
**THE UNIVERSITY OF OKLAHOMA
CONFINED SPACE ENTRY PROGRAM**

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THE UNIVERSITY OF OKLAHOMA CONFINED SPACE ENTRY PROGRAM

I. INTRODUCTION

The Occupational Safety and Health Administration has established a specific rule regarding confined spaces found at 29 CFR 1910.146, *Permit-Required Confined Spaces* (http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9797). OSHA also references confined spaces in several other standards including, but not limited to, 29 CFR 1910.119, *Process Safety Management of Highly Hazardous Chemicals*; 29 CFR 1910.120, *Hazardous Waste Operations and Emergency Response*; 29 CFR, Subpart Q, *Welding, Cutting and Brazing*; 1910.156, *Fire Brigades*; and 29 CFR 1926.353, *Ventilation and Protection in Welding, Cutting, and Heating*. This program has been developed in accordance with these standards. In the event of a conflict among any of these standards, the most stringent has been applied.

II. SCOPE

This confined space entry program is designed to reduce the possibility of worker injury and/or damage to the University of Oklahoma (OU) and all ancillary campus locations, and property resulting from accidents associated with confined space work. No OU employee shall perform work in permit-required confined spaces without prior approval of the EHSO.

III. DEFINITIONS

- A. **Attendant:** An employee designated to remain outside the permit space who monitors the authorized entrants and performs all attendant's duties assigned in this program:
- B. **Atmospheric Testing Equipment:** Equipment used to monitor levels of oxygen, flammable, combustible and toxic gases prior to and periodically during work in a confined space.
- C. **Authorized Entrant:** A person who is approved or assigned by the department head in charge of the entry to perform a specific duty or duties.
- D. **Authorizing Supervisor:** A person who is in charge of a confined space entry onsite with knowledge of the process, hazards, and entry procedures.
- E. **Confined Space:** 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, vaults, and pits are spaces that may have limited means of entry); and
 - 3. is not designed for continuous employee occupancy.

- F. **Confined Space with No Entry Allowed:** A confined space that, due to limitations (equipment and/or rescue capabilities), no OU employee is allowed entry into these spaces. If entry into one of these spaces is required for maintenance or repair activities, a competent contractor experienced in confined space entry shall be used to perform such activities.
 - G. **Emergency:** Any occurrence (including any failure of hazard control or monitoring equipment) or event internal or external to the permit space that could endanger entrants to the confined space.
 - H. **Entry:** The action by which a person passes through an opening into a permit required confined space. Entry is considered to have occurred as soon as any part of the entrant's body breaks the plane of an opening into the confined space.
 - I. **Entry Permit:** The written or printed document provided by entry supervisor that must be completed before entry into a permit required confined space.
 - J. **Hazardous Atmosphere:** An atmosphere that may expose employees to the risk of death, incapacitation, impairment of ability to self-rescue, 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. atmosphere concentration of any substance for which a dose or a permissible exposure limit (PEL) is published in Subpart G, of OSHA Occupational Health and Environmental Control, or in Subpart Z, Toxic and Hazardous Substances and that could result in employee exposure in excess of either; and
 - 5. any other atmospheric condition that is immediately dangerous to life or health.
 - K. **Hot Work:** Any work involving burning, welding or similar fire producing operations or operations that produce a source of ignition, such as grinding, drilling, or heating.
 - L. **Hot Work Permit:** OU's written authorization to perform operations capable of providing a source of ignition in a confined space.
 - M. **Immediately Dangerous to Life or Health (IDLH):** Any condition that poses an immediate or delayed threat to life or would cause irreversible adverse health effects or interfere with an individuals ability to escape unaided from a permit space.
 - N. **In-Plant Rescue Team:** A group of two or more employees designated and trained to
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perform rescues in permit spaces in their facility.

- O. **Lower Explosive Limit (LEL):** Minimum concentration of a flammable gas or vapor in air which will ignite if an ignition source is present.
 - P. **Lifeline:** Line attached to the employee in a confined space to remove him or her if unconscious or disabled.
 - Q. **Non-Permit-Required Confined Space:** A confined space that does not contain or, with respect to atmospheric hazards, have the potential to contain, any hazard capable of causing death or serious physical harm.
 - R. **Oxygen Deficient Atmosphere:** An atmosphere that contains less than 19.5 percent oxygen by volume.
 - S. **Oxygen Enriched Atmosphere:** An atmosphere that contains more than 23.5 percent oxygen by volume.
 - T. **Permit-Required Confined Space:** A 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. **Personal Protective Equipment (PPE):** Equipment to protect eyes, face, head, and extremities, safety glasses, hard-hats, respirators, gloves, and protective clothing.
 - V. **Permissible Exposure Limit (PEL):** Concentration of a substance to which an individual may be exposed repeatedly without adverse effect.
 - W. **Power Ventilator:** Explosion proof electrically powered fan and duct system which supplies fresh air into a confined space, and lowers the concentration of hazardous gases and vapors.
 - X. **Retrieval line:** A line or rope secured at one end to the worker by chest-waist or full- body harness, and with it's other end secured to either a lifting(or other retrieval) device, or to an anchor point located outside the entry.
 - Y. **Self-contained Breathing Apparatus (SCBA):** Respirator which supplies clean air to an
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employee, and must be worn during a confined space rescue.

IV. NON-PERMIT-REQUIRED CONFINED SPACES

A confined space that does not contain or, with respect to atmospheric hazards, have the potential to contain, any hazard capable of causing death or serious physical harm may be considered a non-permit-required confined space. Procedures for such spaces are as follows:

- A. Before entry into any confined space, the authorizing supervisor must follow the pre-entry checklist provided in Appendix A, *Blank Permits*.
- B. Before each entry into any confined space, atmospheric testing utilizing direct-reading instruments must be performed by the EHSO to verify that the space meets the conditions of not requiring a permit. If all conditions in the air monitoring section of the pre-entry checklist indicate “yes” answers, and the space does not meet the definition of a permit-required confined space, no written permit is required.

V. PERMIT-REQUIRED CONFINED SPACE SYSTEM

- A. No OU employee shall perform work in permit-required confined spaces without prior approval of the EHSO.
- B. A written permit system has been established which provides for the proper preparation, issuance, and implementation of entry permits.
- C. A list of known permit-required confined spaces are identified in Appendix B.
- D. No entry into a permit-required confined space will be allowed without a permit. This permit is designed to assure that employees identify conditions that could endanger confined space entrants and attendants. Employees and supervisors are required to contact the EHSO for permits when needed.
- E. All permits must be retained for at least one year after the entry permit has been canceled.
 - 1. For OUHSC, these permits are to be retained by the SCWP Manager or Associate Director of Operations.
 - 2. For OU-Tulsa and OU-Norman, these permits are to be retained by the supervisor of each shop issuing the permit.

VI. RESPONSIBILITIES

- A. The Environmental Health and Safety Office (EHSO) is responsible for:
 - 1. conducting initial air monitoring in the event of a confined space entry.
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2. conducting awareness level training for employees who may encounter a confined space during the performance of their daily duties,
3. conducting detailed training for authorized entrants into a permit required spaces,
4. conducting detailed training for approved attendants in the proper operation of air testing equipment,
5. assisting supervisors in identifying confined spaces on OU campus,
6. providing, maintaining and calibrating the air testing equipment used during confined space entry, and
7. evaluating and identifying an emergency rescue service.

B. Supervisors are responsible for:

1. identifying confined spaces on the OU campus and reporting those identified spaces to the EHSO,
2. ensuring that all employees required to perform any confined space entry procedure have received the appropriate level of training,
3. obtaining and completing the appropriate permit-required confined space entry permit,
4. providing necessary personal protective equipment to employees,
5. ensuring that all employees perform their assigned duties as outlined in this program, and
6. taking appropriate disciplinary action whenever an employee under his or her direction fails to follow safety precautions outlined in this program.

C. Authorizing Supervisors are responsible for:

1. evaluating the hazards which may be faced during permit-required confined space entry;
 2. verifying that all employees have been trained on safe entry procedures and proper use of entry and personal protective equipment;
 3. completing and signing a new entry permit before each entry into a permit-required confined space and communicating the contents of the permit to all parties involved;
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4. determining that the necessary procedures, practices, and equipment for safe entry are in effect before allowing entry (see Section VII., *Entry Preparation Procedures for Permit-Required Confined Spaces*);
5. periodically determining whether entry operations remain consistent with the terms of the permit-required confined space entry permit, and that acceptable entry conditions are present;
6. canceling the entry authorization and terminating entry whenever acceptable conditions are not present;
7. taking necessary actions when terminating an entry operation, such as closing off a permit space and canceling the permit, once the work authorized by the permit has been completed; and
8. taking appropriate measures to remove unauthorized personnel who are in or near entry permit spaces.

D. Authorized entrants are responsible for:

1. knowing the hazards which may be faced during entry to a permit-required confined space;
2. recognizing the signs and symptoms of exposure to a hazard;
3. understanding the consequences of exposure to a hazard;
4. maintaining contact with the attendant;
5. notifying the attendant when the entrants self-initiate evacuation of a permit space;
6. using entry and personal protective equipment properly; and
7. exiting the permit space immediately when:
 - a. the attendant orders evacuation,
 - b. an automatic alarm is activated, or
 - c. the authorized entrants perceive that they are in danger.

E. Attendants are responsible for:

1. remaining outside the permit space(s) at all times during entry operations;
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2. continuously maintaining an accurate count of all persons in the space;
3. recognizing potential permit space hazards;
4. monitoring activities inside and outside the permit space to determine whether it is safe for entrants to remain in the space;
5. maintaining effective and continuous contact with authorized entrants during entry;
6. ordering authorized entrants to evacuate the permit space immediately when:
 - a. a condition is observed which is not allowed in the entry permit,
 - b. behavioral effects or symptoms of hazard exposure are detected,
 - c. a situation inside or outside the space is detected which could endanger the entrants,
 - d. rescue must occur from another space being monitored by that same attendant, or
 - e. the attendant must leave the work station;
7. warning unauthorized persons to remain away from the space;
8. requesting the unauthorized persons to exit immediately if they have entered the permit space;
9. informing the authorized entrants and entry supervisor if unauthorized persons have entered the permit space;
10. summoning rescue and other emergency services as soon as the attendant determines that escape is required from the space;
11. not entering the permit space to attempt rescue of entrants; and
12. properly using any emergency rescue equipment provided for that use and performing any other assigned rescue and emergency duties without entering the permit space.

VII. ENTRY PREPARATION PROCEDURES FOR PERMIT-REQUIRED CONFINED SPACES

- A. Before each entry into a permit-required confined space, a new entry permit must be completed by the authorizing supervisor.
 - B. The authorizing supervisor is responsible for communicating the contents of the permit to all
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parties involved.

- C. All items on the permit must be checked and completed before any person is allowed to enter a permit space.
 - D. The legible name and signature of the authorizing supervisor must be on the permit before the entry begins. By signing this form, the authorizing supervisor must verify that all actions and conditions necessary for safe entry have been performed
 - E. The authorizing supervisor must revoke the permit when conditions or work activity are different than those specified on the permit which could introduce a new hazard to the permit space. The EHSO must be contacted to develop a new permit.
 - F. An attendant is required for each entry and shall be located outside the entry space at all times. The permit must remain in the possession of the attendant at all times while entry activities are underway.
 - G. Atmospheric testing utilizing direct-reading instruments must be performed by the EHSO before entry into a permit-required confined space.
 - 1. Initial monitoring of the atmosphere inside the permit-required confined space shall be conducted from a safe distance outside the space by a trained EHSO employee using air sampling instruments that have been properly calibrated.
 - 2. Monitoring shall occur simultaneously or in the following sequence: oxygen, flammability, carbon monoxide, other toxic gases.
 - 3. If the permit required confined space is vacated for any significant period of time, the atmosphere of the permit required confined space shall be retested before re-entry is permitted.
 - H. The atmosphere of the confined space shall be considered unacceptable for entry whenever the following conditions are noted:
 - 1. the atmospheric oxygen concentration is below 19.5 percent or above 23.5 percent,
 - 2. a flammable gas, vapor, or mist is present in a concentration in excess of 10 percent of its Lower Explosive Limit (LEL) or Lower Flammability Limit (LFL),
 - 3. airborne combustible dusts are present at a concentration that obscures vision at a distance of 5 feet or less,
 - 4. atmospheric concentrations of other substances for which a permissible exposure limit (PEL) is published by OSHA or a threshold limit value (TLV) is published by the American Conference of Governmental Industrial Hygienists (ACGIH) are above
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these recognized exposure limits, or

5. any atmospheric condition recognized as immediately dangerous to life or health exists.
- I. Whenever atmospheric testing of the confined space indicates unacceptable conditions for entry, controls such as providing additional ventilation shall be implemented to modify the atmospheric conditions to acceptable levels or appropriate personal protective equipment will be utilized. These procedures will be performed under the direction of the EHSO.
- J. All energy sources and pipelines which enter the workspace will be locked out according to the *OU Physical/Mechanical Hazards Program*.
- K. Any temporary lighting or portable power tool to be used in a permit-required confined space where there is a potentially explosive atmosphere shall be explosion proof.
- L. Any temporary lighting or portable power tool to be used in a permit- required confined space where there is a potential of electrical shock shall be battery operated or served through a ground fault circuit interrupter.
- M. Rescue provisions and a system of effective and continuous communication between the attendant and the authorized entrants must be established prior to entry
- N. Personal protective equipment that will be required for entry will be determined by the supervisor with the advice of the EHSO. This may include respirators, coveralls, gloves, head protection, foot protection, safety glasses and/or hearing protection. This information will appear on the permit.
- O. Any employee required to wear respiratory equipment must receive additional training on respirator use, a fit test on the respirator to be used, and a physical examination to ensure that the employee is capable of wearing the respirator without undue physical distress.
- P. Upon completion of the entry permit, and after all entrants have exited the permit space, the authorizing supervisor signing the permit must cancel the permit.

VIII. TRAINING

- A. Training is required for permit-required confined space entry to ensure that attendants, authorized entrants, and supervisors can work safely in and around the permit space. Training should be provided to each affected employee before the employee is first assigned duties in a confined space area. The EHSO will coordinate this training which shall include as a minimum:
 1. duties and responsibilities of each participant in entry procedures,

2. hazard recognition of all hazards which may be faced during entry,
 3. how to recognize the signs and symptoms of exposure to a hazard,
 4. the potential consequences of exposure to a hazard,
 5. proper communication procedures,
 6. procedures for evacuation of a permit space,
 7. proper use and limitations of protective equipment, and
 8. proper procedures for rescue.
- B. Awareness training will be provided for shop and other personnel on general procedures for recognizing confined spaces, limitations on entering, and procedures for entry into non-permit-required confined spaces.
- C. Training shall be reinforced at least annually through additional training sessions.

IX. **EQUIPMENT**

- A. Supervisors must provide, ensure maintenance of, and ensure the proper use of the equipment necessary for safe entry, including rescue, atmosphere monitoring equipment, communication equipment, and personal protective equipment.
- B. The EHSO will provide instruction on the proper use of atmospheric testing and monitoring equipment.
- C. Equipment utilized by outside rescue teams will be the responsibility of that rescue team.
- D. Any use of respirators by OU employees for confined space entry will be performed under the requirements of the *OU Respirator Program*.
- E. Any use of hot work equipment during confined space entry must comply with the *OU Hot Work Program*.

X. **RESCUE**

- A. The EHSO should evaluate and identify the most appropriate rescue service prior to any OU employee entering a permit-required confined space [see [29 CFR 1910.146\(K\)\(1\) through 29 CFR 1910.146\(K\)\(2\)\(iv\)](#)].
1. The municipal fire department for each campus may be contacted to provide off-site emergency response personnel to respond to emergencies occurring in confined
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spaces at OU. The EHSO should notify fire department personnel sufficiently in advance of any entry into permit-required confined spaces so that rescue personnel may make themselves available on-call

2. If municipal fire department personnel are not available, no entry shall be made or other means of rescue must be procured.
- B. The EHSO should provide rescue personnel with sufficient information regarding OU policies and procedures to respond to confined space-related emergencies, including information regarding the potential hazards which may be encountered during entry or rescue from the confined spaces.

XI. CONTRACTORS

- A. When OU employees arrange to have contractors perform work that involves permit-required confined space entry, OU employees shall:
1. Inform the contractor that the workplace contains permit required confined spaces and entry is allowed only through compliance with a permit required confined space entry program meeting the requirements of 29 CFR 1910.146;
 2. Inform the contractor of the conditions of the permitted space including the hazards identified and OU employees experience with the space in question;
 3. Inform the contractor of any precautions or procedures that the University of Oklahoma has implemented for the protection of OU employees in or near the permitted space where contractor personnel will be working;
 4. Coordinate entry operations with the contractor, when both OU employees and contractor personnel will be working in or near the permit spaces;
 5. Develop and implement procedures to coordinate entry operations when employees of more than one employer are working simultaneously as authorized entrants in a permit required confined space so that employees of one employer do not endanger the employees of any other employer;
 6. Debrief the contractor at the conclusion of the entry operations regarding any hazards confronted or created during the entry operations;
 7. OU employees must provide available information regarding the known hazards and entry operations for the permit space;
 8. Contractor will coordinate entry operations with OU personnel and EHSO that are responsible for the work in the permit space; and

9. Contractor will inform OU personnel and EHSO of the permit-required confined space program that the contractor will follow and of any hazards confronted or created in the permit space either through a debriefing or during entry operations.

APPENDIX A
BLANK PERMITS

**The University of Oklahoma
 CONFINED SPACE ENTRY PERMIT AND CHECKLIST
 Pre-Entry Checklist**

Date: _____ Time: _____

Location and Description of Confined Space: _____

Purpose of Entry: _____

ISOLATION CHECKLIST	Yes	No	N/A	Time	Inspected by:
Electrical					
Pumps off and locked out					
Lines disconnected, blinded or blocked					
Valves shut and locked/tagged out					

VENTILATION CHECKLIST	Yes	No	N/A	Time On	Inspected by:
Mechanical					
Natural ventilation only					

EHSO AIR MONITORING	Time	Result	Within Safe Parameters		Signature
			Yes	No	
Oxygen					
Flammable gases (LEL)					
Carbon monoxide					
Instrument calibration					

Warning: If any "No" block is checked or air quality is not within safe parameters, entry is not permitted. Contact EHSO before entering the space.

Authorizing Supervisor's signature: _____

Authorizing EHSO signature: _____

The University of Oklahoma
PERMIT-REQUIRED CONFINED SPACE ENTRY PERMIT AND CHECKLIST
Entry Checklist

Date: _____ Time: _____

Location and Description of Confined Space: _____

Purpose of Entry: _____

Entrant(s): _____

Attendant(s): _____

SPECIAL PRECAUTIONS REQUIRED FOR ENTRY		
Action	Check	Initial
Notify Environmental Health and Safety Office 3 days in advance of project		
Obtain (2) two-way radios from Site Support		
Are all employees involved properly trained?		
Has area been ventilated for at least 10 minutes prior to entry		
Assign one person to wear personal monitoring devices for oxygen, LEL and carbon monoxide		
Has rescue service been notified prior to staging for entry?		

Authorizing Supervisor Name: _____

Authorizing Supervisor Signature: _____

Completion of Project Date: _____ Time: _____

Supervisor Signature of Permit Cancellation: _____

**The University of Oklahoma
 PERMIT REQUIRED CONFINED SPACE ENTRY PERMIT AND CHECKLIST
 Attendant Checklist**

Date: _____ Time: _____

Location and Description of Confined Space: _____

ENTRANT(S)	Time		Initial
	In	Out	

ATTENDANT AIR MONITORING	Oxygen	Flammable Gases (LEL)	Carbon Monoxide	Initial
Time:				
Time:				
Time:				
Time:				
Time:				
Time:				
Time:				

Warning: There can be no hazardous atmospheres within the confined space whenever a employee is inside. If a hazardous atmosphere is detected while in the workspace, each employee must leave the confined space immediately.

Attendant(s) Signature: _____

APPENDIX B
IDENTIFICATION OF KNOWN CONFINED SPACES

IDENTIFICATION OF KNOWN CONFINED SPACES

The following are known areas considered confined spaces on OU campuses. If additional confined spaces are identified, they will be added to this program.

I. OUHSC

A. The following confined spaces are identified as permit-required confined spaces:

1. well water reservoir (SCWP)
2. salt reservoir (SCWP)
3. water softeners
4. compressed air tanks
5. expansion tanks (chilled water)
6. steam condensers
7. sulfuric acid tanks
8. crawl space in the College of Health Building between floors 4 and 5
9. turbine exhaust stacks
10. chillers

B. The following areas are considered permit-required confined spaces but may be considered non-permit-required if the pre-entry checklist is completed and acceptable conditions exist.

1. deaerator/surge tanks (SCWP);
2. mud drums (SCWP);
3. steam drums (SCWP);
4. air intake pits at Basic Sciences Education Building, Biomedical Sciences Building, Biomedical Research Center and Dean McGee Eye Institute;
5. elevator shafts and pits in all buildings;
6. utility vault by the fountain; and other vaults,

7. crawlspaces in the College of Health Building on east and west sides between the 5th floor and the roof,
8. sumps, and
9. boiler fire boxes (SCWP) after boiler lockout and bubble check is complete.

II. OU-TULSA

A. The following confined spaces are identified as permit-required confined spaces:

1. deaerator/surge tanks

B. The following areas are considered permit-required confined spaces but may be considered non-permit-required if the pre-entry checklist is completed and acceptable conditions exist.

1. chilled water/steam line vaults
2. water meter vaults
3. cooling towers
4. primary air intake filter boxes
5. steam tunnels

III. OU-NORMAN

A. The following **OU** confined spaces are identified as permit-required confined spaces, **but are being managed by a third party**:

1. Engineering Lab, south of Felgar Hall, electrical vault, high voltage
 2. George Lynn Cross Hall, northeast of George Lynn Cross, electrical vault, high voltage
 3. Huston Huffman Center, north side, electrical vault, high voltage
 4. Nuclear Engineering Lab, north of wind tunnel, electrical vault, high voltage
 5. Nuclear Engineering Lab, northwest of water tower, electrical vault, high voltage
 6. Oklahoma Memorial Union, east entrance, electrical vault, high voltage
 7. Physical Plant, west side of cooling fans, electrical vault, high voltage
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8. Richards Hall, northeast corner of Richards Hall, electrical vault, high voltage
- B. The following areas are considered permit-required confined spaces, but may be considered non-permit-required if the pre-entry checklist is completed and acceptable conditions exist.
1. Chill Water Plant #1, cooling tower, water vault, engulfment (water)
 2. Chill Water Plant #1, cooling tower, water vault, engulfment (water)
 3. Nuclear Engineering Lab, water tower
 4. Physical Plant, west of Power Plant, sulfuric acid storage tank, chemical hazard
 5. Physical Plant, west of Power Plant, chill water storage tank, engulfment (water)
 6. Physical Plant, South of Power Plant, Water Storage Tank, Engulfment (water)
 7. Power Plant, northeast corner in basement, boiler tank, egress
 8. Power Plant, southeast corner in basement, boiler tank, egress
 9. Power Plant, southwest corner in basement, boiler tank, egress

IV. REQUIREMENTS

- A. OU personnel shall inform affected OU employees by posting danger signs or by any other equally effective means, of the existence and location of and the danger posed by the permit spaces.
- B. Unauthorized entry into these spaces will be prevented through information and/or training of affected employees, signage, and locks, where possible.
- C. If entry into a permit-required confined space is required for maintenance or repair activities, OU employees will contact the EHSO and follow the procedures outlined in the program