CONFINED SPACE ENTRY PROGRAM

Program Element R2-10-207(10)(d)

Each agency shall develop, implement and monitor an Industrial Hygiene Program which shall include a Confined Space Entry Program element when applicable.

Each agency shall evaluate each worksite to determine if confined spaces are present; once a confined space is identified by the agency, the space must further be evaluated to determine if it is a permit-required confined space.

The Permit-Required Confined Space Standard, 29 CFR 1910.146, provides requirements for procedures and practices related to specific hazards as described below.

Definition:

Confined space - 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 (for example, tanks, vessels, silos, storage bins, hoppers, vaults, and pits are spaces that may have limited means of entry); and is not designed for continuous employee occupancy.

All confined spaces have the potential to be, or become, permit-required confined spaces; permit-required as defined by OSHA standard 29 CFR 1910.146 are spaces that contain any potential hazard capable of causing death or serious injury. A permit-required confined space may contain any one or more of the following hazards: a hazardous atmosphere, a material capable of engulfing the entrant, an internal configuration that is capable of trapping and asphyxiating the entrant, moving parts, electrical hazards, or any other recognized safety and health hazard.

Why do I need this program?

Confined spaces may be encountered in any facility or worksite; therefore, confined space recognition is the first step in preventing fatalities. Since many of the hazards are not readily visible such as oxygen-rich, oxygen-deficient, toxic, or combustible atmospheres, procedures are required for safe entry and completion of tasks.

How do I know if this program applies to my agency and my specific job hazards?

A facility-specific program is required when the workplace has a confined space. The next step requires agency management to make a risk-based decision to determine if confined space entry work will be performed by agency staff or if the best option is to transfer the risk to a contracted vendor that regularly performs these duties.

What are the minimum required elements and/ or best practices for a Confined Space Program?

Guidelines and Criteria: Agencies that have employees who work in confined spaces must develop a written program that consists of at least the following elements:

- Identify and evaluate confined space hazards before allowing employee entry;
- Implement necessary measures to prevent unauthorized entry;
- If space is classified as a "permit-required confined space," the program will then need to include training, entry permit, monitoring, and rescue procedures;
- Post a "DANGER PERMIT-REQUIRED CONFINED SPACE
 DO NOT ENTER" or similar language at each entrance to the permit-required confined space;
- Identify and train affected employees including entrant, attendant, supervisor, and rescuer(s);
- Establish an entry permit system including preparation, issue, use, and cancellation;
- Establish safe permit-required confined space entry operations procedures and practices to eliminate or control hazards;
- If applicable, establish alternative procedures to a full permit entry;
- Provide and maintain personal protective equipment and any other equipment necessary for safe entry;
- Implement rescue and emergency services procedures;
- Coordinate entry operations when employees of more than one employer are working in the permit space; and
- Review established entry operations annually and revise the permit-required confined space entry program as necessary.

Are there any mandatory training requirements or best practices that must be developed by the agency?

The agency shall provide training so that all affected employees acquire the understanding, knowledge, and skills necessary for the safe performance of the duties assigned under this section. Employees should be trained in required roles including entrant, attendant, supervisor, and rescuer.

Suggested topics include:

- General hazards associated with confined spaces.
- Discussion of specific confined space hazards associated with the facility, location, or operation.
- Proper use and limitations of personal protective equipment, and other safety equipment.
- Explanation of permits and other procedural requirements for a confined space entry.
- Conditions that would prohibit entry.
- Procedures for responding to emergencies.
- Duties and responsibilities of the confined space entry team.
- Description of how to recognize symptoms of overexposure to probable air contaminants in themselves and co-workers, and method(s) for alerting the Attendant(s).

In addition to the agency's site-specific training, State Risk Management recommends the following general awareness confined space training videos available on the <u>State's Employee Learning Portal</u>.

- ADRISKCONFS, Confined Spaces
- ADRISKCONF1, Confined Space Entry Permit Basics (Safety Short)
- ADRISKCONF2, Confined Spaces Definition (Safety Short)

Rescue service personnel: The standard requires employers to ensure that responders are capable of responding to an emergency in a timely manner. In addition to permit-required confined space entry training the standard requires that all rescuers be trained in first aid and CPR. Practice rescue exercises shall be performed yearly.

Are there specific requirements for documenting the program, training, etc...?

After completion of training, the employer must keep a record of employee training and make it available for inspection by employees and their authorized representatives. The record must include the employee's name, the trainer's signature or initials, and dates of the training.

Maintain records per Regulatory requirements and Agency-specific retention schedules. Consult with those entities to determine how long to maintain records.

Reference the State Library, <u>Archives and Public Records website</u> for your Agency's specified retention schedules.

Are there any resources available that can assist me in putting together a Confined Space Program?

The Occupational Safety and Health Administration (OSHA) has an interactive Confined Space Advisor program that can be downloaded or accessed directly from their site. This program provides interactive expert help for the **Permit-required Confined Spaces Standard (29 CFR 1910.146)** and will assist you in identifying **confined spaces**, determining whether they are permit-required confined spaces, and advise you on the appropriate action.

- OSHA Safety and Health Topic Page <u>http://www.osha.gov/SLTC/confinedspaces/index.html</u>
- <u>1910.146 Permit-required confined spaces | Occupational Safety and Health Administration |</u>
- OSHA Fact Sheet, <u>Procedures for Atmospheric Testing in Confined Spaces</u>
- A Guide to Safety in Confined Spaces (87-113) | NIOSH |
 CDC

State Risk Management has Loss Prevention Consultants available to assist managers and supervisors in identifying potential hazards and guide agencies on the establishment of program elements.

For assistance contact State Risk Management, Loss Prevention at rmdlossprevention@azdoa.gov.

Sample Programs/Templates:

- Confined Space Sample Program Template
- Game and Fish Confined Space Program.pdf
- University of Arizona, Confined Space Entry Program