**Confined Space Program**

**Scope**

This program outlines the procedures, precautions, responsibilities, and methods used by RBVetCo to assure and provide employees a safe and healthy work environment along with compliance with the Occupational Safety and Health Administration’s (OSHA) Confined Space Standard. This program applies to the employees that are exposed or potentially exposed to confined spaces on the worksite.

**Purpose**

The purpose of this program is to keep employee safety and health in mind by identifying any Permit-Required Confined Spaces (PRCS) and to eliminate or control hazards associated with PRCS operations. This program is also intended to ensure compliance with the OSHA Permit-Required Confined Spaces Standard, 1926.1200, effective August 3. 2015.

**Definitions**

**Acceptable Entry Conditions** – means the conditions that must exist in a permit space, before an employee may enter that space, to ensure that employees can safely enter into, and safely work within, the space.

**Competent person** - means one who is capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, or dangerous to employees, and who has the authorization to take prompt corrective measures to eliminate them.

**Confined space** - means a space that: (1) Is large enough and so configured that an employee can bodily enter it; (2) Has limited or restricted means for entry and exit; and (3) Is not designed for continuous employee occupancy.

**Early-warning system** - means the method used to alert authorized entrants and attendants that an engulfment hazard may be developing. Examples of early-warning systems include, but are not limited to: alarms activated by remote sensors; and lookouts with equipment for immediately communicating with the authorized entrants and attendants.

**Entry** - means the action by which any part of a person passes through an opening into a permit-required confined space. Entry includes ensuing work activities in that space and is considered to have occurred as soon as any part of the entrant’s body breaks the plane of an opening into the space, whether or not such action is intentional or any work activities are actually performed in the space.

**Entry permit (permit)** - means the written or printed document that is provided by the employer who designated the space a permit space to allow and control entry into a permit space and that contains the information specified in §1926.1206 of this standard.

**Entry rescue** - occurs when a rescue service enters a permit space to rescue one or more employees.

**Hazardous atmosphere** - means an atmosphere that may expose employees to the risk of death, incapacitation, and impairment of ability to self-rescue (that is, escape unaided from a permit space), injury, or acute illness from one or more of the following causes:

1. Flammable gas, vapor, or mist in excess of 10 percent of its lower flammable

limit (LFL);

1. Airborne combustible dust at a concentration that meets or exceeds its LFL;

Note: This concentration may be approximated as a condition in which the combustible dust obscures vision at a distance of 5 feet (1.52 meters) or less.

1. Atmospheric oxygen concentration below 19.5 percent or above 23.5 percent;
2. Atmospheric concentration of any substance for which a dose or a permissible exposure limit is published in Subpart D—Occupational Health and Environmental Control, or in Subpart Z—Toxic and Hazardous Substances, of this part and which could result in employee exposure in excess of its dose or permissible exposure limit;
3. Any other atmospheric condition that is immediately dangerous to life or health.

**Hot work** - means operations capable of providing a source of ignition (for example, riveting, welding, cutting, burning, and heating)

**Inerting** - means displacing the atmosphere in a permit space by a noncombustible gas (such as nitrogen) to such an extent that the resulting atmosphere is noncombustible.

Note: This procedure produces an IDLH oxygen-deficient atmosphere.

**Limited or restricted means for entry or exit** - means a condition that has a potential to impede an employee’s movement into or out of a confined space. Such conditions include, but are not limited to, trip hazards, poor illumination, slippery floors, inclining surfaces and ladders.

**Non-entry rescue** - occurs when a rescue service, usually the attendant, retrieves employees in a permit space without entering the permit space.

**Non-permit confined space** - means a confined space that meets the definition of a confined space but does not meet the requirements for a permit-required confined space, as defined in this subpart.

**Permit-required confined space (permit space)** - means a confined space that has one or more of the following characteristics:

(1) Contains or has a potential to contain a hazardous atmosphere

(2) Contains a material that has the potential for engulfing an entrant;

(3) 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

(4) Contains any other recognized serious safety or health hazard.

**Prohibited condition** - means any condition in a permit space that is not allowed by the permit during the period when entry is authorized.

**Retrieval system** - means the equipment (including a retrieval line, chest or full body harness, wristlets or anklets, if appropriate, and a lifting device or anchor) used for non-entry rescue of persons from permit spaces.

**Ventilate or ventilation** - means controlling a hazardous atmosphere using continuous forced-air mechanical systems that meet the requirements of §1926.57—Ventilation.

**Responsibilities**

Overall Program Responsibility

Name of person or position 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 RBVetCo.

Permit Required Confined Space Evaluation

Name of person or position is responsible for evaluating the workplace to determine if any permit spaces are present.

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

Training

Name of person or position 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.

Initial Contracting for Rescue Services

Name of person or position will ensure that rescue and emergency services have been informed of any permit-required confined spaces at RBVetCo and have been given access to the spaces for drills, training, etc.

Equipment

Name of person or position will ensure that all equipment needed for safe entry into any permit spaces and non-permit spaces is made available and in proper working order.

**Exceptions**

This standard does not apply to Construction Work regulated by…

* 1926 subpart P – Excavations
* 1926 subpart S – Underground Construction, Caissons, Cofferdams and Compressed Air
* 1926 subpart Y – Diving

**General Overview**

All confined spaces must be identified and evaluated on site before work can begin. A competent person must classify each inventoried space as permit required or non-permit required after proper testing and consideration.

If one or more permit space is identified, RBVetCo will notify all employees exposed, by use of danger and warning signs located at each space and in another form of notification, in a timely manner, of the existence, location, and hazards of each permit space.

Proper engineering controls will be used to eliminate or isolate the physical hazards posed by the permit space to where the only remaining hazard is an actual or potential hazardous atmosphere. Forced air ventilation will be used, along with continuous air monitoring and inspections, to ensure that any hazardous atmosphere remains eliminated. Any employee that must enter the space are entitled to be present during permit space testing.

RBVetCo will provide proper training to employees at all worksites so that they are aware of the various hazards and precautions to be taken when entering a confined space. Training will also be provided to assure that all air monitoring equipment and personal protective equipment is used correctly and at all necessary times. Employees will actively participate in implementation of the confined space program at each jobsite and will be provided all information required to be in this standard.

**Inventory of all Permit Required Confined Spaces**

RBVetCo will take inventory of all, if any, Permit Required and Non-Permit Confined Spaces found at all worksites. The name or position of the individual who inventoried and evaluated each space will be stated, along with the location and hazard that qualifies it as a permit space for each one identified.

For all non-permit spaces, if there is a change in use or configuration, or if there is reason to believe the original evaluation of the space was inadequate, a competent person will reevaluate the space and if necessary, reclassify it as a PRCS.

**Prevention of Unauthorized Entry**

If a permit space is indicated at any site of RBVetCo, it is the responsibility of Name of person or position to notify all exposed or potentially exposed employees of their existence and associated hazards. RBVetCo will ensure the posting of danger and warning signs reading “Danger - Permit-Required Confined Space – Do Not Enter” and another form of notification, other than posting, of these spaces to employees.

Name of person or position will determine whether the spaces will be entered or not. If a permit space will not be entered by employees, a list of effective measures to ensure no entry will be outlined and enforced.

**Permit Process**

Before any entry operations, RBVetCo will document the completion of an entry permit. The designated entry supervisor will sign the permit authorizing entry into the space. The document should be made available to all authorized entrants or their authorized representatives and should be posted at the site of entry or in a designated place that can assure that pre-entry preparations have been completed.

The entry supervisor will terminate entry when…

* Operations covered by the entry permit have been completed and the entry permit has been canceled
* An issue or temporary condition in violation of the permit arises resulting in a reevaluation of the permit space and a suspended or cancelled permit.
* An issue or temporary condition arises that is not covered under the permit resulting in a cancelled permit.

RBVetCo will keep each cancelled entry permit on file for one year after their cancellation date. Each permit will contain the reasoning for why the permit was cancelled in order to help fix the condition in the future.

Each entry permit at RBVetCo will contain the following sections…

1. Space to be entered
2. Purpose of the entry
3. Date and authorized duration of the permit
4. Authorized entrants that will be working in the space
5. Means of detecting an increase in atmospheric hazard levels in the event that ventilation stops working
6. Name of attendant(s)
7. Individuals name serving as Entry Supervisor, along with signature or initials of each entry supervisor that authorizes entry.
8. The hazards of the space to be entered
9. Measures taken to isolate the space and to eliminate or control permit space hazards before entry.
10. Acceptable entry conditions
11. Monitoring and test results performed in compliance under 1926.1204(e) of the confined space standard. This should be accompanies with the names or initials of the testers and by an indication of when the tests were performed.
12. Rescue and emergency services that can be summoned and the means by which to do so (i.e. equipment to use or phone numbers to call).
13. Communication procedures used by the authorized entrants and attendants to maintain contact during the entry
14. List of equipment to be provided, such as personal protective equipment, testing equipment, communications equipment, alarm systems, and rescue equipment
15. Any other information needed or necessary, given the circumstances of the particular confined space, to ensure employee safety
16. Any additional permits needed for the authorization of entry, such as hot work permits

**Declassifying a Permit Required Confined Space**

The OSHA regulations also allow permit spaces to be reclassified as non-permit spaces by the total elimination of hazards. A permit space can be reclassified as a non-permit space if there are no actual or potential atmospheric hazards and if all the other hazards within the space are eliminated without entry into the space.

**Personnel, Duties, and Training for Full Permit Required Confined Space Entry Operations**

RBVetCo will provide proper and sufficient training to each employee, at no cost to them, working with or in confined spaces on the jobsite. Training will be provided before the employee starts his or her duties in the permit space or before there is a change in assigned duties, in a language and vocabulary that they can understand. At any time there is a change in the procedures or an addition of a procedure an employee has not yet been trained on or not enough knowledge on the procedure is demonstrated by the employee, those affected employees shall be retrained.

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 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 the means for summoning them is 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…
* Must receive the training required of authorized entrants.
* Know the proper use of all personal protective equipment and rescue equipment necessary to enable them to enter and perform rescue operations.
* Must practice making permit space rescues at least once every twelve months.
* Must be trained in basic first aid and in cardiopulmonary resuscitation (CPR). At least one member must hold current certification in first aid and CPR.
* Off-site rescue services must have access to permit spaces as necessary for those rescuers to develop an appropriate rescue plan.

At RBVetCo, training will encompass awareness training about the written program, permit required confined space training, alternative procedure training, and reclassifying confined space procedure training.

The documented training program for PRCS will include, as a minimum:

* Types of confined space hazards
* Components of the written PRCS program
* Components of the entry permit system
* Components of the hot work permit
* The need for prompt guarding of the spaces entrance opening
* Atmospheric testing equipment including its uses, calibration, and maintenance
* Atmospheric testing protocol
* Methods for the control or elimination of any atmospheric hazards
* Procedures the employees must follow if they detect a hazard
* The evaluation process to be used for entry if hazards are detected
* Train employees on the use of entry equipment (e.g. ladders, communication devices, etc)
* Personal protective equipment required
* Personnel and their responsibilities
* On-site or Off-site rescue
* Procedures for annual review of cancelled permits
* Any other information necessary to ensure employee safety during a permit space entry operation
* Documentation of the training

The documented training program for using alternate procedures will include, as a minimum:

* 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 condition which may make it unsafe to remove the entrance cover.
* The need of prompt guarding of the entrance opening.
* Atmospheric testing equipment including its use, method of calibration, and maintenance.
* Atmospheric testing protocol for oxygen, combustibles, toxics.
* Before entry, frequent of 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 entry if a hazardous atmosphere is detected or the individual vacates the space and returns some later time.
* 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 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.
* Any other information needed to ensure the safety of the employee.
* The documentation of the training.

The documented training program for reclassifying permit space procedures will include, as a minimum:

* Documentation of the elimination of 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 employees on the hazards associated with the space (i.e. Mechanical, chemical, atmospheric) and the methods needed to eliminate the hazards 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 with the employee entering the space.
* Inform employees that any procedures such as welding, cleaning with a chemical, etc. would negate the reclassification and convert space back to a permit space.
* Any conditions which may make it unsafe to remove entrance cover.
* The need for prompt guarding of entrance opening.
* Atmospheric testing equipment including its use, method of calibration, and maintenance.
* Atmospheric testing protocol
	+ Oxygen, combustibles, toxics
	+ Before 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 re-entry if a hazard is detected of the individual vacates eh space and returns some later time.
* Awareness training to recognize other potential hazards in our around the space.
* The documentation of the training.

RBVetCo will keep a record, in the Confined Space Program, of all authorized entrants, attendants, and entry supervisors with their trainer and training date included.

The following is a list of employees who have been equipped and trained to serve as **authorized entrants**:

Authorized Entrants Trainer Date of Training

1.

2.

3.

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

Attendant Trainer Date of Training

1.

2.

3.

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

Entry Supervisor Trainer Date of Training

1.

2.

3.

**Rescue and Emergency Services**

To ensure employee safety while operating within the confined space, RBVetCo will establish a Rescue and Emergency Service plan at each jobsite, should an emergency or event occur. Each prospective rescue team will be evaluated on their response to a rescue summons and, with consideration of the hazard(s), the time in which it takes them to respond. When selecting a team or service, RBVetCo will consider all of the following in evaluation:

* Capability of reaching victims within a timeframe that correlates with the type of permit space and hazards associated with that space
* A team proficient in and completely equipped for the needed rescue services for each individual jobsite
* If the rescue service becomes unavailable at any time, immediate notification will be called in or sent to the jobsite

A copy of all permit spaces, and the hazards associated with each space, will be made available for the rescue team or service and full access will be granted to them to perform practice operations and assemble rescue plans.

In the event that RBVetCo would assemble its own team of employees to perform permit space rescue or emergency services, training and equipment would be provided at no cost to any of those employees. Each employee will receive training on how to properly use personal protective equipment provided, how to perform all rescue duties, and at least one team member must be trained in basic first aid and cardiopulmonary resuscitation. Before performance of actual permit space rescues, the rescue team must perform practice space rescues and do so at least annually.

Non-entry rescue will be used at all times, at all jobsites of RBVetCo unless retrieval equipment would hinder the rescue of the entrant or would increase the overall hazard inside the space. When entering the permit space, the authorized entrant must be wearing a full size body harness that is attached securely and properly to the retrieval system. Retrieval lines and other equipment used will be inspected for use before entry taking into account all contributing factors (i.e. depth of space, configuration, etc.).

**Confined Space Program Review**

Within one year of any entry operation, name of person or position will conduct a review of the program using the cancelled 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 name of person or position. If no permit space entry operations are conducted during the year, no review is needed.