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Management Plan for Confined Spaces

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Saint Paul Public Schools

Management Plan for Confined Spaces

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1.0 Introduction

Saint Paul Public Schools is committed to providing a safe and healthy workplace for all employees. As part of routine maintenance, our employees and contractors are occasionally required to enter potentially hazardous enclosed spaces. The purpose of this written program is to provide information and guidance for safe entry into confined spaces and to comply with OSHA Standard 29 CFR 1910.146 *Permit-Required Confined Spaces*.

Confined spaces meet all of the following conditions:

- a) The space is large enough to physically enter and perform work.
- b) The space has limited means of entry and egress.
- c) The space is not designed for continuous worker occupancy.

A confined space may require a permit if the space contains, or has the potential to contain, a hazardous atmosphere; contains a material that has the potential to engulf an entrant; has a hazardous internal configuration; or contains any other recognized serious safety or health hazard.

2.0 Program Responsibilities

Responsibilities of the administrator of this plan, or designee, include the following:

- Conduct/coordinate hazard assessments to determine confined space locations and associated hazards.
- Determine the space classification (permit-required or non-permit confined space).
- Post appropriate danger/caution signs by each confined space.
- Coordinate and/or conduct employee training and maintain records.
- Enforce employee compliance with the confined space entry program.
- Provide appropriate PPE and equipment and train staff on its proper use and maintenance.
- Provide confined space entry personnel with a copy of the most current confined space entry program and update staff, as necessary.

No employees of Saint Paul Public Schools have been designated or trained as Permit-Required Confined Space Entry Supervisors, Entrants, or Attendants. Employees of the district are not authorized to enter permit-required confined spaces. Training procedures are found in Section 7.0.

3.0 Workplace Confined Space Evaluations and Reclassification

Saint Paul Public Schools is responsible for coordinating/conducting an evaluation of district facilities to determine if confined spaces are present, meeting the three (3) criteria of a confined space:

- The space is large enough to physically enter and perform work.
- The space has limited means of entry and egress.
- The space is not designed for continuous worker occupancy.

The assessment includes the location of each space, a brief description of the space, and actual or potential conditions that could impact immediate health and safety. Confined spaces are further classified as either permit-required or non-permit-required spaces. A permit-required confined space has any one of the following characteristics:

- **Engulfment Hazards:** Hazards from being overcome by material in a confined space (i.e., steam, gas, water, IDLH atmospheres).

- **Atmospheric Hazards:** The confined space has or could have a hazardous atmosphere.
 - Flammable or combustible gas, vapor, or mist at or above 10% of its lower flammable limit (LFL)
 - Combustible dust at or above its LFL
 - Less than 19.5% oxygen
 - Greater than 23.5% oxygen
 - A concentration of any substance that could potentially cause an acute health effect or affect the ability for the entrant to escape from the space
 - Any other atmospheric condition that could pose an immediate threat
- **Entrapment:** The confined space could have hazards caused by converging walls or a floor that could trap an entrant.
- **Other:** Any other recognized or serious safety hazards, which may include, but are not limited to the following examples:
 - *Thermal Hazards:* Hazards due to extremes in hot and cold temperatures. This includes contact burn hazards or heat stress hazards that could impede an entrant's ability to exit the space without assistance.
 - *Slick/Wet Surfaces:* Hazards that can increase the risks of slips, trips, or falls. These surfaces may also increase the risks and effects of shocks from electric tools, machinery, and/or circuitry.
 - *Falling Objects:* Hazards that exist from cement, tools, etc. that have the potential to cause harm to a worker in a confined space.
 - *Mechanical Equipment:* Hazards that may exist due to required machinery **operating** during an entry.
 - *Electrical Hazards:* Hazards that may exist from exposed wiring, power lines, or other faulty equipment.
 - *Fall Hazards:* Hazards that may be caused due to loose gravel, exposed wiring, or equipment left in an open area.

Non-permit confined spaces must be reassessed if new hazards are introduced to the space, such as those listed above, including any materials to complete a task or job brought into a non-permitted confined space, which may reclassify it as a permitted confined space. Reclassification is required for application of solvents, paint chemicals, or other materials that could potentially create a hazardous atmosphere in a confined space, and while performing welding, cutting, brazing, or soldering in those confined spaces with limited or no ventilation.

4.0 Identification of Confined Spaces

Saint Paul Public Schools identifies confined spaces by signs, placards, or symbols. These means of warning are printed in English, indicating one of (but not necessarily limited to) the following:

CAUTION: NON-PERMIT CONFINED SPACE - AUTHORIZED ENTRY ONLY

DANGER: PERMIT REQUIRED CONFINED SPACE – AUTHORIZED ENTRY ONLY

**DANGER: PERMIT-REQUIRED CONFINED SPACE – RECLASSIFICATION ALLOWED –
AUTHORIZED ENTRY ONLY**

5.0 Entry Procedures for Permit-Required Confined Spaces

Employees of Saint Paul Public Schools are not allowed to enter permit-required confined spaces. If space classification changes, this plan will be revised, and entry procedures will be implemented.

5.1 Contractor Guidelines

Contractors hired by the district are informed that the workplace contains permit spaces and that permit-space entry is allowed only through compliance with a permit-space program meeting OSHA requirements. The contractor is provided a copy of the permit-space assessment (including identified hazards). The contractor is required to comply with their own permit-required confined space entry program. The contractor is debriefed 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.

5.2 Permit to Non-Permit Reclassification Procedures

A space classified by the employer as a permit-required confined space may be reclassified as a non-permit confined space once the hazards in the space have been eliminated. If the space must be entered to eliminate the hazards, the entry must be done following permit-required space entry procedures. If conditions change, occupants of a reclassified space must immediately exit and assess conditions from outside the space. Reclassification can be accomplished under the following procedures:

- If the permit space poses no actual or potential atmospheric hazards and if all hazards within the space are eliminated without entry into the space, the permit space may be reclassified as a non-permit confined space for as long as the non-atmospheric hazards remain eliminated. *Note: Elimination of electrical and mechanical hazards can be accomplished through proper lockout/tagout procedures. Hazards from gases or liquids cannot be eliminated through LOTO alone, and must be eliminated through blanking, blinding, double block and bleed, or disconnection.*
- If the permit space poses an actual or potential atmospheric hazard, the source of that hazard must be eliminated. Atmospheric testing must verify the elimination. Once atmospheric testing has verified the elimination, the space may be reclassified as long as the source of the atmospheric hazard remains eliminated and all other hazards within the space have been eliminated.

NOTE: Control of atmospheric hazards through forced air ventilation does not constitute elimination of the hazards.

The employer is required to document the basis for determining that all hazards in a permit space have been eliminated, through a certification that contains the date, the location of the space, and the signature of the person making the determination. The certification will be made available to each employee entering the space or to that employee's authorized representative by posting the form outside the space.

The confined space assessments and completed reclassification forms are maintained electronically with the Confined Space Management Plan.

6.0 Non-Permit-Required Confined Spaces

In order to protect the safety and health of employees associated with non-permit-required confined space entry, employees obtain and use proper PPE, tools, and other equipment necessary to perform the job. An attendant is not required for entry into a non-permit-required confined space; however, district employees inform other personnel when entering and exiting a non-permit-required confined space and utilize two-way radios as appropriate. Other district safety programs (i.e., personal protective equipment and respiratory protection) still apply to entry into non-permit-required confined spaces.

Elevator Shafts and Service Pits

Elevator shafts and service pits are typically permit-required confined spaces that can be reclassified by trained contractors when needed. District employees are not permitted to enter elevator shafts or service pits, regardless of whether the space is permit or non-permit. Any work required in an elevator shaft or service pit will be completed by a contractor.

7.0 Employee Training

Employees do not supervise confined space entry, enter a confined space, or serve as an attendant for permit-required confined space entry. Awareness training is provided to staff on an annual basis and reviews the following:

- Spaces within the district and their classification
- Procedures for entry into non-permit required confined spaces
- Review of permit-required confined spaces and remind staff that entry is not permitted
- Review of the temporary reclassification procedures

8.0 Recordkeeping

Employee training records are maintained electronically for a minimum of three (3) years.

9.0 Annual Review

Saint Paul Public Schools will review the Confined Space Program at least annually, using cancelled confined space permits, and other available information and records in order to determine if:

- Changes should be made to improve the program's overall effectiveness.
- Additional hazards have been identified within a given space.
- Additional measures should be taken to protect the entrants.
- Additional confined spaces should be included within the program.
- Some locations can be removed from the program.

Appendix A

Confined Space Entry Permit (for Contractors)

PERMIT REQUIRED CONFINED SPACE ENTRY PERMIT

Building Name: _____

Confined Space: _____

Activity to be Conducted: _____

Permit Prepared by: _____

Signature: _____

Entry Date and Time: _____

Expiration Date: _____

Authorized Entrant	Authorized Attendant	Time of Entry	Time of Exit

Preparation and Isolation

Emergency procedures in place?	☐ Yes	☐ No	☐ NA
Pumps or lines blocked, blanked, or disconnected?	☐ Yes	☐ No	☐ NA
Mechanical ventilation?	☐ Yes	☐ No	☐ NA
Equipment lockout/tagged out?	☐ Yes	☐ No	☐ NA
Hot Work permit required?	☐ Yes	☐ No	☐ NA

Equipment

Calibrated 4-gas meter	☐ Yes	☐ No	☐ NA
Safety harness/lifelines	☐ Yes	☐ No	☐ NA
Communication equipment	☐ Yes	☐ No	☐ NA
Proper PPE	☐ Yes	☐ No	☐ NA
Mechanical retrieval devices	☐ Yes	☐ No	☐ NA

Atmospheric Check (conducted prior to entry and periodically throughout entry)

Time of Check	Oxygen (19.5-23.5%)	Combustible (<10% CH4)	Toxic (<10% H2S)	Carbon Monoxide (<35ppm)	Name of Tester
PRIOR TO ENTRY	%	%LEL	ppm	ppm	
	%	%LEL	ppm	ppm	
	%	%LEL	ppm	ppm	

AUTHORIZATION BY ENTRY SUPERVISOR OR PROGRAM COORDINATOR

I have reviewed the work authorized by this permit and the information contained herein and written instructions and safety procedures have been reviewed. This permit is not valid unless all appropriate items are completed and understood.

Print Name

Signature

Date



POST THIS PERMIT AT THE ENTRANCE TO THE CONFINED SPACE DURING ENTRY

Permit Cancelled by: _____

Date: _____

Time: _____

Appendix B

Reclassification Form and Records



Permit-Required Confined Space Temporary Reclassification Form

This form is to be utilized for temporarily reclassifying permit-required confined spaces, to non-permit required confined spaces. It must be fully completed to verify that no actual or potential hazards exist prior to entering. A space classified by the employer as a permit-required confined space may be reclassified as a non-permit confined space under the following procedures:

- If the permit space poses no actual or potential atmospheric hazards and if all hazards within the space are eliminated without entry into the space, the permit space may be reclassified as a non-permit confined space for as long as the non-atmospheric hazards remain eliminated.
- If it is necessary to enter the permit space to eliminate hazards, such entry shall be performed. If testing and inspection during that entry demonstrate that the hazards within the permit space have been eliminated, the permit space may be reclassified as a non-permit confined space for as long as the hazards remain eliminated.

NOTE: Control of atmospheric hazards through forced air ventilation or supplied air respiratory protection does not constitute elimination of the hazards.

The reclassification must be posted outside the entry to the space. The space must be evacuated and reevaluated if any hazards develop during the entry. Once returned to normal service, the confined space reclassification is no longer valid, and the confined space is considered permit-required.

Type of Confined Space: _____ **Date/Time:** _____

Confined Space Location: _____ **Purpose of Entry:** _____

Action(s) Taken to Eliminate Hazards

	YES	NO	N/A
1. Contents of the confined space (i.e. tanks, sumps, etc.) have been removed to eliminate the hazards	☐	☐	☐
2. All chemical, utility, and drain/return lines are isolated in a manner that eliminates hazards	☐	☐	☐
3. Lockout/Tagout is implemented to eliminate hazards	☐	☐	☐
4. Atmospheric testing of oxygen level, LEL, and toxic concentrations have been conducted and it is verified that no actual hazards exist	☐	☐	☐
5. Any other noted hazards present? If so, list below.	☐	☐	☐

List Atmospheric Monitoring Results if You Answered "YES" to Question 4 Above

Agent	Limit	Test Results	Test Time	Tester's Initials
Oxygen	19.5%-23.5%			
Flammability	<10 L.F.L			
Hydrogen Sulfide (H ₂ S)	<10			
Carbon Monoxide	35 PPM			
Other Acutely Toxic Substance:				

I certify that all known or potential hazards have been appropriately eliminated prior to entry into the above confined space, thereby allowing for the reclassification of the space as a Non-Permit Confined Space.

Reclassification Authorized By:

Name (Print) Signature Date