
	Confined Space Entry Program				
Control number:	HSE-P-36	Revision date:	8/29/2024	Rev #:	0
Approved by:	Derrick Landry	Revised by:	Madison Myers	MOC#:	N/A

PURPOSE


The purpose of this program is to establish Peak NDT's procedures regarding entry into those areas designated as "Confined Spaces".

1.0 DEFINITIONS


- A. **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 can safely enter into work within the space.
- B. **Attendant:** An individual stationed outside one or more permit spaces who monitors the authorized entrants and who performs all attendant's duties assigned in the permit program.
- C. **Authorized Entrant:** An employee who is authorized by the employer to enter a permit space.
- D. **Blanking or Blinding:** The absolute closure of a pipe, line, or duct by the fastening of a solid plate (such as a spectacle blind or a skillet blind) that completely covers the bore and that is capable of withstanding the maximum pressure of the pipe, line, or duct with no leakage beyond the plate.
- E. **Confined Space:** Any 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 (i.e., vessels, storage bins, hoppers, tanks, silos, vaults, and pits are spaces that may have limited means of entry); and is not designed for continuous human occupancy.
- F. **Double Block and Bleed:** The closure of a line, duct or pipe by closing and locking or tagging two in-line valves and by opening and locking or tagging a drain or vent valve in the line between the two closed valves.
- G. **Emergency:** Any occurrence (including any failure of hazard control or monitoring equipment) or event internal or external to the permit space that could endanger entrants.
- H. **Engulfment:** The surrounding and effective capture of a person by a liquid or finely divided soil substance that can be aspirated to cause death by filling or plugging the respiratory system or that can exert enough force on the body to cause death by strangulation, constriction, or crushing.

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- I. **Entry:** The action by which 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.
- J. **Entry Permit:** The written or printed document that is provided by the employer and/or customer to allow for controlled entry of authorized persons into a permit space, and contains the information specified in the standard.
- K. **Entry Supervisor:** The person responsible for determining if acceptable entry conditions are present at a permit space where entry is planned, for authorizing entry and overseeing entry operations, and for terminating entry as required by this section.
- L. **Hazardous Atmosphere:** An atmosphere that may expose employees to the risk of death, incapacitation, impairment of ability to self-rescue (that is to be able to escape unaided from a permit space), injury, or acute illness from one or more of the following causes:
- Flammable gas, vapor, or mist in excess of 10% of its lower flammable limit.
 - Airborne combustible dust at a concentration that meets or exceeds its lower flammable limit.
 - Atmospheric oxygen concentration below 19.5% or above 23.5%.
 - Atmospheric concentration of any substance for which a dose or a permissible exposure limit is published in Subpart G of the standard or other which could result in employee exposure in excess of its dose or permissible exposure limit.
 - Any other atmospheric condition that is immediately dangerous to life or health.
- M. **Hot Work Permit:** The employer's or customer's written authorization to perform operations capable of providing a source of ignition. (i.e., riveting, welding, cutting, burning, and heating).
- N. **Immediately Dangerous to Life and Health:** Any condition that poses an immediate or delayed threat to life or that would cause irreversible adverse health effects or that would interfere with an individual's ability to escape unaided from a permit space.

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- O. **Inerting:** The displacement of the atmosphere in a permit space by a noncombustible gas (such as nitrogen) to such an extent that the resulting atmosphere is noncombustible.
- P. **Isolation:** The process by which a permit space is removed from service and completely protected against the release of energy and material into the space by such means as:
- Blanking
 - Blinding
 - Misaligning or removing sections of lines, pipes, or ducts
 - A double block and bleed system
 - Lockout/Tagout of all sources of energy
 - Blocking or disconnecting all mechanical linkages
- Q. **Line Breaking:** The intentional opening of a pipe, line, or duct that is or has been carrying flammable, corrosive or toxic material, an inert gas, or any fluid at a volume, pressure, or temperature capable of causing death or serious physical harm.
- R. **Non-Permit Confined Space:** 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.
- S. **Oxygen Deficient Atmosphere:** An atmosphere containing less than 19.5% oxygen by volume.
- T. **Oxygen Enriched Atmosphere:** An atmosphere containing more than 23.5% oxygen by volume.
- U. **Permit Required Confined Space:** A confined space that has one or more of the following characteristics:
- Contains or has a potential to contain a hazardous atmosphere;
 - Contains a material that has the potential for engulfing an entrant;
 - 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.

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V. **Prohibited Condition:** Any condition in a permit space that is not allowed by the permit during the period when entry is authorized

W. **Testing:** The process by which the hazards that may confront entrants of a permit space are identified and evaluated. Testing includes specifying the tests that are to be performed in the permit space.

2.0 HAZARD DETERMINATION


- A. General: Only trained Company employees are permitted to perform confined space entries as part of their assigned job operations and when such is the case, prior arrangements with the customer will be made and entry will be made with consideration to the customer's policy and permit requirements. Subsequently, confined space entry hazards will be discussed during new employee orientation.
- B. Peak NDT will take into consideration, the flammability and toxicity characteristics of those substances previously occupying cellars or other compartments where employees will enter based on information obtained or provided by the customer.

3.0 IDENTIFYING A CONFINED SPACE

Peak NDT, after having performed an evaluation of those locations on site where employees would be required to enter a confined space to perform a servicing activity, has concluded that the employees' greatest exposure will result from work performed inside crawl spaces on the customer's property.

4.0 CONFINED SPACE CHARACTERISTICS

- A. Peak NDT, based upon information contained in 29 CFR 1910.146, will consider an area which meets the below characteristics, as a confined space for the purpose of this policy.
 - The area is large enough and so configured that an employee can bodily enter into it to perform an assigned activity.
 - The area has limited or restricted means for entry or exit.
 - The area is not designed for continuous employee occupancy.
 - The employee can be exposed to moving parts while in the space.
 - The employee can be exposed to electrocution hazards while in the space.
 - The employee can be exposed to slip and fall hazards while in the space.


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- The space may contain flammable, or toxic vapors or gases, and/or oxygen deficient atmosphere (less than 19.5%) or oxygen enriched atmosphere (22.5% or greater), and
- The authorized activity being performed by the employee is likely to create an additional hazard in the work location.

- B. Site Entry Supervisors shall require employees to review safety data sheets (SDS) or other documents to evaluate the physical and health hazards presented by the space, prior to entry.
- C. Entry Supervisors will monitor on-going conditions to ensure that such remains safe for entry, per the conditions of the permit.

5.0 HAZARD CONTROL

- A. Entry Supervisors will deem the use of an approved entry permit as the only acceptable means by which employees will enter a confined space. In addition, it is Peak NDT's policy that only employees whose name physically appear on the entry permit will be allowed to enter the space.
- B. Entry Supervisors will make available, the type of personal protective equipment approved for use in the environment to which the entrant(s) will be exposed.
- C. Entry Supervisors shall require that the below posting be conspicuously placed to communicate the confined space hazard:
- **"NO ENTRY-AUTHORIZED PERSONNEL ONLY"**: On the outer perimeter barricade tape.
 - **"DANGER CONFINED SPACE-ENTRY BY PERMIT ONLY"**: Near the entry into the confined space.
- D. Entry Supervisors will initiate an onsite hazard control in conjunction with customer Safety Representative, and/or third-party emergency response teams by performing at a minimum, the following:
1. Identify other on-going work activities in areas immediately adjacent to the designated work area.
 2. Gather information (visually, etc.), regarding the configuration of the space.
 3. Perform atmospheric testing as outlined in the entry permit, review material safety data sheets (MSDS).

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4. Establish a schedule of continuous atmospheric monitoring.
5. Assess the type and degree of hazards the work activity will create.
6. Conduct a pre-job meeting with the work crew. Discuss at a minimum, the following:
 - Methods to be used to isolate the vessel;
 - How entry will be controlled;
 - Job specific responsibilities;
 - Personal protective equipment required;
 - Administration of engineering controls;
 - Required postings; and
 - Emergency procedures.

E. Entry Supervisors may limit enforcement of this policy whenever:

1. The work area previously contained no flammable or toxic substances, nor has the potential of containing such substances.
2. Forced air ventilation is not required to maintain acceptable oxygen levels or dissipate vapors or gases.
3. Supplied air respirator equipment is not required, or
4. The nature of the work to be performed is not conducive to the creation of additional hazards in the space.

6.0 ENTRY PROCEDURES

- A. In accordance with OSHA standards and Company policy, only those employees whose names appear on the entry permit will be allowed to enter confined spaces.
- B. The Entry Supervisor in charge of the approved activity will work together with the customer representative to prepare the entry permit, ensuring to complete each section in its entirety. After obtaining approval the permit is presented to the workman or crew and "Hole-Watch" person.

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C. The Entry Supervisor in charge of the approved activity should proceed to discuss the specifics of the task to be performed, as well as the known and potential hazards inherent to the task, at a minimum. While reviewing the entry operations, the supervisor should address such areas as:

- Unauthorized entries;
- Employee complaints;
- Hazard not covered by the permit;
- The occurrence of an injury or near miss;
- What substance the vessel previously contained;
- Physical and health hazards inherent to the assigned task;
- Existing oxygen and explosive/flammable gas and vapor readings and information regarding how subsequent testing will be conducted; and
- The type and degree of personal protective equipment required for each stage of the activity, and an explanation as to how this information was attained

D. Review of engineering controls to be deployed (e.g., mechanical ventilation, lockout/Tagout, bonding and grounding, etc.);

E. Explanation of the respective duties of the crew members and "hole watch".


F. Area security and control and how it will be achieved, and

G. Fire, rescue and emergency response actions; Peak NDT will rely on 3rd party rescue response teams. These teams will be given an opportunity to examine the entry site, practice rescue and decline if deemed appropriate. Ensure rescue personnel shall be readily available to respond to a confined space emergency. All rescue teams will be provided PPE, training and practice rescues at least every 12 months at no cost. IDLH conditions will require trained rescue on site while work is being performed.

7.0 ENTRY SUPERVISOR'S RESPONSIBILITIES


A. Peak NDT's Entry Supervisor will make determinations to ensure that necessary procedures, practices, and equipment are in effect prior to allowing entry into a vessel (i.e., testing, summoning rescue and emergency services, rescuing entrants, providing first aid and preventing unauthorized personnel from attempting a rescue.

B. The Entry Supervisor will ensure that monitoring of the space must inform entrants of the potential hazards and results; entrants must participate in the


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permit review and signing. Ventilation must be used & testing must be conducted before entry & during work.

- C. Entry Supervisors are responsible for selecting the specific procedures and equipment to be used for entry into permit-confined space. This responsibility will include developing site-specific procedures for the following:
1. A means to identify and evaluate each hazard in the permit required confined space(s), including those elements, which are characteristic of permit-confined spaces;
 2. Procedures for coordinating entry operations for multi employer's so that employees of one employer do not endanger the employees of any other employer;
 3. A written permit system for confined space entry that will include the methods for permit preparation, specific form of communication to summon rescue (e.g., 2-way radios, verbal, etc.), issuance and implementation of confined space entry requirements and designated persons including "authorized entrants", "attendants" and "entry supervisors";
 4. An information system to notify employees by the use of visual and audible signals or other appropriate means, of the hazards which may be present, and to assure that only authorized entrants are allowed to enter the permit required confined space;
 5. Assign an attendant outside the confined space for the duration of entry operations as part of the preventative measures for unauthorized entry into hazardous work areas or permit-required confined spaces;
 6. Meetings that will enable each individual to understand their respective role when entering permit required confined spaces;
 7. Providing, maintaining, and ensuring proper use of personal protective equipment required for safe entry;
 8. Ensuring the availability and proper use of equipment for safe rescue of entrants from a permit-confined space during emergencies;

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9. A means of protection from external hazards to personnel in the confined space by restricting unauthorized access of pedestrians, vehicles, etc., from outside of the work space for entry during its duration;
 10. Communicating all information concerning confined space hazards to other parties whose employees may be at risk from the hazards.
- D. Entry Supervisors, in conjunction with appropriate technical consultant(s), shall determine the proper application and guidelines for the use of an approved confined space entry and permit requirements.
 - E. Entry Supervisors shall ensure the uniform application of the requirements of this procedure throughout the department through routine, periodic inspections of all department operations.
 - F. Company employees are prohibited from being assigned attendant duties that require monitoring of multiple confined space entries.
 - G. Entry Supervisors are to ensure that all Company employees clearly understand the policy and applicable procedures, and that the requirements of the procedure are similarly enforced among the work force. The Site Entry Supervisor is responsible for the orientation and administration of this policy/procedure to each field employee, and serves as an extension of management.
 - H. Entry Supervisors are responsible for establishing, monitoring and maintaining the on-site Confined Space Entry Program, before and during entry
 - I. Entry Supervisors are responsible for assuring that an application of the entry permit program is adequate for the required work task(s).
 - J. Entry Supervisors involved directly with a confined space entry must be able to recognize changes in the space conditions, and make the necessary adjustments to preserve the health and safety of the workers entering those spaces. The supervisor shall assure that authorized entrants can recognize the changes and be able to respond properly by initiating Self-Rescue, retrieval or change in work scope. Additionally, employees or their representatives are entitled to request additional monitoring at any time.
 - K. If the Entry Supervisor chooses to allow customer employees or contractor employee into the confined space, they must assure that measures are taken to prevent danger to any employee working in the confined space.

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- L. Upon job completion, a confined space permit shall be canceled by the Entry Supervisor and forwarded to the appropriate customer representative for filing and subsequent review.
- M. Entry Supervisors must actively participate in the confined space entry and permit training and instructional programs.
- N. Entry Supervisors must ensure that each confined space entry permit include information relative to the known or suspected hazardous atmospheres (e.g., flammable, corrosive and/or toxic atmospheres), and other factors such as:
- Employee work requirements,
 - Heat or cold stress indices,
 - Necessary operations and rescue equipment,
 - Personal protective equipment (PPE),
 - Concentration of chemical exposure, and
 - The anticipated duration of the entry.

8.0 SAFETY MANAGER'S RESPONSIBILITIES


- A. The HSE Manager is responsible for ensuring that all applicable standards, regulations and policies of this plan are complied with and must also certify that the required training has been accomplished. The certification shall include employee name, trainer's signature and dates of training. Certification must be made available to employees & their authorized representative.
- B. Other responsibilities include, but may not be limited to:
1. Establishing and updating this Company policy.
 2. Supporting this safety policy and applicable regulations.
 3. Delegating authority to the proper responsible parties to facilitate application of this safety policy, specifically while performing activities on temporary job site locations.

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4. Will ensure that routine, periodic inspections of all Company operations are conducted by Entry Supervisory personnel or his/her designee, for the purpose of determining compliance with the requirements of this procedure while the job is ongoing. The results of such inspections will be formally documented on a designated audit form or on the confined space entry permit.
5. Will perform an annual audit of the Permit Required Confined Space Entry Program. The HSE Manager will review the permit space program, using the canceled permits within 1 year after each entry and revise the program as necessary, to ensure that employees are protected. Note: Peak NDT may perform a single annual review covering all entries performed during a 12-month period. If no entry is performed during a 12-month period, no review is necessary.

9.0 EMPLOYEES AND/OR CONTRACTORS

- A. Employees and/or contractors are required to be cognizant of their work environment and must be able to recognize a confined space and the associated hazards involved with entry into confined space;
- B. Employees and/or contractors are required to understand and properly interpret the terminology, policies and procedures associated with this and on-site permit programs, and the proper application required for confined space entries;
- C. Employees and/or contractors are required to understand and comply with the guidelines dictated by written confined space entry permits. Employees must be able to, as a minimum:
 1. Distinguish the hazards in the confined space previously identified by the Site Entry Supervisor and/or customer representative.
 2. Understand the means by which to control the identified hazards in the permit required confined space.
 3. Have the knowledge necessary to safely use the equipment needed to perform the job in a healthy and safe manner while creating no new or additional hazard to himself or co-worker(s).
 4. Be able to recognize the need for SELF-RESCUE during emergencies and the means by which to do so.

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5. Company employees shall **not** work in permit-required confined spaces unless they have actively participated in formal training and informational programs, and appropriate medical surveillance programs.
6. Any protective gear used for entry into a permit-required confined space must meet the standards set forth by the customer and OSHA/NIOSH guidelines for protection.
7. Employees and/or contractors assigned equipment for use during a permit confined space entry are required to inspect, clean, maintain and properly store the equipment, and be able to recognize when the equipment is in need of maintenance, sanitation or replacement.

10.0 EMERGENCY PROCEDURES

- A. If employee detects any possible hazardous atmosphere during entry:
 1. Each employee shall leave the space immediately;
 2. The space shall be evaluated to determine how the hazardous atmosphere developed; and
 3. Measures shall be implemented to protect employees from the hazardous atmosphere before any subsequent entry takes place.
- B. When there are changes in the use or configuration of a non-permit confined space that might increase the hazards to entrants, the employer shall reevaluate that space and, if necessary, reclassify it as a permit-required confined space.

11.0 EMPLOYEE TRAINING

- A. Peak NDT will ensure that each designee is trained and documented in confined space entry, as per 29 CFR 1910.146.
- B. Each affected employee must be trained prior to initial assignment, or prior to a change in assigned duties if a new hazard has been created or special deviations

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have occurred. Only trained Company employees are permitted to perform confined space entries during the course of their assigned work activities. During new employee orientation and training classes, employees will receive information pertaining to confined space hazards to establish competency. Employees shall have refresher training on an annual basis. Any confined space entry issues shall be coordinated with the customer.


C. Peak NDT's training program will consist of, at a minimum:

Entrant Duties:

1. Know and understand the hazards they face;
2. Recognize the signs and symptoms of exposure to a hazard (difficulty in breathing, burning sensation to the eyes or skin, coughing, nausea, etc.);
3. Understand acute (short term) and chronic (long term) effects of the hazard to potential exposure;
4. Know and understand the selection, use and limitations of personal protective equipment needed;
5. Remain aware of external barriers set up to restrict unauthorized entry;
6. Know and understand communication signals with attendant;
7. Know when to alert the attendant;
8. Become familiar with emergency procedures;
9. Know when and how to exit a vessel upon being summoned by the hole watch; and
10. Follow the requirements of the entry permit;

Attendant Duties (Hole-Watch):

1. Remain at the vessel entrance at all times during entry until relieved by another attendant;
2. Maintain accountability of all entrants;
3. Recognize potential hazards during entry in the vessel including mode, signs or symptoms and consequences of exposure.
4. Is aware of possible behavioral effects of hazard exposure in authorized entrants.
5. Monitor activities inside and outside of the vessel in order to determine if continued entry is safe;

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6. Orders the authorized entrants to evacuate the permit space immediately under any of the following conditions:
 - Detects a prohibited condition;
 - Detects the behavioral effects of hazard exposure in an authorized entrant;
 - Detection of an outside situation that could endanger the authorized entrant(s); or
 - If attendant can no longer effectively and safely perform all required duties.
7. Maintain effective and continuous communications;
8. Summon help from a designated person as soon as a determination has been made that an emergency exit of rescue from the vessel is warranted;
9. Performs non-entry rescue only as specified by the employer's rescue procedure (if trained). Properly use rescue and/or emergency equipment, if properly trained, when it is determined that the customer does not provide such services. ***Never attempt rescue if it requires entering the vessel***
10. Take the following actions, as necessary, when unauthorized person(s) approach or attempt to enter a vessel while entry is in progress:
 - Warn the unauthorized person(s) away from the vessel,
 - Request the unauthorized person(s) to exit immediately if they entered the vessel,
 - Inform the authorized entrants, that an unauthorized person has entered the vessel and work must stop,
 - Immediately inform supervisory personnel of the occurrence.

REVISION INFORMATION

This is applicable to changes made to the current version of the preceding document.

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