



Permit-Required Confined Space Entry Program

General Company Policy

The purpose of this program is to inform interested persons, including employees, that EMA is complying with the OSHA Confined Space Standard, Title 29 Code of Federal Regulations 1910.146. We have determined that this workplace needs written procedures for the evaluation of confined spaces, and where permit-required spaces are identified, we have developed and implemented a permit-required confined space entry program. This program applies to all work operations at EMA where employees must enter a permit-required confined space as part of their job duties.

The Project Managers have overall responsibility for coordinating safety and health programs in this company. The Project Manager is the person having overall responsibility for the Permit-Required Confined Space Program. Additionally, they will review and update the program, as necessary.

Copies of the written program may be obtained at the corporate office or as part of EMA written Safety & Health Program

Under this program, we identify permit-required spaces in EMA contracts, and provide training for our employees according to their responsibilities with the permit space(s). These employees receive instructions for safe entry into the specific type of confined spaces, including testing and monitoring, appropriate personal protective equipment, rescue procedures, and attendant responsibilities.

This program is designed to ensure that safe work practices are utilized during all activities regarding the permit space to prevent personal injuries and illnesses that could occur.

If, after reading this program, you find that improvements can be made, please contact the Project Manager. We encourage all suggestions because we are committed to creating a safe workplace for all our employees and a safe and effective permit-required confined space entry program is an important component of our overall safety plan. We strive for clear understanding, safe work practices, and involvement in the program from every level of the company.

Hazard Evaluation for Permit Spaces

To determine if there are permit-required confined spaces, EMA Project Managers, will conduct a hazard evaluation of our contract workplaces. This evaluation will provide us with the information necessary to identify the existence and location of permit-required confined spaces in our workplace that must be covered by the Permit-Required Confined Space Entry Program.

Preventing Unauthorized Entry

To provide a safe work environment and to prevent exposed employees from accidentally entering a permit space, we inform all employees and contractors of the existence, location, and danger posed by permit spaces by identifying, securing, and posting signage to prevent unauthorized entry.

To ensure that unauthorized employees do not enter and work in permit spaces, company policy states that only employees having completed an approved confined space training program will be assigned work in areas that contain permit spaces.

Safe Permit Space Entry Procedures

The Project Manager, or Contractor, who has completed an approved confined space training program will authorize and issue all entry permits for work in our permit spaces. The file of permits and related documents shall be kept on file.

The procedures we follow for preparing, issuing, and canceling entry permits include the following elements: The Project Manager/Contractor at the work place shall complete, in writing, the attached confined space entry sheet. All identified safety hazards shall be addressed and mitigated as necessary before entry can be made. The Project Manager/Contractor shall sign and issue the permit, specifying the exact work to be performed. The work shall then be performed as specified on the permit by approved employees in accordance with the requirements of 29 CFR 1910.146. At the completion of the assigned work, the employee who issued the permit shall put the permit in the appropriate box, canceling the permit.

Pre-Entry Evaluation

To ensure the safety and health of our employees, before allowing authorized workers to enter a permit space, we evaluate conditions in that space to determine if the conditions are safe for entry. Any employee who enters the space, or that employee's authorized representative, has the opportunity to observe the pre-entry and any subsequent testing. The authorized entrant or that employee's representative also has the option of requesting a reevaluation of the space if they feel that the evaluation was not adequate.

Our company follows the procedures to evaluate each permit space before entry according to 1910.146(c)(5)(ii)(C). This includes testing the internal atmosphere with a calibrated direct-reading instrument for oxygen content, flammable gases and vapors, and potential toxic air contaminants. We also periodically test the atmosphere of the space to ensure that the continuous ventilation is preventing the accumulation of a hazardous atmosphere.

Certification

According to 1910.146(c)(5)(ii)(H), our company verifies that the space is safe for entry and that the pre-entry measures required by 1910.146(c)(5)(ii) have been taken, through a written certification that contains the date, location of the space, and signature of the person providing the certification. At our company, the Project Manager is responsible for verifying these procedures. The certification is made before entry and is available to each employee entering the space.

According to 1910.146(c)(5)(iii), our company documents the basis for determining that all hazards in a permit space have been eliminated, through a certification that contains the date, location of the space, and signature of the person making the determination. At our company, the Project Manager is responsible for documenting this information. The certification is available to each employee entering the space.

Equipment

To ensure the safety and health of our employees, EMA shall provide the appropriate equipment to all employees who work in our near our permit spaces. The equipment we will provide to these employees shall include, but is not limited to:

- A multiple gas detector capable of monitoring for combustible gases, oxygen levels, and carbon monoxide.
- A positive pressure ventilation device.
- A mechanical retrieval system with harnesses and fall protection.
- Necessary physical barriers to be placed around the opening.

We maintain all equipment in excellent working condition, train the entrants in the correct usage of this equipment, and ensure that all equipment, including that used for personal protection are used properly. We follow these procedures to ensure entrants are using the appropriate equipment. The jobsite foreman shall be responsible for ensuring that all procedures are being followed. In the event it is discovered they are not, the permit shall be cancelled and all entrants shall exit the space until the problem is corrected and the permit is reissued. Management personnel without warning or prior notice may make spot checks for compliance with safety procedures.

Duties: Authorized Entrants

Those persons who have completed the training and are authorized to enter permit spaces (authorized entrants) are assigned specific duties which they must perform when they work in permit spaces.

Their duties and responsibilities include:

- Know the hazards that may be faced during entry, including information on the mode, signs or symptoms, and consequences of the exposure.
- Properly use equipment as required
- Communicate with the attendant as necessary to enable the attendant to monitor entrant status and to enable the attendant to alert entrants of the need to evacuate the space;
- Alert the attendant whenever: (i) The entrant recognizes any warning sign or symptom of exposure to a dangerous situation, or (ii) The entrant detects a prohibited condition; and
- Exit from the permit space as quickly as possible whenever: (i) An order to evacuate is given by the attendant or the entry supervisor, (ii) The entrant recognizes any warning sign or symptom of exposure to a dangerous situation, (iii) The entrant detects a prohibited condition, or (iv) An evacuation alarm is activated

All authorized entrants shall complete a confined space entry training program, which meets the requirements of 29CFR1910.146.

Duties: Attendants

Those persons who have completed the training and have been designated as permit space

attendants are assigned specific duties and responsibilities which they must perform in permit space job duties.

Their duties and responsibilities include:

- Knows the hazards that may be faced during entry, including information on the mode, signs or symptoms, and consequences of the exposure;
- Is aware of possible behavioral effects of hazard exposure in authorized entrants;
- Continuously maintains an accurate count of authorized entrants in the permit space and ensures that the means used to identify authorized accurately identifies who is in the permit space
- Remains outside the permit space during entry operations until relieved by another attendant.
- Communicates with authorized entrants as necessary to monitor entrant status and to alert entrants of the need to evacuate the space;
- Monitors activities inside and outside the space to determine if it is safe for entrants to remain in the space and orders the authorized entrants to evacuate the permit space immediately under any of the following conditions; (i) If the attendant detects a prohibited condition; (ii) If the attendant detects the behavioral effects of hazard exposure in an authorized entrant; (iii) If the attendant detects a situation outside the space that could endanger the authorized entrants; or (iv) If the attendant cannot effectively and safely perform all the duties required;
- Summon rescue and other emergency services as soon as the attendant determines that authorized entrants may need assistance to escape from permit space hazards;
- Takes the following actions when unauthorized persons approach or enter a permit space while entry is underway: (i) Warn the unauthorized persons that they must stay away from the permit space; (ii) Advise the unauthorized persons that they must exit immediately if they have entered the permit space; and (iii) Inform the authorized entrants and the entry supervisor if unauthorized persons have entered the permit space;
- Performs non-entry rescues as specified by the employer's rescue procedure; and
- Performs no duties that might interfere with the attendant's primary duty to monitor and protect the authorized entrants.
- Safely initiate emergency response to one or more spaces monitored without distraction by utilizing readily accessible and confirmed communication devices to summon designated emergency response team.

All authorized Attendants shall complete a confined space entry training program, which meets the requirements of 29CFR1910.146.

Duties: Entry Supervisors

Those persons who have completed the training and have been designated as permit space entry supervisors are assigned specific duties and responsibilities which they must perform in permit space job duties.

Their duties and responsibilities include

- Knows the hazards that may be faced during entry, including information on the mode, signs or symptoms, and consequences of the exposure;

- Verifies, by checking that the appropriate entries have been made on the permit, that all tests specified by the permit have been conducted and that all procedures and equipment specified by the permit are in place before endorsing the permit and allowing entry to begin;
- Terminates the entry and cancels the permit as required by paragraph (e)(5) of this section;
- Verifies that rescue services are available and that the means for summoning them are operable;
- Removes unauthorized individuals who enter or who attempt to enter the permit space during entry operations; and

All authorized Entry Supervisors shall complete a confined space entry training program, which meets the requirements of 29CFR1910.146.

Training Program

Every employee at EMA who faces the risk of confined space entry is provided with training so that each designated employee acquires the understanding, knowledge and skills necessary for the safe performance of the duties assigned to them. All training related materials, documents, and signed certificates are kept at the corporate office or with the Project Manager for the job.

Employees are trained in confined spaces on an as needed basis.

When training is conducted, it shall consist of a combination of classroom, audiovisual, workbooks, and hands-on practical exercises. A written examination shall be given upon completion of the training. New employees shall always be trained before their initial assignment of duties. All new employees needing training in confined spaces shall complete an approved confined space training program that meets the requirements of 29CFR1910.146. When changes occur in the permit required confined spaces of our company, all affected employees shall be informed of the changes and the necessary measures to mitigate any new hazards. Any additional training in confined space procedures or respiratory protection shall be provided before any work is done in the space. If we have reason to believe that an employee has deviated from a previously trained upon procedure or that their knowledge seems inadequate, the employee shall be sent for re-training and testing. A note shall also be added to the employee's file.

Rescue and Emergency Services

EMA utilizes local emergency services organizations to perform rescue and emergency services in the event of a confined space incident. To familiarize this service with the permit spaces and emergency needs, the emergency services organizations will be sent a letter describing the spaces and their locations to ensure adequate response times. Additionally, emergency services organizations will be requested to tour and visually inspect the spaces prior to the initial entry. If emergency services organizations can not adequately provide rescue and emergency services, arrangements will be made to acquire necessary rescue equipment and services to comply with the requirements of 29 CFR 1910.146 (k). For all IDLH (Immediately Dangerous to Life and Health) entries, rescue services must be on site for non entry rescue.

Multiple Employer Entry Procedures

When outside employers/contractors enter our facility to perform work in permit spaces, we coordinate entry and work operations following these procedures:

- Inform the contractor that the workplace contains permit spaces and that permit space entry is allowed only through compliance with a permit space program;
- Apprise the contractor of the elements, including the hazards identified and the host employer's experience with the space, that make the space in question a permit space;
- Apprise the contractor of any precautions or procedures that the host employer has implemented for the protection of employees in or near permit spaces where contractor personnel will be working;
- Coordinate entry operations with the contractor, when both host employer personnel and contractor personnel will be working in or near permit spaces
- Debrief the contractor at the conclusion of the entry operations regarding the permit space program followed and regarding any hazards confronted or created in permit spaces during entry operations.
- Obtain any available information regarding permit space hazards and entry operations from the host employer;
- Coordinate entry operations with the host employer, when both host employer personnel and contractor personnel will be working in or near permit spaces
- Inform the host employer of the permit space program that the contractor will follow and of any hazards confronted or created in permit spaces, either through a debriefing or during the entry operation.
- Hold a pre-entrance meeting to be held with the entry supervisors of all involved employers such that all entry procedures and issues will be agreed upon and written into the permit.

Post-operations Procedures

Upon completion of work in a permit space, the Entry Supervisor shall sign and cancel the permit. The space shall then be secured to prevent unauthorized entry. The entry supervisor shall cancel the permit, and all associated paperwork shall be forwarded to the Project Manager for review.

Review-Procedures

To ensure that all employees participating in entry operations are protected from permit space hazards, EMA reviews the Permit-Required Confined Space Entry Program on a regular basis. We use the retained cancelled permits from the last 12 months within one year after each entry and revise the program as necessary. EMA shall perform a single annual review covering all entries during a 12-month period. If no entry is performed during a 12-month period, then no review shall be performed.

Should deficiencies be noted with the program due to demonstration of inadequate knowledge by attendants, entrants, entry supervisors, or the trained emergency response team, near misses, unauthorized entry, or injury/illness associated with the space, the entry permit shall be immediately cancelled. Modifications to the program and/or retraining will be conducted prior to the re-issuance of any entry permits to ensure employee protection.

Enforcement

Constant awareness of and respect for permit-required confined space entry hazards, and

compliance with all safety rules are considered conditions of employment. Project Managers and Supervisors reserve the right to issue disciplinary warnings to employees, up to and including termination, for failure to follow the guidelines of this permit entry program.