses & Lifeline	()	()	()	Ventilation	()	()	()
Emergency Retrieval Line	()	()	()	Communication	()	()	()
Hoisting Equipment	()	()	()	Explosion-Proof	()	()	()
Breathing Apparatus	()	()	()	Lights & Tools	()	()	()

Communication Procedures – Entrant-Attendant: _____

Rescue: Non-Entry Retrieval Means of Summoning: _____

TESTING & MONITORING: Periodic _____ Continuous _____ N/A _____ Pre-entry
 Others Percent of Oxygen: 19.5% - 23.5% _____
 Flammability: <10% LFL (_____) _____
 Concentrations: < PEL (_____) _____ Tester's
 Initials _____

Additional Work Permits (Hot-work, etc) Attached: Yes _____ No _____ N/A _____.

Entry cannot be approved if any entries are marked in the "No" column. This permit is not valid unless all items are completed.

All entry conditions have been met

(Entry Supervisor)

Or:

Alternate Entry Procedures: I certify that all pre-entry measures required by this program have been completed and that the space identified above is safe for entry following Alternate Entry Procedures.

(Entry Supervisor)

Or:

Reclassification To Non-Permit Space. I certify that all hazards have been eliminated from the space identified above and that the space is reclassified as a non-permit space.

(Entry Supervisor)

APPENDIX B

Appendix A to §1910.146 -- Permit-Required Confined Space Decision Flow Chart

The decision-making flow chart is to be used as a tool to guide the user on what actions are to be taken during the assessment of a confined space in a variety of situations (see figure 1).

APPENDIX A TO §1910.146—PERMIT-REQUIRED CONFINED SPACE DECISION FLOW CHART

