

PERMIT-REQUIRED CONFINED SPACES PROGRAM

On January 14, 1993, OSHA established safety requirements to protect employees from the hazards of entry into permit-required confined spaces. It is essential to have a clear understanding of just what is covered by this standard. OSHA has software available, **Confined Spaces Advisor 1.1**, which will assist users to identify confined spaces and deal with permit required confined spaces. In addition, a public test version of “e-PRCS” software, released in 2000, is available. The software is designed to help you prepare a written Permit Required Confined Space Program. These can be downloaded from the Internet at <http://www.osha.gov/dts/oshasoft/index.html> under “Expert Advisors. But for those without Internet access, an overview is provided here.

First of all, a **confined space** has limited or restricted means of entry or exit; is large enough for an employee to enter and perform assigned work; and is not designed for continuous occupancy by the employee. All three conditions must be met. Spaces include such things as tanks, pits, diked areas and vessels.

A **permit-required confined space** is one that meets the definition of a confined space and has one or more of these characteristics:

- Contains or *has the potential* to contain a hazardous atmosphere (such as an atmospheric concentration exceeding the permissible exposure limit -- 50 ppm of Styrene as of July, 1997; flammable vapors greater than 10% of its lower flammable limit, etc.)
- Contains a material that has the potential for engulfing an entrant
- Has an internal configuration that might cause an entrant to be trapped or asphyxiated by inwardly converging walls or by a floor that slopes downward and tapers to a smaller cross section, and/or
- Contains any other recognized serious safety or health hazards

If a space to which your employees are exposed meets the above conditions, you then must ensure the following program is in place.

Requirements of the Standard¹

General

Employers must evaluate the workplace to determine if spaces are permit-required confined spaces. If there are permit spaces in the workplace, the employer must inform exposed employees of the existence, location and danger posed by the spaces. This can

¹From U.S. Dept. of Labor, OSHA Publication 3138, 1998,
www.OSHA.gov/Publications/OSHA3138.pdf

be accomplished by posting danger signs or by another equally effective means. The following language would satisfy the requirements for such a sign:

**DANGER--PERMIT- REQUIRED CONFINED SPACE--
AUTHORIZED ENTRANTS ONLY**

If employees are not to enter and work in permit spaces, employers must take effective measures to prevent their employees from entering the permit spaces.

If employees are to enter permit spaces, the employer must develop a written permit space program, which shall be made available to employees or their representatives. Under certain conditions, the employer may use alternate procedures for worker entry into a permit space. For example, if employers can demonstrate with monitoring and inspection data that the only hazard is an actual or potential hazardous atmosphere, which can be made safe for entry by the use of continuous forced air ventilation alone, they may be exempted from some requirements, such as permits and attendants. But even in such circumstances, the internal atmosphere of the space *must* be tested, with a calibrated direct-reading instrument, first for oxygen content, second for flammable gases and vapors, and third for potential toxic air contaminants before any employee enters. Any employee who enters the space may observe the pre-entry testing. Periodic must also be performed.

Written Program

The employer who allows employee entry must develop and implement a written program for permit-required confined spaces.

Among other things, the OSHA standard requires the employer's program to:

- Identify and evaluate permit space hazards before allowing employee entry
- Test conditions in the permit space before entry operations and monitor the space during entry
- Perform in the following sequence appropriate testing for atmospheric hazards: oxygen, combustible gases or vapors, and toxic gases or vapors
- Implement necessary measures to prevent unauthorized entry
- Establish and implement the means, procedures and practices--such as specifying acceptable entry conditions, isolating the permit space, providing barriers, verifying acceptable entry conditions, purging, making inert, flushing, or ventilation of the permit space--to eliminate or control hazards necessary for safe permit-space entry operations
- Identify employee job duties
- Provide, maintain, and require, at no cost to the employee, the use of personal protective equipment and any other equipment necessary for safe entry (e.g., testing, monitoring, ventilating, communications and lighting equipment, barriers, shields and ladders)
- Ensure that at least one attendant is stationed outside the permit space for the duration of entry operations
- Coordinate entry operations when employees of more than one employer are to be

working in the permit space

- Implement appropriate procedures for summoning rescue and emergency services
- Establish, in writing, and implement a system for the preparation, issuance, use and cancellation of entry permits
- Review established entry operations and **annually** revise the permit-space entry program
- When an attendant is required to monitor multiple spaces, implement the procedures to be followed during an emergency in one or more of the permit spaces being monitored

If hazardous conditions are detected during entry, employees must immediately leave the space, and the employer must evaluate the space to determine the cause of the hazardous atmospheres.

When entry to permit spaces is prohibited, the employer must take effective measures to prevent unauthorized entry. Non-permit confined spaces must be reevaluated when there are changes in their use or configuration and, where appropriate, must be reclassified.

If testing and inspection data prove that a permit-required confined space no longer poses hazards, that space may be reclassified as a non-permit confined space. If entry is required to eliminate hazards and to obtain the data, the employer must follow certain procedures found in the standard. A certificate documenting the data must be made available to employees entering the space. The certificate must include the date, location of the space, and the signature of the person making the certification.

Contractors also must be informed of permit spaces and permit space requirements, any identified hazards, the employer's experience with the space (i.e., the knowledge of hazardous conditions), and precautions or procedures to be followed when in or near permit spaces.

When employees of more than one employer are conducting entry operations, the affected employers must coordinate entry operations to ensure that affected employees are appropriately protected from permit space hazards. Contractors also must be given other pertinent information regarding hazards and operations in permit spaces and be debriefed at the conclusion of entry operations.

Permit System

A permit, signed by the entry supervisor and verifying that pre-entry preparations have been completed and that the space is safe to enter, must be posted at entrances or otherwise made available to entrants before they enter a permit space.

The duration of entry permits must not exceed the time required to complete an assignment. Also, the entry supervisor must terminate entry and cancel permits when an assignment has been completed or when new conditions exist. New conditions must be noted on the canceled permit and used in revising the permit space program. The standard

also requires the employer to *keep all canceled entry permits for at least 1 year.*

Entry Permits

Entry permits must include the following information:

- Test results
- Tester's initials or signature
- Name and signature of supervisor who authorizes entry
- Name of permit space to be entered, authorized entrant(s), eligible attendants, and individual(s) authorized to be entry supervisor(s)
- Purpose of entry and known space hazards
- Measures to be taken to isolate permit spaces and to eliminate or control space hazards, i.e., locking out or tagging of equipment and procedures for purging, making inert, ventilating and flushing permit spaces
- Name and telephone numbers of rescue and emergency services
- Date and authorized duration of entry
- Acceptable entry conditions
- Communication procedures and equipment to maintain contact during entry
- Additional permit(s), such as for hot work, that have been issued to authorize work in the permit space
- Special equipment and procedures, including personal protective equipment and alarm systems
- Any other information needed to ensure employee safety

Training and Education

Before initial work assignment begins, the employer must provide proper training for all workers who are required to work in permit spaces. Upon completing this training, employers must ensure that employees have acquired the understanding, knowledge, and skills necessary for the safe performance of their duties. Additional training is required when (1) the job duties change, (2) there is a change in the permit-space program or the permit space operation presents a new hazard, and (3) when an employee's job performance shows deficiencies. Training also is required for rescue team members, including cardiopulmonary resuscitation (CPR) and first-aid training (see Emergencies). Employers must certify that training has been accomplished.

Upon completion of training, *employees must receive a certificate of training* that includes the employee's name, signature or initials of trainer(s), and dates of training. The certification must be made available for inspection by employees and their authorized representatives.

In addition, the employer must also ensure that employees are trained in their assigned duties.

Authorized Entrant's Duties

- Know space hazards, including information on the mode of exposure (e.g., inhalation or dermal absorption), signs or symptoms, and consequences of the exposure
- Use appropriate personal protective equipment properly (e.g., face and eye protection, and other forms of barrier protection such as gloves, aprons and coveralls)
- As necessary, maintain communication (i.e., telephone, radio, visual observation) with attendants to enable the attendant to monitor the entrant's status as well as to alert the entrant to evacuate
- Exit from permit space as soon as possible when ordered by an authorized person, when the entrant recognizes the warning signs or symptoms of exposure exist, when a prohibited condition exists, or when an automatic alarm is activated, and
- Alert the attendant when a prohibited condition exists or when warning signs or symptoms of exposure exist

Attendant's Duties

- Remain outside permit space during entry operations unless relieved by another authorized attendant
- Perform no-entry rescues when specified by employer's rescue procedure
- Know existing and potential hazards, including information on the mode of exposure, signs or symptoms, consequences of the exposure and their physiological effects
- Maintain communication with and keep an accurate account of those workers entering the permit-required space
- Order evacuation of the permit space when a prohibited condition exists, when a worker shows signs of physiological effects of hazardous exposure, when an emergency outside the confined space exists and when the attendant cannot effectively and safely perform required duties
- Summon rescue and other services during an emergency
- Ensure that unauthorized persons stay away from permit spaces or exit immediately if they have entered the permit space
- Inform authorized entrants and entry supervisor of entry by unauthorized persons and
- Perform no other duties that interfere with the attendant's primary duties

Entry Supervisor's Duties

- Know space hazards including information on the mode of exposure, signs, or symptoms and consequences of exposure
- Verify emergency plans and specified entry conditions such as permits, tests, procedures and equipment before allowing entry
- Terminate entry and cancel permits when entry operations are completed or if a new condition exists
- Take appropriate measures to remove unauthorized entrants, and
- Ensure that entry operations remain consistent with the entry permit and that

acceptable entry conditions are maintained

Emergencies

The standard requires the employer to ensure that rescue service personnel are provided with and trained in the proper use of personal protective and rescue equipment, including respirators; trained to perform assigned rescue duties; and have had authorized entrant's training. The standard also requires that all rescuers be trained in first aid and CPR and, at a minimum, one rescue team member be currently certified in first aid and in CPR. The employer also must ensure that practice rescue exercises are performed yearly, and that rescue services are provided access to permit spaces so that they can practice rescue operations. Rescuers also must be informed of the hazards of the permit space.

When appropriate, authorized entrants who enter a permit space must wear a chest or full body harness with a retrieval line attached to the center of their backs near shoulder level, or above their heads. Wristlets may be used if the employer can demonstrate that the use of a chest or full body harness is infeasible or creates a greater hazard. Also, the employer must ensure that the other end of the retrieval line is attached to a mechanical device or to a fixed point outside the permit space. A mechanical device must be available to retrieve personnel from vertical type permit spaces more than 5 feet deep.

In addition, if an injured entrant is exposed to a substance for which an MSDS or other similar written information is required to be kept at the worksite, that MSDS or other written information must be made available to the medical facility treating the exposed entrant.

Toxic gas detectors from Composites One can help with your monitoring requirements for confined space entry. Call 800/348-7503 for the Composites One Accessories & Equipment Catalog.