

CONFINED SPACE ENTRY PROGRAM (Permit-Required)

for the

University of Dayton

**Reference
29 CFR 1910.146
OSHA Confined Space Standard**

November 1, 1998

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Permit-Required Confined Space Entry Program

GENERAL UNIVERSITY POLICY

The purpose of this program is to inform interested persons, including employees, that the University of Dayton is complying with the OSHA Confined Space Standard, Title 29 Code of Federal Regulations 1910.146. We have determined that this workplace needs written procedures for the evaluation of confined spaces, and where permit-required spaces are identified, we have developed and implemented a permit-required confined space entry program. This program applies to all work operations for the University of Dayton where employees must enter a permit-required confined space as part of their job duties.

The Environmental Safety Office (ESO) has overall responsibility for coordinating safety and health program for the University of Dayton. The Environmental Safety Administrator (ESA) is the person having overall responsibility for the Permit-Required Confined Space Program. The ESA will review and update the program, as necessary.

Copies of the written program may be obtained from the Environmental Safety Office in 219 Alumni Hall, Monday through Friday, from 8:30 am to 4:30 pm.

Under this program, we identify permit-required spaces at the University of Dayton, and provide training for our employees according to their responsibilities in the permit space. These employees receive instructions for safe entry into our specific type of confined spaces, including testing and monitoring, appropriate personal protective equipment, rescue procedures, and attendant responsibilities. This program is designed to ensure that safe work practices are utilized during all activities regarding the permit space to prevent personal injuries and illnesses that could occur.

If, after reading this program, you find that improvements can be made, please contact the ESO or ESA. We encourage all suggestions because we are committed to creating a safe workplace for all our employees and a safe and effective permit-required confined space entry program is an important component of our overall safety plan. We strive for clear understanding, safe work practices, and involvement in the program from every level of the company.

1. Hazard Evaluation for Permit Spaces

To determine if there are permit-required confined spaces at the University of Dayton, the ESO will conduct a hazard evaluation of the workplace. This evaluation will provide us the information necessary to identify the existence and location of permit-required confined spaces in our workplace that must be covered by the Permit-Required Confined Space Entry Program. The written hazard evaluation will be kept in the ESO with the Confined Space Permit Log.

2. Preventing Unauthorized Entry

To provide a safe work environment and to prevent exposed employees from accidentally entering a permit space, we have implemented the following procedures to inform all employees of the existence, location, and danger posed by permit spaces at the University of Dayton. To inform employees of the existence of a permit space, we

use <<005>>. To ensure that unauthorized employees do not enter and work in permit spaces, we <<006>>.

Safe Permit Space Entry Procedures

<<007>> is the Entry Supervisor responsible for authorizing entry and issuing entry permits for work in our permit spaces. The file of permits and related documents are kept in <<008>>. The procedures we follow for preparing, issuing, and cancelling entry permits includes the following elements: <<009>>. These are the employees who have current authorization to work in or near our permit spaces. This list also includes the work activities they are expected to perform <<010>>.

Pre-Entry Evaluation

To ensure the safety and health of our employees, before allowing authorized workers to enter a permit space, we evaluate conditions in that space to determine if the conditions are safe for entry. These are the procedures we follow to evaluate each permit space before entry <<011>>.

Equipment

To ensure the safety and health of our employees, <<pCompany>> provides appropriate equipment to all employees who work in or near our permit spaces. The equipment we provide to these employees includes: <<012>>.

We maintain all equipment in excellent working condition, train the entrants in the correct usage of this equipment, and ensure that all equipment, including that used for personal protection, is used properly. We follow these procedures to ensure that the appropriate equipment is being used by entrants <<013>>.

Duties: Authorized Entrants

Those persons who have completed the training and are authorized to enter our permit spaces (authorized entrants) are assigned specific duties and responsibilities which they must perform when they work in the permit space. Their duties and responsibilities include: <<014>>. The elements covered in the training program for authorized entrants includes: <<015>>.

Duties: Attendants

Those persons who have completed the training and have been designated as permit space attendants are assigned specific duties and responsibilities which they must perform in permit space job duties.

Their duties and responsibilities include:
<<016>>.

The elements covered in the training program for permit space attendants includes:
<<017>>.

Duties: Entry Supervisors

Those persons who have completed the training and have been designated as permit space entry supervisors are assigned specific duties and responsibilities which they must perform in permit space job duties. Their duties and responsibilities include:

<<018>>.

The elements covered in the training program for permit space entry supervisors include:
<<019>>.

Training Program

Each Every employee at <<pCompany>> who faces the risk of confined space entry is provided with training so that designated employee acquires the understanding, knowledge and skills necessary for the safe performance of the duties assigned to them. <<020>> conducts our permit-required confined space training. All training related materials, documents, and signed certificates are kept in <<021>>.

<<022>>{In our company, all employees receive training for entry into permit spaces.}{We use this criteria to determine which employees must receive permit-required confined space training:
<<023>>. }

When we conduct the training, we use <<024>>. New employees are always trained before their initial assignment of duties.

We follow these procedures when training these employees <<025>>. When changes occur in permit-required confined space areas of our company, we <<026>>. If we have reason to believe that an employee has deviated from a previously trained upon procedure or that their knowledge seems inadequate, we <<027>>.

Upon successful completion of <<pCompany>> permit-required confined space training program, each participant receives a certificate which they sign verifying that they understand the material presented, and that they will follow all company policies and procedures regarding permit space entry.

<<028>>{<<029>>. }{ }

Rescue and Emergency Services

<<030>>{<<pCompany>> utilizes our own employees to perform rescue services in the event of a permit space emergency. This group of employees has been trained in the following procedures: <<031>>. <<032>> conducts our rescue and emergency training. These designated persons currently make up our emergency rescue team <<033>>. }{<<pCompany>> utilizes <<034>> to perform rescue and emergency services in the event of a permit space incident. To familiarize this service with our facility and emergency needs, we <<035>>.

Multiple Employer Entry Procedures

<<036>>{When outside employers/contractors enter our facility to perform work in permit spaces, we coordinate entry and work operations following these procedures: <<037>>}. }{We do not use outside employers/contractors to perform work in our permit-required confined spaces.}

Post-operations Procedures

Upon completion of work in a permit space, we follow these procedures to close off the space and cancel the permit: <<038>>.

Review-Procedures

To ensure that all employees participating in entry operations are protected from permit space hazards, <<pCompany>> reviews the Permit-Required Confined Space Entry Program on a regular basis. We use the retained canceled permits from the past 12 months within one year after each entry and revise the program as necessary. <<pCompany>> performs 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 will be performed.

ENFORCEMENT

Constant awareness of and respect for permit-required confined space entry hazards, and compliance with all safety rules are considered conditions of employment. Supervisors and individuals in the Safety and Personnel Department reserve the right to issue disciplinary warnings to employees, up to and including termination, for failure to follow the guidelines of this permit entry program.

APPENDIX

We have attached to this plan any lists, samples, or procedures we thought would ensure better understanding of our written program.