



## **Delaware State University**

**University Area Responsible:** Risk and Safety Management

**Policy Number and Name:** 7-06: Confined Space Policy

**Approval Date:** 7/28/11

**Revisions:** 8/8/2013

**Reviewed:** 7/26/2013

**Related Policies and Procedures:** 7-05 Lockout/Tag-out Policy, 7-08 Respirator Policy, 7-29 Protective Equipment Hazard Assessment, 7-34 Vendors and Contractors Safety Procedure

### **1. Purpose**

Delaware State University (DSU) is committed to the safety of its employees and others who may labor at our institution under contracts. This Policy delineates the process by which the University complies with the Occupational Safety and Health Administration (OSHA) regulation "Permit-Required Confined Spaces", 29 CFR 1910.146. OSHA requirements regarding underground lines for Telecommunications, 29 CFR 1910.268, are also covered by this Policy.

**2. Policy** - Authorized University employees and students will not enter any Confined Space before a satisfactory air monitoring test is performed. An attendant must be present and in constant communication with entrants for the duration of any entry. The Supervisor of the department where entry into a Confined Space is to take place must provide the Safety/Risk Manager with the entry date, time, location and purpose of entry prior to entering any Permit-Required Confined Space at DSU. The Attendant will be provided with communication equipment and the local emergency rescue service telephone in case of an emergency prior to entry. Where rescue services are not immediately available, no Confined Space entry may be made.

2.1 Satellite locations may adopt their own policies for confined space entry when and where it better suits their operational needs.

2.2 Contractors are required to comply with all applicable provisions of OSHA and the DSU Confined Space Policy and Procedures. Contractors must provide the name and contact information of the Entry Supervisor, the entry date, time, location and purpose of entry to the Safety/Risk Manager prior to making any entry into a **permit-required confined space** at DSU.

2.3 The Confined Space Policy and Procedures will be reviewed and evaluated for its effectiveness annually, and updated when necessary.

**3. Scope** - The Confined Space Policy applies to all facilities at Delaware State University when there is a need to work inside those areas. All University Employees and students who are authorized to enter a Permit-Required Confined Space must complete Confined Space entry training. Outside contractors and their employees will be expected to be familiar with our Confined Space Policy and Procedures prior to entering those areas to perform work assignment.

#### **4. Procedure**

4.1 **Record Keeping** - Original copies of permits utilized for completed or aborted Confined Space entries will be kept by the Department Supervisor and the Safety/Risk Manager.

#### **4.2 Responsibilities:**

4.2.1 **University Departments:** Departments and the Safety Risk Manager at DSU will create a list of all permit-required confined spaces within their jurisdiction.

4.2.1.1 Departments will prohibit entry to permit-required confined spaces by posting signs that read:

**DANGER!**

**PERMIT-REQUIRED**

**CONFINED SPACEDO NOT ENTER**

- 4.2.1.2 It will be the responsibility of Departments to conduct periodic surveys to identify any new permit-required confined spaces that have been discovered or created in their work areas.
- 4.2.1.3 Departments will inform the Safety/Risk Manager about new permit-required confined spaces so that he or she can assist in their identification and evaluation
- 4.2.1.4 Departments must make sure that all employees working in areas where permit-required spaces exist are trained in how to work in confined spaces before they perform any work of that nature.
- 4.2.1.5 Departments will provide and enforce the use of equipment needed for the entry to permit-required confined spaces.
- 4.2.1.6 Equipment for safe entry into permit-required confined spaces will include:
  - 4.2.1.6.1 Personal Protective Equipment
  - 4.2.1.6.2 emergency rescue Equipment
  - 4.2.1.6.3 barricades/shields
  - 4.2.1.6.4 ladders
  - 4.2.1.6.5 ventilation equipment
  - 4.2.1.6.6 communications Equipment
  - 4.2.1.6.7 lighting
  - 4.2.1.6.8 work in progress signage

**4.2.2 Safety/Risk Manager will:**

- 4.2.2.1 Develop, implement and evaluate the Confined Space Policy.
- 4.2.2.2 Assist Departments with the identification and listing of permit-required confined spaces.
- 4.2.2.3 Provide training to all those involved in the entry and exit of permit-required confined spaces.
- 4.2.2.4 Keep copies of employee training attendance and completion.
- 4.2.2.5 Keep copies of entry permits issued.
- 4.2.2.6 Assist departments with the selection of equipment to conduct safe entry into confined spaces.

- 4.2.2.7 Evaluate and issue entry permits into restricted confined spaces based on University policy.
- 4.2.2.8 Conduct annual reviews on the effectiveness of the Confined Space Policy.
- 4.2.2.9 Attend training programs on the changes and improvements on safe entry into confined spaces.
- 4.2.2.10 Conduct confined Space rescue drills for all those affected by entries into required-permit confined spaces.
- 4.2.2.11 Coordinate and direct all required or recommended medical surveillance programs, including respiratory protection physicals;
- 4.2.2.12 Provide medical consultations and examinations for workers who have been overexposed to hazardous chemical substances or who have sustained an injury related to a Confined Space entry; and
- 4.2.2.13 Maintain medical records relating to consultations, examinations and medical surveillance as required by law.

**4.2.3 Supervisors, Authorized Entrants and Attendants will:**

- 4.2.3.1 Get to know and comply with DSU's Confined Space Policy.
- 4.2.3.2 Comply with training requirements.
- 4.2.3.3 Perform confined space entries following the policy requirements and procedures.
- 4.2.3.4 Inform supervisors of any changes in their workplace that may affect the safe entry and exit into and out of confined spaces.

**4.2.4 Confined Space Entry Supervisor will:**

- 4.2.4.1 Abide by the Confined Space Policy requirements.
- 4.2.4.2 Inform employees about the Confined Space Policy and provide them with access to it.
- 4.2.4.3 Identify all affected employees and refer them to the Safety/Risk Manager for Initial Training in Permit-Required Confined Space Entry.
- 4.2.4.4 Work with the Safety/Risk Manager to complete all safety training requirements, request further instruction if unclear on any part of the training and comply with documentation procedures;
- 4.2.4.5 Work with the Safety/Risk Manager on the creation of the permit for Permit-Required Confined Space entry.
- 4.2.4.6 Verify that all precautions and pre-entry procedures have been fulfilled prior to entry;

- 4.2.4.7 Verify the availability of a local rescue team prior to entry.
- 4.2.4.8 Assure that unauthorized people do not enter the Confined Space during the time that authorized entry is in progress. Employ Public Safety personnel to enforce off-limits area.
- 4.2.4.9 Assure that appropriate personal protective equipment is available and used by entrants;
- 4.2.4.10 Coordinate the requirements of a contractor's Confined Space Program with those of this plan when University employees make an entry into a permit space with a contractor.
- 4.2.4.11 Terminate entry and cancel permits in the event conditions within the space change, entrants show signs of over-exposure or conditions cannot be verified.
- 4.2.4.12 Make sure that original entry permits are delivered to the Safety/Risk Manager upon completion or termination of a Permit-Required Confined Space entry.
- 4.2.4.13 Inform employees about the Confined Space Policy and provide them with access to it.
- 4.2.4.14 Identify all affected employees and refer them to the Safety/Risk Manager for Initial Training in Confined Space Entry.
- 4.2.4.15 Schedule any necessary retraining due to changes, lack of understanding or poor performance issues.
- 4.2.4.16 Maintain copies of employee Confined Space training records.

**4.2.5 Authorized Confined Space Entrants will:**

- 4.2.5.1 Abide by the Confined Space Policy requirements.
- 4.2.5.2 Follow the orders of the Attendant or superiors such as the Entry supervisor and the Safety/Risk Manager.
- 4.2.5.3 Use appropriate safety and personal protective equipment provided for entry.
- 4.2.5.4 Have knowledge and experience in the use of communication equipment required to maintain communication with Attendant; atmospheric testing and monitoring equipment; equipment for ventilation in preparation of acceptable entry conditions; lighting equipment; equipment for ascending or descending and entering or exiting; barriers and shields; rescue and emergency equipment.
- 4.2.5.5 Be familiar with the potential hazards during an entry and the signs, symptoms and consequences of being exposed to those hazards.

- 4.2.5.6 Communicate with the attendant regularly while inside of the Confined Space, report any unusual circumstances to the attendant and leave the space immediately when instructed to do so by the attendant;
- 4.2.5.7 Complete all safety training requirements, request further instruction if unclear on any part of the training and comply with documentation procedures;
- 4.2.5.8 Report all work place injuries, over-exposure incidents or unsafe conditions to their Supervisor, who will inform the Safety/Risk Manager as soon as possible.
- 4.2.5.9 Maintain communication with entry Attendant to allow the Attendant to effectively monitor Entrant status and allow Attendant to alert the Entrant of the need to exit the contained space.
- 4.2.5.10 Inform the Attendant of warning signs or symptoms of exposure are present or being experienced.
- 4.2.5.11 Inform Attendant of a condition or situation prohibited by the entry permit.
- 4.2.5.12 Exit a permit-required Confined Space as quickly as possible when Attendant, Entry supervisor or Safety/Risk manager have given an order to evacuate, signs and symptoms of exposure and or other potential hazards are present or an alarm is activated.

**4.2.6 Authorized Confined Space Entry Attendants will:**

- 4.2.6.1 Abide by the Confined Space Policy requirements.
- 4.2.6.2 Remain outside of the Confined Space in constant two-way communication with the entrants until relieved by an alternate attendant or all entrants have exited the space;
- 4.2.6.3 Continuously communicate with the Confined Space entrants and monitor the space to assure that conditions remain within acceptable parameters as defined in the Permit-Required Confined Space Entry section of this Plan and instruct entrants to leave a space if any parameter varies from acceptable as defined in the this document;
- 4.2.6.4 Summon rescue personnel in the event of an emergency; and police in the event that an unauthorized person enters the space;
- 4.2.6.5 Complete all safety training requirements, request further instruction if unclear on any of part of the training, and comply with documentation procedures;
- 4.2.6.6 Report all workplace injuries, exposure incidents or unsafe conditions to the Departmental Confined Space Entry Coordinator as soon as possible;
- 4.2.6.7 Perform non-entry rescue procedures if able to do so safely;

- 4.2.6.8 Perform no duty that may interfere with attendant duties while serving in the capacity of attendant; and
- 4.2.6.9 Secure the Confined Space after completion of the work to prevent dangerous conditions.
- 4.2.6.10 Know the potential hazards during an entry, including signs and symptoms and consequences of an exposure.
- 4.2.6.11 Know how to recognize behavioral changes in an entrant that may result from exposure to hazards during an entry.
- 4.2.6.12 Know exactly how many Authorized Entrants are listed on the permit, know who they are and be able to keep an accurate count once they have entered and exited the Confined Space for which the permit was issued.
- 4.2.6.13 Remain outside area of the permit-required confined space during entry assignment until the work is completed or until relieved by another authorized Entry Attendant.
- 4.2.6.14 **Under no circumstances** enter the Permit-Required confined Space while performing the duties of the Entry Attendant. Any rescue attempt will be non-entry and only if proper equipment is available and the attempt will not create further hazards to the Entrant(s) or the Attendant attempting the rescue.
- 4.2.6.15 **If a Respirator is used it will be in accordance with the University's Respirator Policy.**
- 4.2.6.16 Monitor activities inside (communication device) and outside the confined Space to determine if it is safe for the entrant(s) to remain in the confined space or to order the Authorized Entrant(s) to exit the confined space right away based on any of the following observations:
  - 4.2.6.16.1 A prohibited condition is detected.
  - 4.2.6.16.2 The behavior of the Authorized Entrant(s) seems to have been affected by exposure to hazards inside the Confined Space.
  - 4.2.6.16.3 A situation outside the Confined space that may represent a danger to the Authorized Entrants is detected.
- 4.2.6.17 The Authorized Attendant must request help as soon as he or she realizes that the Authorized Entrant(s) needs assistance to escape from the Permit-Required confined Space.
- 4.2.6.18 The Authorized Attendant must keep unauthorized individuals and employees from entering Permit-Required Confined Spaces. They must contact the University Police, the entry Supervisor and the Safety/Risk manager if the unauthorized person ignores his warning.

- 4.2.6.19 The Authorized Attendant must not perform any duties that may interfere with his responsibilities as Authorized Attendant to monitor and protect the Authorized Entrant(s) during an entry.
- 4.2.6.20 Employees may alternate duties as entrants and Attendants only after they have been trained in each of those areas.

**4.2.7 University Police will:**

- 4.2.7.1 Respond to a reported emergency in a Confined Space Entry.
- 4.2.7.2 Contact the Safety Risk Manager.
- 4.2.7.3 Contact Medical Emergency Personnel and Fire Department if necessary.
- 4.2.7.4 **Officers shall not enter any Confined Space to retrieve or rescue individuals;**
- 4.2.7.5 Maintain order during a Confined Space related emergency; and
- 4.2.7.6 Participate in any Confined Space rescue drills provided by the Safety/Risk Manager.

**4.3 Prior to Entering a Confined Space:** Whenever an employee identifies a need to enter a confined space he or she must contact his or her Supervisor to request a written permit from the Safety/Risk Manager.

- 4.3.1 The Supervisor will inform the Safety/Risk Manager and together they will complete and approve the permit after making sure that the appropriate equipment, communications equipment, training and safety procedures such as Lockout/Tag-out allow for the safe entry and necessary work inside a confined space can be performed.
- 4.3.2 In an emergency when such planning is not possible, the Authorized Employee will inform the Department of Public Safety who will try to contact the Safety/Risk Manager and get permission to authorize the entry into the confined space requiring work. If unable to reach the Safety/Risk Manager to inform on the situation, authorized employees will proceed after an attempt to reach the department head has been made and all necessary equipment and an authorized Attendant are ready to go. A report of the reason, place, time, work performed and those who participated will be given to the Department Head and the Safety/Risk Manager as soon as possible.
- 4.3.3 Before an entry is made the Safety/Risk Manger will make sure that the Entrant (Authorized Employee that will enter the Confined Space) and the Attendant (Authorized Employee who will remain near the entrance Area

monitoring what's happening and maintaining communication with entrant) are informed about:

- 4.3.3.1 Hazards within the permit-required Confined Space.
- 4.3.3.2 Steps necessary to isolate the permit-required Confined Space.
- 4.3.3.3 Measures to remove or control potential hazards: lockout/tag-out; purging; ventilation, flushing, etc.

#### **4.4 Satellite Campuses:**

- 4.4.1 At the Wilmington Campus: The Safety/Risk Manager will contact the Wilmington Fire Department to inform them of the planned entry and to arrange for on-site rescue services.
- 4.4.2 At the Georgetown Campus: Delaware Technical and community College will be responsible for any confined space entries since we are conducting business as tenants on its campus facilities.

**4.5 Outside Contractors:** Delaware State University's Confined Space Policy must be made available for review to all prospective bidders of a contract involving activities subject to OSHA's confined space entry regulations (29 CFR 1910.146).

#### **4.6 Departments will:**

- 4.6.1 Inform the contractor that the workplace contains permit-required confined spaces and that entry is allowed only through compliance with the University's permit-required confined space program in accordance with the requirements of the OSHA Standard (29 CFR 1910.146).
- 4.6.2 Inform the contractor of the potential hazards associated with the spaces that make them permit-required confined spaces.
- 4.6.3 Inform the contractor of any precautions or procedures that will be used to protect employees in or near permit-required confined spaces where contractor personnel will be working.
- 4.6.4 Coordinate entry operations with the contractor, when both University personnel and contractor personnel will be working in or near permit-required confined spaces.
- 4.6.5 Debrief the contractor, at the conclusion of entry operations, on the procedures followed and any hazards confronted or created during entry.

4.7 **Contractors** are expected to:

- 4.7.1 Have a permit space entry program in place that meets the OSHA requirements.
- 4.7.2 Ensure their employees are properly trained.
- 4.7.3 Have the equipment and resources available to ensure a safe entry.
- 4.7.4 Notify the Public Safety Department prior to conducting any permit-required confined space entry in advance unless there is an emergency. Include the exact location, name and telephone number of a contact person, time, date and the expected duration.
  - 4.7.4.1 Upon completion of the entry, the Department of Public Safety must be notified that entry operations have been completed in the confined space.
- 4.7.5 **NOTE: The use of DSU services or equipment by contractors to perform an entry is not allowed.**