

**Minneapolis College of  
Art and Design**

**Confined Space Entry  
Program**

**MINNEAPOLIS COLLEGE OF ART AND DESIGN  
(MCAD)**

**CONFINED SPACE ENTRY PROGRAM**

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**PROGRAM ATTACHMENTS**

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<b>Attachment 1</b>	<b>Hazard Analysis Guidelines/Form</b>
<b>Attachment 2</b>	<b>Program Summary &amp; Survey</b>
<b>Attachment 3</b>	<b>Program Forms</b> <ul style="list-style-type: none"><li>• <b>Reclassification Form &amp; Procedures</b></li><li>• <b>Short Form &amp; Procedures</b></li><li>• <b>(Full) Entry Permit Form &amp; Procedures</b></li></ul>
<b>Attachment 4</b>	<b>Summary of Procedures for Permit Spaces</b>

## 1. SUMMARY

MCAD has developed and implemented this written Confined Space Entry Program to describe procedures for entry into and work in confined spaces. MCAD-owned properties have been evaluated to determine which spaces are considered **confined spaces** under the OSHA standard. MCAD has further classified certain confined spaces as **permit-required** confined spaces. Each **permit-required** confined space is to be posted with signs at all access points that prohibit entry without a permit.

**Permit-required** confined spaces may only be entered by qualified MCAD employees or contractors under strict compliance with confined space entry procedures.

*Whenever possible, alternative procedures shall be developed to allow the work to be performed without entry into these spaces.*

Spaces that meet the definition of a **confined space** but do not meet the OSHA definition of a **permit-required** confined space are considered **non-permit** confined spaces. **These spaces are to be re-evaluated at least annually to verify that the classification is correct.**

Spaces that are not designed for continuous human occupancy, but do not meet the OSHA definition of a confined space **are not covered in this written confined space entry program.** When tasks in these spaces potentially involve employee exposure hazards, the procedures and equipment are to be covered under the Personal Protective Equipment Program and Employee Right-to-Know Program.

**Program Contact:** Procedures described in this program have been reviewed and approved by the *Program Administrator, Tom Grue, Coordinator, Occupational Health & Safety.* This written program is available for inspection by employees upon request.

**Reference:** For more information see OSHA standard 29 CFR 1910.146, *Permit-Required Confined Spaces.*

## 2. PURPOSE

The purpose of this program is to protect employees from the hazards of entry into **permit-required** confined spaces. These mandatory written procedures are intended for use by MCAD employees or contractors assigned to enter **permit-required** confined spaces on MCAD-owned property.

## 3. RESPONSIBILITIES

The *Program Administrator* is responsible for:

- Overseeing implementation of the Confined Space Entry Program.
- Maintaining an up-to-date survey of all **potential** confined spaces (**non-permit** and **permit-required**) on MCAD-owned properties.
- Overseeing measures to prevent unauthorized entry into OSHA **permit-required** confined spaces.

- Overseeing the use of mandatory permits and procedures for **permit-required** confined spaces.
- Ensuring that MCAD employees are provided with required training for **permit-required** confined space entry.
- Communicating program details to outside contractors assigned to enter confined spaces on MCAD-owned property.
- Overseeing equipment inspections and maintenance.
- Overseeing an annual program audit.
- Maintaining program records.

*Maintenance Staff* are responsible for:

- Following required procedures and assigned duties.
- Attending required training.

*Outside Contractors* are responsible for complying with applicable sections of the MCAD Confined Space Entry Program (or comparable program provided by contractor) and the OSHA Permit-Required Confined Spaces Standard, 29 CFR 1910.146.

#### 4. DEFINITIONS

*Acceptable entry conditions* - means the conditions that must exist in a permit space to allow entry and to ensure that employees involved with a **permit-required** confined space entry can safely enter into and work within the space.

*Attendant* - means an individual stationed outside one or more **permit-required** confined spaces who monitors the **authorized entrant** and who performs all **attendant's** duties.

*Authorized entrant* - means an employee who is authorized by the employer to enter a permit space.

*Confined space* - means 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.

*Note:* Ventilated areas that are designed for continuous human occupancy are not considered as confined spaces. (See FR 58 4462, 1/14/93.)

*Entry supervisor* - means 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** - means an atmosphere that may expose employees to the risk of death, incapacitation, impairment of ability to escape unaided from a permit space, injury or acute illness from one or more of the following five causes:

1. Flammable gas, vapor, or mist in excess of 10 percent of its lower flammable limit (LFL).
2. Airborne combustible dust at a concentration that meets or exceeds its LFL.
3. Atmospheric oxygen concentration below 19.5% or above 23.5%.
4. Atmospheric concentrations in excess of the OSHA permissible exposure limit (PEL) or maximum dose.
5. Any other atmospheric condition that is immediately dangerous to life or health (IDLH).

**Non-permit confined space** - means a confined space that does not contain or, with respect to atmospheric hazards, have the potential to contain any hazard capable of causing death or serious physical harm.

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

- 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.

## 5. IDENTIFICATION OF PERMIT AND NON-PERMIT SPACES

Prior to entry into any confined space, the **Program Administrator** shall survey each building to identify all potential confined spaces. **All potential confined spaces shall be documented in writing.** For each potential confined space, potential hazards shall be identified and evaluated, and the space shall be classified as either a **non-permit** or **permit-required** confined space. Hazard evaluations shall follow the decision flow for classification specified in the OSHA standard and used in the OSHA Confined Space Entry software (see [www.osha.gov](http://www.osha.gov)).

### **5.1 List of Confined Space Locations and Hazards**

The *Program Administrator* is responsible for maintaining a current **survey of permit-required and non-permit** confined spaces on MCAD-owned properties. (See *Attachments*.)

If spaces are not to be entered under any circumstances, and procedures for entry will not be developed, these shall be identified in the list by the phrase **NO ENTRY ALLOWED**. If MCAD contracts with a contractor to perform work in such spaces, the *Program Administrator* shall oversee compliance with the host employer requirements under 29 CFR 1910.146 (c)(8). (See OUTSIDE CONTRACTORS.)

### **5.2 Preventing Unauthorized Entry**

The *Program Administrator* shall oversee measures to prevent unauthorized entry into OSHA **permit-required** confined spaces. Precautions shall include locking/securing and/or posting with signs prohibiting unauthorized entry. A sign reading

**DANGER – PERMIT-REQUIRED  
CONFINED SPACE,  
DO NOT ENTER**

meets this requirement.

### **5.3 Non-Permit Confined Spaces**

Spaces which meet the definition of an OSHA confined space but do not meet the definition of an OSHA **permit-required** confined space, may be classified as **non-permit** confined spaces. (See *Attachments*.)

*A non-permit confined space means a confined space that does not contain or have the potential to contain any hazard capable of causing death or serious physical harm. A permit space may be reclassified as a non-permit space based on current work operations. These reclassified spaces are considered non-permit spaces because there are no atmospheric hazards and all other hazards within the space can be eliminated without entry into the space.*

*These spaces are only reclassified as non-permit confined spaces for as long as hazards remain eliminated.*

A Certification Form shall be used to **reclassify permit spaces to non-permit** spaces. This form is to include:

- **Date** of determination
- **Location** of space
- **Signature** of person making the determination
- **Basis** for determining that there are no existing or potential atmospheric hazards



The *Certification Form* shall be completed by an authorized MCAD employee or contractor and posted or made available to each employee entering a **reclassified non-permit** confined space.

**NOTE:**

*Entry into a non-permit space is prohibited any time conditions may have changed the classification to "permit-required".*

The *Program Administrator* is to ensure that **non-permit** space classifications are current and correct. The *Program Administrator* shall ensure that each identified **non-permit** space is re-evaluated any time conditions change, and at least **annually**.

## **6. PERMIT SPACE PROGRAM**

### **6.1 Confined Space Hazard Analysis**

The *Program Administrator* shall oversee completion of a Confined Space Hazard Analysis for **permit-required** confined spaces that will be entered by MCAD employees or contractors. The analysis shall identify the following:

- **Reason** for entry
- **Operations** to be performed
- **Potential hazards** to be covered on permit

### **6.2 Permit Procedures for Safe Entry**

The *Program Administrator* shall oversee the development of entry permits which cover required procedures for acceptable entry conditions (lock-out tag-out, ventilation and testing, etc.). (See *Attachments*.)

**If required, the following steps shall be covered by the permits:**

#### **1. Isolating the Space**

**Prior to entry**, the space must be isolated from serious hazards. Circuits must be de-energized and locked out, mechanical equipment must be locked out or guarded, chemical or gas lines that are open must be isolated by blanking/blinding, misaligning or removing a section of the line/pipe/duct, or with a double block and bleed system.

#### **2. Purging and Ventilating**

**Prior to entry**, atmospheric hazards must be controlled or eliminated to make the space safe for employees to enter. Requirements for purging, inerting, flushing, and/or ventilating shall be specified. (Note: Open surface tanks must be drained and ventilated before entry for inspection or repair. Testing and entry procedures must comply with the OSHA standard on Open Surface Tanks, 29 CFR 1910.94.)

### **3. Barriers**

**Prior to entry**, pedestrian, vehicle or other barriers must be provided as necessary around the space opening to (1) prevent unauthorized entry into the space and (2) protect employees inside the space from falling objects, vehicular hazards, and/or persons outside the space.

### **4. Provide Required Equipment**

Prior to performing **permit-required** confined space entry, equipment needs shall be determined and all necessary equipment shall be obtained, including:

- **Remote and personal air monitoring equipment** with appropriate sensors (oxygen/combustible gas/toxic gas) and alarms
- **Ventilation blower(s)** and accessories appropriate for space to be entered
- **Communications equipment** for attendant and authorized entrant(s)
- **Personal protective equipment** for hazards which have been controlled but not eliminated (gloves, respiratory protection, coveralls, boots, etc.)
- **Lighting equipment** needed to enable employees to see well enough to work safely and exit the space quickly in an emergency
- **Barriers** for pedestrians, vehicles or other external hazards
- Equipment necessary for safe entrance and exit (**ladders, retrieval systems, etc.**)
- **Rescue and emergency equipment** (unless provided by rescue service)

**Note: Retrieval systems** or methods must be used whenever an Authorized Entrant enters a permit space, unless the equipment would increase the overall risk of entry or would not contribute to the rescue of the entrant.

**Retrieval systems** must meet each of the following OSHA requirements:

(1) Each authorized entrant must use a chest or full body harness, with a retrieval line attached at the center of the entrant's back near shoulder level, or above the entrant's head. Wristlets may be used instead if the retrieval line is not feasible or creates a greater hazard and wristlets are the safest alternative.

(2) The other end of the retrieval line must be attached to a mechanical device or fixed point outside the permit space in such a manner that rescue can begin as soon as the rescuer becomes aware that rescue is necessary.

(3) A mechanical device must be available to retrieve personnel from vertical type permit spaces more than **5 feet (1.52 m)** deep.

- **Any other equipment necessary** for safe entry into and rescue from permit spaces. (*Example:* thermometer(s) with remote sampling capabilities for spaces with potential for temperature extremes.)

#### ***5. Equipment Inspections and Maintenance***

The **Program Administrator** shall oversee inspections of equipment used for OSHA **permit-required** confined space entry **before and after each use**. Air monitoring equipment shall be **calibrated and checked** before and after each use.

Equipment shall be taken out of service and submitted for factory inspection and testing at the frequency recommended by the manufacturer.

Defective equipment shall be taken out of service immediately for repair or replacement. Repairs shall only be performed by **qualified technicians** authorized by the manufacturer.

The **Program Administrator** shall oversee additional periodic calibrations of air monitoring equipment following the manufacturer's recommendations. Factory calibrations shall be performed at the frequency recommended by the manufacturer.

#### ***6. Testing and Monitoring***

**Prior to entry**, conditions in the permit space must be tested to determine if acceptable entry conditions exist. Additional testing shall be done as needed to determine if acceptable entry conditions are being maintained during the course of entry operations. If isolation of the space is infeasible because the space is large or is part of a continuous system, conditions shall be **continuously monitored**.

**When testing for atmospheric hazards,  
air tests must be performed in the following order:**

1. oxygen
2. combustible gases and vapors
3. toxic gases and vapors

#### ***7. Outside Attendant for Full Permit-Required Entries***

For standard (full permit-required) entries, **at least one Outside Attendant** shall be available outside the permit space for the duration of the operation. This individual is to be stationed outside the space to monitor the Authorized Entrant(s) and perform all attendant's duties assigned to them.

#### ***8. Assigned Roles***

For standard entries, each person with an active role in entry operations will be identified in advance and provided with required training.

### ***9. Summoning Rescue Services***

Emergency procedures for standard entries shall include: summoning rescue and emergency services, rescuing entrants from permit spaces, providing necessary emergency services to rescued employees, and preventing unauthorized personnel from attempting rescue.

### ***10. System for Managing Permits***

Procedures shall cover preparing, issuing, using, and canceling standard entry permits. The Entry Supervisor shall terminate entry and cancel the entry permit when:

- **operations are complete, or**
- **prohibited conditions develop in or near the space**

### ***11. Coordination with Contractors***

The *Program Administrator* will coordinate entry operations when more than one employer is involved, so that employees of one employer do not endanger the employees of any other employer.

### ***12. Review Entry Operations***

The *Program Administrator* will review entry operations when there is reason to believe that the measures taken under this permit space program may not protect employees and revise the program to correct problems before any more entries are authorized.

***REASONS FOR REVIEW INCLUDE:***

- Unauthorized entry of a permit space
- Detection of a permit space hazard not covered by the permit
- Detection of a condition prohibited by the permit
- Injury or near-miss during entry
- Change in configuration of a permit space
- Employee complaints

**Additional program review shall be conducted on an annual basis. (See ANNUAL PROGRAM AUDIT.)**

## **7. THE PERMIT SYSTEM**

The *Program Administrator* shall oversee development of job-specific confined space entry procedures based on the hazard analysis. Permits are to specify the **acceptable conditions** which must exist in a space to allow entry and to ensure that employees can safely enter into and work within the space. (See *Attachments*.)

**Note:** According to OSHA, if the only hazard posed by the permit space is a potential **hazardous atmosphere**, and continuous forced air ventilation alone is sufficient to maintain the permit space safe for entry, MCAD may implement abbreviated procedures instead of using the **standard (full) Confined Space Entry Permit**. (Refer to **standard permit** and **short-form permit checklist** below.)

### **7.1 Short-Form Permit Checklist**

If the only hazard posed by the permit space is the potential for **hazardous atmosphere**, and continuous forced air **ventilation alone is sufficient** to maintain that permit space safe for entry, MCAD may implement a **short-form permit** checklist instead of using the standard (full) entry permit described above.

An Entry Supervisor or Attendant is **not required** by OSHA for these entries, provided that the space can be maintained in a safe condition for entry by mechanical ventilation alone.

**However, a buddy system shall be implemented for these entries, in case of medical emergency.**

The *Program Administrator* shall oversee the use of the **short-form permit** checklist, to document compliance with OSHA requirements under 29 CFR 1910.146(c), including:

- Provide required employee training
- Consult with employees on all aspects of the program
- Maintain monitoring and inspection data that shows that the only hazard posed by the space is an actual/potential hazardous atmosphere, and continuous forced air ventilation is sufficient to maintain the permit space safe for entry
- Provide monitoring and inspection data to each employee entering the space (or their authorized representative)
- **If an initial entry of the permit space is necessary to obtain the required monitoring and inspection data, a standard (full) Confined Space Entry Permit is required for the initial entry**

Required procedures are summarized below for the **short-form permit** checklist:

**SHORT-FORM PERMIT PROCEDURES CHECKLIST**

1. Employees shall be trained and consulted on all aspects of the program.
2. Any conditions making it unsafe to remove an entrance cover shall be eliminated before the cover is removed.
3. When entrance covers are removed, the opening shall be promptly **guarded** by a railing, temporary cover, or other temporary barrier that will prevent an accidental fall through the opening and that will protect each employee working in the space from foreign objects entering the space.
4. Before an employee enters the space, the internal atmosphere shall be tested, with a calibrated direct-reading instrument, for **oxygen content, for flammable gases and vapors, and for potential toxic air contaminants**, in that order. Any employee who enters the space (or that employee's authorized representative) shall be provided an opportunity to observe the pre-entry testing.
5. There may be **no hazardous atmosphere** within the space whenever any employee is inside the space.
6. **Continuous forced air ventilation** shall be used, as follows:

*An employee may not enter the space until the forced air ventilation has eliminated any hazardous atmosphere*

*The forced air ventilation must be directed to ventilate the immediate areas where an employee is or will be present within the space and shall continue until all employees have left the space.*

*The air supply for the forced air ventilation shall be from a clean source and may not increase the hazards in the space.*

7. The atmosphere within the space shall be periodically **tested as necessary** to ensure that the continuous forced air ventilation is preventing the accumulation of a hazardous atmosphere. Any employee who enters the space (or that employee's authorized representative) shall be provided with an opportunity to observe the testing.

8. **If a hazardous atmosphere is detected during entry:**

*Each employee shall leave the space **immediately**, and*

*The space shall be evaluated to **determine how the hazardous atmosphere developed**, and*

*Measures shall be **implemented** to protect employees from the hazardous atmosphere before any subsequent entry takes place.*

9. **Written certification.** A trained **Lead Maintenance Mechanic** must certify that the space is safe for entry and that the required pre-entry measures have been taken. The **written certification** must include:

- *date*
- *location of the space*
- *signature of the person providing the certification*

The certification shall be completed **before entry** and made available to each employee entering the space (or that employee's authorized representative).

## 7.2 Standard (Full) Confined Space Entry Permits

For **standard** (full) entry permits, the *Lead Maintenance Mechanic* shall serve as Entry Supervisor. Before entry begins, the Entry Supervisor identified on the permit shall sign the entry permit to authorize entry.

The completed permit shall be made available at the time of entry to all Authorized Entrants by posting it at the space entrance. The duration of a permit shall not exceed the time required to complete the assigned task identified on the permit. The Entry Supervisor shall supervise closing of the confined space at the conclusion of the permit operations.

The Entry Supervisor shall terminate entry and cancel the **Confined Space Entry Permit** when:

- **operations are complete, or**
- **prohibited conditions develop in or near the space**

Any problems encountered during entry shall be noted on the permit so that appropriate revisions to the program can be made. The Entry Supervisor shall discuss any problems encountered during entry with the *Program Administrator*, to identify program deficiencies. The *Program Administrator* shall oversee corrections to the Confined Space Hazard Analysis and the job-specific **Confined Space Entry Permits**.

The *Program Administrator* shall retain completed standard (full) entry permits for at least **one year** to allow review of the program.

Each **standard (full) Confined Space Entry Permit** shall include, at a minimum, the following **15 OSHA-required items**. (See *Attachments* for OSHA example.)

**Required Information for  
Standard (Full) Confined Space Entry Permit**

1. Permit space to be entered
2. Purpose of the entry
3. Date and the authorized duration of the entry permit
4. List of Authorized Entrants within the permit space (by name, or by other means to enable the attendant to determine quickly and accurately at all times which authorized entrants are inside the permit space)
5. Name(s) of the outside Attendant(s)
6. Name and signature of the Entry Supervisor authorizing entry
7. Hazards of the OSHA *permit-required* confined space
8. Steps taken to isolate the OSHA *permit-required* space and to eliminate or control hazards before entry
9. Acceptable entry conditions
10. Name/signature of the person performing air monitoring, time sampling is performed, and results of initial and periodic tests showing acceptable entry conditions existed initially and throughout the course of entry operations (tests listed and performed in the following order: oxygen, combustible gas, toxic gas)
11. Rescue and emergency services and how they will be contacted
12. Communication procedures for maintaining contact between Authorized Entrants and Attendants
13. Required equipment, including: personal protective equipment, testing equipment, communications equipment, alarm systems, rescue equipment
14. Other information for necessary for safe entry
15. Additional permits required (hot work permits, etc.)



## 8. DUTIES

The *Program Administrator* shall ensure MCAD employees are trained and equipped to carry out their duties under this program.

### *Entry Supervisors* shall:

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1. Know the hazards that may be faced during each entry, including information on the modes, signs/symptoms and consequences of exposure.
2. Verify, by checking the entry 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 signing the permit and allowing entry to begin.
3. Terminate the entry and cancel the permit if:
  - operations are completed
  - prohibited conditions develop in or near the space
4. Verify that the Rescue Service is available and methods for emergency communication are operable.
5. Remove unauthorized individuals who enter or who attempt to enter the permit space.
6. Determine throughout the operation that entry operations agree with the terms of the permit and acceptable entry conditions are being maintained.

### *Authorized Entrants* shall:

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1. Know the hazards that may be faced during entry, including information on the mode, signs or symptoms and consequences of exposure.
2. Properly use required equipment.
3. Communicate with the Attendant as necessary to enable the attendant to monitor their status and alert entrants of the need to evacuate the space.
4. Alert the Attendant whenever (1) the Entrant recognizes any warning sign or symptom of exposure to a dangerous situation, or (2) the Entrant detects a prohibited condition.
5. Exit from the permit space as quickly as possible whenever (1) an order to evacuate is given by the attendant or the entry supervisor, (2) the entrant recognizes any warning sign or symptom of exposure to a dangerous situation, (3) the entrant detects a prohibited condition, or (4) an evacuation alarm is activated.

Anyone assigned to perform *Air Monitoring* must:

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1. Know the hazards that may be faced during entry, including information on the mode, signs/symptoms and consequences of exposure.
2. Select appropriate equipment to accurately assess anticipated hazards.
3. Properly use sampling equipment, including checks to verify proper operation.
4. Operate equipment to ensure thorough evaluation of atmosphere in the space.
5. Correctly interpret sampling results.
6. Communicate with the others as necessary (the Attendant or the Authorized Entrant) to monitor the conditions in the space and alert Authorized Entrants of the need to evacuate the space.

The *Attendant* shall:

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1. Know the hazards that may be faced during entry, including information on the mode, signs/symptoms and consequences of exposure.
2. Be aware of possible behavioral effects of hazard exposure in authorized entrants.
3. Continuously maintain an accurate count and identification of authorized entrants in the permit space.
4. **Remain outside the permit space during entry operations until relieved by another attendant.**
5. Communicate with authorized entrants as necessary to monitor their status and alert entrants to the need to evacuate.
6. Monitor activities inside and outside the space to determine if it is safe for entrants to remain in the space and order evacuation of the space immediately under any of the following conditions:
  - if the Attendant detects a prohibited condition
  - if the Attendant detects the behavioral effects of hazard exposure in an authorized Entrant
  - if the Attendant detects a situation outside the space that could endanger the authorized Entrants
  - if the Attendant cannot effectively and safely perform all of their required duties
7. Summon *Rescue Service* as soon as the Attendant determines that authorized Entrants may need assistance to escape from permit space hazards.

8. Take the following actions when unauthorized persons approach or enter a permit space while entry is underway:
9. Warn the unauthorized persons that they must stay away from the permit space
10. Advise the unauthorized persons that they must exit immediately if they have entered the permit space
11. Inform the authorized entrants and the entry supervisor if unauthorized persons have entered the permit space
12. Perform non-entry rescues
13. Perform no duties that might interfere with the Attendant's primary duty to monitor and protect authorized entrants

## **9. RESCUE AND EMERGENCY SERVICES**

### **9.1 Selection of Rescue Service**

The *Program Administrator* shall designate rescue and emergency services for confined space entry. The *Program Administrator* shall select a rescue service which meets the following requirements:

- Has the capability to reach the victim(s) within the appropriate time frame for the permit space hazards identified. (Note: This varies with the hazards involved. For potential atmospheres immediately dangerous to life and health (IDLH), a standby rescuer person(s) capable of immediate action is required.)
- Is equipped and skilled in performing the needed rescue services

The *Program Administrator* shall provide the following information to the rescue service:

- Information on the hazards they may confront when called to perform rescue at the site
- Access to all permit spaces from which rescue may be necessary so that the rescue service can develop appropriate rescue plans and practice rescue operations.

### **9.2 Rescue Equipment**

To assist with non-entry rescue, retrieval systems or methods are required whenever an Authorized Entrant enters a standard permit space, unless the equipment would increase the overall risk of entry or would not contribute to the rescue of the Authorized Entrant.

<b>Non-entry rescue shall be performed whenever possible.</b>
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### 9.3 MSDSs

If an injured entrant is exposed to a hazardous substance, the applicable Material Safety Data Sheet or similar information shall be provided to the medical facility providing treatment.

## 10. OUTSIDE CONTRACTORS

*Outside Contractors* assisting with confined space entry activities shall be required to comply with the MCAD Confined Space Entry Program, or a comparable program provided by the contractor.

The *Program Administrator* shall oversee coordination of contractor confined space entry procedures with the MCAD Confined Space Entry Program, to ensure that employees of one employer do not endanger the employees of any other employer.

If MCAD hires an outside contractor to perform comprehensive **permit-required** confined space entry operations, the *Program Administrator* shall oversee completion and documentation of the following steps:

1. **Inform the contractor of the permit-required spaces**, and explain that **permit-required** confined space entry on MCAD-owned property requires compliance with a permit space program meeting the requirements of OSHA standard 29 CFR 1910.146;
2. **Notify the contractor of the hazards** (including the specific hazards identified and MCAD's experience with the space) that make the space in question a **permit-required** confined space.
3. **Notify the contractor of any precautions** or procedures that MCAD has implemented for the protection of employees in or near **permit-required** confined spaces where contractor personnel will be working.
4. **Coordinate entry operations** with the contractor, when both MCAD personnel and contractor personnel will be working in or near the **permit-required** confined space, so that employees of one employer do not endanger employees of the other employer.
5. **Debrief the contractor** at the conclusion of the entry operations regarding the permit space program procedures which were followed and any hazards confronted or created in the permit space during entry operations.

## 11. TRAINING

The *Program Administrator* shall oversee employee training for the MCAD Confined Space Entry Program. All MCAD employees involved in confined space entry shall be

provided with the required training to acquire the knowledge and skills necessary for the safe performance of their responsibilities and assigned duties.

### **11.1 Frequency of Training**

Training shall be provided as follows:

- **Before employee's are first assigned** duties related to this program
- **Before there is a change** in assigned duties
- Whenever there is a **change in permit space operations** that presents a hazard for which they have not been previously trained
- Whenever there is reason to believe either that employees are not following required procedures or that their knowledge is inadequate

### **11.2 Content of Training**

Training shall provide the knowledge and skills necessary for employees to carry out their duties under this program.

### **11.3 Training Certification**

The *Program Administrator* shall maintain training records for each MCAD employee participating in the Confined Space Entry Program. Copies of training certification shall be available to employees upon request. The certification shall include:

- Employee names
- Signatures/initials of trainers
- Dates of training
- Summary of content

## **12. ANNUAL PROGRAM AUDIT**

The *Program Administrator* shall conduct an annual audit of all phases of the Confined Space Entry Program. This includes review of all entries performed during the previous year.

Corrections shall be made where deficiencies are found and employees shall be retrained.

## **13. RECORDKEEPING**

### **13.1 Completed Permits and Checklists**

The *Program Administrator* shall retain each completed entry permit and short-form checklist for at least **one year** to allow review of the program.

### **13.2 Equipment Records**

The *Program Administrator* shall maintain equipment and repair records for all equipment used for OSHA *permit-required* confined space entry activities.

### **13.3 Training Records**

The *Program Administrator* shall maintain certification of training for MCAD employees involved in OSHA **permit-required** confined space entry activities.

### **13.4 Availability of Records**

Employee training records shall be provided upon request to employees, their authorized representatives and authorized OSHA representatives.

## **14. EMPLOYEE PARTICIPATION**

The *Program Administrator* shall involve all affected MCAD employees (and their authorized representatives) in the development and implementation of all aspects of this confined space entry program.

Preplanning for standard (full) permit-required confined space entry operations shall involve the following parties:

- Program Administrator
- Entry Supervisors
- Authorized Attendants and Entrants
- Rescue and Emergency Service Providers

**PROGRAM ATTACHMENTS**

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<b>Attachment 1</b>	<b>Hazard Analysis Guidelines/Form</b>
<b>Attachment 2</b>	<b>Program Summary &amp; Survey</b>
<b>Attachment 3</b>	<b>Program Forms</b> <ul style="list-style-type: none"><li>• <b>Reclassification Form &amp; Procedures</b></li><li>• <b>Short Form &amp; Procedures</b></li><li>• <b>(Full) Entry Permit Form &amp; Procedures</b></li></ul>
<b>Attachment 4</b>	<b>Summary of Procedures for Permit Spaces</b>