UNIVERSITY OF TOLEDO

SUBJECT: CONFINED SPACE PROGRAM Procedure No: S-08-019

PROCEDURE STATEMENT

Safe procedures, as defined by the Occupational Safety and Health Administration (OSHA) and described below, shall be followed by all University of Toledo personnel prior to entry into a confined space.

PURPOSE OF PROCEDURE

To ensure the safety and health of employees and outside contractors at the University of Toledo through compliance with regulations promulgated by OSHA in 29CFR1910.146.

DEFINITION

Confined Space means a space that:

- 1. Is large enough and so configured that an employee can bodily enter and perform assigned work;
- 2. 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
- 3. Is not designed for continuous employee occupancy.

<u>Permit-required Confined Space</u> (permit space) means a confined space that has one or more of the following characteristics:

- 1. Contains or has a potential to contain a hazardous atmosphere;
- 2. Contains a material that has the potential for engulfing an entrant;
- 3. Has an internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls or by a floor which slopes downward and tapers to a smaller cross-section; or
- 4. Contains any other recognized serious safety or health hazard.

<u>Hot Work Permit</u> means the employer's written authorization to perform operations (for example, riveting, welding, cutting, burning, and heating) capable of providing a source of ignition.

<u>Attendant</u> means an individual stationed outside one or more permit spaces who monitors the authorized entrants and who performs all attendant's duties assigned in the employer's permit space program.

Authorized Entrant means an employee who is authorized by the employer to enter a permit space.

<u>Hazardous Atmosphere</u> means an atmosphere that may expose employees to the risk of death, incapacitation, impairment of ability to self-rescue (that is, escape unaided from a permit space), injury, or acute illness from one or more of the following causes:

- 1. Flammable gas, vapor, or mist in excess of 10 percent of its lower flammable limit (LFL);
- 2. Airborne combustible dust at a concentration that meets or exceeds its LFL;
- 3. Atmospheric oxygen concentration below 19.5 percent or above 23.5 percent;
- 4. Atmospheric concentration of any substance for which a dose or a permissible exposure limit is published in Subpart G, Occupational Health and Environmental Control, or in Subpart Z, Toxic and Hazardous Substances, and which could results in employee exposure in excess of its dose or permissible exposure limit;

NOTE: An atmospheric concentration of any substance that is not capable of causing death, incapacitation, impairment of ability to self-rescue, injury, or acute illness due to its health effects is not covered by this provision.

5. Any other atmospheric condition that is immediately dangerous to life or health.

NOTE: For air contaminants for which OSHA has not determined a dose or permissible exposure limit, other sources of information, such as Safety Data Sheets (SDS) that comply with the Hazard Communication Standard, section 1910.1200 of this Part, published information, and internal documents can provide guidance in establishing acceptable atmospheric conditions.

RESPONSIBILITY

The appropriate Facilities Maintenance Supervisor, or their designees, in conjunction with Environmental Health and Radiation Safety Department, are responsible for the initiation and execution of approved confined space entry procedures as defined by the Confined Space Entry Permit issued for entry.

PROCEDURE

A. Hazard Identification

Facilities Maintenance supervisors shall identify all spaces, meeting the criteria listed in the definition, which they believe may be a confined space, or a permit required confined space, in which it is reasonably anticipated that employees may be required to enter. (See current list attached.)

B. Entry into non permit required confined spaces

Entry into non permit spaces does not require the use of a confined space permit. Entrants are not required to have an attendant, rescue gear, or a rescue team. Entrants into non permit spaces should be acutely aware of any changes in or to the space which could result in the space becoming a permit required confined space.

C. Entry into permit spaces

Permit required confined spaces require the use of an entry attendant, effective rescue equipment, and available, trained rescue team. The University of Toledo does not allow entry into permit required confined spaces by its employees. Any work that must be completed in a permit required confined space must be appropriately contracted out to a vendor who can enter the space in accordance with 29 CFR 1910.146 (OSHA Permit Required Confined Space Standard) or entered under the PRCS C-5 or PRCS C-7 procedure, if applicable.

D. Reclassification of some permit spaces (PRCS C-5 and PRCS C-7)

Some permit required confined spaces on campus may be entered after reclassification. This procedure is known as PRCS C-5 or PRCS C-7.

1. PRCS C-5

If the only hazard posed by the permit required confined space is a (potential) hazardous atmosphere, and the space is proven safe through documented monitoring and continuous forced air ventilation, then the space may be temporarily reclassified as a PRCS C-5 and entry may take place by University of Toledo personnel. All personnel needing to enter a permit required confined space under the PRCS C-5 procedure must request and receive assistance (every time) from the Environmental Health and Radiation Safety Department before entering the space.

2. PRCS C-7

If the only hazard posed by the permit required confined space is mechanical in nature, and the hazard can be effectivly eliminated from outside the space, then the space may temporarily be reclassified as a PRCS C-7. All personnel needing to enter a permit required confined space under the PRCS C-7 procedure must

request and receive assistance (every time) from the Environmental Health and Radiation Safety Department before entering the space.

3. Confined Space Reclassification Form (Appendix A)

When a permit required confined space needs to be reclassified to a non-permit required confined space the Confined Space Reclassification Form must be used. The form contains area's for photo's of the reclassifies space as well as a description and size of the space, description of work activity and a form for atmospheric testing data for the conditions to be recorded and documented. This form must be completed before entering any confined space that needs to be reclassified to a non-permit entry confined space. In addition to the checklists and forms in the Confined Space Reclassification Form there is also detailed instructions on the last page as Reclassification Instructions.

E. Personal Protective Equipment

Personal protective equipment is never a substitute for the creation of safe working conditions and good judgement on the part of the worker and supervisory personnel. All personal protective equipment shall be selected based upon a hazard assessment of the job.

F. Training

The appropriate Supervisor shall ensure that his/her employees receive training on this procedure's requirements and personal protective equipment (where such protection is required) prior to entry of any confined space.

G. Outside Contractors

When outside contractors must enter a known confined space, it is the duty of the appropriate supervisor to provide a copy of the OSHA Standard on confined space entry to that contractor. In this case, the "appropriate" supervisor is the supervisor with primary knowledge of the work to take place. In addition to providing a copy of the standard, the supervisor shall enable, to the degree possible, the contractor to provide for safe practices for their employees. The supervisor shall provide assurance to the Environmental Health and Radiation Safety Department as to the effectiveness and use of the contractor's confined space entry program.

Source: Safety & Health Committee Effective Date: 3/13/95

Review/Revision Date: 7/17/96

6/2/99 1/7/02 1/1/05 12/28/07 12/15/10 12/11/13 12/11/16 12/11/19 12/9/22

LIST OF HEALTH SCIENCE CAMPUS CONFINED SPACES

| Building | Space | Location | Classification |
|---|---------|---------------------------------|----------------|
| | | | |
| Steam Tunnels: | | | 2,4 |
| Educare | | | |
| Main Campus to P.H. | | | |
| P.H. to Dana | | | |
| Storm Sewer Manholes (deeper than 4 feet) | | Various | 2,4,PRCS |
| Heatherdowns Boiler | Educare | Basement Mechanical Space | 1,2,4,PRCS |
| Underground Storage Tanks | | Various | 2,3,4,PRCS |
| Air Handlers: (those large enough | | | 2-C5 or C7 |
| to enter) | | | |
| D.H. (8) | | | |
| HEB (10) | | | |
| CAPH (1) | | | |
| Health Center (2) | | | |
| Glendale (1) | | | |
| Dana (1) | | | |
| FSB (1) | | | |
| Library (1) | | | |
| BHSB (4) | | | 2,3,5,PRCS |
| ECI | | | 2,4,PRCS |
| Elevator Pits | | | 2,4,PRCS |
| D.H. (4) | | | |
| HEB (2) | | | _ |
| CAPH (1) | | | |

*See page 6 for code definitions

- c. 2 page 6 for code definitions
 c. 2 Combustible Dust
 c. 2 Limited Access/Egress
 c. 3 Flammable Atmosphere
 c. 4 Oxygen Deficiency/Enrichment
 c. 5 Exceeds OSHA Limit
 P Permit required

| Building | Space | Location | Classification |
|----------------------------|-------|----------|----------------|
| Health Center (1) | | | |
| Glendale (1) | | | |
| Dana (1) | | | |
| Library (5) | | | |
| Hospital (8) | | | |
| HSB (3) | | | |
| Cooling Towers | | | 2 |
| Sewer Manholes | | | 2,4,PRCS |
| Acid Sumps | | | 2,4,PRCS |
| Utility Tunnel at Sub. St. | | | 2,4,PRCS |
| Natural Gas Manholes | | | 2,3,PRCS |
| Sump Pump Pits | | | 2,4,PRCS |
| Wire Closets | | | 2 |
| Pipe Shafts | | | 2 |

LIST OF MAIN CAMPUS CONFINED SPACES

| Building | Space | Location | Classification |
|---------------------------|------------------------------------|---------------------------------|----------------|
| Bowman Oddy | Storm Pumps/Crocks | NW Side | PRCS |
| Campus | Manholes | Various | PRCS C-5 |
| Campus | Steam Vaults/Pits | Various | PRCS C-5 |
| Carlson | Lift Station | N of Stadium, NE of Parks Tower | PRCS |
| Field House | Small Tunnels | | NPRCS |
| Gillham Hall | Sump Pump | Mech Room, NE Corner, S Side | PRCS |
| Glass Bowl | Dike Pumps | Lot 10 | PRCS C-5 |
| Health Education | Pool Discharge Pit | Pool Filter Room | PRCS |
| Health and Human Services | Dana Auditorium | Half Door Over Crawl | NPRCS |
| Law Center | Sump Pump | Е | PRCS |
| North Engineering | Mechanical Room | Boiler Room, S Basement | PRCS |
| Palmer | Sewage Lift Station | S Door under W Stairway | PRCS |
| Parks Tower | Dike Pumping Station | NE in flats | PRCS |
| Parks Tower | Concrete Waste Vault | Mechanical Room | PRCS |
| Savage Hall | Dike Pumping Station | Lot 5, NE Corner | PRCS |
| Memorial Field House | Mechanical Room 1078 | | NPRCS |
| Student Union | Steam Line Access | S Side | NPRCS |
| Student Union | Steam Line Access | NW Side | NPRCS |
| Student Union | Fountain Pump Room Sub Basement | N Side | NPRCS |

LIST OF SCOTT PARK CONFINED SPACES

| Building | Space | Location | Classification |
|------------------------------|---|-----------|----------------|
| Non Academic Services Center | Gas/Diesel Above Ground Storage Tank | Rear Side | PRCS |
| Non Academic Services Center | Sump Pump | Rear Side | PRCS C-5 |

Atmosphere Hazards

- 1. Combustible Dust = An airborne combustible dust at a concentration that obscures vision at a distance of five feet or less.
- 2. Limited Access/Egress = A space large enough that an employee can enter, which has restricted means for entry or exit and is not designed for continuous employee occupancy.
- 3. Flammable Atmosphere = A flammable gas, vapor, or mist in excess of 10% of its lower flammable limit.
- 4. Oxygen Deficiency/Enrichment = An atmospheric oxygen concentration below 19.5% or above 22%.
- 5. Exceeds OSHA Limit = Exceeds a "recognized" exposure limit [OSHA permissible exposure limit, immediately dangerous to life or health limit, or published exposure recommendation (i.e., from a SDS)].
- P Permit required for entry (where feasible area is required to be posted "Permit Required Confined Space").