
Confined Space Policy and Permit Program

University of Portland

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Portland, OR

97203-5798

Version 2.7

January 2014

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Environmental Health and Safety



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Review and Approval

This University of Portland Confined Space Entry Policy and Permit Program is hereby approved and effective as of this date.

University Officer Signature	Printed Name	Title	Date
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This University of Portland Confined Space Entry Policy and Permit Program has been reviewed for content and applicability.

Public Safety Representative Signature	Printed Name	Title	Date
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Information Services Representative Signature	Printed Name	Title	Date
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Physical Plant Representative Signature	Printed Name	Title	Date
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SECTION ONE - PURPOSE

1.1 CONFINED SPACE ENTRY POLICY AND PERMIT PROGRAM

1.1.1 The University of Portland is dedicated in providing a method of protection from the hazards associated with confined space entry.

1.1.2 It is intended that following this procedure will eliminate or minimize the hazards that may be evident in confined spaces before entry.

1.1.3 Failure to follow this policy may result in disciplinary action up to and including discharge.

1.1.4 This policy is designed to address all aspects of working in or near confined spaces, to include:

1.1.4.1 Identification of *all* confined spaces on University grounds.

1.1.4.2 Identification of any hazard in each confined space.

1.1.4.3 Categorization of the confined spaces as No Permit, Permit-Required, or No Entry.

1.1.4.4 Elimination or control of any confined space hazard

1.1.4.5 Establishment of confined space entry procedures

1.1.4.6 Identification of employees who may require permit-required confined space entry.

1.1.4.7 Training of identified employees on confined space entry.

1.1.4.8 Emergency planning.

1.2 OREGON OSHA STANDARD §1910.146

1.2.1 This standard protects general industry workers who enter permit-required confined spaces.

1.2.2 The University of Portland will do its utmost to adhere to the guidelines as set forth by this standard.

SECTION TWO – DEFINITIONS

2.1 CONFINED SPACE

2.1.1 Defined as having *all* of the following characteristics:

2.1.1.1 It has a restricted opening that makes entry and exit difficult,

2.1.1.2 It is large enough for one person to enter completely, and

2.1.1.3 It is not designed to be occupied.

2.2 PERMIT-REQUIRED CONFINED SPACE

2.2.1 Defined as a confined space that has *at least one* of the following characteristics:

2.2.1.1 Contains or has a known potential to contain an atmospheric hazard,

2.2.1.2 Contains a material with the potential for engulfment of an entrant,

2.2.1.3 Has an internal configuration such that an entrant could be trapped or asphyxiated, and/or

2.2.1.4 Contains other recognized serious safety or health hazards.

2.3 NO PERMIT-REQUIRED CONFINED SPACE

2.3.1 Defined as a confined space that has been designated as not containing any hazard associated with a permit-required confined space.

2.3.2 The confined space has been determined to be safe to enter and employees may work in it without a permit.

2.4 NO-ENTRY CONFINED SPACE

2.4.1 Defined as a confined space containing hazards that cannot be eliminated or controlled per University of Portland resources.

2.4.2 Under normal circumstances, no entry is allowed.

2.4.3 Only under very specific and highly limited circumstances are employees allowed to enter these areas; a permit is required.

2.5 CONFINED SPACE ENTRY PERMIT

2.5.1 Defined as a written form, which verifies that the hazards in a confined space have been eliminated or controlled, and that the confined space is safe to enter.

2.6 HAZARD

2.6.1 Defined as any situation, existing or potential, that proposes an unsafe environment in a confined space.

2.6.2 Confined space hazards are categorized as:

2.6.2.1 Atmospheric Hazards

2.6.2.1.1 Oxygen Deficiency – less than 19.5% oxygen – chemical or biological reactions consume oxygen.

2.6.2.1.2 Oxygen Enrichment – greater than 23.6% oxygen – results from welding tasks and from the improper use of oxygen for breathing air.

2.6.2.1.3 Flammable Atmospheres – fuel, oxygen, and a source of ignition that cause fires and explosions.

2.6.2.1.4 Toxic Atmospheres – accumulates through some manufacturing, biological, or chemical reactions; can be released during work or tasks such as welding and cleaning.

2.6.2.1.5 Corrosive Atmospheres – accumulates from some manufacturing processes, biological, or chemical reactions.

2.6.2.2 Non-atmospheric Hazards

2.6.2.2.1 Engulfment – loose materials drawn from the bottoms of storage bins can suffocate or bury an entrant; liquids or materials are suddenly released into the confined space.

2.6.2.2.2 Mechanical & Hydraulic Energy – mechanical and hydraulic equipment start or move unexpectedly.

2.6.2.2.3 Noise – permit-required spaces may amplify sounds produced by tools and equipment.

2.6.2.2.4 Falling Objects – objects fall into the space because topside openings are unguarded or improperly guarded.

2.6.2.2.5 Extreme Temperatures – the confined space's location and equipment it contains may make it very hot or cold.

2.6.2.2.6 Slippery Surfaces – leaks, spills, and condensation make traversing surfaces slippery.

2.6.2.2.7 Corrosive Chemicals – corrosive chemicals are stored in the confined space, or entrants use them to do tasks.

2.6.2.2.8 Access Problems – confined spaces are difficult to enter and exit.

2.6.2.2.9 Illumination Problems – most permit-required confined spaces are dark places.

SECTION THREE – IDENTIFICATION

3.1 CONFINED SPACE IDENTIFICATION

3.1.1 A complete survey of *all* confined spaces on University grounds shall be made.

3.1.1.1 This survey shall be made by an individual who is trained with respect to confined spaces and is therefore familiar with its definition.

3.1.1.2 Each confined space shall be categorized as:

3.1.1.2.1 Permit-Required Confined Space,

3.1.1.2.2 No-Entry Confined Space, or

3.1.1.2.3 No Permit-Required Confined Space.

3.1.1.3 The survey shall include all hazards (if any) associated with each confined space.

3.1.1.4 The survey shall be accomplished every three (3) years, and changes made accordingly; i.e., status and entry.

3.1.2 Each confined space shall be labeled to identify it as a confined space and its categorization – permit-required, no-entry, no permit-required.

3.1.3 It is the responsibility of the Physical Plant to conduct this survey and the resulting labeling.

3.1.4 Appendix VI contains the Confined Space Hard Assessment that shall be used to identify and designate confined spaces.

3.2 SAFETY PRECAUTIONS

3.2.1 Each permit-required confined space shall have safety precautions identified relevant to its hazards.

3.2.2 Each no-entry confined space shall have as many safety precautions as possible identified as related to its hazards.

3.3 CONFINED SPACE DATABASE

3.3.1 The information gathered from the completed survey of confined spaces and the respective safety precautions shall be accumulated in a database (hardcopy or softcopy) to ensure availability of the data to all pertinent employees.

3.3.2 The database shall be kept current and annually evaluated by the Physical Plant.

SECTION FOUR – RESPONSIBILITIES

4.1 AUTHORIZED ENTRANTS

4.1.1 Individuals who are permitted by an employer to enter a permit-required confined space.

4.1.2 Under no circumstances may a University of Portland student be permitted to be an authorized entrant.

4.1.3 Responsibilities include:

4.1.3.1 Knowing the permit-required confined space hazards, including the symptoms and consequences of exposure,

4.1.3.2 Using equipment properly,

4.1.3.3 Communicating regularly with the authorized attendant,

4.1.3.4 Leaving the space immediately during a hazardous condition or when the authorized attendant orders an evacuation,

4.1.3.5 Utilize any and all personal protective equipment required by the Confined Space Entry Permit, and

4.1.3.6 Posting the Confined Space Entry Permit at the operation site.

4.2 AUTHORIZED ATTENDANTS

4.2.1 Individuals who are permitted by an employer to monitor permit-required confined space entrants' activities from outside the confined space.

4.2.2 At all times, there must be *two* (2) authorized attendants during a permit-required confined space entry.

4.2.3 University of Portland students who are employed by the University are allowed to be authorized attendants following appropriate training and being appointed by an authorized supervisor.

4.2.4 Responsibilities include:

4.2.4.1 Knowing the permit-required confined space hazards, including the symptoms and consequences of exposure,

4.2.4.2 Knowing how many entrants are in the confined space,

4.2.4.3 Staying at the entrance of the confined space,

4.2.4.4 Staying out of the permit-required confined space during entry operations,

4.2.4.5 Keeping in contact with entrants,

4.2.4.6 Monitoring, if necessary, the atmospheric conditions during entry, recording findings on the Confined Space Entry Permit, and relaying such information to Public Safety,

4.2.4.7 Ordering an evacuation for a hazardous condition,

4.2.4.8 Keeping unauthorized persons away from the confined space area, and

4.2.4.9 Activating rescue procedures.

4.3 AUTHORIZED SUPERVISORS

4.3.1 Individuals who are designated by the employer to ensure authorized entrants/attendants follow entry-permit procedures.

4.3.2 Authorized supervisors are the only individuals permitted to sign (authorize) permit-required confined space entry through the Confined Space Entry Permit.

4.3.3 The two authorized supervisors that can authorize a permit are the Director and Assistant Director of the Physical Plant.

4.3.4 Responsibilities include:

4.3.4.1 Verifying that all individuals associated with a permit-required confined space entry process are authorized entrants and authorized attendants as required,

4.3.4.2 Verifying that the Confined Space Entry Permit is accurate and current prior to authorizing its use,

4.3.4.3 Knowing the permit-required confined space hazards, including the symptoms and consequences of exposure,

4.3.4.4 Stopping entry operations and “closing” the entry permit when permit-space work is completed or during a hazardous condition,

4.3.4.5 Ensuring that responders will be available in an emergency,

4.3.4.6 Removing any unauthorized person who enters the confined space,

4.3.4.7 Ensuring that entry operations are consistent if another authorized person must replace an attendant or an entrant, and

4.3.4.8 Ensuring that all permit-required confined space entry equipment and rescue equipment (if applicable) is fully functional prior to use, and for its periodic testing/inspection.

4.4 EMPLOYER

4.4.1 Responsible for the training and equipment associated with permit-required confined space entry procedures.

SECTION FIVE – PERMIT PROCESS

5.1 PRE-ENTRY

5.1.1 Before an authorized employee enters into a permit-required confined space, he/she must obtain a Confined Space Entry Permit.

5.1.1.1 Entry is achieved when *any* part of the employee's face breaks the plane of the opening of the permit-required confined space.

5.1.1.2 The employee must notify an Authorizing Supervisor – the individual who is authorized to execute a Confined Space Entry Permit – and present a pre-entry completed Confined Space Entry Permit.

5.1.2 If hot work is required in the any confined space, a Hot Work Permit is required prior to entry.

5.1.2.1 The completed Hot Work Permit shall be attached to the Confined Space Entry Permit maintained at the confined space.

5.1.2.2 The University of Portland's Hot Work Safety Policy must be referenced and followed.

5.1.3 If lock-out/tag-out is required in any confined space, the University of Portland's Lock-Out/Tag-Out Safety Policy must be referenced and followed.

5.1.4 Gas Testing is required prior to anyone entering a permit-required confined space and periodically thereafter.

5.1.4.1 Gas testing must be annotated on the Confined Space Entry Permit.

5.1.4.2 Gas test results must be relayed to Public Safety.

5.1.4.3 If gas testing determines that one or more gases are below or above permissible limits, entry shall not be allowed; any entrant in the confined space must evacuate.

5.1.5 All confined space required equipment (entry, safety, protective, and rescue) must be present at the site and determined to be in full operational capacity prior to entry.

5.1.6 Notification to Public Safety must be done prior to any entry.

5.1.6.1 Communication procedures shall also be established with Public Safety based on the location of the confined space, and the most effective communication method will be utilized.

5.2 CONFINED SPACE ENTRY PERMIT PROCESS

5.2.1 An authorized entrant or authorized supervisor shall prepare the Confined Space Entry Permit as required.

5.2.2 Prior to approving the permit, the Authorized Supervisor shall ensure Public Safety has been notified of the potential permit-required confined space, to include its location and point of entry.

5.2.3 An Authorized Supervisor shall approve the permit when all required areas are completed.

5.2.4 Following approval of the permit, but prior to entry:

5.2.4.1 Public Safety shall be given the **white** copy of the Confined Space Entry Permit, (example Appendix I)

5.2.4.2 The Authorizing Supervisor shall retain the **yellow** copy of the permit,

5.2.4.3 The "**hard**" copy of the permit shall be posted at the confined site,

5.2.4.4 Public Safety and the Authorized Attendant shall establish a communication method and have contact prior to entry.

5.2.4.5 Pre-entry gas testing shall be accomplished and relayed to Public Safety.

5.2.5 During entry, the permit shall be updated as required; i.e., gas testing.

5.2.6 Post-entry permit requirements include:

5.2.6.1 "Closing" the permit by an authorizing supervisor's signature indicating that all associated requirements have been fulfilled.

5.2.6.2 Properly filing the combined yellow and hard copies of the permit at the authorizing supervisor's department, to include any Hot Work Permit(s), and be kept on file for a period of three (3) years.

5.3 CONFINED SPACE ENTRY PERMIT AUDIT

5.3.1 Public Safety Environmental Health and Safety Officer is responsible for audits of the Confined Space Entry Permits.

5.3.2 The audit shall be accomplished quarterly, and the results logged.

5.3.3 Disciplinary action may be taken against those individuals not properly filling-out the permit.

SECTION SIX – CONFINED SPACE TRAINING

6.1 GENERAL

6.1.1 The Director of departments whose employees may require entry to a permit-required confined space are responsible to ensure proper training to those employees is given.

6.1.2 The Director of the Physical Plant shall ensure training is provided for Authorized Supervisors, Authorized Entrants, and Authorized Attendants.

6.1.2.1 Initial training and/or refresher training must be accomplished, at a minimum, on an annual basis.

6.1.2.2 A record of all confined space training shall be kept at the Physical Plant; a copy will be kept at each respective department.

6.2 SPECIFIC

6.2.1 Only trained and qualified employees shall be authorized as Entrants, Attendants, Supervisors, or in-house emergency responders.

6.2.2 Training shall ensure that individuals have the understanding, knowledge, and skills to perform their duties safely.

6.2.3 Employees must receive training:

6.2.3.1 Before their duties are assigned or changed,

6.2.3.2 When their work presents a hazard for which they have not been trained, and

6.2.3.3 When they do not follow entry procedures.

SECTION SEVEN – EMERGENCY RESCUE

7.1 AUTHORIZED ATTENDANT'S RESPONSIBILITY

7.1.1 In the event a permit-required confined space rescue is necessary, the Authorized Attendant is responsible for the following:

7.1.1.1 Summoning emergency responders and contacting Public Safety,

7.1.1.2 Attempting to rescue Entrants using only *non-entry* rescue equipment,

7.1.1.3 Monitoring the emergency and informing responders about the number of victims, their condition, and the hazards in the confined space.

7.2 NON-ENTRY RESCUE REQUIREMENTS

7.2.1 Non-entry rescue is the preferred method for rescuing and entry from a permit-required confined space.

7.2.2 Retrieval systems shall be utilized unless the equipment would increase the entrant's risk or injury.

7.2.3 Employees shall not enter a permit-required confined space to respond to an emergency unless they have been properly trained and equipped to do so.

7.3 ENTRY RESCUE REQUIREMENTS

7.3.1 Only responders designated by the Director of Public Safety may enter a permit-required or no-entry confined space during an emergency.

7.3.2 Each emergency responder must know how to do the following:

7.3.2.1 Use personal protective and rescue equipment,

7.3.2.2 Perform assigned rescue duties, and

7.3.2.3 Be certified in and able to perform basic first-aid and CPR.

7.3.3 Each rescue responder shall practice a permit-required confined space rescue at least annually.

7.3.4 Public Safety shall be responsible for ensuring proper rescue responder training is provided and maintained.

7.4 SUMMONING OFF-SITE RESCUE RESPONDERS

7.4.1 Public Safety shall be responsible for summoning off-site rescue responders.

7.4.2 Departments *shall not* contact off-site rescue responders directly; they shall contact Public Safety for such requirements.

SECTION EIGHT – CONFINED SPACE ENTRY EQUIPMENT

8.1 GENERAL

8.1.1 The University of Portland shall provide all necessary equipment for permit-required confined space entry.

8.1.2 This equipment shall be maintained by the Physical Plant

8.1.2.1 The Physical Plant has responsibility to ensure the equipment is tested, calibrated, and operational prior to use.

8.1.2.2 The permit-required entry equipment may be checked-out by authorizing supervisors as needed.

8.2 PERSONAL PROTECTIVE EQUIPMENT (PPE)

8.2.1 Each department is responsible for ensuring proper PPE is available to its authorized entrants and authorized attendants, and for its related training.

8.3 COMMUNICATION

8.3.1 The Physical Plant has responsibility that permit-required confined space communication equipment is operational when needed.

8.3.2 This equipment may be checked-out by authorizing supervisors as needed.

SECTION NINE – OUTSIDE CONTRACTORS

9.1 UNIVERSITY RESPONSIBILITIES

9.1.1 The University of Portland shall ensure that all non-University employees (e.g., contractors) that may need to enter a permit-required confined space on University property are notified of the hazards that may be present in the confined space.

9.1.2 Public Safety and the Physical Plant shall ensure the contractor(s) follow the University of Portland's Confined Space Policy and Permit Program as much as is possible; a copy shall be afforded the contractor.

9.1.3 It is Physical Plant's responsibility to ensure contractor entrants have had the appropriate training and utilize the proper equipment.

9.1.4 The Physical Plant is responsible in ensuring that the contractor assumes all liability over its employees during a permit-required confined space entry in case of injury or death, as well as damage to any University of Portland property.

9.2 CONTRACTOR RESPONSIBILITIES

9.2.1 The contractor shall utilize the University of Portland's Confined Space Entry Permit.

9.2.2 If the contractor utilizes its own Confined Spaces Entry Permit, it will be in conjunction with the University of Portland Permit.

9.2.2.1 The permit shall be treated as University property and shall be handled accordingly; e.g., hard-copy on site, filed by responsible department for three (3) years, etc.

9.2.3 The contractor shall keep in communication with Public Safety during entry and during the performance of all required functions; e.g., pre-entry gas tests.

APPENDIX II – DUTIES

DUTIES OF AUTHORIZED ENTRANTS, ATTENDANTS, and AUTHORIZED INDIVIDUALS

Working in permit-required confined spaces is a team effort involving Authorized Entrants, Attendants, and Supervisors. Their duties and responsibilities are shown below:

DUTY/Responsibility	Entrant	Attendant	Authorized Individuals
Keep unauthorized entrants away from the space		X	X
Remove un-authorized individuals who enter or who attempt to enter the permit space			X
Communicate with entrants, monitor their status, and tell them when to evacuate		X	
Inform the entrants and the entry supervisor if un-authorized persons enter the space		X	
Communicate with the attendant regularly	X		
Remain outside of the space during entry operations until relieved by another attendant		X	
Know the number and identity of the authorized entrants		X	
Use all equipment properly	X	X	
Determine that acceptable entry conditions are maintained			X
Exit from the space immediately given an order to evacuate, an alarm warning or a sign of a hazardous condition	X		
Know permit space hazards, including the mode, symptoms, and consequences of exposure.	X	X	X
Notify the attendant of any signs or symptoms of exposure to a hazardous condition	X		
Terminate entry and cancel the permit when entry procedures are finished or if a prohibited condition arises		X	
Verify that entry conditions are acceptable before signing the permit and allowing entry			X
Perform non-entry rescue if necessary		X	
Verify that rescue services are available and the means for summoning them are effective			X
Summon emergency responders when entrants need their services		X	

APPENDIX III – AUTHORIZED ENTRANT TRAINING

University of Portland Training Evaluation Form for Confined Space Entry:

Authorized Entrants

The University of Portland has a confined space permit policy and procedure designed to provide a method of protection from hazards associated with confined spaces. The following of this policy and procedure will guarantee the safety of everyone at the University of Portland.

I understand that before entering into an area that is marked “Caution, Confined Space # _____, Entry by Permit Only” that I must obtain a permit from an authorizing individual. I have also been trained and understand the following:

- | Yes | No | <u>Authorized Entrants</u> |
|-----|-----|--|
| () | () | Permits are issued for a certain date/time, that if the job to be done exceeds this date/time, I must exit the space and obtain another permit if more time is needed to finish the job. |
| () | () | I must follow all safety rules and regulations noted in the Confined Space Entry and / or Hot Work Safety Policy while I am in or around a confined space. |
| () | () | If I am advised to exit the confined space, I must do so. |
| () | () | I must review all information on the permit and understand the hazards I may face before I enter the confined space. |
| () | () | I understand how to detect the effects of hazard exposure to others and myself and know what the consequences of these exposures can be. |
| () | () | I am to maintain contact with the Authorized Attendant at all times. |
| () | () | I must obey all other job, Physical Plant, and University safety rules which may apply |
| () | () | I understand that no one is allowed in areas marked “Danger, Confined Space # _____, No Entry Allowed.” |
| () | () | I fully understand what my duties are as defined in the Confined Space Policy and Procedure Manual. |
| () | () | I understand that failure to comply with all conditions and terms of the Confined Space Policy and Procedures will result in disciplinary action up to and including discharge. |

Date

Employee

Supervisor

APPENDIX IV – AUTHORIZED SUPERVISORS

University of Portland Training Evaluation Form for Confined Space Entry

Authorizing Supervisors

The University of Portland has a confined space permit policy and procedure designed to provide a method of protection from hazards associated with confined spaces. The following of this policy and procedure will guarantee the safety of everyone at the University of Portland.

I understand that before entering into an area that is marked “Caution, Confined Space # _____, Entry by Permit Only” the authorized entrant must obtain a permit authorized by me. I have also been trained and understand the following:

Yes	No	Authorizing Supervisors
()	()	I have read and understand the University of Portland’s Confined Space Policy and Procedures.
()	()	I understand what my duties are as an authorizing individual as defined in the Confined Space Policy and Procedures Manual.
()	()	I understand that when I sign a “Confined Space Permit” or a “Hot Work Permit” that I am saying that I have checked all the required information and that it is correct to the best of my knowledge at the time of signing.

Date

Authorizing Individual

Physical Plant Director

APPENDIX V – PERSONAL PROTECTIVE EQUIPMENT

Examples of Personal Protective Equipment

- FACE SHIELD
- GOGGLES
- HARD HAT
- HEARING PROTECTION (FOAM & “MUFF”)
- MASK (SMALL, WHITE BREATHING MASKS)
- PROTECTIVE BOOTS (RUBBER)
- PROTECTIVE CLOTHING (“BUNNY” SUIT, JACKET, ETC)
- PROTECTIVE GLOVES
- LIFELINES
- RESPIRATOR(S) (AIR PURIFYING)
- EMERGENCY RETRIEVAL EQUIPMENT
- FULL BODY HARNESS W/“D” RING
- LINE(S) BROKEN-CAPPED-BLANKED

APPENDIX VI – CONFINED SPACE HAZARD ASSESSMENT

Example of Confined Space Hazard Assessment Sheet

CONFINED SPACE HAZARD ASSESSMENT

Assessment Date:	Performed By:
Department Name:	
Space Name:	Confined Space ID#
Description:	Supervisor Confirmation:

Permit Space ()YES ()NO		place picture here
Confined Space Criteria (Must meet all three)		
	Large enough for bodily entry and perform work; and	
	Limited means of entry and exit; and	
	Not designed for continuous occupancy	
Permit Required Confined Space Criteria		
	Contains or has the potential to contain a hazardous atmosphere; or	
	Contains material that has the potential of engulfing an entrant; or	
	Has internal configuration that could trap an entrant; or	
	Contains any other recognized serious safety or health hazard	

Hazard Assessment

Check	Hazard	Source	Control
	Oxygen Deficiency		
	Explosivity/ Flammability		
	Electrical Circuits		
	Toxic Gases/ Vapors		
	Toxic Material		
	Thermal Hazard		
	Slip/ Fall Hazard		
	Engulfment Hazard		
	Entrapment Hazard		
	Other (describe)		

Required Hazard Controls

Check	Personal Protective Equipment	Hazard Control and Safety Equipment	Check
	Gloves	Life Line	
	Coveralls	Body Harness	
	Hearing Protection	Floor Level Opening Barrier	
	Air Purifying Respirator	Tripod	
	Self Contained Breathing Apparatus (SUBA)	Powered Communication	
	Face Shield	Portable Lighting	
	Rubber Boots	Atmospheric Monitor	
	Hard Hat	Man Winch	
	Chemical Gloves	Fall Arrest Unit	
	Emergency Escape Respirator	Blower/ Ventilation	
	Other	Ladder	
	Other	Fire Extinguishers	
	Other	Lockout/ Tag-Out Machinery and/or Electrical Equipment	