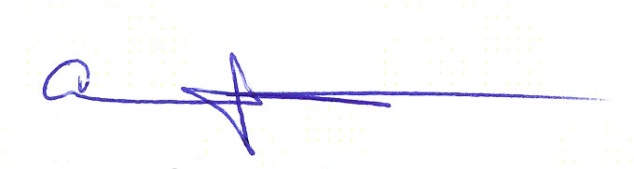
**Confined Space Policy**



Approved:

Ahmed Boomrod, President / COO

Approved:

Michael G. Cadotte, VP Safety & Quality

**Change Record**

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| --- | --- | --- | --- |
| Rev.: | Date: | Responsible Person: | Description of Change: |
| 0 | 01/06/14 | M. Cadotte/VP Safety | Initial Release |
| 1 | 03/18/14 | M. Cadotte/VP Safety | Audit – no significant changes |
| 2 | 03/27/15 | Corp. Safety Team | Annual review |
| 3 | 03/31/16 | M Cadotte | Annual Review – change in corporate name |
| 4 | 01/11/2019 | M Cadotte | Review |
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1. **Purpose**

The OSHA standard on Permit-Required Confined Spaces (1910.146) requires employers to implement practices and procedures to protect employees from hazards associated with entry and work within permit required confined spaces.

1. **Scope**

The following policy is established for ALL GDI employees as a corporate safety policy and applicable to all GDI work sites. Site specific modifications to this policy must be documented in a separately coded policy, referencing this policy and shall not diminish any provisions of this, the master policy.

1. **Responsibility**
   1. VP of Safety

Has overall authority and responsibility for implementing and monitoring safety & environmental programs at GDI.

Shall audit, or authorize compliant person(s) to audit, this policy annually for compliance and note any corrections if made in the log on page 1. All revisions shall be posted to the safety site online and safety teams notified of the change. If additional training is required based on the revision they shall be conducted and document prior to any further confined space work.

* 1. Account Executives and GDI Managers

Are responsible for monitoring all environmental programs and systems at their facility (ies) including researching new programs and systems to further enhance overall safety at the company and/or job site.

* 1. Employees

Each and every employee at GDI has a primary responsibility to comply with all safety and policies, guidelines and laws. Furthermore, every employee must report any unsafe conditions, follow all policies, procedures and SSOPs in place to ensure their actions are in full compliance with GDI’s safety programs.

Employees working in a confined space must be certified as and entrant every 24 months.

1. **Policy**
   1. Confined Space – Defined
      1. A confined space, by design, has limited or restricted means for entry and exit and is not intended for continuous employee occupancy. Confined spaces include, but are not limited to manholes, ovens, pipelines, tunnels, silos and tanks.

* 1. Permit Required Confined Space (PRCS) – is a confined space with one or more of the following characteristics:
     1. Contains or has known potential to contain a hazardous atmosphere. Several of the more common atmospheric conditions that constitute hazards are oxygen deficiency, presence of combustible gases and vapors, and toxic gases and vapors;
     2. Contains a material with the potential for engulfment of an entrant;
     3. Has an internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls, or a floor which slopes downward and tapers to a smaller cross-section; or
     4. Contains any other recognized serious safety or health hazard.
  2. Confined Space Crew – Definition of Duties
     1. Authorized Entrant: an employee who is authorized by the employer to enter a permit required space. Only employees who are trained as an entrant and have obtained a permit signed by the entry supervisor may enter a permit required confined space.
     2. Attendant: an individual who is stationed outside one or more permit required spaces that monitor authorized entrants. At least one individual must be stationed outside the permit required confined space and thus cannot attend to more than one confined space event at the same time.
     3. Entry Supervisor:

The entry supervisor is the department head, Shift Supervisor, Project Manager or supervisor responsible for determining if acceptable entry conditions are present at a permit space where entry is planned, for authorizing entry, for overseeing entry, and for terminating entry.

Although the Entry Supervisor completes the entry permit and closes out the PRCS they are not required to be present during the work involving the PRCS. The Entry Supervisor, however, must ensure that all entrants and attendants are properly trained and authorized to perform the PRCS.

An entry supervisor also may serve as an attendant or as an authorized entrant, as long as that person is trained and equipped as required by this section for each role he or she fills. Also, the duties of entry supervisor may be passed from one individual to another during the course of an entry operation and should be noted on the permit.

The Entry Supervisor complete the permit when work is finished, signs the permit closed and files in the GDI site office.

* 1. Identification and Warning Signs

The customer’s safety department (or other) shall identify all confined spaces and those suspected of being a PRCS. PRCSs must be posted with warning signs notifying employees of any hazard that are present and that only authorized entrants may enter the PRCS.

GDI will not classify or de-classify areas of a customer’s facility. GDI may provide suggestions and expert advice but the customer must take responsibility for the areas and conditions within their facility. GDI will comply with such determinations

In the event there is a space GDI deems a potential PRCS that is NOT identified by the customer it shall be treated as a PRCS until GDI’s safety department and the customer’s safety representative can make a final determination

Barriers / Postings shall be in place where there is potential for a non-entrant to enter into a PRCS. These should be in place before a PRCS event starts and remain up until completed.

* 1. Required Permits

The following permits must be completed and posted for every PRCS work performed:

* + 1. Confined Space Entry Permit – GDI form: F300.0069

Only an authorized, and trained, Entry Supervisor may complete a PRCS Entry Permit.

Preparation, Issuance and posting: performed by the Entry Supervisor

Usage: Entry Supervisor and/or Attendant maintains posting and updates any ongoing required data during the confined space event

Cancellation: Entry Supervisor completes and files the PRCS including work not performed due to a cancellation or work stop.

* + 1. On-Site Rescue Plan – page 3 of Procedure: SP15W.0001

A rescue plan shall be established prior to beginning any PRCS work. This plan is part of GDI procedure SP15W.0001 which shall be trained with all entrants, attendants, supervisors and rescue team members prior to the start of any PRCS.

* 1. Atmosphere: Before an employee enters the space, the internal atmosphere shall be tested, with a calibrated direct-reading instrument, for oxygen content, for flammable gases and vapors, and for potential toxic air contaminants, in that order. Any employee who enters the space shall be provided an opportunity to observe the pre-entry testing.

The atmosphere within the space shall be periodically tested as necessary to ensure that there is not an accumulation of a hazardous atmosphere. Any employee who enters the space shall be provided with an opportunity to observe the periodic testing.

* 1. Training
     1. The employer shall provide training so that all employees whose work is regulated by this policy acquire the understanding, knowledge, and skills necessary for the safe performance of the duties assigned in a confined space environment. Training shall be provided to each affected employee:
        1. Before the employee is first assigned duties under this policy
        2. Before there is a change in assigned duties;
        3. Whenever there is a change in permit space operations that presents a potential hazard that the employee has not been trained;
        4. Whenever there is a reason to believe that there are deviations from the entry procedure or belief the employee does not have the full knowledge to perform confined space work.
     2. Training shall be documented in the following manner:
        1. Signed or initialed by each trained employee [F300.0025]
        2. Entered into each employee’s training record (Online Matrix)
     3. After all training an employee must be shadowed during their first confined space to show proficiency in all duties, responsibilities and policies as they relate to any confined space work.
  2. Rescue
     1. Rescue (since GDI works in multiple locations for multiple customers) may be conducted by customer rescue team, outside service or GDI team. This shall be determined before any confined space work is authorized at a job site and said rescue team has been given due and timely notice to examine the entry site, has proper training and has all needed equipment to perform a rescue. In the event any of these steps are lacking the confined space event is not-authorized to proceed.
     2. Confined space work that poses an immediate danger to life is NOT allowed and beyond GDI’s capabilities to perform.
     3. Each authorized entrant shall use a chest or full body harness, with a retrieval line attached at the center of the entrant's back near shoulder level, above the entrant's head.
     4. The Onsite PRCS Rescue Procedure shall be followed, identified employees trained and familiar with it, and the rescue assessment complete for each PRCS event.
     5. Annually each job site shall practice a test emergency retrieval if said retrieval is conducted by the local site employees. In the event the retrieval is conducted by local emergency responders (i.e. local fire service) an audit of availability and general review of the PRCS practices shall be conducted to ensure appropriate response is attainable.
     6. Rescue summons: in the event a rescue is required the following ques are to be utilized between the entrant(s) and attendant:
        1. Verbal command to, “Rescue” – spoken aloud or via radio
        2. Pulling on the safety line as a non-verbal command to rescue.
        3. Anytime the attendant has lost contact with the entrant(s) and / or deems them non-responsive to verbal or physical commands OR their actions give the possible impression of an adverse event.
  3. PPE
     1. General PPE shall be determined by the type of work being performed and the PPE required for said process.
     2. A full body harness shall be worn with a retrieval line (lanyard).
        1. Proper pre-use inspection and usage of harnesses and lanyard shall be followed at all times. GDI’s SP13W.0001 procedure and SP-13 Working at Heights safety policy shall be followed.
     3. Additional PPE may be required based on the type of PRCS work being performed. Such additional PPE shall be identified on the Confined Space Permit [GDI Form: F300.0069].
  4. Non-GDI operations
     1. GDI will not issue permits, monitor and enter under another company’s permit unless such persons (entry supervisor, attendant) have authorization from GDI Safety.
     2. In the event other contractors / workers are working in the same area, and its determined safe to operate as such, GDI Entry Supervisor is to meet with their counterpart to review each other’s operation and perform an SPA. If the SPA results in safety concerns the join work must not move forward and scheduling must be re-addressed.

1. **Related Documents**
2. F300.0069 Confined Space Entry Permit
3. SP15W-0001 Confined Space Rescue Procedure

On-Site Rescue Plan

1. SP-13 Working at Heights Safety Policy
2. SP13W.0001 Harness/Lanyard Inspection Procedure